

September 2020

COP - Communication On Progress 2019

I am pleased to confirm AKTOR S.A. continued support for the UN Global Compact and its Ten Principles in the areas of human rights, labour, environment and anti-corruption.

AKTOR S.A., is a subsidiary of ELLAKTOR Group, which is a signatory member of UN Global Compact. AKTOR in itself, is a member of the local Global Compact Network Hellas – GCNH. Information on AKTOR's, environmental, social and governance (ESG) issues is included in ELLAKTOR Group Sustainable Development Report for 2019.

ELLAKTOR Group's Sustainable Development Report 2019, describes all actions taken to continually improve the integration of the Global Compact and its principles into the Group and its subsidiaries business strategy, culture and daily operations and is primarily used to establish a communication channel with our key stakeholders.

Regarding UN Global Compact 10 Principles:

- Principles 1, and 2 (Human Rights): AKTOR follows the requirements of ELLAKTOR Group Code
 of Conduct, approved in July 2016 by the Group BoD, according to which all employees are treated
 with respect, no form of harassment is tolerated, while the company ensures a healthy and safe
 working environment for both employees and sub-contractors.
- Principles 3, 4, 5 and 6 (Labour): AKTOR offers an equal opportunities working environment, freed
 from any form of discrimination based on either visible characteristics such as age, sex, race, ethnicity
 and physical ability or non-visible such as culture, religion, marital status, experience and opinion.
 Any form of child and forced labor is forbidden, while the company respects freedom of association
 and recognizes employees' right to collective bargaining.
- Principles 7, 8 and 9 (Environment): AKTOR implements an Environmental and Energy Management System across company operations, certified by ISO 14001:2015 and ISO 50001:2011 and verified by EMAS III. The company's primarily objective is to manage resources (water and energy) efficiently as well as waste responsibly, minimizing the quantities that end up in landfills.
- Principle 10 (Anti-Corruption): AKTOR complies with the ELLAKTOR Group Code of Conduct, as
 well as Group's Anti-Bribery Policy approved in January 2020. The Group and all its subsidiaries carry
 out their activities honestly, ethically, with integrity and in line with applicable laws, regulations,
 standards, policies and guidelines as well as the Code of Conduct. A whistle-blowing mechanism is
 available to employees, suppliers, and any other interested party to report any breach with the Group's
 Code of Conduct and policies.

As we are during the COVID-19 pandemic, our primary concern for 2020 is to carry on with our business plan, while taking all the necessary measures to secure the health and safety of our employees and our sub-contractors employees and respond to urgent societal needs as they arise.

Yours faithfully.

Alexandros Exarchou Managing Director