

ENVIRONMENTAL, ENERGY & CLIMATE CHANGE POLICY

The Company is committed to operate with responsibility and respect for the environment and society. Sound environmental and energy management of production and storage installations is one the most important aspects and is essential to the sustainability of our activities.

This policy confirms ELVALHALCOR's approach to be a part of the global effort to tackle climate change. ELVALHALCOR is committed to buying and using energy in a responsible, efficient, and cost-effective manner with the aim to reduce the carbon footprint.

The main parameters that govern the above mentioned terms and functions, are integrated into the Environmental and Energy Management System which is in compliance at least with the organizational and managerial requirements that are prescribed in the International Standards EN ISO 14001 and ISO 50001 and apply to all of our activities, for the design, production, sales and formation of company products. The principles that the implementation of the Environmental and Energy Management System is based upon, are specified in the present Environmental, Energy & Climate change Policy with the commitment of the company to the following principles:

Environment

- operate in full compliance with applicable national environmental legislation and other company commitments, as well as with the specific environmental operational terms of each plant;
- operate responsibly, aiming to minimize potential impacts to the environment and biodiversity, and to establish and adhere to mechanisms for monitoring environmental aspects and risks;
- establish and achieve meaningful targets for the Company's' environmental management systems, as well as goals for continuously improving our environmental performance and environmental footprint;
- train our employees so that they participate actively in environmental and energy management issues and understand the Company's targets.
- strive to maximize the use of secondary raw materials in order to contribute to a circular economy and to minimize the carbon footprint of the products while at the same time optimize processes and develop new technologies to reduce the generation of waste;
- manage operational waste according to the principles of the circular economy;
- take the necessary preventive measures to ensure environmental protection for the storage of hazardous substances;
- recognize that water is a precious resource which must be conserved and aquatic life must be protected. The Company shall make efficient use of water in their operations and will increase efforts to reduce water consumption, and increase water reuse;
- address any potential environmental incidents by following the designated procedure of environmental incident response and relevant incident investigation;
- communicate performance transparently and participate in an open dialogue on environmental issues with all stakeholders;
- encourage business partners (suppliers, subcontractors) to adopt environmental principles at least as stringent as ours;

- regular self-evaluation of Environmental and energy performance against the standards of the Company, whereas, in the same context, conduction of plans to improve our environmental and energy performance, set up goals and objectives to meet;
- ensure the availability of information and necessary resources to meet our environmental and energy goals;
- commitment to delivering environmentally and energy efficient products and services;
- support design activities such as facilities, equipment, systems and energy-using processes that consider energy performance improvement.

Energy & Climate Change

- Comply with all energy and carbon-related legislation and other regulatory and reporting requirements;
- Improve energy efficiency continuously by implementing effective energy management programs that support all operations while providing a safe and comfortable work environment;
- Evaluate all infrastructure investments (new equipment, refurbishing of existing equipment) and new production processes, as well as the procurement/sourcing of products and services on the basis of energy and carbon footprint contribution;
- Develop a strategy to effectively identify and reduce the carbon footprint; both from direct and indirect operations of the Company and its products;
- Engage in industry-standard initiatives to set up a carbon reduction program throughout the value chain and involve all stakeholders;
- Train employees in energy management practices according to their role and area of influence;
- Actively engage with trade and public bodies to develop and implement best practices;
- Regularly review and report on our performance and ensure continuous improvement.

Compliance

ELVALHALCOR shall comply with the provisions of the Environmental policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

Governance and accountability

Responsibility for the implementation of this Policy lies with the most senior executive responsible of ELVALHALCOR.

The above Policy is available to the public and is communicated to all personnel and partners of ElvalHalcor, whom the company demands its full implementation.

The present Policy is determined by the Top Management of ElvalHalcor and is being reviewed regularly with respect to its applicability and effectiveness, being committed to the company's continuous improvement on that and all areas of environmental, energy & climate change management.

ElvalHalcor – Copper and Alloys Extrusion Division

General Manager

Panos Lolos

Oinofyta 03.12.2021