



Sustainability Report 2024

(part of the Annual Financial Statement, p.42-140)

v. Sustainability Report

General disclosures

ESRS 2 – General disclosures

Sustainable development constitutes a key pillar of IDEAL Holdings' business strategy and investments, having fully integrated the Principles of Sustainable Development into its business operations.

This report has been prepared in accordance with the requirements of the European Union Directive on Corporate Sustainability Reporting (CSRD) and Law 5164/2024, which incorporates this Directive into Greek law, is on a consolidated level and includes information on IDEAL Holdings (the "Company") and its investments (the "Group"). The Company is active in mid-sized markets through acquisitions and growth investments following the philosophy of a private equity, having created an investment portfolio with diversified business activities in two segments/industries, those of Information Technology and Specialized Retail. Data from the Sustainability Report is also presented in aggregate by business segment, just as in the consolidated Annual Report.

The IDEAL Holdings Sustainability Report is divided into the following sections: "General Disclosures", "Environment", "Society" and "Corporate Governance". The following ESRS thematic standards outline the Company's approach to social and environmental impacts, as well as the risks and opportunities highlighted throughout its value chain:

- E1 – Climate Change
- E5 – Resource use and circular economy
- S1 – Own workforce
- S4 – Consumers and end-users
- G1 – Business Conduct

For further information on the 2024 Sustainability Report or other relevant issues, please contact Ms. Katerina Psifi IR & Corporate Governance Manager at kpsifi@idealholdings.gr.

Report includes IDEAL Holdings and its fully consolidated subsidiaries as presented in the Group's consolidated Financial Statements for the financial year 2024, excluding companies from which the Company has divested within the same period and investments acquired after the balance sheet date.

This report does not include the former investment of the Company "ASTIR VITOGIANNIS BROS S.A." and its subsidiary Company "COLEUS Packaging Proprietary Ltd", operating in the Industry sector, from which the Company disinvested by selling its shareholding therein on 23.04.2024, as well as data of BLUESTREAM, a new investment of the Company as at 08.2024.

Corporate Profile

ESRS 2 BP-1 – General basis for preparation of sustainability statements

This Sustainability Report has been prepared on a consolidated basis and covers IDEAL Holdings and its subsidiaries, in accordance with the scope of consolidation applicable to the consolidated financial statements of the Group, in accordance with Article 48i of Directive 2013/34/EU. It is therefore confirmed that the scope of consolidation of this Sustainability Report is identical to that of the financial statements.

The Report includes information on material impacts, risks and opportunities across the entire range of IDEAL Holdings' value chain, both upstream (e.g. raw material suppliers, IT services, transport and infrastructure suppliers) and downstream (e.g. customers, end users, distribution and sales networks). The disclosures relate to the Group's own operations and to significant relationships with external partners and associates that materially affect performance and sustainability footprint.

IDEAL Holdings is a Greek holding company, listed on the Athens Stock Exchange, aiming to create long-term value for its shareholders. The Company's strategy is based on the diversification of its investments through the acquisition of majority stakes in leading companies operating in various sectors.

In FY 2024, IDEAL Holdings' portfolio consists of companies operating in two business sectors, namely, specialized retail and IT, as follows:

1. Specialized Retail through its investment in Attica Department Stores S.A. "Attica",
2. Information Technology through its investments in Byte Computer SA (hereinafter "Byte"), ADACOM ADVANCED INTERNET APPLICATIONS S.A. ("ADACOM"), IDEAL TECHNOLOGY S.A. ("IDEAL Technology"), ADACOM CYBER SECURITY CY LTD ("ADACOM CY") and METROSOFT INFORMATICS S.A. ("METROSOFT").

Major Group Companies

The Companies ATTICA and BYTE have been determined as major subsidiaries of IDEAL Holdings, by decision of its Board of Directors dated 20.06.2024. In order to determine the above Companies as major subsidiaries, the Group took into account: their impact on the financial position and performance of the Group and the Company.

Measurements, Sources of Uncertainty and Assumptions

In the double materiality assessment based on the impact materiality approach, data are subject to considerable uncertainty, as they are obtained from a variety of sources with different levels of completeness and accuracy. In particular, quantifications of environmental, social and governance impacts are collected both from internal systems (ERP, HRIS, risk management tools) and external providers (e.g. biodiversity databases, pollutant reports), where in some cases gaps are filled with proxy indicators or estimates based on historical trends. For this reason, the outliers of the estimates have a range of uncertainty that, depending on the type of indicator, can reach ± 10 - 15%. In the context of measuring greenhouse gas (GHG) emissions and monitoring our targets, Ideal Holdings has already filled significant gaps in the available data and continues to strengthen its internal capabilities to improve their quality. Despite these efforts, the accuracy and availability of data remains limited in some cases, primarily due to external market conditions and the characteristics of our portfolio. As a result, in the short-term we continue to resort to estimates and proxies, such as when using indirect value chain data sources to calculate the Group's GHG emissions.

Goal, Vision and Mission

Our Goal

Our goal is to establish ourselves as a dynamic Greek holding company through sustainable growth and innovation, with a diversified investment portfolio that creates sustainable value for our stakeholders. We envision a future where businesses grow by contributing to a better world.

Our Vision

Our vision is to lead a paradigm shift in the investment sector. It is our ambition to push our portfolio companies towards maximizing their returns, while incorporating the Environment, Society and Governance (ESG) principles, thereby creating shared value for all stakeholders.

Our Mission

At IDEAL Holdings, our mission is to seize investment opportunities that lead to positive change. We are dedicated to identifying and investing in sound businesses that support our environmental, social and governance (ESG) commitments.

IDEAL Holdings Certifications

ISO 22301:2019	Business Continuity System
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ISO 14001:2015	Environmental Management System
ISO 37001:2016	Anti-Bribery Management System
ISO 45001:2018	Occupational Health and Safety Management System

The following are the investments of IDEAL Holdings:

ATTICA DEPARTMENT STORES S.A.

Attica Department Stores S.A. "Attica", a company with 20 years of presence in the Greek market and with over 5 million visitors every year, is a leading force in the fashion and cosmetics sector in Greece, collaborating with international luxury brands. The Company operates four department stores in Athens and Thessaloniki, seven additional stores, as well as a state-of-the-art online store. The facilities cover 69.000 m2 of leased space, with the main locations in Athens, with City Link's flagship store in the center of Athens occupying 35.302 m2, in Golden Hall and the Mall, and in Thessaloniki with stores in Mediterranean Cosmos and Tsimiski Str. It offers over 1 million products and services, and its strategy focuses on enhancing brand awareness and holistically approaching consumers through physical and digital channels.

Company Information:

Board of Directors	Number of Members	Percentage (%)
Members of the Board of Directors	9	100%
Executive Members	2	22%
Non-Executive Members	3	33%
Independent - Non-Executive Members	3	33%
Women on the Board of Directors	3	33%
Men on the Board of Directors	6	67%
Members of the BoD under 30 years old	0	0%
Members of the BoD aged 30-50 years	0	0%
Members of the BoD over 50 years old	9	100%
Total number of employees	1.133	
Turnover in million euros	231,90	

BYTE

Byte Computer S.A., which is one of the leading providers of integrated IT and communications solutions in Greece. With a presence of more than 40 years in the Greek market, it is specialized in the implementation of complex and flagship projects and plays an important role in shaping the new digital reality in the country. It participates in innovative projects in various private sector fields, while at the same time it contributes decisively to the digital transformation of the public sector. The Company has pioneered projects such as electronic and intangible prescription, the COVID-19 registry, "Police on Line", migrant ID cards, applications for the fire brigade and the Anti-Money Laundering Authority, smart city solutions and encrypted networks.

In addition, Byte is registered on the European Union's list of approved trust service providers and offers electronic signatures and seals through its innovative "Trust Centre".

Company Information:

Board of Directors	Number of Members	Percentage (%) of total
Members of the Board of Directors	4	100%
Executive Members	2	50%
Non-Executive Members	2	50%
Women on the Board of Directors	1	25%
Men on the Board of Directors	3	75%
Members of the BoD under 30 years old	0	0%
Members of the BoD aged 30-50 years	1	25%
Members of the BoD over 50 years old	3	75%
Total number of employees	224	
Turnover in million euros	74,75	

Certifications	
45001:2018	Occupational Health and Safety Management System
ISO 9001:2015	Quality Management System
ISO / IEC20000-1-2018	IT Service Management System
ISO 27701:2019	Privacy Information Management
ISO 27001:2022	Information Security
ISO 22301:2019	Business Continuity System
ISO 14001:2015	Environmental Management System
ISO 37001: 2016	Anti-Bribery Management System

Metrosoft

Metrosoft is a subsidiary of BYTE and is located within the building of the parent company BYTE. Its main activity is the distribution of IT products and peripherals.

Company Information:

Board of Directors	Number of Members	Percentage (%) of total
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Members of the Board of Directors	3	100%
Executive Members	3	100%
Women on the Board of Directors	1	33%
Men on the Board of Directors	2	67%
Members of the BoD under 30 years old	0	0%
Members of the BoD aged 30-50 years	1	33%
Members of the BoD over 50 years old	2	67%
Total number of employees	5	
Turnover in million euros	13,23	

ADACOM

ADACOM is a leading Certified Trusted Service Provider, Cybersecurity Solution Integrator and Managed Security Services Provider (MSSP), based in Athens, with subsidiaries in Cyprus and a branch in the Kingdom of Bahrain.

Operating in more than 30 countries in Europe, the Middle East and Africa and with over 20 years of experience in cybersecurity, ADACOM supports businesses to operate in a modern and secure environment, facilitating the digital transformation of processes and ensuring the reliability of digital identity. Combining international expertise, global partnerships and local experience, the Company offers comprehensive solutions that respond to internal and external threats, addressing almost every cybersecurity challenge.

Today, more than 500 organizations trust ADACOM to protect their data and secure their operations. The Company operates two state-of-the-art Secure Data Centers dedicated to Trust Services, as well as an advanced Secure Operations Center (SOC) that provides a full range of managed security services, leveraging cutting-edge technologies, including artificial intelligence, for fast and robust protection.

For more information about the Company, please visit the following link: <https://adacom.com/> *Company information:*

Board of Directors	Number of Members	Percentage (%) of total
Members of the Board of Directors	6	100%
Executive Members	6	100%
Women on the Board of Directors	1	17%
Men on the Board of Directors	5	83%
Members of the BoD under 30 years old	0	0%
Members of the BoD aged 30-50 years	2	33%
Members of the BoD over 50 years old	4	67%
Total number of employees	154	
Turnover in million euros	27,91	
Certifications		
ISO 27001:2022	Information Security	
ISO / IEC20000-1-2018	IT Service Management System	
ISO 22301:2019	Business Continuity System	
ISO 14001:2015	Environmental Management System	
ISO 27701:2019	Privacy Information Management	
ISO 37001:2016	Anti-Bribery Management System	
ISO 45001:2018	Occupational Health and Safety Management System	
eIDAS	Q-Cert of Trust Services Provision	
EUSecret & NATO Secret for security classifications	EU Clearence Certification	
ISO 9001:2015	Quality Management System	

ADACOM CY

ADACOM CY was founded in 2017 and provides cybersecurity solutions and services in Cyprus, having established itself as a major player in the local market. It has demonstrated an unwavering commitment to standards of excellence and security, managing to obtain certifications which underline its dedication towards quality of service.

For more information about the Company, please visit the following link:

<https://www.adacom.com/company/adacom-cyprus>

Company Information:

Board of Directors	Number of Members	Percentage (%) of total
Members of the Board of Directors	3	100%
Executive Members	3	100%
Women on the Board of Directors	1	33%
Men on the Board of Directors	2	67%
Members of the BoD under 30 years old	0	
Members of the BoD aged 30-50 years	1	
Members of the BoD over 50 years old	2	
Total number of employees	15	
Turnover in million euros	4,12	

Certifications	
ISO 27001:2022	Information Security
ISO 22301:2019	Business Continuity System
ISO 9001: 2015	Quality Management System

IDEAL Technology

IDEAL Technology has established a strong presence in the highly competitive areas of network security, data protection and storage, information systems, telecommunications and telephony. Through strategic partnerships with leading companies such as Fortinet, Alcatel-Lucent Enterprise, Forcepoint, Tufin, Kaspersky, Proofpoint, Barracuda, Storagecraft, Quantum, Panda, Allot and Atlinks, IDEAL Technology is distinguished as a reliable partner and distributor of innovative solutions and equipment in the Greek market.

Since 1985, the Company has been the main distributor of Toshiba products in Greece, offering award-winning and innovative solutions. After the introduction of the Dynabook brand in 2019, IDEAL Technology maintains its strong position in the personal computer market, with new models that combine advanced technology and modern design, ensuring high quality and reliability. At the same time, it continues its successful partnership with Toshiba Storage, offering sophisticated data storage solutions.

For more information on the Company's operations, please visit the following link: <https://www.idealtech.gr/> business unit of IDEAL Technology, is a leader in the field of Customer Communications Management (CCM) software in Greece and internationally. It specializes in Output Management (OM), serving businesses that manage large volumes of transactional documents. 75% of Greek banks and telecoms use *i-DOCS* for their communication needs.

For more information on *i-DOCS* operations, please visit the following link: <https://www.i-docs.com/> *Company Information*:

Board of Directors	Number of Members	Percentage (%) of total
Members of the Board of Directors	4	100%
Executive Members	4	100%
Women on the Board of Directors	1	25%
Men on the Board of Directors	3	75%
Members of the BoD under 30 years old	0	0%
Members of the BoD aged 30-50 years	0	0%
Members of the BoD over 50 years old	4	100%
Total number of employees	42	
Turnover in million euros	29,58	

Organizational structure

ESRS 2 GOV-1 – The role of administrative, management, and supervisory bodies

The Board of Directors of the Company is elected by the General Meeting of Shareholders, following the recommendation of the Nomination Committee, in accordance with the Suitability Policy for the Members of the Board of Directors, as approved by the General Meeting of Shareholders. The Nomination Committee conducts an annual evaluation of the Members of the Board of Directors and of the Board of Directors as a whole, ensuring that the management of the Company meets the suitability criteria established for the smooth operation and sustainable development of the Company.

The following link contains the Company's Suitability Policy:

https://www.idealholdings.gr/media/bg4hp4ewp/omilos_politiki_katallilotitas_30062021.pdf

The Nomination Committee is a joint Committee with the Remuneration Committee.

The Board of Directors of the Company consists of nine (9) members:

Name	Position	Executive or non-executive member
Lampros Papakonstantinou	Chairman of the Board of	Executive member of the BoD
Eleni Tzakou	Vice Chairman	Independent, Non-executive member of
Panagiotis Vasileiadis	Chief Executive Officer	Executive member of the BoD
Savvas Asimiadis	Director	Executive member of the BoD
Ioannis Artinos	Director	Non-executive member of the BoD
Georgios Diakaris	Director	Non-executive member of the BoD
Marina Efraimoglou	Director	Independent, Non-executive member of
Anastasia Dritsa	Director	Independent, Non-executive member of
Panagiotis Kanellopoulos	Director	Non-executive member of the BoD

Percentage of women on the BoD: 33%.

Percentage of Members of the Board of Directors of the Company who are non-executive members: 67%.

Percentage of members of the Board of Directors of the Company who are independent non-executive members: 33%.

The detailed CVs of the members of the Board of Directors are presented on the Group's website

[\(https://www.idealholdings.gr/en/ideal-holdings/board-of-directors/\)](https://www.idealholdings.gr/en/ideal-holdings/board-of-directors/)

For additional information on the Group's Board of Directors, please refer to the Rules of Procedure of the Board of Directors on the Group's website

https://www.idealholdings.gr/media/qi2pkq2o/kanonismos_leitourgias_dioikhtikou_sumvouliou.pdf

The CVs of the Members of the Board of Directors are available at the following link:

<https://www.idealholdings.gr/el/ideal-holdings/dioikhtiko-symvoylio/#>

There is no employee representation on the Boards of Directors of the Company and its subsidiaries.

Audit Committee

The Audit Committee plays a crucial role in ensuring transparency, accountability and compliance with regulations. Its key responsibilities include reviewing the accuracy of financial statements, overseeing both external and internal auditors to ensure their independence, and monitoring the effectiveness of risk management systems. In addition, the Committee ensures compliance with legal requirements, provides mechanisms to protect whistleblowers, and reports its findings to the Board of Directors. This function is fundamental to building trust between investors and stakeholders, ultimately supporting the sustainable growth of the Group. The Audit Committee is an independent committee and consists of 3 members, one Independent Non-Executive Director and two third parties independent of the Company.

Further information about the Audit Committee is included in the Corporate Governance Statement, which also forms part of the Annual Report of the Board of Directors, as does this Sustainability Report, and on the Company's website:

<https://www.idealholdings.gr/en/investor-relations/corporate-governance/committees/>

Remuneration and Nominations Committee

The Remuneration and Nominations Committee ensures that the Company's ESG priorities are reflected in executive compensation practices. As part of this, the Committee promotes accountability and fosters a culture of responsible leadership. In line with the Company's commitment to fully integrate the Sustainable Development Goals into its performance evaluation criteria and reflect them in the Remuneration Policy, the Extraordinary General Meeting of Shareholders approved a new Remuneration Policy in September 2024. According to this new Policy, among the performance criteria for the Executive Members of the Board of Directors of the Company who hold management roles in the Company's subsidiaries are non-financial criteria, such as successful completion of strategic projects, ESG criteria, indicators related to customer satisfaction or employee engagement. This approach ensures that rewards are linked both to financial results and to the Company's long-term commitment to environmental, social and corporate governance objectives, while protecting the interests of stakeholders.

Further information on the Remuneration and Nominations Committee is included in the Corporate Governance Statement, which also forms part of the Annual Report of the Board of Directors, as does this Sustainability Report, and on the Company's website:

<https://www.idealholdings.gr/en/investor-relations/corporate-governance/committees/>

ESRS 2 GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

To ensure effective ESG governance, executives from various departments of the Company are responsible for the collection, monitoring and management of data related to ESG criteria by IDEAL Holdings and its subsidiaries.

The executives have the necessary experience and expertise to collect, analyze and present data regarding sustainability. At the same time, respective responsible executives have been appointed to collect and record the necessary data and indicators from the subsidiaries.

The **Corporate Governance Manager** is responsible for leading the team, coordinating and overseeing the team's activities, ensuring the smooth flow of information between members, being responsible for and coordinating communication with stakeholders and external partners. She also acts as a quality editor as she carries out the final review of the report, defines its final format and is responsible for its publication.

The **Senior Reporting Officer** ensures the proper collection and presentation of financial information for eligible activities in accordance with the EU Taxonomy, Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx.)

Other roles utilized are the following:

The **Manager, HR & Operations** provides the necessary information around issues relating to employee wellbeing, professional development, equal opportunities, diversity and inclusion.

The **CSR and ESG Officer** is responsible for collecting and documenting issues related to Corporate Social Responsibility, Environmental issues and Governance. They work with the Heads of the Company's departments to integrate sustainable development practices into the day-to-day operations of the Company and ensure compliance with governance rules and policies. They are also responsible for communicating with the relevant executives of the subsidiaries. Finally, they assist in the review of the Sustainability Report and provide feedback.

The team includes a member from the **Procurement** department, who deals with issues related to the supply chain and suppliers.

Furthermore, reference persons from the subsidiaries are involved in the whole process. Every subsidiary company designates the person responsible for the collection of data and ESG indicators related to the Company it represents, as well as for communication with the executives that constitute the Corporate Team.

Their responsibilities include, among other things, developing and disclosing non-financial information on an annual basis, as well as preparing and reporting to the management team on the ESG performance of IDEAL Holdings and its subsidiaries.

In particular, they ensure that the Company complies with international and European Sustainability Reporting Standards (ESRS), conduct regular audits and evaluations of ESG practices, and provide guidance to subsidiaries on continuous improvement and integration of ESG principles into their day-to-day operations. This process enhances transparency, accountability and the ability to respond effectively to stakeholder requirements, contributing to sustainable growth and long-term value creation.

ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes

In line with the Company's commitment to fully integrate the Sustainable Development Goals into the performance evaluation criteria and reflect them in the Remuneration Policy, the Extraordinary General Meeting of Shareholders, held in September 2024, approved the revision of the Remuneration Policy. The current Remuneration Policy provides that, apart from the financial criteria for the performance of variable remuneration, non-financial criteria will be taken into account for Executive Members of the Board of Directors of the Company who also perform management roles in the Company's subsidiaries, with a minimum of 25%. Indicative nonfinancial criteria include ensuring the health and safety of employees, the environment, corporate social responsibility and other criteria related to the implementation and reinforcement of ESG initiatives. The Remuneration Policy has been prepared in accordance with the relevant European and national Directives and regulations on corporate governance and shareholders' rights, ensuring compliance with applicable laws and international best practices.

ESRS 2 GOV-4 – Statement on due diligence

IDEAL Holdings applies a comprehensive Environmental & Social (E&S) Risk Screening to its investment analysis to identify potential or existing environmental and social risks through a 5-step process:

1. Review of exclusion list(s): A defined procedure is used to determine whether the investment includes any excluded activity from the EBRD & IFC Exclusion Lists. If the investment involves an excluded activity, all relevant stakeholders will be informed immediately and will be excluded from the investment plan.
2. Regulatory compliance review: The defined procedure also reviews whether the investment complies with national laws and regulations, including EU Directives and regulations on ESG issues.
3. ESG data collection: preliminary E&S information related to the investment is required and recorded.
4. On-site visit: An authorized person or external expert may, if necessary, conduct an initial site visit to identify potential E&S risks and impacts.
5. Environmental and Social (E&S) Risk Categorization: The authorized person will conduct an E&S Risk Categorization (High/Medium/Low) of the investment/asset to determine the E&S Risk Categorization Level according to international best practices, as described in the table below.

Environmental & Social Due Diligence (ESDD)

By determining the Environmental and Social Risk category of an asset, IDEAL Holdings will determine the level of Due Diligence required and the measures that may be necessary in accordance with the following practices:

- Regulatory Compliance Audit
- Interviews with Management
- Environmental and Social Due Diligence & On-site Visit

Environmental and Social (E&S) Monitoring

IDEAL Holdings ensures that an appropriate E&S monitoring process is in place to ensure that potential E&S risks are identified and addressed through the following E&S Monitoring Activities at the portfolio companies:

- Regular meetings on a quarterly basis
- ESG reports on an annual basis
- On-site visits if/when required

Environmental & Social Action Plan for new investments

For new investments categorized as medium/high risk, IDEAL Holdings may commission an employee or external expert to develop an Environmental and Social Action Plan (ESAP) in accordance with an ESAP template, which is aligned with the EBRD Performance Requirements (PRs) and IFC Performance Requirements (PRs).

ESRS 2 GOV-5 – Risk management and internal controls over sustainability reporting

IDEAL Holdings, as part of its comprehensive risk management framework, has identified a number of key risks that may affect the sustainability of its business activities. The most significant risks include: increasing energy consumption and carbon footprint in the value chain (climate change risk), the possibility of supply chain disruptions due to geopolitical developments (supplier risk), the risk of personal data leakage (digital security), and compliance issues with regulatory requirements and ESG regulations.

Mitigation strategies include: the adoption and strengthening of certified environmental management systems (e.g. ISO 14001), the integration of privacy and cybersecurity policies across all subsidiaries (e.g. ISO 27001), and the regular monitoring and review of the risk registry through the Risk Management Unit.

Integration of risk assessment and internal control findings into the sustainability reporting process

IDEAL Holdings has established and applies an integrated system of risk assessment and internal control mechanisms, which is fully integrated into the internal functions related to the process of preparing and submitting the Sustainability Report. The findings from annual and interim risk assessments, as well as from internal control mechanisms, feed into the relevant ESG data collection, verification and documentation functions at Group and subsidiary level.

The Risk Management Unit develops, updates and monitors the Risk Registry, incorporating risks related to nonfinancial issues and in particular to the quality of sustainability data. The Internal Audit Unit conducts independent audits as to the adequacy of ESG data collection and reporting systems, ensuring that relevant policies are properly and consistently applied.

The results of the audits and risk assessment are communicated to the responsible teams designated within IDEAL Holdings and the subsidiaries (such as the Corporate Governance Manager and the CSR & ESG Officer) in order to provide feedback for improving the reporting processes and harmonising them with the relevant legislation and European ESRS standards requirements. Through this continuous integration, transparency, reliability and accuracy of the information provided to stakeholders is achieved.

IDEAL Holdings has a Risk Management Unit (RMU) and its Head is appointed by the Board of Directors. The responsibilities of the RMU include:

- Risk Management Framework
- Risk Management
- Reporting

The relevant procedures include:

- Risk Identification

In order to identify risks, the Risk Manager develops a comprehensive risk identification and assessment process (Risk Assessment) which is implemented on an annual basis or more frequently if required. The methodical approach to risk identification is designed to ensure that all major activities within the Company have been identified and that all risks arising from these activities have been identified and their potential impact on the Company has been quantified.

- Risk Description

The goal of risk description is to reflect the identified risks in a structured format. The use of a well-designed structure is necessary to ensure a comprehensive risk identification, description and assessment process. Taking into account the consistency and likelihood of each of the risks, it should be possible to prioritize the key risks that need to be analyzed in greater detail. The identification of risks and their categorization in the risk registry follow the Company's general approach to identifying business activities and decision making.

- Risk Assessment

Risk assessment requires the definition and consistent application of an approach that should be tailored to the Company. Any risk assessment process should start with the definition of a scope and plan, taking into account the Company's objectives, responsibilities, timeline and requirements. Responsibilities in the risk assessment process are assigned to stakeholders who can provide a meaningful perspective on the relevant risks.

- Risk Categorization

Risk assessment scales are determined in relation to the Company's objectives in the scope. Risks are typically measured in terms of their impact and the likelihood of occurrence.

The risk assessment uses:

A) a 4-point scale 1-4 assessing the likelihood of the risk occurring and based on the time horizon for assessing its occurrence.

B) a 4-point scale for assessing the impact of the risk on predefined functions or sectors set by the RMU.

The scales for risk assessment are reflected in the tables below:

A) Likelihood scale

Likelihood level	Ranking	Description
4	Very high	Very likely to occur in the next 12 months (more than 50%)
3	High	20%-50% likelihood of occurring in the next 12 months
2	Medium	10%-20% likelihood of occurring in the next 12-24 months
1	Low	Very low likelihood of occurring

B) Risk impact scale

Impact level	Description
4	Very high
3	High
2	Medium
1	Low

The above scales apply to two "levels" of risk:

1. Inherent risk: risk assessment on likelihood and impact scales without taking into account the Company's internal control system (safeguards)
2. Residual risk: risk assessment on likelihood and impact scales, taking into account the Company's internal control system (safeguards).

The risk rating is broken down into the following levels which are derived from the assessment obtained from the impact of the risk on the Company's activities and the likelihood of occurrence in a given time horizon. Depending on the level of risk, the priorities for addressing it are set.

LIKELIHOOD LEVEL	LEVEL OF IMPAC			
	1	2	3	4
4	4	8	12	16
3	3	6	9	12
2	2	4	6	8
1	1	2	3	4

- Risk Monitoring

Effective risk management requires a reporting and review framework to ensure that risks are effectively identified and assessed and that appropriate control measures and responses are in place.

The monitoring process should provide assurance that control measures appropriate to the Company's activities are in place and that procedures are understood and followed.

Also, any monitoring and review process should determine whether and to what extent:

- The measures adopted have had the expected impact.
- The procedures adopted and the information collected in order to perform the assessment were optimal.

For the purpose of continuous monitoring and assessment of risks, the RMU develops, updates and maintains specific risk management tools such as the following:

- Risk registry
- Risk tolerance framework
- Risk assessment tool
- Special risk event monitoring reports, risk indicators and watch lists
- Business continuity plan for specific risks
- Reporting

The Risk Manager prepares and provides regular updates to the Board of Directors on:

- the most significant risks the Company and its investments face;
- any measures to prevent or address the risks at all levels of the Company and its investments; • the back testing results;
- any extraordinary risks and recommends measures to address them.

On an annual basis, the Risk Manager submits a formal report to the Board of Directors through the Audit Committee, which shall at least include:

- the control methods;
- the procedures used to identify risks and how they are addressed by the risk management systems implemented by the Company;
- the key control systems in place to manage material risks;
- the main risks by category, the system for monitoring them and the measures taken to eliminate or mitigate them.
- Risk Appetite Framework

The Risk Management Unit analyzes the individual risks, their potential impact on the Company and recommends to the Board of Directors possible measures to address or accept them.

The Board of Directors, taking into account the process of identification, assessment and evaluation of each risk, defines the level and conditions at which a risk becomes acceptable and sustainable without threatening the wellbeing of the Company's activities and without harming the Company's interests. These limits may be quantitative or qualitative and may vary according to the type of risk, its origin, its potential impact, etc. The Risk Appetite Framework and process may be reviewed on an annual basis by the Board of Directors if circumstances so require, on the recommendation of the Risk Manager.

IDEAL Holdings has established an integrated internal control system designed to effectively manage and control its activities. This system includes:

- Internal control mechanisms and procedures that cover all of the Company's activities on an ongoing basis, ensuring the safe and efficient operation of the Company.
- A risk management and regulatory compliance system, which ensures that all Company operations comply with applicable regulations and internal policies.
- An Internal Audit Unit that operates as an independent organizational unit within the Company. This unit monitors, evaluates and improves the functions and policies of the internal control system, with the main purpose of ensuring adequate and correct reporting, risk management, regulatory compliance and the implementation of the corporate governance code adopted by the Company. The Internal Audit Unit applies internal Rules of Procedure approved by the Board of Directors, which clearly defines its responsibilities and procedures.

The Board of Directors shall ensure that the Internal Audit Unit has sufficient independence, financial and human resources and the necessary authority to perform its role effectively. The responsibilities and reporting lines of the Internal Audit Unit shall be clear and fully documented in order to avoid conflicts of interest and to ensure the credibility and independence of the system.

This system is adopted in accordance with the requirements of the relevant legislation (Law 4706/2020) and the guidelines of the Securities and Exchange Commission, including the Suitability Policy and the criteria for evaluating the Internal Control System.

More information on the Company's Internal Control System is set out in the Company's Rules of Procedure which is available on the Company's website:

<https://www.idealholdings.gr/en/investor-relations/corporate-governance/>

The Strategy of IDEAL Holdings

ESRS 2 SBM-1 – Strategy, business model and value chain

The Company has integrated sustainability into its business strategy and business model, ensuring that the ESG principles are applied to all its activities. Since the Company's key activities are investments/participations, in other companies through majority shareholding, it has prepared an ESG strategy detailing its principles for selecting sustainable investments. IDEAL Holdings' mission is sustainable value creation through the strategic management and enhancement of a diversified portfolio of holdings. The Company invests in companies with growth potential and responsible business behaviour, promoting innovation, resilience and environmental and social responsibility across the Group's activities.

IDEAL Holdings' ESG strategy demonstrates the Company's commitment to creating a positive impact on environmental, social and governance issues across all the sectors in which it operates.

The ESG strategy is based on three pillars:

- Environmental monitoring
- Creating shared value • Responsible business conduct

The objectives of the ESG strategy are:

- To strengthen the Company's ESG commitments.
- To integrate ESG criteria into strategic investments.
- To guide portfolio companies towards sustainable models.
- To foster partnerships and positive impact on communities and the environment.

ESG Policy:

The Company's ESG policy includes commitments such as:

- Integrating ESG into the investment decision-making process.
- Promoting sustainable investments.
- Strengthening ESG practices in portfolio companies.
- Adopting innovations and technology for sustainable growth.
- Creating long-term value for shareholders in a transparent manner.

ESG Action Plan for IDEAL Holdings

Action Plan Year 1 (2024)	
Goals	Progress
Incorporate ESG factors into the investment cycle	
Enhance ESG governance structure by assigning new roles and responsibilities	<p>This goal was achieved by creating the following two new roles that serve to improve the ESG governance structure:</p> <p>The Corporate Governance Manager is responsible for leading the team, coordinating and overseeing the team's activities, ensuring the smooth flow of information between members, being responsible for and coordinating communication with stakeholders and external partners. She also acts as a quality editor as she carries out the final review of the report, defines its final format and is responsible for its publication.</p> <p>The CSR and ESG Officer is responsible for collecting and documenting issues related to Corporate Social Responsibility, Environmental issues and Governance. They work with the Heads of the Company's departments to integrate sustainable development practices into the day-to-day operations of the Company and ensure compliance with governance rules and policies. They are also responsible for communicating with the relevant executives of the subsidiaries. Finally, they assist in the review of the Sustainability Report and provide feedback.</p>
Initiate employee training programs on ESG risk management, sustainable finance and ESG investing	<p>This goal was achieved since both the CEO of the organization and the executives dealing with ESG and sustainable development issues attended relevant seminars from renowned educational organizations. In particular:</p> <ul style="list-style-type: none"> • In May 2024, the Company's CEO Panagiotis Vasileiadis completed the specialized program "Environmental, Social and Governance Leadership: a Pathway to Business Sustainability" by Cambridge University. • In addition, in April, the Corporate Governance Manager and the CSR and ESG Officer obtained the "Certified Sustainability (ESG) Practitioner Program, Leadership Edition" certificate from the Chartered Management Institute (CMI), after successfully completing the program. • The same executives in October 2024 attended the seminar "CSRD DIRECTIVE, ESRS STANDARDS &

Action Plan Year 1 (2024)	
Goals	Progress
	STAKEHOLDER ENGAGEMENT STANDARDS FOR SUSTAINABILITY REPORTING"
Establish partnerships with local communities for community development projects	In 2024, the Environmental Action Tree Planting / Reforestation of 1.000 tree seedlings in regions of Greece in need started, with permission from the local authorities where required.
Implement renewable energy projects in manufacturing facilities to increase reliance on clean energy sources	Due to the divestment from companies in the Industry sector in early 2024, the Company no longer monitored the implementation of the planned projects.
Conduct ESG audits across all subsidiaries to identify baseline ESG performance metrics	It is performed on an annual basis for the purposes of the ESG report.

Action Plan Year 2 (2025)	
Goals	Progress
Monitor the progress on RES	In 2024, IDEAL Holdings changed its contract with the electricity provider for the companies housed in its offices at 25 Kreontos Street in Athens, in order to supply 100% of its electricity from renewable energy sources. The agreement has been extended for 2025.
Enhance ESG supplier assessment procedures to ensure alignment with international and EU standards	It is currently being implemented.
Appointing non-executive directors to the Board where necessary and enhancing ESG governance structure and practices	The independent non-executive members of the Board of Directors constitute 33% of its members. The Boards of Directors of the subsidiaries do not provide for the appointment of independent members in the Articles of Association of the companies. During 2024, the Company as a shareholder increased the number of non-executive members of its major subsidiary ATTICA from 5 to 7 members and the Company aims to have its major subsidiaries governed by a Board of Directors with a majority of non-executive members.
Conduct ESG audit of all portfolio companies	During the collection of data, areas of improvement are identified and discussed at management level in order to initiate improvement actions.

Action Plan Year 3 (2026)	
Goals	Progress
Expand community development initiatives and measure their impact on local communities	According to the Company's Annual CSR Action Plan, the expansion of initiatives and the measurement of their impact on local communities is expected.
Publish the first comprehensive annual ESG report outlining progress, achievements, and areas for improvement	Taking into account the Company's current investments and divestments that change the goals and the fact that the Company will provide detailed information from 2024 with the first consolidated sustainability report in accordance with Directive 2022/2464/EU, it is not planned to publish further ESG reports.
Review and update ESG goals and targets based on the achieved milestones and evolving industry best practices	It will be conducted depending on the investment situation and the structure of the Group.
Conduct ESG audit of all portfolio companies	The Company currently does not intend to undertake any external safeguards beyond those required by the applicable legislation.

The Group promotes a responsible investment approach, aiming to achieve strong financial results with a positive environmental and social impact.

The business model of the subsidiary Attica Department Stores S.A. focuses on providing an exceptional shopping experience through luxury physical and digital channels. The Company operates four department stores in Athens and Thessaloniki and has invested in a modern online store expanding its online presence. Attica's strategy focuses on brand awareness and creating a holistic consumer approach, offering over 1 million products and services by partnering with international luxury brands. The Company is strengthening its sustainability through its multichannel strategy and dedication to quality, focusing on continued growth in the Greek market and offering innovative solutions in fashion and cosmetics. This model reinforces differentiation and customer loyalty, ensuring high performance and competitive advantage.

IDEAL Holdings Group's Information Technology companies operate in the IT, cybersecurity solutions, cloud services and digital business transformation support sectors. Their business model is based on providing specialized and high value-added solutions to businesses and organizations, with a focus on data security, system reliability and technological innovation.

Their strategy focuses on sustainable digital growth, focusing on creating long-term value through:

- investing in new technologies and human capital,
- promoting solutions with a low environmental footprint (e.g. virtualized infrastructure, energy-efficient data centers),
- strengthening the cyber resilience of customers and partners,
- complying with the principles of responsible governance and data protection.

Companies leverage international standards, innovate with ESG-supported technology solutions and contribute to the digital transformation of the economy with responsibility while focusing on customer satisfaction.

Information on the Group's value chain

A. IDEAL Holdings and subsidiaries (Group)

The value chain of IDEAL Holdings and its subsidiaries reflects the full range of activities, resource flows and stakeholder relationships, from the procurement stage to the final utilization of products and services. The Group's approach focuses on creating shared value through partnerships with suppliers, human resources and customers, while taking into account critical external factors that affect its business ecosystem. Value chain mapping enhances transparency and understanding of impacts and risks at all stages of the Group's operations, supporting the implementation of targeted sustainable development strategies.

THE VALUE CHAIN of the IDEAL Holdings S.A. Group		
Upstream	Own operations	Downstream
External Stakeholders	Internal Stakeholders	External Stakeholders
<u>Suppliers of Public Utilities (Electricity, Water, Fuel)</u> <u>IT infrastructure providers - software</u> <u>IT infrastructure providers (hardware)</u> <u>Partnerships with financial and insurance institutions</u> <u>Transport and logistics services</u> <u>Network and telecommunications services</u> <u>Innovation and research & development (R&D) partnerships</u> <u>Partnerships in real estate services</u> <u>Partnerships with clothing, footwear and cosmetics brands</u> <u>Construction and renovation services</u>	<u>Own Human Resources</u> <ul style="list-style-type: none"> • Employees • Members of the Board of Directors • Shareholders 	<u>Direct Customers</u> <ul style="list-style-type: none"> <u>a. Cybersecurity & IT Services Companies</u> – Public and private sector companies <u>b. Technology Equipment Distribution Companies</u> – Companies (Private Sector) <u>c. Retailing, (Footwear, Watches, Cosmetics)</u> – Customers of Physical Stores (Shopping Centers) – Customers of electronic shops (e-shops) <u>d. Participation & Investment activities</u> Shareholders and Parent Companies
	Main Activities <p>Cybersecurity & IT Services</p> <p>Technology Distribution</p> <p>Clothing Retail: Footwear, Watches, Cosmetics</p> <p>Holding & Investment Activities</p>	
	IDEAL Holdings S.A. Supporting Activities <p>"2. Supply Chain Management</p> <p>IDEAL Holdings S.A. applies an integrated supply chain approach that covers many sectors, including IT infrastructure (hardware & software), utilities, financial and insurance services, transportation, telecommunications, Research & Development (R&D) and retail partnerships in the clothing, footwear and cosmetics sectors.</p> <p>The Group ensures operational resilience and value creation through strategic partnerships and optimized logistics in the areas of cybersecurity, technology distribution and investments.</p> <p>"3. Human Resources Management</p> <p>Refers to the policies and practices related to attracting, training and retaining employees while ensuring workplace safety and compliance with labor law standards. Human resource management is a key factor in developing a competent and motivated workforce that supports operational excellence and innovation." It also ensures that 100% of employees are</p>	

	covered by employment contracts that comply with the applicable provisions of labor legislation and that their salaries do not fall short of the statutory rates in force at any given time.	
<p>Industry peers and competitors, the media, non-governmental organizations (NGOs), as well as the natural environment ("nature"), are key external stakeholders who, although not directly included in IDEAL Holdings S.A.'s value chain as presented here, play a key role in shaping its business environment.</p> <p>Companies in the sector and competitors influence market position, benchmarking practices and innovation, while the media and NGOs shape public opinion, increase regulatory pressure and influence reputational risk. Nature, as a fundamental aspect of environmental sustainability, is embedded throughout the value chain, influencing regulatory compliance and long-term operational resilience. These stakeholders are taken into account in materiality assessments to identify risks and opportunities, ensuring that the Company remains competitive, compliant and aligned with evolving market and sustainability expectations.</p>		

Table 1: Value Chain

Stakeholders

Analysis of total revenues by major business sectors (ESRS sectors)

An analysis is provided in Note 34 - Segment Reporting, in the Company's Annual Financial Statements, which presents the two segments of the Company's business, Specialized Retailing and Information Technology.

List of Major Sectors (ESRS Sectors - NACE Codes)

IDEAL Holdings operates in a diversified portfolio of sectors that are considered important to its business model and sustainability performance. According to the classification of sectors based on NACE Codes, the Group's main areas of activity are as follows:

- 62.01 – Computer programming activities. This covers computer and cyber security services provided by subsidiaries such as Byte and ADACOM.
- 46.51 – Wholesale of computers, computer peripheral equipment and software. This corresponds to the technological equipment distribution sector in which IDEAL Technology operates.
- 47.71 – Retail sale of clothing in specialized stores.
- 47.72 – Retail sale of footwear and leather goods in specialized stores.
- 47.75 – Retail sale of cosmetic and toilet articles in specialized stores. These activities concern Attica Department Stores in the retail sector.
- 64.20 – Activities of holding companies. This represents the investment and shareholding nature of IDEAL Holdings, as a holding company.

These sectors contribute substantially to the Group's turnover and strategy, while they are also key pillars of the Group's ESG policies.

Description of the Business Model and Value Chain of IDEAL Holdings Group

IDEAL Holdings is a diversified investment group with a presence in strategic sectors of the Greek and international market. Its business model is based on the acquisition of majority stakes in dynamic and sustainable companies, aiming to create long-term value for shareholders and stakeholders. The Group's main areas of activity include: information technology and cybersecurity services (Byte, ADACOM), distribution of technological equipment (IDEAL Technology), retailing of clothing, footwear and cosmetics (Attica Department Stores). The Group's value chain extends to all stages of production and commercial activity, from upstream providers (such as IT infrastructure providers, financial and insurance service providers, transport and utilities), to the subsidiaries' own operating activities and downstream end customers. Human resources, governance and strategic investment partnerships are key drivers of value creation, while compliance with ESG standards and the integration of

sustainable development practices in every part of the chain enhance the Group's long-term resilience and competitiveness.

Description of key inputs and approach

IDEAL Holdings Group utilizes key inputs such as human resources, technological infrastructure, energy and material resources, financial instruments and social capital. Their management is based on compliance procedures, certifications (ISO) and continuous investment in innovation.

Inputs are linked to key stakeholders:

- Human capital: employees and trade unions.
- Energy/Material Resources: suppliers.
- Technology: IT providers and external partners.
- Financing: investors and financial institutions.
- Social capital: community, customers, regulators.

IDEAL's approach includes due diligence, promoting sustainability, enhancing transparency throughout the value chain and consistently engaging with stakeholders.

Company	Total number of employees	Athens	Athens (%)	Thessaloniki	Thessaloniki (%)	Cyprus	Cyprus (%)
Attica	1.133	868	76,6%	265	23,4%		
ADACOM	154	154	100%				
ADACOM CY	15					15	100%
BYTE	224	216	96,4%	8	3,6%		
IDEAL Technology	42	42	100%				
IDEAL Holdings	27	27	100%				

Table 2: Employees by geographic area

Results, Expected Benefits and Characteristics of the IDEAL Holdings Group Value Chain

IDEAL Holdings' value chain is characterized by multi-divisional operations, geographic market diversification and synergies between business segments, which enhance the Group's resilience and competitiveness. A key feature is the strategic focus on partnering with high-quality suppliers, the implementation of ESG compliance policies, and the active management of human capital through training, ethical governance and talent retention policies. Subsidiaries operate with operational autonomy but under a single control and risk monitoring framework, which enables continuous monitoring and optimization of performance at each stage of the chain.

Based on the Group's strategy, the expected benefits of the value chain include: increased turnover and operational efficiency, added value for stakeholders, mitigation of operational and regulatory risk, and enhancement of the Group's reputation and trust. At the same time, through the systematic adoption of sustainability practices, IDEAL Holdings promotes the transition towards responsible business models that combine economic performance with social and environmental impact.

ESRS 2 SBM-2 –Interests and views of stakeholders

Engaging with stakeholders is a key factor in understanding the impacts of our activities. We develop and maintain strong relationships with internal and external entities, whether individuals or legal entities, whose support and advice is critical to our long-term success. These relationships are at the heart of our sustainable growth strategy.

In this context, IDEAL Holdings and its subsidiaries are committed to continuously improving our communication methods, understanding the expectations of our stakeholders and responding to their needs. Our commitment to active collaboration is essential in identifying financial and non-financial risks, opportunities and material issues.

To ensure that our stakeholder communication and engagement practices are meaningful and effective, we have developed a comprehensive Stakeholder Engagement Plan, separated for IDEAL Holdings' internal and external stakeholders.

Stakeholder Engagement Plan

Our approach to stakeholder engagement is a fundamental element of our commitment to sustainability and transparency. The process began with a stakeholder mapping process, identifying all relevant groups, including employees, customers, investors, regulators, local communities, non-governmental organizations, etc. Each stakeholder was assessed based on their level of interest, their influence, and the extent to which they are affected by our activities.

After the mapping, we then proceeded to prioritize the stakeholders, categorizing them based on their influence and relevance to our strategic objectives. This hierarchy allowed us to formulate tailored collaboration strategies, ensuring meaningful interactions and focus on key issues.

Our Stakeholder Engagement Plan includes regular updates, feedback channels and collaborative initiatives aimed at aligning stakeholder expectations with our sustainability goals. We are committed to reviewing and refining this approach to meet evolving stakeholder needs, enhancing trust and creating shared value.

The following table presents IDEAL Holdings' stakeholders:

Internal Stakeholders	External Stakeholders
Board of Directors of IDEAL Holdings	Employees of subsidiaries
Shareholders	Customers
Employees of IDEAL Holdings	Government / Public entities
Boards of Directors of subsidiaries	Regulatory authorities
	Financial Auditors
	Lenders (national/private banks)
	Investors / International Financial Institutions
	Suppliers / External Contractors
	Civil Society Organisations
	Business Networks
	Local Communities

Table 3: Internal and External Stakeholders of the Group

Stakeholders	Key Requirements & Key Issues	Group Response	Communication Channels and Frequency
Employees of IDEAL Holdings Employees of the subsidiaries	Building a creative and efficient working environment.	-Continuous development of human resources skills. -Recognition of diversity and equal opportunities for all. -Ensuring and improving health and safety conditions.	-Providing regular information to employees via email -Uploading of all Regulations and Policies on the Company's intranet - Issuing and distributing a semi-annual internal newsletter to the employees of the IT companies
Board of Directors of IDEAL Holdings Boards of Directors of the subsidiaries	Setting objectives and choosing strategies to achieve them.	-Human resources management, training and motivation. -Choosing effective communication methods. -Implementing environmental management to protect the environment and prevent risks.	-Monthly update on the financial results of the holdings -Extraordinary meetings for decision-making -Regular meetings -Regular communication between non-executive members and executive members -Individual meetings between independent members
Customers of the subsidiaries	-Customer satisfaction, - Protection of personal data and privacy of customers and employees, -Social contribution, - Product and service innovation	-Quality of services provided, -High level of service, -Protection of personal data of employees, customers and partners	-Through the Company's communication channels - Through questionnaires
Suppliers / External Contractors	Promoting safety and environmental responsibility among suppliers.	-Collaborating with suppliers who adhere to high standards in terms of human rights, safety, environment and prices. -Sharing knowledge and experience for responsible entrepreneurship.	-In-person meetings with the companies' key suppliers -Sending the companies' financial data on a regular basis

Stakeholders	Key Requirements & Key Issues	Group Response	Communication Channels and Frequency
Civil Society Organizations	Supporting NGO actions for environmental protection and social welfare.	<ul style="list-style-type: none"> -Participating in humanitarian events and seeking ways to help society. -Contributing to the local community by creating jobs, procuring from local suppliers and targeting customers in the area. 	<ul style="list-style-type: none"> -Through the Company's communication channels -Through face-to-face meetings and correspondence
Shareholders	<i>Recognition of the moral and practical support of shareholders in the progress of the Company.</i>	<ul style="list-style-type: none"> -Transparency -Profitability -Avoiding incidents that discredit the Company -Reducing or eliminating risk -Ensuring human rights at work 	<ul style="list-style-type: none"> -Announcements of the Company through the Stock Exchange and its website -Quarterly and annual announcement of financial results -General Meetings to ensure the direct and uninterrupted participation of shareholders -The Company's Shareholders' Department
Financial Auditors	<ul style="list-style-type: none"> -<i>Transparency and reliability of financial statements</i> -<i>Compliance with accounting and tax standards</i> -<i>Effective internal control and risk management mechanisms</i> 	<ul style="list-style-type: none"> -Providing complete and documented information -Collaboration with the Financial Services and Internal Audit Units -Implementing compliance and transparency policies 	<ul style="list-style-type: none"> -Annual and interim meetings -Publication of financial statements and reports -Participation in Audit Committees -Regular communication with financial management
Lenders (national/private banks)	<ul style="list-style-type: none"> -Profitability -Creating jobs and retaining staff -Transparency -Selecting portfolios based on ESG criteria 	<ul style="list-style-type: none"> -Respecting Human Rights -Respecting Diversity and Equal Opportunities -Recruiting women in the technology sector -Personal data protection measures 	<ul style="list-style-type: none"> -Updating on a regular basis by sending various legal documents and certificates of the Company -Face-to-face meetings with representatives of financial institutions to examine the financing

Stakeholders	Key Requirements & Key Issues	Group Response	Communication Channels and Frequency
	<ul style="list-style-type: none"> -Ensuring human rights at work -Protecting employee/client-partner privacy 		needs of the Company and its holdings
Local Communities	The Company's response to local and wider community issues	Social contribution	<ul style="list-style-type: none"> -Through the Company's communication channels -Through face-to-face meetings and correspondence

Table 4: Key stakeholder requirements, channels and frequency of communication

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

IDEAL Holdings' material impacts, risks and opportunities, as well as their interaction with the Group's strategy and business model, are analyzed in the respective thematic templates. The material ESG issues identified are discussed in detail in the individual sections of the report, where the respective strategies, objectives, actions and key figures associated with these material impacts, risks and opportunities are detailed.

ESRS	Impact	Description	Type of impact
E1	Greenhouse gas emissions	GHG emissions from the operations and value chain of the Group's subsidiaries (in particular energy consumption for production, refrigeration, storage and retail) constitute material environmental impact.	Upstream, Own operations, Downstream Existing, Negative
E1	Energy use in the Group's facilities and in the Value Chain	Increased energy consumption in the Group's facilities and the wider value chain leads to significant indirect emissions (Scope 2 & 3). At the same time, fluctuations in energy prices affect operating costs and increase risk.	Upstream, Own operations, Downstream Existing, Negative 1-5 years
E5	Waste generation from the Group's facilities and products	Waste generation from the Group's operations and the disposal of its products is a negative impact on the environment due to inadequate management and irrational use of resources. At the same time, compliance costs may increase due to possible tightening of legislation.	Upstream, Own operations, Downstream Existing, Negative 1-5 years

ESRS	Impact	Description	Type of impact
S1	Employee Training and Development	Regular training and skills development, particularly in non-technical and digital skills, enhances the competitiveness, efficiency and quality of the Group's services, especially in the midst of digital transformation.	Own operations Potentially Positive 1-5 years
S1	Establishment of a certified occupational health and safety framework	The Company and its subsidiaries have an ISO 45001 certified health and safety system and those that are not certified have put in place all the policies and procedures required to provide a safe working environment.	Own operations Potentially Negative <1 year
S1 Diversity and Equal Opportunities	Innovation and Continuous Improvement through a healthy working environment	Training and health programs promote creativity and innovation within the organization.	Own operations Expected, Positive 1-5 years
S1 Attracting women to the technology sector	Creating a Positive Corporate Profile	Attracting and supporting women enhances the Company's reputation and attracts talented executives.	Own operations Expected, Positive 1-5 years
S1 Attracting women to the technology sector	Increasing Competitiveness	Integrating more talent boosts performance and responsiveness to technological developments.	Own operations Expected, Positive 1-5 years
S1 Human Rights	Optimizing Internal Procedures	Respect for human rights enhances cohesion and increases employee commitment.	Own operations Expected, Positive 1-5 years
S1 Employee Satisfaction Survey	Improving Internal Culture	Regular satisfaction surveys can enhance trust and two-way communication.	Own operations Expected, Positive 1-5 years
S1	Increasing Productivity and Commitment	Well-designed surveys help to enhance the work environment and loyalty.	Own operations

ESRS	Impact	Description	Type of impact
Employee Satisfaction Survey			Expected, Positive 1-5 years
S1 Customer and Employee Data Protection and Privacy	Legal Sanctions and Fines	Failure to comply with regulations such as the GDPR can result in serious financial penalties and legal disputes.	Own operations Existing, Negative 1-5 years
S1 Customer and Employee Data Protection and Privacy	Loss of Confidence	A data breach can seriously damage a Company's reputation and reduce customer and employee confidence.	Own operations Existing, Negative 1-5 years
S1 Customer and Employee Data Protection and Privacy	Risk of cyber attacks	The lack of adequate security measures increases the risk of cyber-attacks with possible leakage of sensitive information.	Own operations Existing, Negative 1-5 years
S1 Customer and Employee Data Protection and Privacy	Enhancing Confidence and Reputation	Implementing strict data security policies enhances the Company's image and the confidence of stakeholders.	Own operations Expected, Positive >5 years
E1 Digital Transformation	Cybersecurity risks	Increased reliance on digital systems is associated with greater risks of cyberattacks and data loss.	Own operations Existing, Negative 1-5 years
E1 Digital Transformation	Innovation and New Business Models	Digital transformation enables the development of new products, services and business models.	Own operations Expected, Positive >5 years
S1 Cybersecurity in business operation	Cyber attacks	Companies are at risk of attacks such as hacking, ransomware or phishing that can lead to data loss and downtime.	Own operations Existing, Negative 1-5 years

ESRS	Impact	Description	Type of impact
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S1 Cybersecurity in business operation	Inadequate Updates and Management	Failure to properly manage updates and security systems can leave critical data exposed.	Own operations Existing, Negative 1-5 years
S1 Cybersecurity in business operation	Strengthening competitiveness	Investing in modern cybersecurity systems enhances trust and data protection.	Own operations Expected, Positive >5 years
S1 Cybersecurity in business operation	Improving Operational Efficiency	Automation and continuous updating of security systems reduces interruptions and ensures operational continuity.	Own operations Expected, Positive 1-5 years
S1 Cybersecurity in business operation	Innovation and Development	Advanced cybersecurity technologies create new solutions and competitive advantage.	Own operations Expected, Positive >5 years
GOV Regulatory Framework compliance	Legal Sanctions	Failure to comply with standards and regulations can lead to fines, legal repercussions and damage to corporate reputation.	Own operations Existing, Negative 1-5 years
GOV Regulatory Framework compliance	Improving Governance	Compliance strengthens internal governance and risk management processes.	Own operations Expected, Positive 1-5 years
GOV Regulatory Framework compliance	Reliability and Reputation	Compliance with regulatory requirements enhances investor and customer confidence, creating a competitive advantage.	Own operations Expected, Positive >5 years
GOV Regulatory Framework compliance	Access to New Markets	Compliance with international standards facilitates access to highly transparent markets and partnerships.	Downstream Expected, Positive >5 years
ESRS	Impact	Description	Type of impact

GOV Anti-bribery and anti-corruption	Legal Sanctions and Reputation	Failure to implement strict anti-bribery measures can lead to fines, legal repercussions and damage to corporate reputation.	Own operations Existing, Negative 1-5 years
GOV Anti-bribery and anti-corruption	Lack of Transparency and Internal Controls	The absence of adequate oversight can foster the spread of illegal practices and damage relations with stakeholders.	Own operations Existing, Negative 1-5 years
GOV Anti-bribery and anti-corruption	Zero Tolerance Policies	Adopting strict anti-corruption policies enhances trust and corporate credibility.	Own operations Expected, Positive 1-5 years
GOV Anti-bribery and anti-corruption	Continuous Training and Independent Audits	Strengthening prevention processes contributes to improving the efficiency and competitiveness of the Company.	Own operations Expected, Positive 1-5 years
GOV Business Continuity	Business interruption	The lack of business continuity plans increases the risk of interruption by unforeseen events such as natural disasters or technical failures.	Own operations Existing, Negative 1-5 years
GOV Business Continuity	Data loss	Inadequate protection and copying of data can lead to losses that affect daily operations.	Own operations Existing, Negative 1-5 years
GOV Business Continuity	Interruptions in the Supply Chain	Disruptions to suppliers or partners can disrupt production and customer service.	Upstream Existing, Negative 1-5 years
GOV Business Continuity	Resilience and Flexibility	The implementation of business continuity plans enhances the ability to cope with crises and maintain business continuity.	Own operations Expected, Positive >5 years
ESRS	Impact	Description	Type of impact

GOV Business Continuity	Competitive Advantage	The adoption of innovative business continuity solutions provides a strategic advantage in the marketplace.	Own operations Expected, Positive >5 years
GOV Risk Analysis in Business Decision Making	Uncertainty and Volatility	External factors make predictions more difficult, reducing the effectiveness of decision-making.	External environment Existing, Negative 1-5 years
GOV Risk Analysis in Business Decision Making	Optimizing Decision Making	Risk analysis helps informed decision making and adaptability in dynamic environments.	External environment Expected, Positive >5 years
GOV Risk Analysis in Business Decision Making	Identifying Opportunities	Proper risk assessment can lead to the identification of new opportunities.	Own operations Expected, Positive 1-5 years
GOV Risk Analysis in Business Decision Making	Strategic Resilience	Appropriate risk management enhances the ability to respond to crises and emergencies.	Own operations Expected, Positive 1-5 years
GOV Participation of women and independent nonexecutive members in the BoDs	Improved Decision Making	Increased diversity leads to more comprehensive decisions thanks to different experiences.	Own operations Expected, Positive 1-5 years
GOV Participation of women and independent nonexecutive	Competitive Advantage	Equality and diversity attract investors and create a positive market profile.	Own operations Expected, Positive 1-5 years
ESRS	Impact	Description	Type of impact

members in the BoDs.			
S1	Diversity and inclusion of the workforce	Implementing diversity and inclusion policies enhances job satisfaction, engagement and productivity, promoting an inclusive and respectful environment for all employees.	Own operations Existing Positive 1-5 years
S1	Talent Management (Recruitment & Retention)	Implementing targeted talent management practices can have a positive impact by enhancing employee retention, reducing turnover and improving the overall work experience.	Own operations Potentially Positive 1-5 years
S4	Customer data protection	Non-compliance with data protection protocols entails the risk of leakage of personal customer information, with negative consequences for the Group's reputation and possible regulatory sanctions. This risk is already recorded in the Risk Registry.	Upstream, Own operations, Downstream Existing, Negative <1 year
G1	Ethical corporate governance practices	The lack or ineffective implementation of ethical governance practices can lead to a reduction in stakeholder confidence, operational failures and undermine the overall corporate performance.	Own operations Potentially Negative 1-5 years

Table 5: Impacts

Material Risks and Opportunities

The material risks (R) and opportunities (O) identified in the Group's Dual Materiality Assessment, along with their descriptions and the specific points in the value chain (upstream, own operations, downstream), where they arise, are summarized in the table below.

ESRS	Risk/Opportunity	Description	R/O
E1	Energy use in the Group's facilities and in the Value Chain	High dependence on external energy suppliers poses a long-term systemic risk for the FAIS Group, affecting operating costs and business stability, especially in the international subsidiaries	Risk >5 years Upstream, Own operations, Downstream
E1	Addressing natural impacts of climate change	The increasing frequency and intensity of extreme weather events—such as heat waves, floods, or droughts—may significantly disrupt operations, damage property, and interrupt the FAIS Group's supply chain, especially in areas with low resilience.	Risk >5 years Upstream, Own operations, Downstream
S1	Employee Training and Development	Enhancing training and development programmes offers the opportunity for upgrading the skills of the workforce, enhancing operational efficiency, innovation and readiness towards technological developments. There is value in investing in non-technical skills and digital competences, which can improve performance, job satisfaction and employee engagement.	Opportunity Own operations 1-5 years
S1	Employee Talent Management (Attract & Retain)	Investing in talent attraction and retention strategies is an important opportunity to enhance the stability of human resources and reduce turnover costs. By creating an attractive working environment and providing opportunities for development, the Group can strengthen employee engagement, increase productivity and maintain business continuity in a competitive context.	Opportunity Own operations 1-5 years
S4	Personal data and customer privacy protection	Failure to adequately protect customer personal data poses a significant risk to the Group, as it may lead to leakage incidents, legal sanctions and loss of trust by stakeholders.	Risk Own operations, upstream & downstream <1 year

ESRS	Risk/Opportunity	Description	R/O
G1	Regulatory changes & non-compliance and legal requirements of products	The possibility of non-compliance would result in sanctions, high financial costs and damage to the Group's reputation.	Risk Own operations 1-5 years
G1	Significant suppliers loss	Large overseas companies in the upstream value chain are currently implementing control procedures on governance requirements for their downstream partners. Failure to meet these requirements poses a risk to the Group. In addition, current geopolitical events may affect US-EU trade of goods and services, through US-imposed tariffs and subsequent retaliation by economic systems in Europe and Asia.	Risk Upstream 1-5 years
S1	Inadequate employee safety	Inadequate health and safety measures may lead to accidents and reduced productivity.	Risk 1-5 years Own operations
S1	Training and Well-being programmes	Enhancing health and support programmes increases efficiency and engagement.	Opportunity 1-5 years Own operations
S1	Lack of diversity in technology	Limited women representation reduces innovation and creates internal discontent.	Risk 1-5 years Own operations
S1	Attracting women in technology roles	Increased diversity enhances innovation and the Company's reputation.	Opportunity >5 years Own operations
S1	Personal data breach	Inadequate data protection may lead to fines and reputational damage.	Risk 1-5 years Own operations
S1	Reinforcing privacy policies	Investing in data protection technologies boosts trust and improves data management.	Opportunity >5 years Own operations

ESRS	Risk/Opportunity	Description	R/O
GOV	Business interruption due to insufficient continuity	Lack of business continuity plans increases operational risk.	Risk 1-5 years Own operations
GOV	Enhancing resilience	Maintaining a business continuity plan ensures operational continuity and confidence.	Opportunity >5 years Own operations
GOV	Fair competition infringement risk	Practices of pricing pressure or rule-violation may result in legal consequences.	Risk 1-5 years Own operations
GOV	Transparency and innovation through fair competition	Implementing rules promotes quality, innovation and reputation.	Opportunity >5 years Own operations
GOV	Bribery/corruption risk	Lack of policies and monitoring cause legal and reputational issues.	Risk 1-5 years Own operations
GOV	Training and zero-tolerance	Anti-corruption policy enhances reputation and ethical culture.	Opportunity >5 years Own operations

Table 6: Risks and Opportunities

Connecting Impacts, Risks and Opportunities to the Business Model and Strategy of IDEAL Holdings

As part of our sustainable development strategy, IDEAL Holdings recognizes that the material environmental, social and governance impacts, as well as the associated risks and opportunities, are inextricably connected to its business model and business strategy.

Operating with a diversified portfolio in specialty retail and technology, the Group is exposed to a variety of risks, such as the impact of climate change, increased regulatory requirements on sustainability issues, human rights issues and the need to ensure integrity and transparency in governance. In response to these challenges, it has integrated the material impacts and risks management into its investment and strategic decision-making processes, using relevant policies, reporting mechanisms and environmental and social risk assessment tools

At the same time, it recognises that actively addressing ESG issues creates strategic opportunities: developing cybersecurity and digital trust services, diversifying the portfolio with sustainable investment schemes and strengthening resilience of its subsidiaries through responsible working practices are key priorities.

The Company, in cooperation with its subsidiaries' management, aims to complete the preparation of individual ESG strategies for each subsidiary by the end of 2025. These strategies will be tailored to the specific characteristics and requirements of their industry of operation.

Double Materiality Analysis

ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks, and opportunities

IDEAL Holdings conducted a double materiality analysis to identify material impacts, risks and opportunities. The aim of this analysis was, on the one hand, to identify all the significant impacts that IDEAL Holdings' activities and facilities have on people and the environment, across the Group's value chain. On the other hand, it was necessary to obtain a complete and detailed overview of the financial risks and opportunities that arise for IDEAL Holdings by addressing sustainable development issues. The double materiality analysis for this Sustainability Report was based on extensive research and review of documentation, based on research studies and other publicly available information, as well as on the active involvement of stakeholders.

Key Assessment Stages

1. Operational Framework Understanding

Taking into account the Group's diversified activity in the IT, retail and food production sectors, a comprehensive mapping of the value chain and markets in which the Group operates was carried out.

2. Issues and IROs Mapping

The key impacts, risks and opportunities related to the Group's business operations and overall operating environment were identified. The analysis began in terms of impact materiality and expanded on the issues financial significance.

3. Assessment & Prioritisation

Factors such as range and impact severity, the likelihood of occurrence and the possibility of recovery were considered for each issue. The evaluation included both input and outputs, aiming to provide full documentation.

4. Material Issues Selection

Based on the analysis, the issues deemed to have the greatest impact on IDEAL Holdings' environmental and social performance were selected. These issues align with strategic priorities and contribute to the ESG decisionmaking process at ESG level.

Impact Materiality

The impact materiality assessment focuses on the environmental and social impacts that may arise from IDEAL Group's operations and value chain. For this process, the operational data of the subsidiaries, as well as external reports and industry best practices were taken into account.

The analysis identified greenhouse gas emissions, energy use, and waste generation as material impacts, which are linked to operational needs for storage, cooling and resource consumption. At the same time, significant social impacts were identified in talent management, training and skills development, diversity and inclusion, and ensuring health and safety in the workplace.

Finally, material impacts were identified in the governance sector, particularly regarding personal data protection, compliance with regulatory requirements and ethical governance practices dissemination. These are key pillars of the Group's ESG strategy and guide the Group's design of targeted initiatives.

Financial Materiality

In the context of the Dual Materiality approach, IDEAL Holdings assesses Financial Materiality as the extent to which environmental, social and governance (ESG) issues may materially affect the Group's financial position, results, cash flows or value in the short, medium and long term.

The financial materiality analysis was performed in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and was based on a rigorous assessment process by the Management. Specifically:

- Every identified material issue was reviewed based on specific metrics and evaluated for the potential to present a risk or opportunity to IDEAL Holdings.
- The assessment has differentiated the risks into natural (coming from the immediate impacts of climate change) and transition (related to the transition to a low-emission economy or institutional/market changes).
- For each issue, the following were evaluated:
 - The likelihood of occurrence (Likert scale: possible, likely, unlikely),
 - The size of the financial impact (severity of impact) and
 - The duration of the impact (time horizon).

A quantitative evaluation model was then applied using a threshold model:

- Only issues with a probability of at least possible and an impact size of more than 20% were classified as material.
- The issues were classified as high, medium, low financial materiality.

The key ESG issues recognized as financially material are:

1. Financial Growth

This issue was assessed as critical, with a high impact probability (20%-60%), affecting key financial indicators such as EBITDA and Turnover. Economic development is expected to directly affect both profitability and liquidity of the company through changes in demand for services, raw material costs and investment strategy.

2. Participation of Women and Independent Non-Executive Members in the Boards of Directors This issue was identified as transitional risk and opportunity. Increased shareholding contributes to improving corporate governance, enhances transparency and investor confidence, and facilitates access to funding sources, positively impacting the Group's financial stability and competitiveness.

In addition, at portfolio level, material financial issues that continue to be closely monitored include:

- **Climate Risks and Transition Opportunities:** possible impacts at energy cost and necessary investments in low emission technologies.
- **Cybersecurity and Data Protection:** risks from cyber attacks with potential direct financial losses and/or legal liabilities.
- **New ESG Regulations:** which may lead to increased compliance costs and create a competitive advantage.

Disclosures pursuant to EU Taxonomy

Following the European Union's strategic approach, which aims to create resilient, sustainable and climate-neutral economies and to achieve the ambitious climate and energy targets for 2030, and in the broader framework of the European Green Deal, the European Commission has adopted a unified classification system for sustainable activities. This classification was implemented in July 2020 through the corresponding Regulation, in order to clearly define and assess when an economic activity is considered environmentally sustainable.

The EU Taxonomy provides a unified and reliable framework which contributes to avoiding misunderstandings by promoting common understanding between investors, businesses and policy makers. This enhances transparency and facilitates effective communication on sustainability issues, facilitating investment decisions and aiding the transition to green, sustainable and economically resilient development. This system allows stakeholders to clearly identify which activities make a substantial contribution to environmental protection, adaptation to climate change and the achievement of sustainable development in Europe.

IDEAL Holdings Statement of Alignment with national, EU and international frameworks.

The following table demonstrates the ways in which IDEAL Holdings aligns its investment strategy with national, EU and international regulatory frameworks and standards.

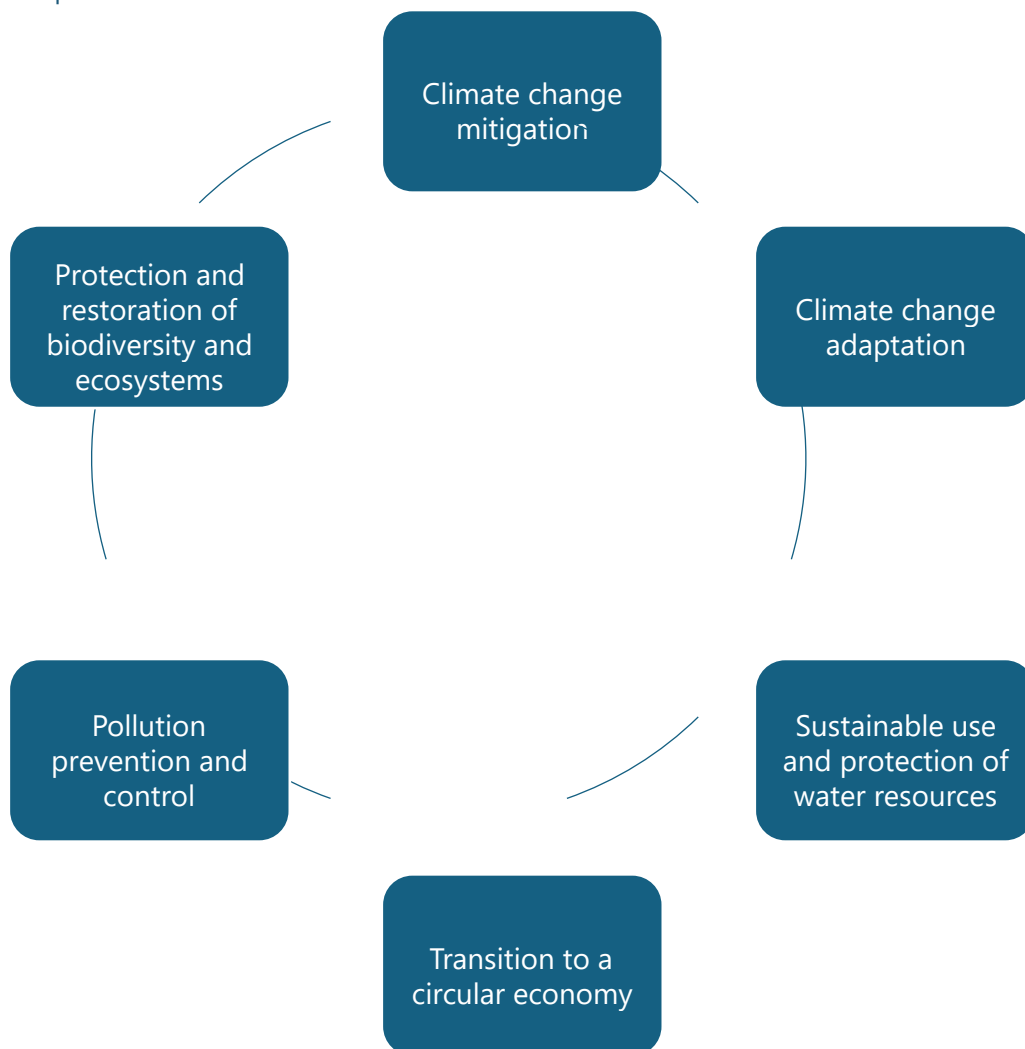
Investment strategies	Regulations, Frameworks and Standards
Negative/Exclusion	<p>IDEAL Holdings complies with the following lists of financial institutions:</p> <ol style="list-style-type: none"> 1. EBRD's Environmental & Social Exclusion List 2. IFC Exclusion List
Positive	<p>IDEAL Holdings seeks to include in its portfolio investments that have a positive impact: in line with:</p> <ol style="list-style-type: none"> 1. UN Sustainable Development Goals (SDGs) 2. Paris Agreement on temperature goal 3. EU Taxonomy Regulation
Monitoring Rules	<p>The international standards and principles adopted and taken into account in the investment analysis are:</p> <ol style="list-style-type: none"> 1. EBRD Performance Requirements 2. IFC Performance Standards 3. Responsible investments principles

Disclosures pursuant to the EU Taxonomy Regulation in accordance with Article 8 of Regulation 2020/852/EU (EU Taxonomy Regulation)

The Taxonomy Regulation is an integral part of the European Commission action plan aiming to reorient capital flows towards a more sustainable economy. EU Taxonomy is a classification system for activities, which can, under certain conditions be considered environmentally sustainable, or activities that facilitate the transition to sustainability. Under the regulatory framework, companies and organisations can attract investments to further expand and develop their sustainable activities, provided they meet certain criteria. Alignment with these criteria is continuously monitored, and relevant data is published on an annual basis and is reported in the non-financial section of the annual financial statements.

The EU Taxonomy Regulation focuses on the following six environmental objectives:

1. Climate change mitigation: focusing on stabilization of greenhouse gas concentrations and on aligning with the long-term temperature goal of the Paris Agreement.
2. Climate change adaptation: focusing on reducing or preventing the adverse impact of the current climate or the expected future climate.



3. Sustainable use of water and protection of marine resources: focusing on sustainable use and protection of water resources or mitigating water scarcity and drought.
4. Transition to a circular economy: which can be achieved in various ways, for example by increasing the durability and reusability of products or reducing the use of resources through the design and choice of materials as well as by developing "product-as-a-service" business models.
5. Pollution prevention and control: focusing on avoiding using certain materials or products that may cause pollution, improving air, water or soil quality levels and cleaning up waste and other pollution.
6. Protection and restoration of biodiversity and ecosystems: which can be achieved in several ways, for example, with the provision of food and water, monitoring climate and diseases, nutrient cycles and oxygen production and cultural services, such as providing spiritual and recreational benefits.

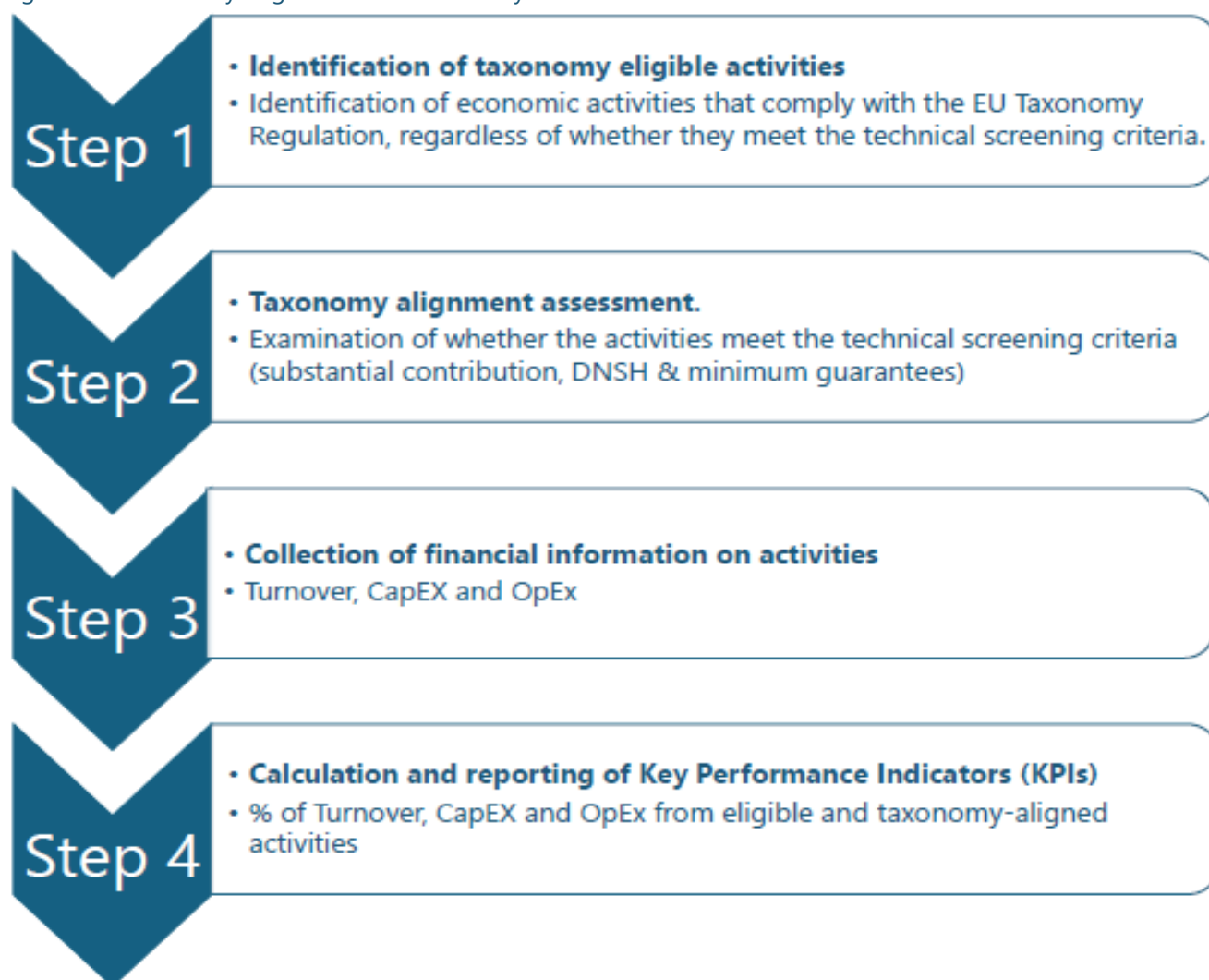
Identification of eligible and taxonomy-aligned criteria.

An economic activity must meet four general criteria in order to be classified as an environmentally sustainable or green activity under the EU taxonomy. It should:

- Make a substantial contribution to one of the environmental objectives described above
- Not damaging the other five environmental objectives significantly
- Meet the so-called "minimum safeguards", such as the UN Guiding Principles on Business and Human Rights, so that they do not have a negative social impact
- Comply with the technical screening criteria.

The information presented below is in accordance with the requirements of the Regulation and the delegated acts adopted up to the time of publication. A taxonomy eligible economic activity is an economic activity whose relevant revenues, capital or operating expenses match the description of one of the activities defined in the EU Classification Regulation, as described in the delegated acts supplementing the Classification Regulation. Consequently, any economic activity that is not described in those delegated acts is defined as an 'economic activity taxonomy non-eligible'.

The relevant directives are open to interpretation and are constantly evolving to adapt to the needs of the process. Subsequently, IDEAL Holdings will monitor such developments and adjust its approach accordingly in terms of the assumptions and methodology applied, which follows the following four steps in order to identify eligible and taxonomy-aligned activities for the years 2023 and 2024.



This section includes disclosures in accordance with the public reporting requirements as set out in Annex III of Regulation (EU) 2022/1214 (Climate Complementary Delegated Act) and Annex XII of the Delegated Act on Disclosures. The following table shows the Group's participation, financing and/or exposure to nuclear and fossil gas related activities for the year 2024.

Template 1		
Line	Activities related to nuclear energy	
1.	The company conducts, finances or is involved in research, development, demonstration and exploitation of innovative power generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The company shall undertake, finance or be involved in the construction and safe operation of new nuclear installations for electricity production or industrial heat, including district heating purposes or industrial processes such as hydrogen production, and safety upgrades, using the best available technologies.	NO
3.	The company undertakes, finances or has openings in the safe operation of existing nuclear installations producing electricity or industrial heat, including for district heating purposes or industrial processes such as hydrogen production from nuclear energy, as well as safety upgrades.	NO
Activities related to fossil gases		
4.	The company undertakes, finances or is involved in the construction or operation of power generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The company undertakes, finances or is involved in the construction, renovation and operation of combined heat/cooling and electricity generation plants using fossil gaseous fuels.	NO
6.	The company undertakes, finances or is involved in the construction, renovation and operation of heat generation facilities that produce heat/cooling using fossil gaseous fuels.	NO

The Group does not engage in any of the activities listed in the above table and therefore does not present any of the KPI tables in Templates 2-5 of Annex XII of Regulation 2021/2178 (EU).

STEP 1: Identification of taxonomy eligible activities

According to the regulatory framework, the following economic activities have been identified as eligible for classification:

SECTOR	ACTIVITY NUMBER	NACE CODE	ACTIVITY	ENVIRONMENTAL OBJECTIVE	GROUP-COMPANY
INFORMATION TECHNOLOGY AND COMMUNICATION	8.2	J62	Computer programming, consulting and relevant activities.	Contribution to climate adaptation	ADACOM GR, ADACOM CY, BYTE, IDEAL TECHNOLOGY, METROSOFT,
SERVICES	5.4	G46 G47	Sale of used goods	Contribution to circular economy	IDEAL TECHNOLOGY

* Other Companies of the group that are not included in the table (SICC, ATTICA, etc) are not identified as taxonomy eligible.

** The Companies ASTIR, COLEUS, are not included in the table because they were transferred during the year and for data comparability purposes they are not included in the relevant tables.

Computer programming, consulting and relevant activities (NACECODE=J62, ACTIVITY NUMBER = 8.2),

involving the provision of expertise in the field of information technologies, writing modification, testing and support of software programming and design of computer systems incorporating computer hardware, software and communication technologies; on-site management and operation of computer systems or customer data processing facilities and other relevant professional activities. The economic activities in this category are linked to NACE code J62 according to the statistical classification of economic activities established by Regulation (EC) No 1893/2006.

Sale of used goods (NACE CODE = C27, G46, G47 and ACTIVITY NUMBER = 5.4) refers to products manufactured by economic activities classified under different NACE codes. The relevant products sold by IDEAL TECHNOLOGY SA are manufactured under NACE codes C27 Manufacture of electrical equipment. The economic activities in this category are linked to NACE code G46 according to the statistical classification of economic activities established by Regulation (EC) No 1893/2006.

The above-mentioned economic activities are not classified as 'transitional' or 'favourable' contribution type activities on the basis of the definitions in the Commission Delegated Regulation (EU) 2021/2178 and the EU Taxonomy Regulation.

STEP 2: Taxonomy alignment assessment

The Group performed the taxonomy alignment assessment for every activity and there is no economic activity assessed as taxonomy aligned according to the technical screening criteria defined in the EU Taxonomy Regulation.

STEP 3: Collection of financial information on activities

KPI's Requirements

Note: The Group will not include ASTIR and COLEUS Companies in Taxonomy KPI's as it does not appear in the 2024 consolidated financial statements. For comparability purposes the tables have been adjusted and do not include such data.

The activities of Bluestream operations are included in the consolidated financial statements and are not included in the ESRS based disclosures due to its recent acquisition in 2024. Its turnover has been included in the total Turnover of the EU Taxonomy. Given its recent acquisition, its operations have not yet been included in the eligibility assessment process based on the requirements of the Taxonomy, and as a result, at this stage, it is classified as non-eligible

Based on Directive 2021/2178/EU, by eliminating intra-company transactions and allocating indicator amounts to only one environmental objective, double counting has been avoided when allocating in the KPIs numerator of the turnover, CapEx and OpEx for the different economic activities.

The financial information for the KPI's eligibility and alignment monitoring was retrieved from the financial information systems at the end of FY 2023 and FY 2024. They were analysed and verified at a consolidated level to ensure consistency with consolidated Turnover, (CapEx) and (OpEx) for fiscal years 2023 and 2024.

The Key Performance Indicators ("KPIs") include the turnover KPI, CapEx KPI and OpEx KPI. For the reporting period, the rates of the annual turnover from sales of goods and services, capital (CapEx) and operating (OpEx) expenditure corresponding to the economic activities of the group that were considered as non-eligible, eligible or taxonomy aligned according to the description of these activities and taking into account the corresponding NACE codes, as well as the relevant technical screening criteria as set out in the Delegated Regulations 2021/2139/EU (Delegated Regulation for the Climate, as amended by (EU) 2023/2485), 2023/2486/EU (Environmental Delegated Regulation) and 2022/1214/EU (Complementary Delegated Regulation for the climate) are presented below. The following group financial information was used for the calculation of the KPIs:

Turnover KPI's

The consolidated turnover used as the denominator of the classification is the "Revenue" item of € 178,9 million in 2023 and € 374,2 million in 2024. Turnover covers revenue recognized in accordance with International Accounting Standard (IAS) 1, paragraph 82(a), as adopted by Commission Regulation (EC) No 1126/2008. It is

included in "Note 23 Revenue" (resulting from the sale of goods and services after deduction of sales discounts and VAT and other taxes directly linked to turnover).

The turnover rate from goods and services, including intangible goods, not including the use of products or services for covering their own needs or intragroup sales, related to eligible economic activities (numerator) is 27,75 million euro in 2023 and 35,96 million euro in 2024. Therefore, the turnover ratio for the economic activities eligible is 15,51 % in 2023 and 9,61 % in 2024 respectively.

There are no environmentally sustainable activities (Taxonomy aligned) for 2023 and 2024.

CapEx KPI's

The denominator includes additions to tangible and intangible assets during the financial year 2023 and 2024 respectively, before depreciation and any revaluations, including those resulting from revaluations and impairments for the related financial years and excluding changes at fair value.

CapEx coverage costs are accounted for in accordance with:

- IAS 16 Property, Plant and Equipment
- IAS 38 Intangible assets, - IAS 40 Investment property, - IFRS 16

Leases.

Leases that do not result in the recognition of a right of use asset have not been accounted for as capital expenditure.

Based on the above requirements, the denominator (Total CapEx) stood at € 12,35 million and € 25,73 million respectively. This total is shown in the line " Additions for the period " in Notes "5. Tangible fixed assets", "6. Intangible assets", "7.1. Right-of-use assets"

The numerator is equal to the part of the capital expenditure included in the denominator that is related to assets or processes associated with taxonomy eligible (economic activities i.e. €1,75 million in 2023 and € 1,17 million in 2024).

OpEx KPI's

The denominator includes direct non-capitalized expenditure relating to research and development, building renovation measures, short-term leases, maintenance and repair, and any other direct expenditure relating to day-to-day servicing of tangible fixed assets or to third parties, to whom activities necessary to ensure the continuous and efficient operation of those assets are outsourced.

Based on the above requirements, the denominator (Total OpEx) stood at € 0,2539 million and € 1,039 million in the fiscal years 2023 and 2024 respectively.

The numerator is equal to the part of the operating expenditure included in the denominator and is related to assets or processes associated with Taxonomy eligible economic activities, including training and other human resources adjustment needs, as well as direct non-capitalized expenditure representing research and development needs. The total operating expenditure for the Taxonomy eligible economical activities stood at € 63,45 thousand in 2023 and € 75,61 thousand in 2024.

There is no operating expenditure for the eligible and environmentally sustainable (aligned) economic activities for the Taxonomy in 2023 and 2024.

The information presented in this report complies with the requirements of the Regulation and the Delegated Regulations issued up to the time of this publication. The relevant guidelines have a relative margin of interpretation and are continually adapted to the needs of the process. Taking this into account, Ideal Holdings

Group pays close attention to relevant developments and adapts its approach depending on the assumptions and applicable methodology.

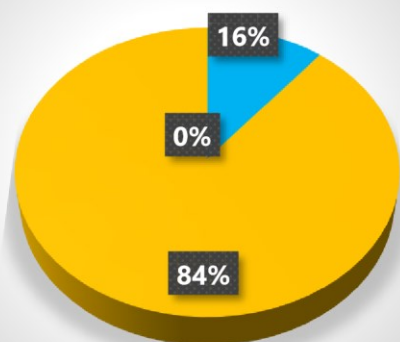
STEP 4: Calculation and reporting of Key Performance Indicators (KPIs) (Disclosures Summary) A

summary of the Taxonomy Calculation results is presented in the following tables:

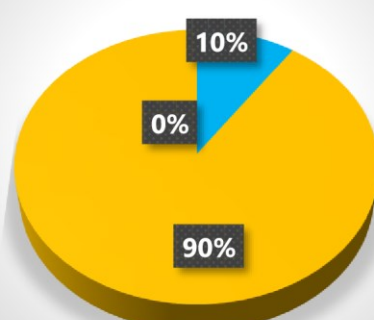
A. TAXONOMY ELIGIBLE ACTIVITIES	NET TURNOVER 2023	NET TURNOVER 2024	CAPEX 2023	CAPEX 2024	OPEX 2023	OPEX 2024
Computer programming, consulting and relevant activities	27.720.798	35.959.709	1.749.255	1.168.043	63.454	75.612
Sale of used goods	28.421	0	0	0	0	0
TOTAL TAXONOMY ELIGIBLE ACTIVITIES TOTAL	27.749.219	35.959.709	1.749.255	1.168.043	63.454	75.612
TAXONOMY ELIGIBLE ACTIVITIES RATE %	15,51%	9,61%	14,17%	4,54%	24,98%	7,17%
A.1 Environmentally sustainable activities (taxonomy aligned)						
TOTAL TAXONOMY ELIGIBLE AND TAXONOMY ALIGNED ACTIVITIES	0	0	0	0	0	0
TAXONOMY ELIGIBLE AND TAXONOMY ALIGNED ACTIVITIES RATE %	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
A.2 Taxonomy eligible but environmentally non-sustainable activities (not aligned with Taxonomy)						
ELIGIBLE BUT NOT ALIGNED ACTIVITIES IN TOTAL	27.749.219	35.959.709	1.749.255	1.168.043	63.454	75.612
ELIGIBLE BUT NOT ALIGNED ACTIVITIES RATE %	15,51%	9,61%	14,17%	4,54%	24,98%	7,17%
B. NON-ELIGIBLE ACTIVITIES	NET TURNOVER 2023	NET TURNOVER 2024	CAPEX 2023	CAPEX 2024	OPEX 2023	OPEX 2024
TOTAL NON-ELIGIBLE ACTIVITIES	151.189.713	338.284.041	10.598.684	24.562.235	190.531	979.513
NON-ELIGIBLE ACTIVITIES RATE %	84,49%	90,39%	85,83%	95,46%	75,02%	92,83%
TOTAL (A+B)	178.938.932	374.243.749	12.347.939	25.730.278	253.985	1.055.125

Taxonomy Aligned	Eligible but not Aligned	Non-Eligible
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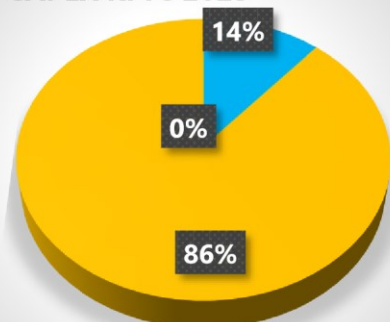
TURNOVER KPI's 2023



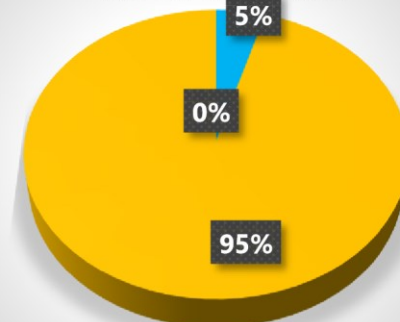
TURNOVER KPI's 2024



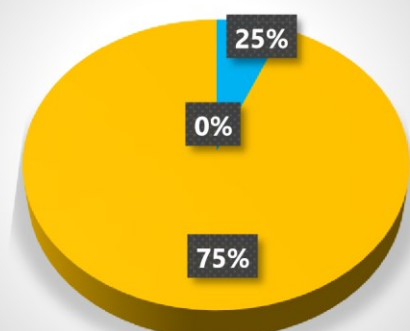
CAPEX KPI's 2023



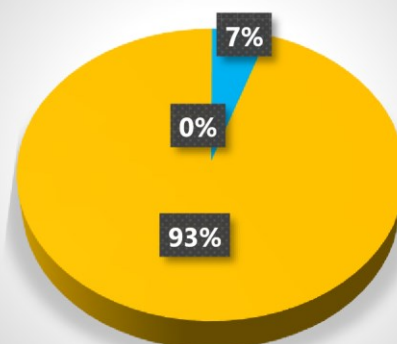
CAPEX KPI's 2024



OPEX KPI's 2023



OPEX KPI's 2024



TURNOVER KPI's																			
Financial Year 2024	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA "DO NO SIGNIFICANT HARM "									
1- ECONOMIC ACTIVITIES	2- CODESI	3- ABSOLUTE TURNOVER	4- TURNOVER PERCENTAGE	5- CLIMATE CHANGE MITIGATION	6- CLIMATE CHANGE ADAPTATION	7- WATER RESOURCES PROTECTION	8- CIRCULAR ECONOMY	9- POLLUTION PREVENTION AND CONTROL	10- DIVERSITY AND ECOSYSTEMS	11- CLIMATE CHANGE MITIGATION	12 CLIMATE CHANGE ADAPTATION	13- WATER RESOURCES PROTECTION	14- CIRCULAR ECONOMY	15- POLLUTION PREVENTION AND CONTROL	16 DIVERSITY AND ECOSYSTEMS	17-MINIMUM GUARANTEES	18-TAXONOMY ALIGNED TURNOVER PERCENTAGE 2024	19- AXONOMY ALIGNED TURNOVER PERCENTAGE 2023	20-CATEGORY ENABLING ACTIVITIES
		EURO	%	%	%	%	%	%	%	N/O	N/O	N/O	N/O	N/O	N/O	N/O	%	E	M
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (taxonomy aligned)																			
Turnover of environmentally sustainable activities (taxonomy aligned) A.1		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	-	-	-		E	M
A.2 Taxonomy eligible but environmentally non-sustainable activities (not aligned with Taxonomy)																			
				EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL										
Computer programming, consulting and relevant activities.	CCM 8.2 / CCA 8.2	35.959.708	9,61%	EL	EL	N/EL	N/EL	N/EL	N/EL										
Sale of used goods	CE 5.4	0	0,00%	N/EL	N/EL	N/EL	EL	N/EL	N/EL										
Turnover of taxonomy eligible but environmentally non-sustainable activities (not aligned with Taxonomy A.2)		35.959.708	9,61%	9,61%	0%	0%	0%	0%	0%										
Total (A.1 + A.2)		35.959.708	9,61%	9,61%	0%	0%	0%	0%	0%										
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
Turnover of taxonomy non-eligible activities		338.284.041	90,39%																
Total (A + B)		374.243.749	100,00%																

CAPEX KPI's																			
Financial Year 2024	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA "DO NO SIGNIFICANT HARM"									
1- ECONOMIC ACTIVITIES	2-CODESI	3-ABSOLUTE TURNOVER	4-TURNOVER PERCENTAGE	5- CLIMATE CHANGE MITIGATION	6-CLIMATE CHANGE ADAPTATION	7-WATER RESOURCES PROTECTION	8-CIRCULAR ECONOMY	9-POLLUTION PREVENTION AND CONTROL	10-DIVERSITY AND ECOSYSTEMS	11- CLIMATE CHANGE MITIGATION	12 CLIMATE CHANGE ADAPTATION	13- WATER RESOURCES PROTECTION	14- CIRCULAR ECONOMY	15- POLLUTION PREVENTION AND CONTROL	16 DIVERSITY AND ECOSYSTEMS	17-MINIMUM GUARANTEES	18-TAXONOMY ALIGNED TURNOVER PERCENTAGE 2024	19- AXONOMY ALIGNED TURNOVER PERCENTAGE 2023	20-CATEGORY ENABLING ACTIVITIES
		EURO	%	%	%	%	%	%	%	N/O	N/O	N/O	N/O	N/O	N/O	N/O	%	E	M
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (taxonomy aligned)																			
CapEx of environmentally sustainable activities (taxonomy aligned) (A.1)		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	-	-	-		E	M
A.2 Taxonomy eligible but environmentally non-sustainable activities (not aligned with Taxonomy)																			
				EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL										
Computer programming, consulting and relevant activities	CCM 8.2 / CCA 8.2	1.168.043	4,54%	EL	EL	N/EL	N/EL	N/EL	N/EL								14,17%		
Sale of used goods	CE 5.4	0	0,00%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								0,00%		
CapEx of taxonomy eligible but environmentally non-sustainable activities (not aligned with taxonomy) (A.2)		1.168.043	4,54%	4,54%	0%	0%	0%	0%	0%								14,17%		
Total (A.1 + A.2)		1.168.043	4,54%	4,54%	0%	0%	0%	0%	0%								14,17%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
CapEx of taxonomy non-eligible activities		24.562.235	95,46%																
Total (A + B)		25.730.278	100,00%																

OPEX KPI's																					
Financial Year 2024		YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA "DO NO SIGNIFICANT HARM"										
1- ECONOMIC ACTIVITIES	2-CODESI	3-ABSOLUTE TURNOVER	4-TURNOVER PERCENTAGE	5- CLIMATE CHANGE MITIGATION	6-CLIMATE CHANGE ADAPTATION	7-WATER RESOURCES PROTECTION	8-CIRCULAR ECONOMY	9-POLLUTION PREVENTION AND CONTROL	10-DIVERSITY AND ECOSYSTEMS	11- CLIMATE CHANGE MITIGATION	12 CLIMATE CHANGE ADAPTATION	13- WATER RESOURCES PROTECTION	14- CIRCULAR ECONOMY	15- POLLUTION PREVENTION AND CONTROL	16 DIVERSITY AND ECOSYSTEMS	17-MINIMUM GUARANTEES	18-TAXONOMY ALIGNED TURNOVER PERCENTAGE 2024	19- AXONOMY ALIGNED TURNOVER PERCENTAGE 2023	20- CATEGORY ENABLING ACTIVITIES		
		EURO	%	%	%	%	%	%	%	N/O	N/O	N/O	N/O	N/O	N/O	N/O	%	E	M		
A. TAXONOMY ELIGIBLE ACTIVITIES																					
A.1 Environmentally sustainable activities (taxonomy aligned)																					
OpEx of environmentally sustainable activities (taxonomy aligned) (A.1)		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	-	-	-		E	M		
A.2 Taxonomy eligible but environmentally non sustainable activities (not aligned with Taxonomy)																					
				EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL	EL, N/EL												
Computer programming, consulting and relevant activities.	CCM 8.2 / CCA 8.2	75.612	7,17%	EL	EL	N/EL	N/EL	N/EL	N/EL							24,98%					
Sale of used goods	CE 5.4	0	0,00%	N/EL	N/EL	N/EL	EL	N/EL	N/EL							0,00%					
OpEx of taxonomy eligible but environmentally non sustainable activities (not aligned with Taxonomy) (A.2)		75.612	7,17%	7,17%	0%	0%	0%	0%	0%							24,98%					
Total (A.1 + A.2)		75.612	7,17%	7,17%	0%	0%	0%	0%	0%							24,98%					
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																					
CapEx of taxonomy non eligible activities		979.513	92,83%																		
Total (A + B)		1.055.125	100,00%																		

Data points from other EU Legislation (IRO-2_02)

The table below contains all data points arising from other EU legislation, as listed in the ESRS 2 Annex, and indicates where the data points can be found in the report and which data points are assessed as 'Not Significant', 'Not reported' and 'Not applicable'.

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		Group & Subsidiaries	Organisational Structure ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		Group & Subsidiaries	Organisational Structure ESRS 2 GOV-1 – he role of the administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				Group & Subsidiaries	ESRS 2 GOV-4 – Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		Not reported	-
ESRS 2 SBM-1 Involvement in activities related to chemical	x		x		Not reported	-

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
production paragraph 40 (d) ii						
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		Not reported	-
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		Not reported	-
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	Not Significant	-
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		Not Significant	-
ESRS E1-4	x	x	x		Group & Subsidiaries	ESRS E1 – Climate Change

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
GHG emission reduction targets paragraph 34						
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				Not Significant	-
ESRS E1-5 Energy consumption and mix paragraph 37	x				Group & Subsidiaries	ESRS E1 – Climate Change
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				Not Significant	-
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		Group & Subsidiaries	ESRS E1 – Climate Change Scope 3 – Not reported
ESRS E1-6	x	x	x		Group & Subsidiaries	Not reported

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Gross GHG emissions intensity paragraphs 53 to 55						
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not Significant	-
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)			x		Not Significant	-
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		x			Not Significant	-
ESRS E1-9 Breakdown of the carrying value of its real estate		x			Group & Subsidiaries	EU Taxonomy

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
assets by energy-efficiency classes paragraph 67 (c)						
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			x		Not Significant	-
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				Not applicable	-
ESRS E3-1 Water and marine resources paragraph 9	x				Not applicable	-
ESRS E3-1 Dedicated policy paragraph 13	x				Not applicable	-
ESRS E3-1	x				Not applicable	-

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Sustainable oceans and seas paragraph 14						
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				Not applicable	-
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	x				Not applicable	-
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	x				Not applicable	-
ESRS 2- IRO 1 - E4 paragraph 16 (b)	x				Not applicable	-
ESRS 2- IRO 1 - E4 paragraph 16 (c)	x				Not applicable	-
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	x				Not applicable	-
ESRS E4-2	x				Not applicable	-

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Sustainable oceans / seas practices or policies paragraph 24 (c)						
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				Not applicable	-
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				Not Significant	-
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				Not applicable	-
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f))	x				Group & Subsidiaries	ESRS S1 – Own Workforce
ESRS 2- SBM3 - S1 Risk of child labour incidents paragraph 14 (g)	x				Group & Subsidiaries	ESRS S1 – Own Workforce
ESRS S1-1	x				Group & Subsidiaries	ESRS S1 – Own Workforce

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Human rights policy commitments paragraph 20						
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			x		Group & Subsidiaries	ESRS S1 – Own Workforce
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	x				Not applicable	-
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	x				Group & Subsidiaries	ESRS S1 – Own Workforce
ESRS S1-3	x				Group & Subsidiaries	ESRS S1 – Own Workforce

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Grievance/complaints handling mechanisms paragraph 32 (c)						
ESRS S1-14 Number of fatalities and number and rate of workrelated accidents paragraph 88 (b) and (c)	x		x		Group & Subsidiaries	ESRS S1-14 – Health and safety metrics
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				Group & Subsidiaries	ESRS S1-14 – Health and safety metrics
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		Group & Subsidiaries	ESRS S1-6 – Characteristics of the undertaking's employees
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				Group & Subsidiaries	Not reported
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				Group & Subsidiaries	ESRS S1-17 — Incidents, complaints and severe human rights impacts

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
ESR S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a))	x		x		Group & Subsidiaries	ESRS S1-17 — Incidents, complaints and severe human rights impacts
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				Not applicable	-
ESRS S2-1 Human rights policy commitments paragraph 17	x				Group & Subsidiaries	ESRS S1-1 – Own workforce related policies
ESRS S2-1 Policies related to value chain workers paragraph 18	x				Not significant	-
ESR S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		Group & Subsidiaries	ESRS G1-1 – Corporate culture and Business conduct policies and corporate culture
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International			x		Group & Subsidiaries	ESRS 2 GOV-4 – Statement on due diligence

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
Labor Organisation Conventions 1 to 8, paragraph 19						
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				Group & Subsidiaries	ESRS 2 GOV-4 – Statement on due diligence
ESRS S3-1 Human rights policy commitments paragraph 16	x				Group & Subsidiaries	Material Issue: Human Rights
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		Group & Subsidiaries	Material Issue: Human Rights
ESRS S3-4 Human rights issues and incidents paragraph 36	x				Group & Subsidiaries	Material Issue: Human Rights
ESRS S4-1 Policies related to consumers and endusers paragraph 16	x				Not significant	-

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		Not significant	-
ESRS S4-4 Human rights issues and incidents paragraph 35	x				Not significant	-
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				Group & Subsidiaries	ESRS G1-1 – Corporate culture and Business conduct policies and corporate culture
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	x				Group & Subsidiaries	ESRS G1-1 – Corporate culture and Business conduct policies and corporate culture
ESRS G1-4 Fines for violation of anticorruption and antibribery laws paragraph 24 (a)	x		x		Group & Subsidiaries	ESRS G1-3 – Prevention and detection of corruption and bribery

Disclosure requirements and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Entity of application	Reference on the Report
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	x				Group & Subsidiaries	ESRS G1-3 – Prevention and detection of corruption and bribery

Table 7: Data from other EU legislation

ESRS E1 – Climate Change

ESRS 2 SBM-3 E1 – Material impacts, risks and opportunities and their interaction with the strategy and business model

IDEAL Holdings has adopted a Sustainable Development Policy, as well as a specific Environmental Management Policy in accordance with the requirements of ISO 14001 applied. This policy outlines our approach to minimizing environmental impacts, promoting resource efficiency and ensuring compliance with environmental regulations. By aligning our operations with both the Sustainability Policy and the Environmental Management Policy, we reinforce our commitment to sustainable business practices, responsible corporate governance and long-term value creation for all stakeholders.

Climate Change and Energy Management

Climate change was identified as a material issue for the Group based on the double materiality analysis carried out. More specifically, impacts, risks and opportunities related to climate change mitigation and the adaptation of the Group's business model create the conditions for further broadening of the processes followed by the Group towards the improvement of its energy performance and the reduction of its carbon footprint. In this context, the Group will consider in the future whether there is a need to establish a climate transition plan in line with the ESRS standards.

At the same time, the Group has initiated the study for the implementation of a resilience analysis of its business model, in relation to natural and transition risks related to climate change, which concern the Group's facilities and its value chain. This analysis, which will be completed by the time of the next sustainability report and will include different climate scenarios, will enable the design of effective measures and actions that will respond to the need to protect the Group's activity and mitigate climate change.

In this context, IDEAL Holdings has already undertaken targeted actions to enhance its understanding and monitoring of the impact of climate change on its operations and investment portfolio. Greenhouse gas emission (GHG) measurements have been implemented for Scope 1 and Scope 2, marking an important first step in developing adaptation and mitigation strategies. Through this approach, the company seeks to enhance transparency, align with international sustainability standards and lay the foundations for a more resilient and responsible development path in the future.

Measures for reducing greenhouse gas emissions:

- Contract with an electricity provider for the supply of electricity only from renewable sources for IDEAL Holdings, IDEAL Technology and ADACOM (Greece),
- Installation of charging stations for electric and hybrid cars,
- Renewal of the vehicle fleet after expiry of lease contracts with hybrid or electric vehicles,
- Replacing light bulbs with energy efficient light bulbs in the Companies' premises as well as gradual replacement of air conditioning units with new energy efficient light bulbs.

The Group monitors the identified impacts, risks and opportunities related to climate change through reliable indicators, in compliance with all applicable legal requirements. The adoption and updating of individual policies as well as the setting of quantitative emission reduction targets through actions and measures will be considered in subsequent financial statements if deemed necessary.

Given that the Group's activity is located in high impact climate sectors (wholesale and retail) and non-high impact climate sectors (service provision), the Group's total consumptions are shown below, categorized into those related to the activity in high impact climate sectors and those related to non-high impact climate sectors.

Energy consumption and mix	Unit of measurement	Total energy consumption	Activities in high impact climate sectors	Activities in sectors other than high-impact climate sectors
		2024	2024	2024
(1) Fuel consumption from coal and coal products	MWh	0	0	
(2) Fuel consumption from coal and petroleum products	MWh	1.137,60	465,58	
(3) Fuel consumption from natural gas	MWh	128,41	128,41	
(4) Fuel consumption from other fossil sources	MWh	0	0	
(5) Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	MWh	10.064,62	9.914,76	
(6) Total energy consumption from fossil sources	MWh	11.330,64	10.508,76	821,87
Share of fossil sources in total energy consumption	%	64,19%	64,27%	63,17%
(7) Consumption from nuclear sources	MWh	0	0	0
Share of consumption from nuclear sources in total energy consumption	%	0%	0%	0%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0	0	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	MWh	6.320,78	5.841,65	479,14
(10) Consumption of self-generated non-fuel renewable energy (MWh)	MWh	0	0	0
(11) Total renewable energy consumption	MWh	6.320,78	5.841,65	479,14
Share of renewable sources in total energy consumption	%	35,81%	35,73%	36,83%
Total energy consumption	MWh	17.651,42	16.350,41	1.301,01
Energy intensity	(MWh/mil. €)	47,36	58,72	13,80

Table 8: Energy consumption and mix

Special Energy Consumption	Unit of measurement	2024
Net revenue from activities in high climate impact sectors	€	278.438.651
Total energy consumption from activities in high impact climate sectors	MWh	16.350,41
Total energy consumption from activities in high impact climate sectors per net revenue from activities in high impact climate sectors	(MWh/million €)	58,72

Table 9: Special Energy Consumption

Revenue from activities in high impact climate sectors	Unit of measurement	2024
Net revenue from activities in high climate impact sectors used to calculate energy intensity	€	278.438.651
Net revenue (other)	€	94.278.095
Total net revenue (in the financial statements)	€	372.716.745

Table 10: Revenue from high impact sectors

GHG emissions 2024	Unit of measurement	IDH	BYTE	ADACOM	IDEAL TECHNOLOGY	ATTICA	TOTAL
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions 1	tCO ₂ eq	0	0	125,76	54,34	108,42	326,67
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	0%	0%	0%	0%	0%	0%
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions)	tCO ₂ eq	8,7 1	231,08	165,62	46,53	7.735,6 7	8.187,61
Gross market-based Scope 2 GHG emissions	tCO ₂ eq	0	168,39	7,05	0	5.652,1 6	5.827,59
Total GHG emissions							
Total location-based GHG emissions	tCO ₂ eq	8,7 1	269,23	291,38	100,87	8.844,0 8	8.514,28
Total marked-based GHG emissions	tCO ₂ eq	0	206,54	132,81	54,34	5.760,5 7	6.154,26
Special GHG emissions							
Special location-based GHG emissions	tCO ₂ eq/mil. €	5,4 5	3,24	9,81	3,82	33,82	22,84
Special market-based GHG emissions	tCO ₂ eq/mil. €	0	2,48	4,47	2,06	24,84	16,51

Table 11: Emissions measurements

The calculation of emissions (market-based) includes Guarantees of Origin, which represent 3% of the emissions of scope 2 market-based emissions, for all electricity consumed in the Group's companies IDEAL Holdings, IDEAL Technology and ADACOM (Greece). The Group is in the process of identifying the most significant emission sources related to scope 3 and its value chain, for which, based on the GHG Protocol, relevant methodologies, assumptions and factors will be applied to calculate the emissions related to them. Study and calculation of the indirect emissions of scope 3 will be completed by the next sustainability report.

Revenue used to calculate GHG intensity	Unit of measurement	2024
Net revenue used to calculate GHG intensity	€	372.716.745
Net revenue (other)	€	0
Total net revenue (in the financial statements)	€	372.716.745

Table 12: Revenue analysis

Emission benchmark limits and methodology

The operational control method was applied for the selection of benchmark limits and the consolidation of the Group's scope 1 and scope 2 emissions.

Conversion factors for fuels and electricity were used to calculate the Group's GHG emissions disclosed in the report. Specifically, for scope 1 emissions, fuel conversion factors from the Ministry of Renewable Energy were used, while for scope 2 emissions conversion factors for the country's residual energy mix and the providers, as published by the DAPEEP annually, were used for location-based and market-based calculations respectively. The factors used for calculations concern 2023, given that at the time of publication of the report the corresponding factors for 2024 had not been published. Furthermore, fuel consumption for vehicles and natural gas for heating were included for direct emissions in scope 1.

Waste Management

Effective waste management is an integral part of the Group's sustainable development strategy. Increasing environmental awareness, stricter legislative requirements and the need to reduce the environmental footprint require urgent adoption of organized and responsible practices in waste streams management. Having systems in place that prevent, monitor and reduce waste generation and promote recycling and circular economy is of critical importance to a Company that operates in multiple sectors

The analysis carried out under the double materiality framework highlighted Group's waste management as an important environmental sub-theme. In particular, the impacts, risks and opportunities associated with waste management were examined in accordance with the requirements of ESRS.

The Group's operations comply with all legal obligations and opportunities are recognized for measures aimed at improving the Group's performance in terms of waste management. The Group will consider the adoption of individual policies and quantitative targets through the implementation of measures in subsequent financial statements, if necessary. In this context, waste generated by the Group's activities is managed and/or recycled by authorized and certified waste management operators, in accordance with the applicable environmental legislation. This responsible approach protects the environment and public health, while enhancing operational efficiency, reducing costs and contributing to the Group's positive public image.

Company	Waste type	Amount in tons
IDEAL Holdings and other companies located at 25 Kreontos Street	Paper	0,132
	Plastic	0,052
	Aluminum	0,020
BYTE	Electric and electronic appliances	4,485
Attica	Second-hand clothing recycling	No amount available

Table 13: Waste management for the year 2024

Hazardous waste (tons)	2024
Recovery operations	4,48
Preparation for re-use	-
Recycling	-
Other disposal operations	4,48
Disposal operations	-
Incineration	-
Landfill	-
Other disposal operations	-
Non-hazardous waste (tons)	2024
Recovery operations	0,204
Preparing for re-use	-
Recycling	0,204
Other recovery operations	-
Disposal operations	-
Incineration	-
Landfill	-
Other disposal operations	-
Total waste	4,69
Amount of non-recycled waste	4,48
Amount of non-recycled waste	95,5%

Table 14: Waste measurements

The Group relied on vouchers from external partners responsible for waste collection and management to collect data on waste quantities for 2024. The Group's activity is not related to the production of radioactive waste.

Initiatives for Employee Wellbeing and Health

The well-being and health of our employees is a fundamental priority in our corporate strategy. As part of our ESG criteria, we are investing in creating a safe, supportive and stimulating work environment where the physical and mental health of our employees is at the heart of our activities. Our commitment to promote the wellbeing of our employees is not only a corporate responsibility, but also a strategic advantage that enhances productivity and long-term success of the Company.

- As part of our commitment to the well-being and health of our employees, the Company provides all employees with private health insurance. This provision ensures that our employees have access to high quality medical services, reinforcing the sense of safety and care that is a central pillar of our strategy for a healthy and supportive work environment.
- Our Company recognizes the importance of financial security for our employees and offers the opportunity to participate in a private pension plan. In this way, we reinforce our commitment to a sustainable future, putting our employees first.
- One of the important management initiatives for the well-being of the employees is the provision of Pilates classes, which are held on a weekly basis. Apart from promoting physical and mental health, this initiative also contributes to the socialization of employees by encouraging them to get to know each other and interact in a positive and cooperative environment. Since February 2023 to date, a total of 21 hours of courses have been held, during which employees have completed 161 hours of attendance, demonstrating the value and acceptance of this action

Other activities that contribute to creating a positive working environment, enhancing employee engagement and creating a shared company culture are the following:

- New Year's Eve dance and pitta cutting: An opportunity to have fun and strengthen relationships, but which also lays the foundation for a shared work culture
- Presentation of awards to the best employees/department: Recognizing outstanding performance shows the Company's commitment to developing and supporting talent.
- Christmas gifts to employees' children: this initiative expresses the Company's gratitude to employees, offering support that goes beyond professional relationships, embracing the human aspect of family.

Continuing training on ESG issues

- As part of our sustainability leadership strategy, the Company's CEO Panagiotis Vasileiadis completed the specialized program "Environmental, Social and Governance Leadership: a Pathway to Business Sustainability" by Cambridge University. This training, offered by one of the world's leading academic institutions, provides us with in-depth knowledge and up-to-date tools to effectively integrate ESG principles into our strategy.
- Also, in April, two executives of the Company obtained the "Certified Sustainability (ESG) Practitioner Program, Leadership Edition" certification from the Chartered Management Institute (CMI), following the successful completion of the program. This certification is a recognition of their expertise in sustainability and ESG criteria, enhancing their abilities to lead our strategic initiatives based on the latest standards and guidelines for sustainable development.
- As part of the ongoing training and information on best sustainability practices, the Company's executives attended in July the seminar "CSRD DIRECTIVE, ESRS STANDARDS & STAKEHOLDER ENGAGEMENT STANDARDS FOR SUSTAINABILITY REPORTING" organized by Global Sustain, ensuring that the Company remains up to date with the latest developments in order to successfully meet the modern sustainability and corporate governance requirements.

ESRS S1 – Own workforce

ESRS 2 SBM-3 S1 – Material impacts, risks and opportunities and how they interact with its strategy and business model

IDEAL Holdings recognizes that its business model and strategy have a significant impact on its employees, therefore regular assessments and analyses of important issues are conducted to identify and prioritize impacts such as working conditions, health and safety and work-life balance.

Mechanisms such as employee satisfaction surveys and interviews, together with materiality assessment, are used to identify and understand significant impacts on our workforce. Based on the findings, we make strategic adjustments and create or adapt policies that promote employee well-being, enhance health and safety, provide training opportunities and promote a flexible (hybrid) work schedule.

As part of our commitment to employee well-being, we apply internationally recognized standards. Through ISO 45001, we ensure a safe and healthy working environment by proactively identifying and mitigating occupational hazards. Our ISO 14001 compliance further enhances workplace safety by addressing environmental factors that may affect employees. In addition, ISO 37001 enhances ethical business practices, promoting a fair and transparent workplace, while ISO 22301 strengthens business continuity measures, ensuring workforce stability during crises.

IDEAL Holdings invests in the continuous training and professional development of its employees, recognizing that their development is essential to our long-term success. Through targeted training and skills enhancement programs, we equip our workforce with the tools necessary to adapt to market developments and emerging business needs. In addition, we support leadership development initiatives and encourage lifelong learning, fostering a culture of innovation, competence and career development within the organization.

Society

Besides professional development, we also invest in the overall well-being of our employees through a comprehensive workplace wellness strategy. In collaboration with our occupational physician and safety technician, we implement initiatives that promote both physical and mental well-being. These include preventive health checks, ergonomic workplace assessments and wellness programmes such as Pilates sessions, which help improve posture, reduce stress and improve overall wellbeing. By incorporating these initiatives, we are promoting a healthier and more productive work environment.

ESRS S1-1 – Policies related to own workforce

A safe working environment is non-negotiable for us. For this reason, IDEAL Holdings has implemented a strong Policy for the prevention and response to workplace violence and harassment. This Policy ensures that all employees feel safe and respected, fostering a culture of dignity and professionalism. We are committed to taking prompt and effective action to address any challenges, ensuring a safe space for unhindered growth and creativity.

In addition, the Company is committed to respecting and promoting human rights in the workplace. Our policies are aligned with international frameworks, such as the UN Guiding Principles on Business and Human Rights, ensuring fair treatment, equal opportunities and a safe and inclusive work environment for all employees.

Finally, acceptance of differences and gender equality is a priority for IDEAL Holdings and we demonstrate this by signing the UN Women's Empowerment Principles.

Management values employees' views, which is why the Company conducts annual satisfaction surveys through questionnaires and interviews. The results inform the updating or revision of HR policies. Furthermore, all employees participate in the impact materiality process, contributing to the identification and evaluation of key issues for both the Company and themselves.

IDEAL Holdings and its major subsidiaries have a Code of Conduct, Rules of Procedure, and a set of policies:

- Human Rights Policy
- Policy against Incidents of Violence
- Health and Safety Policy
- Policy for the Protection of Personal Data
- Anti-Corruption Policy

These Policies have been prepared taking into account internationally recognized practices including the United Nations Guiding Principles on Business and Human Rights.

All of the above have been approved by the Board of Directors of the Company and the Boards of Directors of its subsidiaries and are posted on the Company's website and the Company's intranet to ensure that they are readily accessible to stakeholders.

Metrics

ESRS S1-6 – Characteristics of the undertaking's employees

The figures below refer to employee data with reporting date 31.12.2024.

IDEAL Holdings information

Gender	Number of employees (total employed)
Men	12
Women	15
Total	27

Table 15: Total employees by gender IDEAL Holdings (2024)

Women	Men	Total
Number of permanent employees		
15	12	27
Number of temporary employees		
0	0	0
Number of employees with non-guaranteed working hours		
0	0	0
Number of full-time employees		
15	12	27
Number of part-time employees		
0	0	0

Table 16: Employees by contract type and gender IDEAL Holdings (2024)

Attica information

Gender	Number of employees (total employed)
Men	240
Women	893
Total	1.133

Table 17: Total employees by gender Attica (2024)

Women	Men	Total
Number of permanent employees		
0	0	0
Number of employees with non-guaranteed working hours		
0	0	0
Number of full-time employees		
620	194	814
Number of part-time employees		
273	46	319

Table 18: Employees by contract type and gender Attica (2024)

Region A (ATHENS)	Region B (THESSALONIKI)	Total
Number of employees		
868	265	1.133
Number of permanent employees		
868	265	1.133
Number of temporary employees		
0	0	0
Number of employees with non-guaranteed working hours		
0	0	0
Number of full-time employees		
669	145	814
Number of part-time employees		
199	120	319

Table 19: Employees by region of operation Attica (2024)

BYTE information

Gender	Number of employees (total employed)
Men	169
Women	56
Total	224

Table 20: Total number of employees by gender BYTE (2024)

Women	Men	Total
Number of permanent employees		
55	169	224
Number of employees with non-guaranteed working hours		
0	0	0
Number of part-time employees		
0	0	0

Table 21: Employees by contract type and gender BYTE (2024)

Region A (ATHENS)	Region B (THESSALONIKI)	Total
Number of employees		
216	8	224
Number of permanent employees		
216	8	224
Number of temporary employees		
0	0	0
Number of employees with non-guaranteed working hours		
0	0	0
Number of full-time employees		
216	8	224
Number of part-time employees		

Table 22: Employees by region of operation BYTE (2024)

IDEAL Technology information

Gender	Number of employees (total employed)
Men	22
Women	20
Total	42

Table 23: Total employees by gender IDEAL Technology (2024)

All IDEAL Technology employees are permanent and full-time.

ADACOM information

Gender	Number of employees
Men	110
Women	44
Total	154

Table 24: Total employees by gender ADACOM (2024)

Women	Men	Total
Number of temporary employees		
0	0	0
Number of employees with non-guaranteed working hours		
0	0	0
Number of full-time employees		
44	109	153
Number of part-time employees		
0	1	1

Table 25: Employees by contract type and gender ADACOM (2024)

Departure & Employee Turnover Rate

Company	Total Employees	Departed	Turnover rate %
Attica	1.133	382	34.60%
ADACOM	154	41	26,6%
ADACOM CY	15	5	33,3 %
BYTE	224	43	19,2%
IDEAL Technology	42	11	26,8%
IDEAL Holdings	27	3	11,1%

Table 26: Departure & Employee Turnover Rate by Company (2024)

100% of the employees are covered by employment contracts that comply with the applicable provisions of the Labor Law and their remuneration is not less than the legal remuneration in force at any given time.

Material issue: Employee Health, Safety and Well-being

Employee health and safety during work is a major concern of the Company.

Ensuring the health and safety of all human resources is a key part of our wider business policy and philosophy. We monitor and control relevant risks and take all necessary preventive measures against accidents and occupational diseases in the workplace. We have safety technicians and occupational physicians and follow all the rules and protective measures for Health & Safety at workplaces. Through training programs, wellness interventions and policies that promote equality and diversity, IDEAL Holdings seeks the continuous growth and well-being of its employees.

Therefore, IDEAL Holdings is committed to the health and safety of its employees, both physically and mentally, and ensures that it complies with international standards and is certified in accordance with them. It is therefore ISO 45001 certified for employee health and safety.

Ensuring the health and safety of our entire workforce is a key part of our broader business policy and philosophy. We monitor and control relevant risks and take all necessary preventive measures against accidents and occupational diseases in the workplace. We have safety technicians and occupational physicians and follow all the rules and protective measures for Health & Safety at workplaces.

IDEAL Holdings is ISO 45001:2018 certified and has a corresponding Health and Safety Policy in which it is clearly stated that its ultimate goal is the health and safety of employees and the elimination of identified occupational hazards. The Policy is available on the Company's website <https://www.idealholdings.gr/en/idealholdings/certifications/> and Safety Policy includes a commitment to provide safe and healthy working conditions to prevent occupational injuries and illnesses and is appropriate to the purpose, size and context of the business and to the specific nature of occupational health and safety threats and opportunities:

- i. provides the framework for the definition of Health and Safety objectives,
- ii. includes a commitment to meet legal and other requirements,
- iii. includes a commitment to eliminate hazards and reduce OHS risks, iv. includes a commitment to continuous improvement of the OHS management system; and
- v. includes a commitment to consult and involve employees and, where appropriate, employee representatives.

The Company has established and follows a Health and Safety Policy for its employees, which is fully aligned with international standards and the requirements of the ISO 45001, according to which it has been certified. In this context, IDEAL Holdings makes the necessary adaptations to the physical environment in order to ensure the safety of employees, visitors and persons with disabilities. It is also important to note that the Company employs an occupational physician on a weekly basis, as well as a safety technician so that employees can operate and work in a healthy and safe environment.

All IDEAL Holdings employees (100%) are covered by an Employee Health and Safety Policy.

Attica

We provide a safe and healthy workplace in compliance with applicable laws, regulations and internal health and safety requirements. Our focus is on maintaining a productive workplace, minimizing the risk of accidents, injuries and exposure to health hazards. We are committed to ensuring our employees' interest in the continuous improvement of health and safety in the workplace, ensuring, among other things, that hazards are identified and health and safety issues are addressed.

Safety in the workplace

We are committed to maintaining a workplace free of violence, harassment, intimidation and other unsafe or disturbing conditions due to internal and external threats. We provide safeguards for employee safety as deemed necessary, with respect for the privacy and dignity of employees.

BYTE

The Company has established and applies an Employee Health and Safety Policy, which is fully aligned with international standards and the requirements of the ISO 45001, according to which it has been certified. In this context, it makes the necessary adaptations to the physical environment in order to ensure the safety of employees, visitors and persons with disabilities.

Byte operates its own training department, actively supporting the development of its employees by providing them with the opportunity to attend prestigious education and training programs. These training programs are mainly technical skills and prestigious certifications. Particular emphasis is placed on equal access for all employees, regardless of position or experience.

All employees at BYTE (100%) are covered by an Employee Health and Safety Policy.

ESRS S1-14 – Health and safety metrics

	IDEAL Holdings	Attica	BYTE	IDEAL Technology	ADACOM
Number of fatalities due to workrelated injuries and health problems	0	0	0	0	0
Number and rate of recorded accidents at work	0	5**	0	0	0
Number of cases of recorded workrelated health problems	0	0	0	0	0
Number of days lost to injuries, and fatalities due to work related accidents	0	170 days*	0	0	0

Table 27: Health and safety metrics * 40% OUTSIDE the workplace (2 out of 5 accidents) and 60% INSIDE the workplace (3 out of 5 accidents).

**Workplace accidents are caused by a) failure to follow workplace safety instructions, for which workers have received the necessary training; and b) accidents due to uncoordinated physical movements caused by workers' carelessness that could not have been prevented/avoided. Measures have been taken to prevent further accidents, namely training and new worksite posts with detailed instructions on how to carry out the work safely.

The accidents outside the workplace took place when workers arrive and leave work and are classified as workrelated accidents according to labour legislation.

ESRS S1-15 – Work-life balance metrics

Company	Percentage of employees entitled to take family-related leave	Percentage of entitled employees that took familyrelated leave, and a breakdown by gender		
		Total number of employees	Men	Women
IDEAL Holdings	100%	11%	33%	67%
Attica	100%	22,25%	2,83%	19,42%
BYTE	100%	6%	46%	54%
IDEAL Technology	100%	21%	22%	78%
ADACOM	100%	10%	25%	75%

Table 28: Work-life balance metrics (2024)

The above leaves refer to maternity and paternity leaves taken by employees in the fiscal year 2024. No applications were submitted by employees for disabled caregiver leave during the fiscal year.

Material Issue: Diversity and Equal Opportunities
ESRS S1-13_2 Employee percentage participated in regular performance and career development evaluations

Company	Total Employees	Number of Employees evaluated	Percentage %
Attica	1.133	1.133	100 %
ADACOM	154	154	100%
ADACOM CY	15	15	100%
BYTE	224	224	100%
IDEAL Technology	42	42	100%
IDEAL Holdings	27	27	100%

Table 29: Indicators of percentage of employees participating in evaluations

The data presented relate to the companies listed below whose employees attended training programmes in 2024.

ESRS S1-13_3 Average Number of Training Hours per Gender
IDEAL Holdings

Gender	Number of participants in seminars	Total training hours	Average number of hours
Women	14	384	27,4
Men	8	422	52,8
Total	22	814	

Table 30

ADACOM SA

Gender	Number of participants in seminars	Total training hours	Average number of hours
Women	4	332	27,7
Men	12	281	70,3
Total	16	613	

Table 31

ESRS S1-13_4 Average Number of Training Hours per Person

IDEAL Holdings: $814 / 22 = 37$ hours

ADACOM: $613 / 16 = 38,3$ hours

The Company has delegated responsibility for equal treatment and equal employment opportunity issues to the Officer of Human Resources, who is responsible for issuing clear company policies and procedures that guide equal employment practices. In addition, progress in this area is linked to specific performance indicators, ensuring continuous improvement and accountability.

The Equal Opportunities Policy included in IDEAL Holdings' Code of Conduct contributes to the creation of a corporate environment characterized by the principle of equality and respect for the individual rights of all employees.

IDEAL Holdings is committed to treating all current employees and prospective candidates with equality and fairness, guaranteeing equal opportunities for advancement and development. Discrimination or harassment of any kind is strictly prohibited in the workplace, and we adhere to all relevant legislation concerning equal employment opportunities, encompassing regulations on discrimination, harassment, and offensive treatment.

The criteria for employee selection, recruitment, and training are based on:

- qualifications and efficiency,
- experience and knowledge,
- interest and creativity,
- other criteria relevant to the job in question.

The Company also has structured procedures to help new employees adapt and integrate into the working environment during their adjustment period.

Evaluation

We employ an objective, merit-based evaluation system to reward our executives. Employee performance is evaluated to provide targeted training and guidance for professional skill development.

Specific objectives ensure an objective evaluation process, scoring both quantitative and qualitative achievements for all employees.

IDEAL Holdings' Human Resources Department maintains up-to-date recruitment and promotion records. To ensure complete transparency, a modern software system accessible through individual employee accounts allows them to monitor their job progress and evaluate their personal development within the Company.

The Company has a Violence and Harassment Prevention Policy and a Reporting and Management Policy to protect employees vulnerable to discrimination for any reason.

The Violence and Harassment Prevention Policy explicitly prohibits all forms of violence and harassment occurring during, related to, or arising from work, including gender-based and sexual harassment. Intentional discrimination based on age, sexual orientation, nationality, religion, race, or disability is also expressly forbidden. The Company has zero tolerance for any violent or harassing conduct.

Identified incidents are immediately treated as harassment and reported by the staff member to the HR Manager(s). If the issue involves the immediate supervisor(s), the staff member should contact their supervisor directly.

Following identification of discrimination, the affected individual receives necessary support, including immediate medical and psychological assessment and assistance if required. The Company's legal representative, in collaboration with the HR Officer and senior management (if necessary), determines the action plan. This plan may include appropriate safety and protection measures, protection against retaliation and further victimization, reporting to authorities, conflict resolution/complaint procedures, disciplinary actions for the respondent, etc. The HR Officer will immediately inform the affected individual of the decision and action plan. In serious cases, the legal representative will report the matter to the competent authority and seek their input. Legal proceedings and/or other legal actions may be initiated as appropriate.

To promote diversity and inclusion, a specialized training seminar on Equality, Diversity & Inclusion in the workplace has been launched for 2025.

BYTE

In accordance with the new Code of Conduct approved by the Board of Directors in January 2024 and adopted by the Parent Company IDEAL Holdings, BYTE is an equal opportunity employer. This means that religion, age, gender, sex, nationality, race, disability, sexual orientation, political beliefs, marital and social status are not considered in recruitment, remuneration, or benefits for candidates and employees (Article 15 of P.D. 80/2022). Recruitment is open to all qualified candidates, with final selection based solely on knowledge, experience, and skills. All recruitment adheres to relevant labor legislation and the Company's Board of Directors' existing decisions.

The Company employs an evaluation system, the primary objective of which is to enhance the enterprise's operational performance and the quality of its production output. This improvement is significantly driven by increasing the productivity of human resources, recognized as the most vital element in the growth of an organization.

The immediate benefits of this appraisal system are concentrated in the following areas:

- Rewarding outstanding performance.
- Identifying employees' weaknesses with a view to taking appropriate measures to improve them.
- Developing a meaningful relationship of mutual trust between subordinates and supervisors.
- Better acquaintance with the staff in order to enable the effective utilization of the skills of each employee of the Company in application of the principle: 'the right person in the right job'.
- Rational determination of the increase to be received by each employee.

BYTE conducts annual work and performance evaluations for all employees at the close of each fiscal year. Each employee's supervisor completes the designated performance evaluation form, prepared by the Company, in conjunction with the employee. This process allows the employee to present their views and discuss their development prospects and training requirements. The outcomes of the appraisal process are linked to the individual increment scheme and hold relevance for the employee's long-term career trajectory within the Company.

Upon joining the Company, each new employee receives a copy of the Code of Conduct and the Violence and Harassment Prevention Policy. The Code of Conduct is also accessible on the Company's website.

The Administration/Personnel Department is tasked with maintaining current records regarding recruitment, training, and promotions. These records provide a transparent overview of opportunities for employees and their professional development within the Company.

ESRS S1-9 – Diversity metrics

Senior management includes management executives one and two levels below the Company's Management and supervisory bodies, as presented in its organization chart.

Gender	Number	Rate
Men	2	40%
Women	3	60%
Total	5	100%

Table 32: Gender analysis at senior Management level of
IDEAL Holdings (2024)

Age Group	Number	Rate
<30 y.o.	201	18%
30-50 y.o.	678	60%
>50 y.o.	254	22%
Total	1.133	100%

Table 33: Analysis by age group of Attica employees
(2024)

Gender	Number	Rate
Men	7	54%
Women	6	46%
Total	13	100%

Table 34: Gender analysis of Attica's senior
Management level (2024)

Age Group	Number	Rate
<30 y.o.	3	11%
30-50 y.o.	19	70%
>50 y.o.	5	19%
Total	27	100%

Table 35: Analysis by age group of IDEAL Holdings
employees (2024)

Gender	Number	Rate
Men	169	75,45%
Women	55	24,55%
Total	224	100%

Table 36: Gender analysis at the level of senior
Management of BYTE (2024)

Age Group	Number	Rate
<30 y.o.	43	19%
30-50 y.o.	135	60%
>50 y.o.	46	21%
Total	224	100

Table 37: Analysis by age group of BYTE employees (2024)

Gender	Number	Rate
Men	4	80%
Women	1	20%
Total	5	100%

Table 38: Gender analysis at senior Management level of IDEAL Technology (2024)

Age Group	Number	Rate
<30 y.o.	9	21%
30-50 y.o.	24	58%
>50 y.o.	9	21%
Total	42	100%

Table 39: Analysis by age group of IDEAL Technology employees (2024)

Gender	Number	Rate
Men	7	58%
Women	5	42%
Total	12	100%

Table 40: Gender analysis at senior Management level of ADACOM

Age Group	Number	Rate
<30 y.o.	55	36%
30-50 y.o.	74	48%
>50 y.o.	25	16%
Total	154	100%

Table 41: Analysis by age group of ADACOM employees

SRS S1-12 – Persons with disabilities

Percentage of Employees with Disabilities IDEAL Holdings (2024)

ADACOM	0,69%
IDEAL Technology	0%
IDEAL HOLDINGS	0%
Byte	0,04%
Attica	0%

Table 42

ESRS S1-16 –Compensation metrics (pay gap and total compensation)

Pay gap*

ADACOM	14,80 %
IDEAL Technology	32,64%
IDEAL HOLDINGS	24,99 %
Byte	20%
Attica	25,90%

Table 43

*Information regarding the pay gap between employee and CEO remuneration is provided in the Annual Remuneration Report 2024. This report will be published on the Company's website coinciding with the Annual

Material Issue: Attracting women to the technology sectors

The global technology sector continues to experience a significant gender imbalance, not only in attracting women to the industry but also in retaining them through the cultivation of environments that support their professional advancement. IDEAL is committed to fostering a workplace founded on meritocracy and equal treatment. Our policies underscore the principles of fair hiring, equitable compensation, and impartial professional development for all employees, irrespective of gender or other grounds for discrimination.

This commitment is demonstrated by the progression of many of our female colleagues to senior management roles, affirming their substantial contribution to the Company's development.

We acknowledge the distinct challenges in the technology sector and we are dedicated not only to attracting talented women but also to cultivating a supportive environment that enables them to achieve their full potential. Our aspiration is to establish a truly equitable workplace where every woman can thrive, develop, and excel professionally.

At the same time, we are committed to ensuring balance and fairness for all employees, irrespective of gender. We conduct regular pay reviews to guarantee pay equity and mitigate potential disparities, as an integral part of our ongoing dedication to diversity, inclusion, and fairness.

Furthermore, our endorsement of the UN Women's Empowerment Principles actively reinforces our commitment to gender equality throughout all our subsidiaries.

Material Issue: Human Rights

IDEAL Holdings has established and follows a Human Rights Policy under which it is fully committed to respecting human and labour rights, aligning its policies and practices with:

- The United Nations Universal Declaration of Human Rights
- The Fundamental Conventions of the International Labour Organization (ILO)
- The Principles of the UN Global Compact
- The United Nations Guiding Principles on Business and Human Rights
- The Guidelines of the Organisation for Economic Cooperation and Development (OECD)
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment)
- The Global Goals for Sustainable Development (Agenda 2030)

The Company's policies include a clear prohibition of any form of discrimination, harassment or forced labour, and is committed to creating a safe, fair and supportive working environment.

The Company has established mechanisms to prevent and address human rights violations, including:

- Procedures and reporting mechanisms that ensure anonymity and protection from retaliation for employees who report violations.
- A system for managing reports that allows for the reporting of cases of discrimination, harassment or violation of labour rights, with clearly defined procedures for investigation and resolution.
- Equal Opportunities Policy (within the Code of Conduct) that commits to the principle of equality and respect for individual rights, focuses on preventing discrimination, combating harassment and promoting diversity.

The Company will ensure that new staff are provided with the Code of Conduct and Ethical Behavior and the Policy for the Prevention of Violence and Harassment, and that their acknowledgement is obtained. Additionally, the Company ensures that executives are educated on issues concerning discrimination in the workplace.

IDEAL Holdings maintains a comprehensive reporting system, underpinned by the Reporting and Management Policy and its associated platform. This system enables employees to submit concerns or complaints, including those related to discrimination, either anonymously or with identification. The system incorporates processing protocols designed to ensure that all submissions are addressed equitably and promptly.

Particular emphasis is placed on protecting whistleblowers from potential retaliation. At the same time, regular information and training is provided to staff on their rights and the appeal procedures available, with the aim of creating a culture of transparency and trust.

Regarding the reporting and management system, it is open to any of the stakeholders and is therefore published on the Company's website. Actions that positively impact communities within an organization have been mentioned above in the Society chapter on page 36 - 37. In relation to compliance with ILO principles relating mainly to labour rights and social protection, the Company demonstrates its compliance through its Human Rights Policy and its Code of Conduct. Through them they result in:

- Child and forced labor prohibition
- Freedom of association
- Equal opportunities measures
- Anti-discrimination efforts at work

Regarding OECD compliance on responsible business conduct, this is highlighted through the Company's AntiBribery policies and the Report Management System.

Finally, concerning the Organization's link to the 17 SDGs, we can mention: Measures to reduce our environmental footprint (**SDG 13: Climate Action**) by sourcing energy from renewable sources and green certificates of origin.

Cooperation with NGOs for social contribution (**SDG 3: Good Health and Well-being**) through cooperation with NGOs for community and charitable purposes, as mentioned above.

ESRS S1-S1-17 — Incidents, complaints and severe human rights impacts

	IDEAL Holdings	Attica	BYTE	IDEAL Technology	ADACOM
Total number of incidents	0	2	0	0	0
Number of complaints	0	0	0	0	0
Number of serious human rights incidents in the field of labourrelated human rights	0	0	0	0	0
Total amount of fines	0	0	0	0	0

Table 44: Incidents, complaints and serious impacts in the field of human rights (2024)

Material Issue: Employee Satisfaction Survey

In 2024, IDEAL Holdings, ADACOM S.A., and IDEAL Technology conducted employee satisfaction surveys. At these companies, semi-structured staff interviews were held with an HR department member, alongside a quantitative survey administered via the HR department's dedicated platform. This combination of qualitative and quantitative methods aimed to gather data leading to reliable conclusions about overall staff satisfaction and specific parameters. These surveys are expected to be repeated annually. Management is considering conducting similar surveys in its other subsidiaries in 2025.

ADACOM S.A. also participated in the Best Place to Work survey and received certification for 2024. This participation is planned to be repeated next year.

Material Issue: Protection of Personal Data and Privacy of Customers and Employees

IDEAL Holdings prioritizes confidentiality of all sensitive business information, encompassing the personal data of our employees, suppliers, and customers. Any unauthorized use or disclosure of this confidential information is strictly forbidden.

We manage our information systems with responsibility and implement stringent data protection measures to safeguard the security and integrity of information assets.

	Number
Total number of users whose data are used for secondary purposes	0
Legal requests for user data - Number of requests from law enforcement authorities for user information	0
Legal requests for user data - Number of users whose information was requested	0
Legal requests for user data - Percentage leading to a disclosure	0
Total amount of monetary losses due to fines for data security and privacy breaches	0

Table 45: Data protection items

The subsidiary companies BYTE, ADACOM and IDEAL Technology have been certified for information and personal data security according to ISO 27001:2022 & ISO 27701:2019.

Material Issue: Digital Transformation

Responsible management of sensitive data is a top priority for us. We have put in place strong measures and certifications to ensure the protection of personal and sensitive information.

Some of our subsidiaries hold the following certifications in the field of cybersecurity:

- ISO 27001:2013 & ISO 27701:2019 for information security (BYTE, ADACOM, IDEAL Technology)
- ISO 22301:2019 for business continuity assurance (BYTE, ADACOM, IDEAL Technology)
- eIDAS EE 910/2014 for Trust Services (ADACOM)
- ISO 9001:2015 for service quality (BYTE, ADACOM, IDEAL Technology)
- EU Secret & NATO Secret for classified security (ADACOM)

Our ongoing investment in advanced technologies and processes is crucial for preventing data breaches and ensuring adherence to the General Data Protection Regulation (GDPR). Our objective is to safeguard both personal data and business information with the highest level of security.

IDEAL Holdings is committed to driving innovation and embracing digital transformation to sustain our position as a market leader. We recognize that modernizing our digital infrastructure and investing in advanced e-services are essential to enhance the accessibility and efficiency of our products and services for all stakeholders.

Our objective is to continuously elevate both the quality and the scope of our offered solutions, with a primary focus on addressing the needs of our customers.

Interaction with society and the local community

The Company recognises that its strategy and business model can impact local communities, both positively and adversely, through its economic, social and environmental activities.

The procedures used include:

- Social and environmental impact assessment
- Participation in corporate social responsibility (CSR) activities to support communities.

Through our activities, we impact communities primarily in the following areas:

- Economic development: We support local employment
- Environmental impact: We recognise our responsibility to reduce our environmental footprint and comply with ISO 14001 through the implementation of our Environmental Management Policy.
- Social contribution: We implement corporate social responsibility (CSR) activities, providing support to vulnerable groups in society and strengthening civil society efforts.
- Human rights & labour: we are committed to respecting human rights through our Code of Conduct which sets standards for responsible labour practices, and our Human Rights Policy in which we are committed to respecting Human Rights.

Based on the results of the impact assessment, we have adjusted our strategy as follows:

- We invest in businesses that do not operate in areas of high ecological value, such as protected areas or areas with special flora and biodiversity.
- We are strengthening corporate responsibility initiatives, including education and support programmes for vulnerable groups.
- We disclose our environmental and social performance with transparency and commitment through our ESG Reports, where we capture our challenges and initiatives.

Risks and opportunities arising from impacts on communities affect the long-term sustainability of the Company. Specifically:

- Risks include social reactions, regulatory constraints and environmental challenges.
- Opportunities include enhanced corporate reputation, social value creation and innovative sustainable practices

To enhance its responsible business strategy, the Company has adopted:

- Sustainability Strategy
- Human Rights Policy
- Environmental Management Policy (ISO 14001).
- Annual ESG Reports documenting its actions and commitments.

Actions for Society 2024

Our participation in and award at the Onassis Foundation's **Organ Donation and Life Chain** event, part of the **Organsmeetings** program, demonstrates our commitment to raising awareness about organ donation and transplantation. This commitment begins with informing and raising awareness among our staff. At the event held at the National Theatre's Main Stage, the Foundation recognized the companies, institutions, organizations, and associations that participated in the **2023** webinars. Organ donation is an act of humanism and solidarity that strengthens societal cohesion and improves the quality of life for our fellow human beings.

- Always focusing on people, and in support of an important cause, the Company made a donation to Aurora Together Against Hematological Diseases.
- With the aim of strengthening social solidarity and giving, on Tuesday 5 December 2023 we hosted a Christmas Bazaar at our offices by the Smile of the Child.
- In addition, on Tuesday April 30, 2024, we hosted the Easter Bazaar of "Make a Wish" at our offices, enhancing the festive atmosphere with a spirit of contribution and solidarity.
- On April 29, 2024 we sponsored the Annual Walk for the "Make a Wish" World Wish Day event.
- On May 22, 2024 we participated in the inauguration of the Special Unit for Neuromuscular Diseases at the Thrasio Hospital, the creation of which we had the honor to support as sponsors.

Corporate Governance

ESRS G1 – Business Conduct

The CEO is constantly monitored, informed and trained on current developments relating to sustainability issues. In May 2024, he attended a three-day seminar at a prominent academic institution on "Environmental, Social and Governance Leadership. He has also been an active participant in conferences and sustainability forums.

ESRS G1-1 –Business conduct policies and corporate culture

IDEAL Holdings has policies and procedures in place to ensure proper and ethical business conduct, while promoting the development of an appropriate business culture.

Specifically, it has:

- **Code of Conduct:** The objective of the Code is to promote a common corporate culture at IDEAL and its subsidiaries that reflects the general principles that define responsible business behaviour and the ethical rules that all our people and our partners are expected to follow and is based on the applicable legislation and the ten universally accepted principles in the areas of human rights, working conditions, the environment and anticorruption of the Universal Declaration of Human Rights and the UN Convention against Corruption.
- **Policy and Procedure for the Prevention and Handling of Conflicts of Interest:** The objective of the Policy is to establish the framework for the identification, assessment, management and prevention of conflicts of interest, so that the Company's governing bodies are able to make prudent, objective and independent decisions in the interest of the Company and in order to achieve its objectives, to ensure the due diligence of its members and to promote corporate interest. In particular, this Policy reflects the principles and procedures adopted by the Company in order to fulfil its legal obligations to maintain and implement effective administrative procedures and control mechanisms to prevent, identify and manage existing and potential conflict of interest cases in its business environment.
- **Anti-Bribery Policy:** The Company is committed to preventing, deterring and detecting fraud, bribery and all unlawful practices. It is the Company's policy to conduct all its business with honesty integrity and the highest possible ethical standards and to vigorously enforce its business practices wherever it operates geographically and not to engage in situations of bribery and corruption.

- **Whistleblowing Policy:** Whistleblowing Policy sets out the general principles and the operational framework according to which the Company and its subsidiaries receive, process and investigate identified and anonymous reports of irregularities, omissions or other criminal acts relating to violations of EU law that are harmful to the public interest, which come to the attention of staff, customers or suppliers or other third parties.
- **Human Rights Policy:** IDEAL Holdings S.A. recognizes the importance and value of human rights and is committed to protecting and promoting them in all its business activities. This Policy outlines the principles and procedures governing the conduct of the Company, its partners, and suppliers in relation to human rights. IDEAL Holdings declares its zero tolerance for any human rights violations, whether through the Company's direct or indirect participation, and commits to avoiding all transactions and contacts with third parties suspected of involvement in conditions that may cause such violations in any aspect of its business. To actively support these commitments, non-involvement in human rights infringements, including any passive participation or silence, is a strict requirement. This zero tolerance for all human rights violations is actively enforced through the Company's internal supervision mechanisms and the consistent implementation of its Policies. Moreover, this Policy is designed to foster awareness and ensure the unwavering commitment of IDEAL Holdings' employees, suppliers, and partners to the respect and protection of Human Rights, extending to the Company's holdings.

IDEAL Holdings has a comprehensive internal control system, which helps to detect, prevent and address illegal or unethical behaviour, ensuring compliance with the Code of Conduct and its internal rules.

The internal control system consists of three main operations:

1. Regulatory Compliance Unit:
 - i. Monitors the implementation of legal and regulatory requirements.
 - ii. Ensures the Company's compliance with internal policies and international standards of ethical business conduct.
2. Risk Management Unit (RMU):
 - i. Identifies, analyses and manages risks that may affect the operation of the business, including risks of corruption, fraud and non-compliance.
 - ii. Implements mechanisms to prevent and mitigate risks.
3. Internal Audit Unit:
 - i. Conducts independent audits and reviews to ensure transparency and accountability.
 - ii. Assess the effectiveness of the Company's policies and procedures.

Together with the whistleblowing mechanism, this system enhances transparency, responsible corporate governance and stakeholder confidence.

The Company has established a comprehensive framework for the protection of public interest whistleblowers, ensuring safe whistleblowing channels and protection from retaliation, in accordance with Directive (EU) 2019/1937 and national legislation.

- Internal complaint channels and staff training. The Company has established secure and confidential reporting mechanisms for public interest whistleblowers, which include:
- Through the online platform either by telephone, in writing or by email. At the request of the whistleblower, reports can be submitted through a face-to-face meeting with the Reporting Receiving & Monitoring Officer (RRMO) by appointment, calling the telephone number for receiving reports, indicating a request for an appointment.

- A complaint handling procedure ensuring that every report is investigated impartially and independently.

Anti-retaliation measures

To ensure the protection of public interest whistleblowers, IDEAL Holdings implements the following measures:

- Ensuring the whistleblower is adequately protected from potential negative consequences, such as threats or attempts at retaliation, discrimination or any kind of unfavourable treatment. In particular, where the report refers to a supervisor of the whistleblower and the supervisor proposes to dismiss the whistleblower, that proposal shall be evaluated by a Division Director other than the one evaluating the whistleblower.
- Ensuring the whistleblowers are fully protected from potential negative consequences in the event that the evaluation of the report does not reveal a violation of the Policy. Even if the investigation finds a violation and action is taken against the whistleblowers, it ensures that they are protected from unintended negative consequences, irrespective of the possible sanctions imposed by the competent bodies.
- Implementing compliance policies with national legislation, such as the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council "on the protection of persons who report breaches of Union law" which was transposed into national law by Law 4990/2022 and the implementing JMD 47312/18.11.2023.

Through these measures, the Company creates a safe environment where employees can raise concerns without fear, enhancing transparency and responsible corporate governance.

Attica

The company has a Reporting Management Policy which applies to all those who perform operations for the Company, such as:

- All employees and executives (full-time, part-time, temporary, permanent or other employment relationship)
- Third parties and their staff (external partners, suppliers, consultants, contractors and subcontractors, etc.)

The Company appreciates that the submission of any reports may cause concern and, therefore, wishes to reassure those who intend to submit a report by stating explicitly and unequivocally that they will not suffer any adverse treatment as a result of such action. No action will be taken against a person who reports in good faith, even if the concerns raised by the complaint are not confirmed by a subsequent investigation. Victimization, harassment, intimidation or any other adverse treatment of a person who has made a report under this policy in retaliation will not be tolerated. If the reporting party believes that they have been subjected to any retaliation as a result of reporting under this policy, they should immediately notify the Reporting Officer.

The Company undertakes to protect the anonymity of the reporting party and not to take any action that may reveal their identity. It is to be noted that disclosure of the identity of the reporting party may be required by a court or other legal process as part of the investigation of the case.

The retention and processing of personal data is carried out in accordance with the applicable legislation on the protection of personal data.

For reasons of independence and confidentiality, any reports will be submitted to the Human Resources Officer as the responsible "Reporting Officer", who, based on their experience in the Company, is able to recognize the importance of protecting interests while assisting in the thorough investigation of the case.

Reports should be made by email to whistleblowing@atticadps.gr, to which the Reporting Officer will be the sole recipient.

Any processing of personal data under the Policy shall be carried out in accordance with the relevant national and European legislation. The data of all parties involved are processed for the sole purpose of verifying the validity or otherwise of the specific report/complaint and investigating the specific incident. The Company takes all necessary

technical and organisational measures to protect personal data. Sensitive personal data and other data not directly related to the Report shall not be taken into account and shall be deleted.

Technology Companies (BYTE, IDEAL Technology, ADACOM)

Implementing the following policies and procedures, BYTE, IDEAL Technology and ADACOM companies contribute significantly to the strengthening of IDEAL Holdings' ESG strategy, promoting an environment of transparency, ethical business conduct and resilience against cases of corruption and bribery. This approach not only enhances the Group's credibility but also contributes to long-term value creation for all stakeholders.

Code of Conduct

Every company has adopted a detailed Code of Conduct that defines the following:

- Fundamental ethical standards and values for all personnel and partners.
- Clear procedures for objectivity and conflict of interest avoidance.
- Emphasis on respecting human rights and internationally accepted principles in matters of working conditions and environmental protection. **Conflict of interest management and prevention**

Policies to address conflicts of interest provide:

- A clear framework for identifying and assessing potential conflicts of interest to ensure that decisions are taken transparently and, in the company's, best interests.
- Procedures to prevent and manage such situations, including regular training and review of internal procedures.

Internal Control and Training Systems

The development of a culture of responsible business conduct is achieved through:

- Regular training for staff on company policies, the importance of transparency and international ethical standards.
- Integrating ethical standards into all business processes, with the aim of continuously updating and upgrading employees' skills in business ethics.
- Working with suppliers and external partners to ensure that the highest standards of responsibility and sustainability are also observed in the supply chain.

Collaboration with External Partners

Companies place particular emphasis on selecting suppliers who share the same values and standards:

- In the selection process, an assessment is made on the basis of the criteria of responsible business conduct.
- Regular evaluations and risk assessments are carried out to ensure that partners remain compatible with the company values.

Collaborations

IDEAL Holdings collaborates with trusted suppliers who share the same principles of sustainability and business ethics, ensuring responsible practices throughout the supply chain.

When selecting suppliers, the company gives priority to those that follow high standards of responsibility and sustainability, aligned with its corporate principles.

G1-6 — Payment practices

IDEAL Holdings: 99% of its suppliers are serviced within 1 to 30 days, while 1% are paid in 60 days and a very small percentage (0.2%) in 90 days. In terms of standard payment terms, for foreign suppliers, overdue invoices identified within the month are paid at the end of the same month (with an additional credit of 1 to 30 days), while for domestic suppliers, overdue invoices are paid by the 10th of the following month (with an additional credit of 1 to 40 days). No legal proceedings for late payments are mentioned.

BYTE: The company processes its payments within 60 to 90 days, following the agreed terms and systematically monitoring the timely payment of suppliers. No legal proceedings for late payments are mentioned.

IDEAL Technology: the payment of invoices varies according to the category of suppliers: 63% are paid within 45 days, 30% within 1 to 30 days (including prepayments), 4% within 60 days, 3% within 90 days and an extremely small percentage (0.01%) within 75 days. Invoices for foreign suppliers are paid at the end of the same month and for domestic suppliers by the 10th of the following month. No legal proceedings for late payments are mentioned.

ADACOM: ADACOM's payment policy is analyzed as follows: 41% of suppliers are paid within 60 days, 19% in 120 days, 18% in 1 to 30 days (including prepayments), 9% in 75 days, 2% in 45 days and 1% in 90 days, while for subcontractors the terms set out in the contractor's contract apply. As with other companies, overdue invoices for foreign suppliers are paid at the end of the same month, and for domestic suppliers by the 10th of the following month. No legal proceedings for late payments are mentioned.

Material Issue: Data Protection

Risks	<p>Legal Sanctions: Failure to comply with data protection regulations (e.g. GDPR) can result in high fines and legal consequences.</p> <p>Loss of Trust: Data breaches can damage corporate reputation, leading to loss of customers and distrust from employees. Cyber attacks: Inadequate protection increases vulnerability to attacks that can lead to leakage of sensitive information and financial losses.</p>
Opportunities	<p>Enhanced Corporate Reputation: Strategic investment in advanced data protection systems underscores a commitment to security, thereby fostering trust among customers and partners.</p> <p>Optimized Information Management: The adoption of modern data protection technologies can optimize information collection, analysis, and utilization processes, leading to more informed decision-making.</p> <p>Market Differentiation: A comprehensive data protection policy serves as a competitive differentiator, attracting customers who place a high value on the security of their information, thereby facilitating market diversification.</p>

IDEAL Holdings has a Policy for the protection of Personal Data. The objective of this policy is to ensure the lawful, transparent and responsible processing of personal data collected and maintained by the Company, in compliance with the Legislative Framework.

The Privacy Policy applies to all personal data collection, processing, storage and management activities performed by the Company. It applies to any natural person with whom the Company has a business relationship, including, but not limited to, shareholders, partners, employees, suppliers and other third parties.

Specifically, within the scope of this document are the following:

- Personal data collected by electronic means and kept electronically (e.g. emails, databases).
- Data collected and maintained in paper form (e.g. contracts, forms, applications).
- Any form of data processing, including collection, recording, organisation, storage, modification, retrieval, transmission or deletion.

The Policy applies to all departments of the Company, as well as to all the employees, partners and third parties who have access to personal data processed by the Company. Any non-compliance with this Policy will be dealt with in accordance with the prescribed procedures and sanctions, where applicable.

In order to ensure that staff are aware of this Policy, as well as any applicable legislative and regulatory developments relating to the protection of personal data, a webinar is held annually for all staff.

In February 2024, this webinar was held and followed by a web test to confirm participants' understanding of the topics.

Material Issue: Cybersecurity in the operation of the enterprise

Risks	<p>Cyber attacks: Companies are at risk of attacks, such as hacking, ransomware or phishing, which can lead to data loss and downtime.</p> <p>Inadequate Updates and Management: Improper management of updates and security systems can leave critical company data vulnerable.</p> <p>Human Factors: Lack of proper employee training can pose a significant risk as a weak point for social engineering attacks</p>
Opportunities	<p>Strengthening Competitiveness: By investing in modern cybersecurity systems and processes, the Company can protect its data and enhance the trust of customers and partners.</p> <p>Improving the Operational Efficiency: Adopting automated solutions and continuously updating security systems reduces downtime and ensures going concern.</p> <p>Innovation and Development: Integrating advanced cybersecurity technologies can lead to new solutions and applications, improving the overall business process and providing a competitive advantage.</p>

Material Issue: Compliance with the regulatory framework

Risks	<p>Legal Sanctions: Failure to comply with standards and regulatory requirements can lead to fines, legal disputes and adverse effects on corporate reputation.</p> <p>Increased Operating Costs: Implementing new regulations often requires investment in infrastructure, processes and training, which can increase operating costs.</p> <p>Integration Challenges: Frequent changes in the regulatory framework can create challenges in updating processes and adapting them to new standards.</p>
Opportunities	<p>Improving Governance: Compliance leads to more transparent and organized processes, strengthening internal governance and risk management.</p> <p>Reliability and Reputation: Compliance with standards can enhance investor, customer and partner confidence, creating a competitive advantage in the marketplace.</p> <p>Access to New Markets: Compliance makes it easier to enter international markets and work with organizations that require strict standards of operation and transparency.</p>

Material Issue: Fair competition

Risks	<p>Profit pressure: In a highly competitive environment, the need for higher profits can lead to excessive price cutting or rule breaking, adversely affecting quality and corporate reputation.</p> <p>Price war: Excessive competitive pressure can create price wars, reducing profit margins and suppressing innovation.</p> <p>Legal and Litigation Disputes: Asymmetric competitive behavior can lead to legal and litigation disputes, burdening the business both financially and in terms of reputation.</p>
Opportunities	<p>Innovation and Development: Fair competition encourages companies to develop new technologies, products and services, promoting innovation and improving business processes.</p> <p>Improving Services and Quality: With the goal of market excellence, companies enhance the quality of their products and services, creating increased customer satisfaction and enhanced trust.</p> <p>Strengthening Transparency: Adherence to fair competition rules promotes transparency and compliance with regulatory frameworks, which can improve corporate reputation and attract investors.</p>

The Company has a Related Party Policy which sets out the Company's commitment to transparency of transactions and equal information to stakeholders. These principles are cornerstones of healthy competition, recognizing that related parties play a key role in shaping a fair and transparent business environment, the Company is committed to developing cooperative relationships with all related parties on the basis of equality, transparency and respect for the principles of healthy competition.

In our cooperation with suppliers, customers, business partners and other stakeholders, practices that could restrict competition are avoided and compliance with relevant national and European competition legislation is promoted.

Material Issue: Combating Bribery and Corruption

Risks	<p>Failure to implement strict measures can lead to legal sanctions, fines and reputational consequences.</p> <p>A lack of transparency and internal controls can create an environment where illegal practices spread, adversely affecting corporate culture and relationships with investors and partners.</p>
Opportunities	<p>The adoption of zero tolerance policies enhances the confidence of customers, investors and employees, creating a stable and transparent business environment.</p> <p>Ongoing training and independent audits can foster innovation and improve internal processes, making the company more competitive and sustainable in the long term.</p>

ESRS G1-3 – Prevention and detection of corruption and bribery

The Company is committed to preventing, detecting and deterring bribery and corruption, following international standards, including ISO 37001 (Anti-Bribery Management System).

Prevention, detection and response procedures

Prevention:

- Compliance with all relevant legal and regulatory requirements. Zero tolerance for bribery and corrupt practices. Mandatory anti-bribery training for employees and associates.
- Dual control system and approval process for high-risk transactions.
- Conduct regular compliance audits on high-risk transactions.

Detection:

- A whistleblowing system for reporting suspicious incidents.
- Regular audits by the Compliance and Internal Audit Unit to detect suspicious transactions.

Response:

- Ensuring the confidentiality and protection of the personal data of those involved.
- A procedure for the evaluation of incidents by the Reports Evaluation Committee, which may meet regularly or ad hoc.
- Depending on the severity, the report may be referred to the Internal Audit Unit or Management may be informed for further action.

The Company has clearly defined procedures for investigating incidents of business conduct, including corruption and bribery, which ensure that reports are investigated promptly, independently and objectively.

The investigation of incidents is delegated to independent units (Compliance, Internal Audit), which are not involved at the management levels to which the incident may relate.

The findings and actions taken in the fight against corruption are reported to the Audit Committee and the Board of Directors, with the aim of transparency and continuous improvement of the system.

Elements of the procedure:

- Conduct Policy: Defines the principles of ethical business conduct and unacceptable practices.
- Anti-Bribery Policy: Sets zero tolerance for corruption and bribery and outlines ways to report and investigate such incidents.
- Internal Audit System: It consists of:
 - Compliance Unit (ensures compliance with the regulatory framework).
 - Risk Management Unit (identifies and assesses relevant risks).
 - Internal Audit Unit (ensures independent assessment and investigation of incidents).
- Complaints Submission and Investigation Procedure: A secure and confidential mechanism is provided for reporting by internal and external stakeholders.
- Measures to ensure independence & objectivity: Include the delegation of investigation to independent units or external partners where appropriate.

Additional actions:

- Investigate all reported incidents, regardless of the source of the complaint.
- Take preventive and remedial action where necessary.
- Protecting complainants from retaliation, in accordance with applicable legislation.

The Company implements a comprehensive in-house training program on business conduct to ensure that all the employees understand and apply the principles of conduct.

- Upon joining the Company, new employees are given the policies regarding business conduct and the Code of Conduct to study and understand.
- Overall, employees attend regular trainings on significant issues which include Business Continuity, Cyber Security, Privacy and Anti-Bribery training. Training on the above issues is an integral part of the relevant ISO certifications held by IDEAL Holdings: ISO 22301:2019 Business Continuity, ISO 27001:2022 Information Security, ISO 37001:2016 Anti-Bribery Management. The training method may be face-to-face or online depending on the circumstances and the training requirements at the time. Also, where necessary, ad hoc training interventions may be conducted on specific topics or in cases of changes in policies or legislation. The Company monitors employee participation and understanding to ensure the effectiveness of training and the ongoing reinforcement of a culture of ethical and responsible business conduct.

The implementation of the BoD's strategic decisions is performed by the executive members of the BoD with the contribution of senior management. The Company's representation and internal transaction approval processes are structured in such a way that a cycle of approvals from various executives and from different departments of the Company is required even before entering into business with third parties up to and including payment. Compliance with the process is monitored by the Company's internal audit unit in a very strict framework.

Attica

The company has an Anti-Bribery Policy which specifies and analyses the principles contained in the Company's "Code of Conduct".

This Policy clarifies what is acceptable and unacceptable in relation to gifts, hospitality or entertainment, outlines factors to be considered, a procedure for recording gifts, hospitality or entertainment and a procedure for evaluating the above.

The Policy applies to both gifts and hospitality/entertainment we offer and gifts and hospitality/entertainment we receive. In evaluating a gift or act of hospitality/entertainment as reasonable, the criterion for evaluating a gift or act of hospitality/entertainment as reasonable is the perception of the average honest businessperson in the industry that they are business gifts or benefits whose value can be justified on grounds of propriety or business conduct.

There are specific criteria that must be applied in order to evaluate the offer or receipt of a gift.

The Company has zero tolerance for any behavior that does not comply with this Policy and any violation of this Policy is considered a very serious event, which constitutes disciplinary misconduct that is subject to penalties, in accordance with the Company's Rules of Operation.

Disciplinary sanctions are decided on a case-by-case basis, depending on the nature and severity of the conduct or conscious omission exhibited and the violation found, based on the principle of proportionality, and all cases are managed in a coherent manner based on the principle of equality. Any disciplinary sanctions shall be imposed without prejudice to the provisions of applicable law.

The procedure for submitting, managing and investigating any report/complaint, including the cases described in the Anti-Bribery Policy, as well as the principles governing data analysis, record keeping, protection of personal data and protection from retaliatory acts in a report/complaint are detailed in the Company's "Report Management Policy".

In terms of management and control, the Company has designated the Compliance Unit as responsible for managing matters related to this Policy.

The Company provides training on business conduct for executives and staff in general. In particular, the Company shall ensure that training activities are performed in order to provide a more effective understanding of the content of the Anti-Bribery Policy and to raise awareness of bribery issues among all the employees. The Company also provides the necessary education and training on conflict of interest issues to all staff. Management designs and implements training programs to develop the ability of the Company's executives to identify and manage conflict of interest situations in a timely manner. The key principle of these programs is that the Company's personnel are encouraged to report immediately to the Company's Board of Directors and/or the Compliance Unit of the parent company "IDEAL HOLDINGS S.A.", the slightest suspicion of a potential conflict of interest.

Technology Companies (BYTE, IDEAL Technology, ADACOM)

Strict Zero Tolerance Policy

Across the Group's technology companies, adopted policies actively reject all forms of bribery and corruption. This means a clear refusal of any direct or indirect involvement in illegal practices. These policies are built upon internationally recognized principles and demonstrate a strong commitment to adhering to all legal and regulatory obligations to maintain transparency in every business transaction.

Integrated Internal Control System

Companies apply triple lines of defense:

- **Compliance Unit:** Continuously monitors the implementation of legal and regulatory requirements, ensuring that all processes comply with internal policies and international ethical standards.
- **Risk Management Unit:** Identifies and assesses risks associated with potential violations, enabling timely response and prevention.
- **Internal Audit Unit:** Conducts independent audits and inspections to ensure that all policies are effectively implemented and that systems for detecting violations are operating transparently and independently.

Whistleblowing Procedures

Companies have established secure and confidential channels for reporting. Through them:

- Internal and external stakeholders can report incidents or irregularities without fear of retaliation.
- The anonymity of the reporting party is ensured and specific controls are in place, such as the delegation of the investigation to independent units.
- The findings of investigations are presented to the Audit Committee and the Board of Directors in order to ensure transparency and continuous improvement of the anti-corruption system.

Number of convictions and amount fined for violations of laws on anti-corruption and anti-bribery	
IDEAL Holdings	0
Attica	0
BYTE	0
IDEAL Technology	0
ADACOM	0

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Material Issue: Business Continuity

Risks	<p>Operational Outages: Lack of robust business continuity plans can cause outages due to unforeseen events like natural disasters or technical malfunctions.</p> <p>Data Loss: Inadequate data security and backup can lead to significant data loss, disrupting daily business operations.</p> <p>Supply Chain Vulnerabilities: Disruptions to partners or suppliers can impede production and customer service.</p>
Opportunities	<p>Resilience and Flexibility: Implementing comprehensive business continuity plans enhances the company's ability to respond quickly to crises, ensuring smooth operations even in difficult conditions.</p> <p>Enhancing Corporate Reputation: A well-prepared company demonstrates its commitment to protecting stakeholders by building trust with customers, investors and partners.</p> <p>Competitive Advantage: Adopting innovative business continuity solutions can be turned into a market advantage, ensuring stability and efficiency over competitors.</p>

Both the parent company IDEAL Holdings and its subsidiaries BYTE and ADACOM are certified according to the ISO 22301:2019 system for Business Continuity. These companies have established and follow a Business Continuity policy whereby they ensure the continuity of their operations, systems, infrastructure and processes, and where these are disrupted by any incident, allowing them to return to "normal" operations as soon as possible, taking into account the impact of any delay on their reputation, their relationships with stakeholders, as well as the financial impact.

To ensure staff awareness of the Business Continuity policy and measures relevant to the company's risks, an annual webinar is held for all the employees.

In February 2024, this webinar was conducted, followed by a web-based test to confirm participants' understanding of the topics.

Material Issue: Economic Development

Risks	<p>Economic uncertainty: Unstable economic conditions, market uncertainty and increased competitive pressure can adversely affect the company's growth and liquidity.</p> <p>Limited Access to Financing: Difficulties in securing capital or investment may limit opportunities for expansion and growth.</p> <p>Increased Costs: Increases in operating or capital expenses can affect profitability and create pressure on profit margins.</p>
Opportunities	<p>Innovation and New Products: Developing innovative products or services can create new markets and enhance the company's competitive advantage.</p> <p>Expand into New Markets: Penetrating new geographic or business markets can increase sales and broaden the customer base.</p> <p>Increasing Productivity: Investing in technology and optimizing processes helps reduce costs and increase efficiency, leading to sustainable economic growth.</p>

Material Issue: Risk Analysis in Business Decision Making

Risks	<p>Incorrect Decisions: Inadequate risk analysis can lead to wrong business decisions, which can have a negative impact on the company's operations and finances.</p> <p>Uncertainty and Volatility: Unpredictable market conditions and external factors make it difficult to reliably forecast risks, resulting in a decision that does not fully reflect reality.</p> <p>Overestimation of Positive Factors: overestimating opportunities and underestimating risks can create an illusion of security, leading to investment decisions that are not sustainable in the long term.</p>
Opportunities	<p>Optimizing Decision Making: Systematic risk analysis provides an evidence-based basis for decision making, allowing the organization to better adapt to changing market conditions.</p> <p>Opportunity identification: Through risk assessment, companies can identify and exploit new business opportunities, enhancing their competitiveness.</p> <p>Strategic Resilience: A good understanding and management of risks improves a company's ability to deal with unforeseen situations, creating a more flexible and resilient business model.</p>

Material Issue: Participation of women and independent non-executive members on the Board of Directors.

Risks	<p>The introduction of new members, especially from different categories, may be met with resistance from existing executive or management circles, causing potential difficulties in unifying views.</p> <p>Conflicts may arise between the new independent members and executives if roles and responsibilities are not clearly defined.</p>
Opportunities	<p>Increasing diversity on the BoD enhances decision-making through combined experience and different perspectives, leading to more comprehensive and informed decisions.</p> <p>The presence of women and independent non-executive members enhances transparency, objectivity and accountability, improving corporate governance and the company's reputation.</p> <p>A positive image as a company that promotes equality and diversity can attract investors and create a competitive advantage in the market.</p>

Independent Auditor's Limited Assurance Report on Sustainability Report of IDEAL Holdings S.A.

To the Shareholders of the Company "IDEAL HOLDINGS S.A."

We have conducted a limited assurance engagement on the Sustainability Report of IDEAL HOLDINGS S.A. and its subsidiaries (hereinafter referred to as the "Company" and/or the "Group"), included in section "SUSTAINABILITY REPORT" of the Board of Directors' Management Report ("Sustainability Report"), for the period from 01.01.2024 to 31.12.2024.

Limited assurance conclusion

Based on the procedures performed, as described below in the paragraph "Scope of Work Performed", and the evidence obtained, nothing has come to our attention that causes us to believe that:

- the Sustainability Report has not been prepared in all material respects, in accordance with Article 154 of Law 4548/2018 as amended and effective by Law 5164/2024, which transposed Article 29(a) of Directive 2013/34 into the Greek legislation.
- the Sustainability Report does not comply with the European Sustainability Reporting Standards (hereinafter referred to as "ESRP"), in accordance with Regulation (EU) 2023/2772 of the European Commission of July 31, 2023 and Directive (EU) 2022/2464 of the European Parliament and the Council of December 14, 2022
- the process followed by the Company to identify and assess the significant risks and opportunities (the "Process"), as set out in "ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities" section of the Sustainability Report, does not comply with "Requirement IRO-1- Description of the processes to identify and assess material impacts, risks and opportunities" of ESRP 2 "General Disclosures",
- the disclosures in section "Disclosures pursuant to EU Taxonomy" of the Sustainability Report do not comply with Article 8 of EU Regulation 2020/852.

This assurance report does not extend to information on prior periods.

Basis for the assurance conclusion

We have conducted our assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000").

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities are further described in the section "Auditor's Responsibilities".

Ethics and Quality Management

We are independent of the Company and the Group, throughout this engagement in accordance with the requirements of the International Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA Code), the ethics and independence requirements of Law 4449/2017 and EU Regulation 537/2014.

Our auditing firm applies International Standard on Quality Management 1 (ISQM1) "Quality Management for Audit Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements" and therefore maintains a comprehensive quality management system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Responsibilities of the Management of the Company for the Sustainability Report

The Management of the Company and the Group is responsible for the design and implementation of an appropriate process to determine the required information to be included in the Sustainability Report in accordance with the ESRP, as well as for the disclosure of the Process in the "ESRS 2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies" section in the Sustainability Report.

More specifically, this responsibility includes:

- Obtaining an understanding of the context in which the Company's and the Group's operations and business relationships take place and understanding the affected stakeholders.
- Identifying the actual and potential impacts (both negative and positive) related to sustainability issues, as well as the risks and opportunities that affect, or could reasonably be expected to affect, the Company's and the Group's financial position, financial performance, cash flows, access to funding or cost of capital in the short, medium or long term.
- Assessing the materiality of identified sustainability impacts, risks and opportunities through the selection and application of appropriate thresholds; and
- Formulating assumptions that are reasonable under the circumstances.

The Management of the Company and the Group is also responsible for the preparation of the Sustainability Report, in accordance with Article 154 of Law 4548/2018, as amended and in force by Law 5164/2024, which transposed Article 29(a) of the EU Directive 2013/34 into the Greek Legislation.

In this context, the Management of the Company and the Group is responsible for:

- Compliance of the Sustainability Report with the ESRP.
- Preparing the disclosures in the "Disclosures pursuant to EU Taxonomy" section of the Sustainability Report, in compliance with the requirements of Article 8 of EU Regulation 2020/852.
- Designing and implementing such internal control procedures as Management determines are necessary to ensure that the Sustainability Report is free from material misstatement, whether due to fraud or error; and
- Selecting and applying appropriate reporting methods, including assumptions and estimates about individual disclosures in the Sustainability Report that have been evaluated as reasonable under the circumstances.

The Audit Committee of the Company is responsible for supervising the process of the preparation of the Company's Sustainability Report.

Inherent limitations in preparing the Sustainability Report

As recorded in "Measurements, Sources of Uncertainty and Assumptions" sections of the Sustainability Report, in certain categories of non-financial reporting, the recording and evaluation criteria are determined internally by the Group, as there are currently no internationally harmonized standards that consistently define their reporting. This enables the implementation of diverse yet broadly accepted methodologies that, while aligning with the principles of transparency and reliability, may result in variations among individual entities. Concurrently, as relevant practices evolve over time, disparities may emerge within the same business unit, potentially impacting the comparability of the reported data.

When disclosing forward-looking information under ESRP, the Management of the Company is required to prepare forward-looking information based on disclosed assumptions regarding future events and possible future actions of the Company and the Group. The actual outcome of these actions may be different, as anticipated events do not often occur as expected.

Our assignment covered the items listed in the "Scope of Work Performed" section to obtain limited assurance based on the procedures included in the Program. Our assignment is not an audit or review of historical financial information in accordance with applicable International Standards on Auditing or International Standards on Assurance Engagements, and therefore we do not express any assurance other than that set out in the "Scope of Work Performed" section.

Auditor's Responsibilities

This limited assurance report has been prepared in accordance with the provisions of Article 154C of Law 4548/2018 and Article 32A of Law 4449/2017.

Our responsibility is to prepare and perform the limited assurance engagement to obtain limited assurance as to whether the Sustainability Report is free from material misstatement, due to fraud or error, and to issue a limited assurance report that includes our conclusion. An error may arise from fraud or misstatement and is considered material when, individually or in the aggregate, it could reasonably be expected to affect the financial decisions of users made on the basis of the Sustainability Report taken as a whole.

In the context of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain our professional skepticism throughout the engagement.

Our responsibilities with respect to the Sustainability Report, in relation to the Process, include:

- Conducting risk assessment procedures, including an understanding of the relevant internal control procedures, to identify risks related to whether the Process followed by the Company and the Group to determine the information reported in the Sustainability Report does not meet the applicable requirements of the ESRP, but not for the purpose of providing a conclusion regarding the effectiveness of the internal controls on the Process; and
- Preparing and conducting procedures to assess whether the Process to identify the information reported in the Sustainability Report is consistent with the description of the Process as disclosed in the "ESRS 2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies" section of the Report herein.

We are further responsible for:

- Conducting risk assessment procedures, including an understanding of the relevant internal controls, to identify those disclosures that may be materially misstated, whether due to fraud or error, but not for the purpose of expressing a conclusion regarding the effectiveness of the Company's and the Group's internal controls.
- Preparing and performing procedures related to those Sustainability Report disclosures in which a material misstatement is possible to occur. The risk of not detecting a material misstatement resulting from fraud

is higher than that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentation or deviation from the internal controls.

Scope of Work Performed

Our engagement includes performing procedures and obtaining audit evidence for the purpose of forming a qualified assurance conclusion and covers only the assurance procedures set out in the assurance program issued by the 22.01.2025 decision of the HAASOB (the "Program"), as formulated for the purpose of issuing a qualified assurance report on the Company's and the Group's Sustainability Report.

Our procedures were designed to obtain a limited level of assurance on which our conclusion is based and which do not provide all the evidence that would be required to provide a reasonable level of assurance.

Athens, April 28, 2025

The Certified Public Accountant

Athina Moustaki

Registry Number SOEL 28871



Grant Thornton

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