

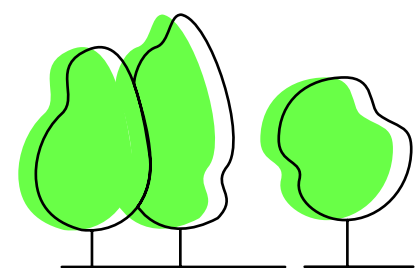


Sustainable Development Report **2019**



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“**We are one,**
for a sustainable future”



ESG¹ Performance Statement

The purpose of this statement is to provide MYTILINEOS' Stakeholders with up-to-date information on matters pertaining to the **Environment, Society and Corporate Governance (ESG)** which are of interest to them². It summarizes **the Company's distinctions and performance** in 2019, as well as the **commitments** for the next 3 years, reflecting its ability to create long term value.

Commitments 2019



In 2019, MYTILINEOS undertook three key commitments regarding its business viability.

- **To join, in 2021, the CDP Climate Change International Sustainable Development Initiative.**
- **To obtain, in 2022, the ASI Performance Standard certification for its Metallurgy Sector** from the Aluminum Stewardship Initiative (ASI) international organization. This certification relates to the development, application and maintenance of responsible environmental, social and governance standards to ensure responsible production and rational use of aluminium.
- **To incorporate in its financial disclosures** (financial year 2022) the recommendations of the **Task Force on Climate-Related Financial Disclosures (TCFD)** initiative, analyzing related risks and opportunities in the climate change domain.

Distinctions 2019



2019 was yet another year in which the Company garnered a number of major awards and distinctions.

- **FTSE4Good:** MYTILINEOS was included for the **first time in the FTSE4Good index**, after its independent evaluation by the FTSE International Organization, in recognition of its long-standing commitment to Sustainable Development.
- **Ecovadis:** Ecovadis, the leading European Corporate Social Responsibility rating agency, awarded MYTILINEOS **a silver medal** for its Corporate Business Responsibility practices.
- **True Leaders:** The market's true leaders, the top companies out of 31,000 companies and business groups assessed in 2018, were nominated and awarded by ICAP, as part of its prestigious True Leaders institution. MYTILINEOS was one of the leaders awarded, having satisfied all objective and measurable criteria.
- **Most Admired Companies in Greece (Fortune):** MYTILINEOS was included in the annual list of "Most Admired Companies in Greece", compiled by Fortune magazine and KPMG. The list of most admired companies in 2019, published last October, was again of great significance – as is the case every year – given that the distinctions gained come from the market executives themselves, who reward the companies' continuity, consistency and persistence in their vision and values.
- **Hellenic Responsible Business Awards: GOLD Award**, which the Company wins back-to-back for the 2nd year, for the redesigned "Integrated Value Creation Scorecard" informative application.
- **Hellenic Responsible Business Awards: SILVER Award & BRAVO Governance Award** for the implementation of the Company's annual institution of Consultation with its Social Partners, whose theme for its 2019 edition was: "Developing a Responsible Supply Chain".
- **Hellenic Responsible Business Awards: BRONZE Award**, presented to the Company for the 2nd consecutive year, for capturing the overall social value of the innovative pilot social program "I'm in" to tackle school dropout, using the international Social Return on Investment (SROI) methodology.
- **HR Excellence Awards: Bronze Award** in the "Best Change Management Strategy / Initiative" category, for the implementation of an experiential training program designed by executives of the Company's Metallurgy Sector.
- **Partnership Awards: Gold Award** in the "Best Utilities Project" and Silver Award in the "Best Financial Structure" category, with the Company outperforming its industry's largest global competitors.

ESG Performance 2019

E Environment

The use of basic raw materials (Bauxite and Natural Gas) from non-renewable sources, the emission of air pollutants and the generation of waste, in the context of our activity, limited the stock of value of our Natural Capital.

In order to reduce our environmental footprint, we implement **an ISO 14001-2015 certified environmental management system** and we also promote the systematic application of **Best Available Techniques** in all our Business Activity Sectors. As an example, **25 thousand tons of recycled aluminium were produced in the Metallurgy Sector for the first time in 2019** (accounting for 12% of total production) by expanding our activity to aluminium scrap recycling, a technique that greatly contributes to reducing energy consumption and air emissions.

The implementation of Best Techniques requires financial resources (**our environmental expenditures in 2019 amounted to €61 million**), the allocation of which reduces the value of our Financial Capital in the short term.

At the same time, these resources are used to comply with the approved environmental terms of our plants' operation and, by extension, for the protection of the environment. This ensures the social acceptance of our activity and thus strengthens the value of our Social Capital.

In 2019 **there were no incidents of pollution** of the natural environment from our production activity, while the air emission levels recorded were below the statutory ones.

We continued our mining activity in a responsible and sustainable manner, **increasing to 82.4% the rehabilitation rate of the total area of land used in mining operations, with no new land areas earmarked for mining activity**.

One of the metrics we monitor to keep track of our performance in climate change are the **specific CO₂ emissions** (direct and indirect) **per ton of product produced, which in 2019 decreased further**, compared to the base year 2017.

We are consistently supporting with investments in RES **the production of clean energy, which in 2019 rose to 6.4% of our total production, increased by 33%** relative to the base year 2017.

Total energy consumption, as well as electric power consumption, remained at base year levels, while total carbon dioxide emissions (direct and indirect) stood at **4.64 million tons of CO₂ eq (-11%** compared to 2017).

We maintained our position in the second-best ranking level ("MANAGEMENT LEVEL") of the CDP Water Security rating, a result which ensures that we take concerted action to ensure proper management of water resources, having improved our performance in 6 of the 11 individual assessment areas.

We have ensured, by undertaking a specialized study, that we **withdraw water (ground water)** from renewable sources and that our activity does not limit or threaten the adequacy of the water quantity available in the aquifer.

Our environmental R&D expenditures stood at €1.5 million, representing investments in the development of pilot plants in the Metallurgy Sector, where new technologies for the exploitation of bauxite residues are already being tested.

We are steadily increasing the recycling, reuse and utilization of our waste in other activities. Indicative of our efforts in this area is that **we have already reduced, by about 10% since 2016, the annual amount of bauxite residues disposed in the areas designated by law as disposal sites for this purpose**.

There have been no incidents of non-compliance with environmental laws and regulations, as a result of which the Company avoided direct financial risks such as related fines, as well as indirect ones involving negative impacts on its reputation.

S Social

Overall, we have strengthened the value of our Social Capital by **maintaining our "social license to operate" and ensuring the acceptance of our CRS policy by our Social Partners**.

The management of social issues, both centrally and locally, has prevented the occurrence of risks that might have significant negative impacts on our financial results.

As an industrial company, we increased significantly the percentage share of direct employment in our sector, **by creating 281 new jobs**, both in Greece and abroad, in order to ensure our smooth operation, while we also kept the percentage shares of part-time and fixed-term employees very low.

In the field of safety at work, we recorded **zero fatalities** across all our activities and we observed very significant improvements in accident frequency indicators, **minimizing lost time injuries** involving direct employees through information campaigns on key safety issues.

We continued to implement supplementary pharmaceutical and hospital care programs for all our employees and their family members, giving top priority, as always, to health issues.

Continuing with the implementation of our social policy, **we implemented new social programs and investments in local infrastructure worth a total of €3.4 million**, benefiting nearly **30,000 citizens** and making a significant contribution to all social aspects of the Sustainable Development Goals.

We fully protected labor rights as well as other categories of Human Rights related to our activity.

We do not burden our financial resources with costs arising from incidents of non-compliance with regulations regarding the impacts of our products and services on the health and safety of our customers and of consumers.

We successfully pursued the social dialogue with our Social Partner groups, discussing with them topical and significant Responsible Entrepreneurship issues in order to determine our strategic priorities at the level of sustainable development for the coming years.

G Governance

Seeking to implement higher Corporate Governance standards, we have decided **to voluntarily adapt, as of 1/1/2019, to the UK Corporate Governance Code - 2018, and have already aligned ourselves with 60% of the relevant requirements**.

Our business model describes how we utilize our resources and how these are transformed into the final products and services that we provide, generating income and profits for the Company and creating value for our Social Partners.

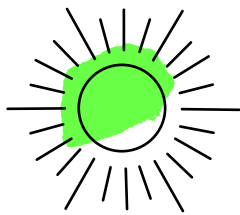
We follow a **"Zero Tolerance" approach in connection with incidents of corruption and bribery** in all our activities, both domestically and internationally.

There were no financial charges arising from violations of our Code of Business Conduct

We have strictly complied with the legislation in force regarding our business activity; as a result, **there were no incidents of non-compliance with the legislation nor any related environmental, social and economic impacts**.

1. The acronym "ESG" refers to issues related to the environment, society and governance.
2. According to the results of the Materiality process 2019 (p. 39)

Parameters of the Sustainable Development Report



The MYTILINEOS Sustainable Development Report (hereinafter the “Report”), published annually, **[GRI 102-52]** refers to the review of the Company's non-financial performance, supplements its Annual Financial Report and is available online at the official website of MYTILINEOS mytilineos.gr/en-us/csr-reports/publications.

Principles of drafting the Report

The Report was prepared in accordance with the Standards of the Global Reporting Initiative Organization (GRI Standards), the ISO 26000 Corporate Social Responsibility International Standard and the 10 Principles of the UN Global Compact, and complies with the relevant obligations under Greek legislation and European Directives.

Scope of the Report

This Report covers the period from 1/1/2019 to 31/12/2019 **[GRI 102-50]** and includes data about the following activities per Business Sector of the Company.

Sector	Activities
Metallurgy	<ul style="list-style-type: none">• Bauxite mining• Production of anhydrous and hydrated alumina• Production of aluminium alloys• Operation of port facilities, loading and unloading of products• Treatment of aluminium alloys
Electric Power & Gas Trading	<ul style="list-style-type: none">• Electric Power generation• Development, organization, supervision of construction, operation and maintenance of RES power stations• Management and sale of electric power• Supply of electricity to the retail market• Supply of natural gas to the retail market
EPC & Infrastructure Projects	<ul style="list-style-type: none">• Development, management, construction, operation and maintenance of integrated projects• Development, management, construction, operation and maintenance of building construction and infrastructure projects• Development, management, manufacture, operation and maintenance of electromechanical equipment for energy and infrastructure projects.• Development, management, construction, operation and maintenance of photovoltaic & hybrid projects

The data about these activities are obtained from the MYTILINEOS Central Function of Business Sectors in the Greek territory, the construction sites operated by the Company through its EPC & Infrastructure Projects Sector in countries abroad, its RES subsidiaries currently in full operation and its other subsidiaries in which the Company's participation is over 50%, as stated in its Annual Report. Non-financial data from Zinc/Lead Metallurgy operations are not included. **[GRI 102-45]**

Report details

The structure of the Report is organized with a view to presenting quantitative and qualitative data about the performance of MYTILINEOS in meeting key Environmental, Social and Governance criteria and has been prepared in accordance with the GRI Standards “Core” option. **[GRI 102-54]**
The data and information presented in the Report are initially

collected at the first level based on the procedures and ways of recording that are applied in each Sector of Business Activity and the subsidiaries of the Company but also by the databases that are observed in the context of the application of the central corporate systems. The data is then forwarded through the integrated management system for the disclosure of non-financial performance, which consists of a software platform developed in-house (custom-configured Excel files based on the GRI Standards).

The calculation of the data composing the non-financial performance indicators included in the Report generally follows the definitions and the methodology described in the respective GRI Standards.

The data are checked and verified using the SAP system (where available), as well as using internationally accepted verification methods which the Company has available, such as the OHSAS 18001 Occupational Health and Safety Management Systems, the ISO 14001 Environmental Management Standard, the ISO 14064 Greenhouse Gas Inventory Management and Reporting System (where this is in place) and the ISO 9001 Quality Management Standard. Also, included data from direct measurements or estimates, while in the case of certain quantitative indicators, three - or five-year historical data are mentioned for comparison purposes. Performance results at top level are calculated by consolidating (aggregating the relevant quantities) the individual data obtained from the Business Sectors and subsidiaries of the Company.

The content focuses on the sustainability issues which are significant to the achievement of the strategic goals of MYTILINEOS and which have been identified based on the Company's formal Materiality process, in accordance with the GRI Standards **[GRI 102-40]** to **[GRI 102-47]**. The information presented in the Report is supplemented by the required references to the Company's Annual Report 2019.

Significant changes from previous reporting periods

- The most significant change in this Report concerns the change in the identification and presentation of the individual issues of material significance for the Company's sustainable development, previously grouped into broader categories for

the purposes of their identification and prioritization by the Stakeholders, so that the impacts of individual issues and the relevant needs and expectations of the Social Partners to be assessed individually. **[GRI 102-49]**

- Inclusion of data from two (2) new subsidiaries of the Company (EPALME & Zeologic)
- Inclusion of environmental data from METKA EGN
- Revision of the environmental expenditures to account for the inclusion of the cost of CO₂ emissions

Restatements of information **[GRI 102-48]**

There is no reprinting of information in relation to previous editions, while new data in this Report are:

- A new section titled “ESG Performance Overview”
- A new section reporting on the Company's activities regarding its contribution to the Global Sustainable Development Goals
- New “Management Approach” subparagraphs for each Material issue
- Enhanced Environmental & Social performance indicators, as well as their Governance Indicators
- Addition of the table presenting the Company's alignment with the Athens Stock Exchange ESG reporting guide
- Inclusion in the Report of the GRI Standards Content Index, which in previous reports was produced as a separate file
- A new section titled “Index of Key Terms”

Communication **[GRI 102-53]**

To send your remarks, comments or suggestions about the Report's content, please use the custom-designed questionnaire available at mytilineos.gr/en-us/survey/survey-about-mytilineos, while for additional information or clarifications, please use the contact details given below:

Mr. George Galanis

Sustainable Development Director
MYTILINEOS S.A.
8 Artemidos Street
Maroussi, 151 25 Athens
E-mail: georgios.galanis@mytilineos.gr



Message from the Chairman



[GRI 102-14]

Although I initially planned to begin by mentioning our priorities and the major Sustainable Development issues that we faced in 2019, I cannot help but start with a reference to the devastating public health crisis that our planet has been going through since the beginning of 2020.

The first months of 2020 have been an extremely difficult time for the entire world and at all levels, due to the spread of the COVID-19 pandemic that changed our daily lives and our way of life in general, affecting people and societies in an unprecedented way. MYTILINEOS remains constantly alert to the evolution of the pandemic, following the national and international guidelines on prevention and protection aimed at containing its spread. We are concentrating on protecting our employees, for whom we take all necessary measures to ensure that they will remain active and healthy, as well as our customers and the local communities where we operate. At the same time, we are contributing to the national effort with all the means at our disposal.

In 2019, demands for urgent action on climate change became more and more intense. All social groups, consumers, businesses, and governments have acknowledged the need to step up the global efforts to reduce greenhouse gas emissions. At the same time, we see that technological innovation, the proliferation of information and data and the rapidly evolving environmental, social, and economic conditions, are reshaping every aspect of society, including the business environment.

The health and sustainability of businesses and financial markets, together with the growth of society's confidence in them,

are crucial for economic growth. Our collective future depends greatly on dynamic and sustainable businesses and capital markets, which will ensure long-term creation of value for the benefit of all.

Climate change, energy transformation and the digital revolution are trends that are already affecting the activities of MYTILINEOS – and will continue to do so. We are aware of the upcoming changes and we continue to adapt to them, following a threefold approach based on the Sustainable Development Goals (SDGs), on Corporate Social Responsibility (CSR) and on an ESG-driven approach, operating responsibly across all our activities.

Our approach to **Sustainable Development** stems primarily from our business mission which, translated into concrete strategic priorities, as set out in the relevant section of this report, makes a substantial contribution to our continued and sustainable operation and is closely linked to the 17 Sustainable Development Goals (SDGs). We welcome, anticipate and – for our part – contribute to the achievement of Agenda 2030, which is the only internationally agreed framework on sustainable development and is inextricably linked to business strategy through three pillars: (1) Economy with a social face, focusing on the future of work and the utilization of new technologies. (2) Sustainability of raw materials and value chains, giving priority to sustainable procurement, the circular economy, human rights and the responsible management of materials. (3) Sustainable markets and financing, focusing on transparency in governance, sustainable financing and the disclosure of non-financial information. Against this background, in 2019:

“Our strategic priorities lie in our continuous effort to **ensure a safe and healthy work environment** for our people, our dedication to **reducing our environmental footprint** through innovative and responsible sustainable practices and measurable results while **adopting new methods** that strengthen our commitment to the transparency of our corporate governance”

- We declared our commitment, together with 34 other Greek businesses, to the largest initiative in support of a sustainable future ever to be undertaken at European level by the private sector, entitled **“Call to action for a sustainable Europe by 2030”**.
- We redefined the process of identifying the material issues pertaining to our activity and affecting sustainable development and the decisions of our social partners.
- We are publishing **the first report of our activities (for 2016 - 2019)**, regarding every Sustainable Development Goal directly or indirectly related to our activity and to the respective national Sustainable Development priorities (p. 32-35).
- We have created and we are releasing the **“Sustainability Actions Map”** a new online information tool addressed to our social partners, which reflects the impact of our key initiatives on our local communities and, more broadly, in the wider Greek territory as well as abroad.

For us, the vehicle to achieve our goal is the implementation of **Corporate Social Responsibility** which, as a corporate process of self-assessment, continuous learning and self-improvement, determines our responsible attitude and behavior towards our people, the natural environment, our local communities, the markets we operate in and our social partners in the broader sense. In this respect, during the past year:

- We applied for the first time the **“Maturity & Integration Assessment Tool”** – the special tool developed by CSR Europe and its key partners, using which we determined the degree of maturity and integration of CSR in our Company, while at the same time documenting relevant actions for the long-term improvement of our strategy and policies, within the framework of the principles of corporate social responsibility and sustainable development.
- We were also evaluated for the first time by **Ecovadis**, (CSR Rating), the world's leading supplier rating agency for responsible entrepreneurship, winning a **silver medal** for our CSR practices.
- We renewed our commitment to the **principles of the United Nations Global Compact** on respect for and protection of labor and human rights, environmental protection and the fight against corruption.

Moreover, measurement, disclosure and transparency are vital for the proper functioning of markets. As a business, we operate in an environment characterized, by growing concerns about the natural risks associated with the climate change and by a growing dependence on non-financial information as well as on the opportunities that will be created during the implementation of the European Green Deal's investment plan. This plan is expected to mobilize European Commission funding and to create a supportive framework, which will facilitate and stimulate the public and private investments necessary for the transition to a climate-neutral, green, competitive and inclusive economy. In this respect, the provision to investors of quality information is essential for the allocation of funds for productive uses. At the same time, the adoption of **Environmental, Social and Governance (ESG)** criteria in the investment process and the selection of investment placements has been a fast-growing trend internationally over the last couple of years, on the part of both investors and Fund Managers.

At MYTILINEOS, we understand that the largest part of corporate value is nowadays to be found in intangible assets – the human, natural and social capital that shape all material information investors need. In this respect, we have incorporated the ESG approach as a practice that uses quantitative performance indicators (KPIs), together with corresponding qualitative information, to codify our responsible behavior, i.e. our CSR policy and initiatives. This practice also meets the demands of both investors and Fund Managers, on the following three levels: (a) Enhanced transparency, through the extensive disclosure of non-financial information; (b) identification and management of non-financial risks which may potential impact our financial position, and (c) recognition, by analysts and socially responsible investment firms, of our ability to create value.

To improve our disclosure of ESG-related information:

- We are launching, starting with this year's Sustainable Development Report, the **“ESG Performance Statement”** section – a new section designed to facilitate the flow of key information to investors and other social partner groups. This new section summarizes our core performance, taking also account of the increase, preservation or decrease of the stock of value of the basic categories of resources which we

use in the conduct of our business, as detailed in our business model (p. 28).

- We are enhancing the transparency of data and, in this year's report, we present information regarding the process of identifying and managing every material issue, with an emphasis on the effects of risks with potential impacts on the Company's business model and financial adequacy, on the methods to address these risks and on the results of our policies.
- We are publishing our alignment with the new **“Athens Stock Exchange ESG Reporting Guide - 2019”** (p. 156), published by ATHEX in the context of its participation in the United Nations Sustainable Stock Exchanges (SSE) initiative.

We continue to disclose our performance in almost 10 international ESG indicators, in the context of specialized assessments of companies in Socially Responsible Investing (SRI) and Sustainable Development evaluations carried out by investment analysts. **A major achievement in 2019 was our inclusion for the first time in the FTSE4Good index, after a relevant independent evaluation** of MYTILINEOS by the FTSE International FTSE Organization, in recognition of our long-standing commitment to sustainable development.

2020 will be a year that will go down in history as a year of extraordinary challenges, given that the health crisis we are experiencing is evolving into a fiscal one. Remaining consistent in our choices, we continue our efforts to protect our employees, ensure continuity and reorganize our operation, and we hope to get out of this ordeal soon, returning to the normality of social and therefore economic life.

In addition, **our commitment to Sustainable Development is and remains unwavering, hoping that Europe will also implement the “Green Agreement on a Climate Neutral Europe by 2050”** as expressed by the new European Industry Strategy.

Evangelos G. Mytilineos

Chairman of the Board of Directors and
Chief Executive Officer



Profile & Business Activity Sectors

Vision

“Inspired and motivated by our Greek heritage, we lead our business to global success.”

Mission

“To operate in challenging local and international markets, showing resourcefulness, efficiency and respect for the environment and for society. To rely on the potential of our people and to create value for our customers, our shareholders, our employees and the Greek economy.”

Corporate Values [GRI 102-16]

- Effectiveness with Safety as a priority
- Ceaseless effort for Competitiveness by our People
- Respect and important role for every Employee
- Two success factors: Teamwork and Excellence
- Continuous improvement by all to everything we do



Profile

MYTILINEOS S.A. **[GRI 102-1]** is one of the top industrial companies in the country, active in the Metallurgy, EPC & Infrastructure Projects and Electric Power & Gas Trading sectors. The Company was established in Greece in 1990 and has been listed in the Athens Exchange since 1995. Its diverse business activity constitutes a driving force for the Greek economy, with a praiseworthy presence internationally. As a responsible industrial company, it seeks to apply the Corporate Social Responsibility and Sustainable Development principles in all its main activities, working to achieve its key objective of maintaining its leading position in all sectors of its business activity through continuing reinvestment. At the end of 2019, the consolidated turnover of MYTILINEOS stood at **€2,256.1 million**, increased by **47.8%** from 2018 (€1,526.5 million).

Business Activity Sectors

MYTILINEOS is active in the Metallurgy, EPC & Infrastructure Projects, and Electric Power & Gas Trading sectors. **[GRI 102-2] [GRI 102-6]**

Metallurgy Sector

MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminium in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries.

EPC & Infrastructure Projects Sector

MYTILINEOS operates in the construction of broad scale projects, covering the wide spectrum of Engineering-Procurement-Construction and the industrial production of high-level know-how, with presence in the Energy & Infrastructure sectors. In the energy sector, the Company focuses on the international markets, with ongoing projects in Europe, Middle East and Africa and is specialized in the construction of turn-key power plants that utilize the full range of thermal power generation technologies, as well as of hydro and solar power large-scale plants. With more than 50 years of experience and with the necessary resources for the implementation of complex energy projects, MYTILINEOS is a reliable partner of electricity companies, industrial customers and local communities around the world.

Electric Power & Natural Gas Trading Sector

MYTILINEOS has a wide range of activities in the sector of energy, extending from the construction of gas-fired thermal power generation plants and Renewable Energy Sources (RES) plants, to power and natural gas supply. It is the largest private electric power producer in Greece, with an energy portfolio of 1,200 MW thermal production capacity and 200 MW Renewable Energy Sources capacity, producing more than 11% of electricity production in Greece. In terms of its supply activity, it is steadily strengthening its presence in the market, as at the end of 2019 it represented over 180,000 electricity meters and over 13,000 gas meters across the country (businesses & households).

Key Figures 2019 [GRI 102-7]

25

Industrial and Renewable Energy Sources Plants
(Industrial: 10 – RES: 15 in full operation)

3,662

Employees
(Direct & Indirect)

€2,256.1

m. Turnover

€4,157.9

m. Total Capitalization
(Equity 39.3% - Liabilities 60.7%)

€144.9

m. Net Profits

659.1

kt Sales of Metallurgical Products
(Alumina: 72.4% - Aluminium: 28.6%)

5,782.4

GWh Electricity sold

Countries of Activity 2019 [GRI 102-4]



● **MYTILINEOS S.A. [GRI 102-3]**

Head Office
8 Artemidos Street
151 25 Maroussi, Athens

Industrial production plants
Greece

● **Metallurgy Sector**

Countries where aluminium products are exported
England, Austria, Bosnia-Herzegovina, Bulgaria, France, Germany, Switzerland, Greece, United States of America, Spain, Israel, Italy, Montenegro, Norway, Poland, Russia, San Marino, Serbia, Slovakia, Slovenia, Sweden, Turkey, Czech Republic, Tunisia

● **EPC & Infrastructure Projects Sector**

Countries where large-scale energy and infrastructure projects are in progress or in the design stage
Australia, Ghana, Greece (infrastructure), United Kingdom, Spain, Kazakhstan, Libya, Nigeria, Uganda, Slovenia, Chile

● **Electric Power & Gas Trading Sector**

Production and Supply of Electric Power - Gas Trading
Greece

Strategic priorities

MYTILINEOS' main target is to grow continuously and responsibly and to maintain its leading position across all sectors of its Business Activity through steady reinvestment, securing at the same time its sustainability and stable yields for its shareholders. This target translates into the following strategic priorities per Business Sector:

Metallurgy Sector

- Ongoing productivity and performance improvement to keep the Company's place within the first quadrant of the global cost curve.
- Expansion into the aluminium scrap recycling business in order to reduce the consumption of energy and increase production.
- Commitment to sustainable production and to the use of Renewable Energy Sources in the Company's metallurgical activity up to 100% by 2030.
- The basic technical study for the new Alumina plant with a production capacity of 1m. tons annually, is under completion.
- Provision of optimal products and solutions to customers, over and above the mere supply of goods.
- Seeking new vertical integration or expansion projects, in order to strengthen its metallurgical business activity.
- Increasing competitiveness through strategic investments and risk-hedging methods.

EPC & Infrastructure Projects Sector

- Focus on undertaking integrated energy projects of wide scale in the natural gas and solar energy sectors.
- Expansion into existing and new developing markets.
- Probing into new opportunities when undertaking large infrastructure projects in developing countries.
- Utilizing the significant industrial know-how and infrastructure developed over the recent years.
- Maintaining the Company's leading role in EPC energy projects globally.
- Investing in the continuous training of specialized scientific personnel.

Electric Power & Gas Trading Sector

- Largest independent electric power producer in Greece.
- Reduction of carbon footprint by means of further investment in the sector of Renewable Energy Sources.
- Construction of a new 826 MW combined cycle gas-fired power plant (CCGT), to further consolidate the Company's position as the leading independent electric power producer in Greece.
- Top-notch private supplier to the electric power retail market.
- Maintaining its leading position in the natural gas market with a share of 32%, by ensuring low power generation costs.
- Development and maintaining of a dynamic and balanced portfolio and expansion into the energy markets of neighboring countries.

In parallel, the Company's dynamic business growth is inextricably linked to the principles of Corporate Social Responsibility and Sustainable Development. MYTILINEOS is actively involved in domestic and international initiatives and organizations working to addressing the challenges of Sustainable Development. [\[GRI 102-12\]](#) [\[GRI 102-13\]](#)



Since 2008, MYTILINEOS has been consistently declaring its commitment to upholding the ten principles of the Global Compact, by disclosing its performance on an annual basis.



Since 2016, the Company is a voluntary participant in the global sustainable development initiative CDP – WATER Security, by disclosing extensive quantitative and qualitative information on the management of water resources in the context of its business activity.



Ecovadis is the world's leading supplier rating agency for responsible entrepreneurship. By participating in the ecovadis evaluation platform, MYTILINEOS responds to its customers' request by giving them access to its relevant reports and performance, which they can use as a market criterion.



Since 2008, the Company has been following the GRI Reporting Guidelines in its Non-Financial Data Disclosure process. Moreover, as a member of the GRI's Gold Community, it supports its mission to develop and disseminate the commonly accepted principles in Sustainability Reporting.



As a founding member of the Council on Sustainable Development established by the Greek Federation of Enterprises (SEV), MYTILINEOS is fully committed to the relevant Code of Principles and is actively participating in the Council's initiatives for the promotion and dissemination of the Sustainable Development principles.



MYTILINEOS has been a member of the Hellenic Association of Independent Power Producers since 2010; this is an initiative with a key objective to promote and manage issues related to generation and distribution of reliable, cost-effective and environment friendly electric power and to deregulate the market of all energy raw materials.



MYTILINEOS has been supporting since 2016 the achievement of the Global Sustainable Development Goals (2030 Agenda), contributing to the respective national priorities.



As of 2012, MYTILINEOS has integrated the Principles of the International Standard of Corporate Social Responsibility into its operation and is disclosing its progress and performance information on an annual basis.



Since 2019, MYTILINEOS is participating in the International Aluminium Stewardship Initiative (ASI) as a Production & Manufacturing member.



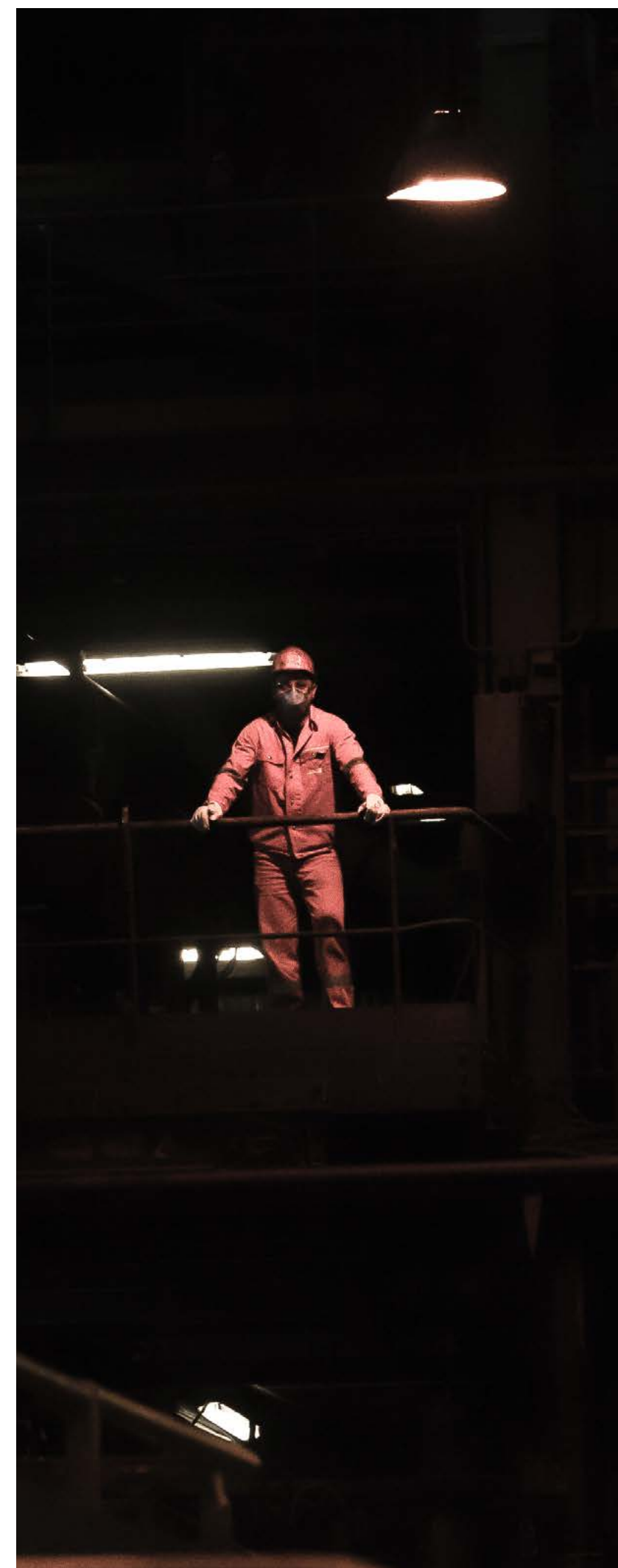
Since 2006, MYTILINEOS is an official member of CSR Hellas, the Hellenic Network for Corporate Social Responsibility, taking active part in and supporting the Network's various activities for the promotion and dissemination of the Corporate Social Responsibility principles and practices.



MYTILINEOS, has been an ambassador of the Greek Sustainability Code, since 2015, while it actively participated in its co-drafting, by either tabling views and initiatives through the open consultation procedure in the context of dialogue or by participating in the relevant working groups.



Through SEV, MYTILINEOS takes part in the Business Europe initiative aiming at the development and competitiveness at European level and at the support of the European companies regarding the issues mostly affecting their performance.



How we create value

MYTILINEOS creates value for its Social Partners through its business activities, making a substantial contribution to the economy, to employment and to the development of its local communities.

A key element of the Company's business model is the way it creates and allocates value. From the approach of markets, the development and maintenance of customer relationships, the supply of raw materials, the production, the promotion, the sale to the end of the products life cycle and the raising of funds, MYTILINEOS creates an important value chain **with strong social and economic impact**. Across all its sectors, MYTILINEOS

supports income, tax revenues and jobs and the same applies for its suppliers and associates in their own value chain. This way, a multiple positive footprint is generated, beyond the Company, affecting domestic employment and relevant sectors of economy. The information given on the production and distribution of economic value, in the table below, illustrates how MYTILINEOS creates wealth for its key social partners groups.

Economic Value Table [GRI 201-1]	2017	2018	2019
Economic value generated			
Turnover (€)	1,526,720,983.8	1,526,514,352.9	2,256,090,691.0
Economic value distributed			
Operating cost (€)	1,204,796,213.2	1,229,255,481.5	1,921,834,562.0
Salaries and benefits of employees (€)	72,808,441.0	81,033,170.7	93,792,981.0
Income tax payments & other taxes (€)	57,430,814.2	71,250,824.0	84,767,149.0
Payments to capital providers (€)*	36,992,429.2	76,701,562.2	73,053,080.0
Investments at community level (€)	2,018,275.3	2,296,020.0	3,471,138.0
Total (€)	1,374,046,172.9	1,460,537,058.5	2,176,918,910.0
% economic value distributed	90.0%	95.7%	96.4%
% economic value retained	10.0%	4.3%	3.6%

* (shareholder dividends, payment of interest to creditors; this includes interest in all forms of debt, as well as retrospective dividend dues to preference shareholders).

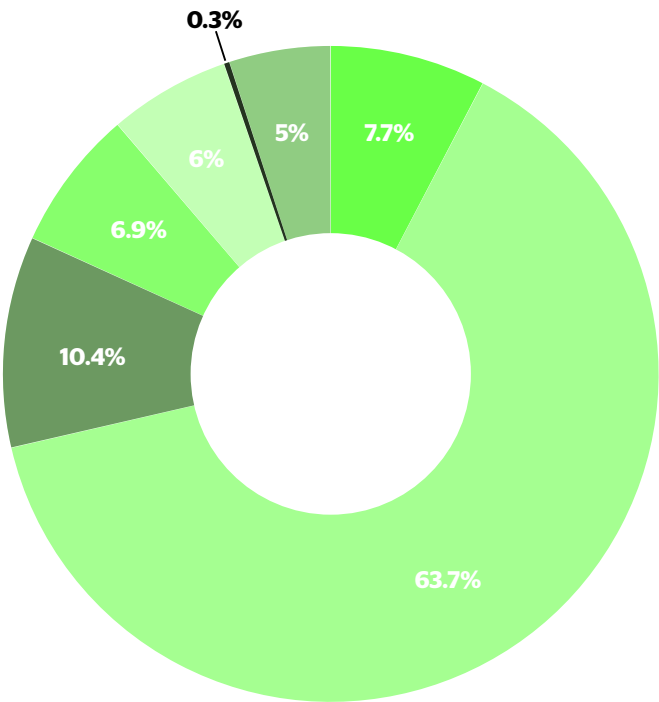
MYTILINEOS' total **Social Product** for 2019 amounted to **€1220.3 million**. The economic value created and distributed was the following, by key Social Partner group:

- €93.7 million for employee salaries and benefits.
- €777.5 million to domestic suppliers
- €127.0 million for investments
- €84.7 million for the payment of taxes to the State
- €73.0 million for payments to capital providers
- €3.4 million for social investments
- €61.0 million for the improvement of the Company's environmental footprint

In addition, our approach to creating long-term value is at the core of our business, which makes a substantial contribution **to the goal of Sustainable Development**. More specifically:

- We produce Aluminium, one of the most environment-friendly metals³, applying responsible practices in the extraction of raw material as well as in its production from aluminium scrap recycling.
- We build integrated power generation plants in countries with substantial energy needs, helping thousands of people obtain access to eclectic power as a commodity, as well as photovoltaic units and energy storage and hybrid energy projects.

3. thealuminiumstory.com



• We invest in, and produce electric power from, Renewable Energy Sources (RES) plants as well as thermal plants making maximum use of Natural Gas, also providing specialized Energy Conservation Services to all our customers.

All of the above require making the most of basic **financial, industrial, human, physical, intangible and social** resources, as reflected in the Company's Business Model described in the following, as well as incorporating the relationship and interaction between these resources into the Company's decision-making process, further enhancing its ability to create value on an annual basis.

Business Model

The Company's business model is at the centre of its operation. It supports its growth, describes the categories of resources it utilises, presents the picture of its activities, its production performance, the value it creates for its Stakeholders and, in general, its overall contribution to Sustainable Development. To offer a better understanding of the Company's business model, use is made of key performance indicators together with descriptions of the interrelationships between the resources utilised. The relative information can be found in: scorecard.mytilineos.gr/index-en.html

1 Use of capitals — Inputs —>

Financial
Our business activities require significant financial resources, drawn from cash flows from our business activity, investments, own capital and loans.

Industrial
Our 10 industrial plants and 15 Renewable Energy Sources (RES) plants, together with our supply chain, enable is to manufacture and offer products that meet the needs of customers and consumers.

Human
Our more than 3,600 people add value with their knowledge, talent and skills across the entire range of our activities. From our relations with local communities and customers, to the development of effectiveness and innovation in our production activity, two elements which are crucial to creating added value.

Natural
Bauxite, natural gas and water are the key raw materials we use. Additionally, the use of land and of semi-manufactured materials are key inflows, which we seek to use responsibly and effectively.

Intangible
Our intellectual property covers a wide range of subjects, from research and development for new products, bauxite residues utilisation, energy efficiency and know-how in the optimal processing of aluminium scrap, to excellent skills and advanced know-how in the management of construction projects that allow the company to implement complex and demanding projects to the strictest technological standards.

Social
The social acceptance of our activity is based on our reputation, to the strengthening of transparency in everything we do, to our social investments and to the trust of the local communities where we operate and of our people, our customers, our supplies and our other Stakeholders.

2 How we operate

Mission – Vision – Corporate Values
Corporate Governance – Code of Business Conduct – Policies

Central Services

- Human Resources Management
- Legal & Regulatory
- Finance & Treasury
- Investor Relations
- Mergers & Acquisitions
- Corporate Communication

Support Services

- Sustainable Development
- Occupational Health & Safety System
- Environmental Management System
- Supply Chain Management
- Quality Policy & Standards
- Sales Systems & Customer Management Systems
- Research & Development

Our Activity
Significant value-added synergies between Sectors



Activity with direct contribution to Sustainable Development

We produce **Aluminium**, one of the most environment-friendly metals, applying responsible practices for bauxite extraction and raw material production from recycled aluminium scrap.

We produce **Electric Power** from plants using **Renewable Energy Sources** and from thermal plants making the maximum possible utilisation of Natural Gas.

We build **integrated power generation plants** in countries with substantial energy needs, as well as photovoltaic units and energy storage and hybrid energy projects.

Key stages of our value chain



3 Outputs — Outcomes —>

- €2.25 bn. turnover
- 820.1 k. tonnes of Alumina produced
- 186.9 k. tonnes of Alumina produced
- 21,197.6 Tj of Electric Power generated
- 1,871.4 k. tonnes of bauxite consumed
- 1,133.7 m. Nm³ of Natural Gas consumed
- 6.5 m. cm³ of Water consumed
- 4.64 m. tonnes of direct & indirect CO₂ (scope 1 & 2) emissions
- 5.2 k. tonnes of air emissions (NO_x, SO_x)
- 849.1 k. tonnes of solid waste
- 0 m² of land used by mining operations
- 0 work-related fatalities
- 1 lost time accident
- 5.16% employee turnover rate
- 59,788 employee training man-hours
- 0 incidents of human rights violation
- 10 social programmes in progress











































4 Increased ↑ or Decreased ↓ Value by our business activities

























Economic Value		
↑	€84.7 m.	of taxes paid
↑	777.5 m.	to domestic suppliers
↑	€73,1 m.	to capital providers
↑	5.14%*	share of the electric power retail market, increased by 27,8% from 2018
↑	17.5%*	share of net electricity production from conventional units in the system
Environmental Value		
↑	Zero	Incidents of non-compliance with environmental laws and the burden of the natural environment on industrial accidents
↑	€1.5 m.	in R&D initiatives, for technology development holistic utilization of bauxite residues.
↓	8.5%	increase of total energy consumption
↑	377,752.7 MWh	production from RES, increase up to 54.8%
↓	14.5%	increase of total water consumption
↓	10.7%	increase of total CO ₂ (scope 1 & 2) emissions
↑	7.5%	decrease of total solid waste production
↑	17.9%	Percentage, of the total amount of solid waste produced, that has been reused or recycled
↑	81.4%	Rehabilitation percentage of usable areas from the mining activity
Social Value		
↑	3,662	direct and indirect jobs supported
↑	0.04	lost time accidents / 200,000 working hours (direct employees)
↑	€93.7 m.	for employees' wages & benefits
↑	93.5%	full time employees' retention rate
↑	281	new jobs
↑	€3.47 m.	for social investments
↑	€2.33 m.	for supporting the needs in local infrastructure & services with direct public benefit
↑	27,850	citizens as direct beneficiaries of our social programs
↑	Zero	Incidents of non-compliance with laws and regulations
↑	Zero Tolerance	of all forms of corruption and bribery across the entire range of our activities





* Monthly Energy Balance ADMIE (December 2019)

Our approach to Sustainable Development

Sustainable Development is a key strategic priority of MYTILINEOS. **Through Corporate Social Responsibility (CSR), we express our commitment and contribution to the achievement of the 17 Global Goals (2030 Agenda).** As a member of the United Nations Global Compact, the Company has aligned its policy with the Sustainable Development Goals, which serve as a common basis for dialogue and cooperation with its key Social Partner groups and also determine the Company's key priorities up to 2025.

Targets 2025	Ways of implementation	Status 2017	Status 2018	Status 2019
Ensuring a work accidents free environment. Related Sustainable Development Goals SDGs: 3, 8	<ul style="list-style-type: none"> Maintaining the already successful practices of strengthening the internal culture of Health & Safety at the Workplace. 			
	<ul style="list-style-type: none"> Greater emphasis on the training of contractors. 			
	<ul style="list-style-type: none"> Adaptation to the new ISO 45001 international standard. 			
	<ul style="list-style-type: none"> Exchange of views and best practices through consultation with specialized bodies and consultants in Health & Safety issues. 			
Developing, managing and retaining dedicated employees with practices that promote equal opportunities and respect for human rights. Related Sustainable Development Goals SDGs: 5, 8, 10	<ul style="list-style-type: none"> Improvement of all work practices in the context of the completion of the Company's transformation – Integrated corporate culture. 			
	<ul style="list-style-type: none"> Carrying out an employee satisfaction survey and utilization of the results. 			
	<ul style="list-style-type: none"> Informing employees about CSR issues. 			
	<ul style="list-style-type: none"> Employees' training in the Code of Business Conduct. 			
	<ul style="list-style-type: none"> Development of corporate volunteerism. 			
Continuous improvement of environmental footprint. Related Sustainable Development Goals SDGs: 6, 7, 12, 13, 14, 15, 17	<ul style="list-style-type: none"> Use of more environment-friendly fossil fuels (where feasible). 			
	<ul style="list-style-type: none"> Increase of waste recycling / reuse. 			
	<ul style="list-style-type: none"> Stabilization and reduction of air emissions. 			
	<ul style="list-style-type: none"> Sustainable water withdrawal. 			
	<ul style="list-style-type: none"> Continued participation in programs on bauxite residues utilization. 			

Targets 2025	Ways of implementation	Status 2017	Status 2018	Status 2019
Development of a responsible supply chain (key suppliers). Related Sustainable Development Goals SDGs: 8, 12, 17	<ul style="list-style-type: none"> Rehabilitation of land areas used in mining activity. 			
	<ul style="list-style-type: none"> Adoption of environmentally cleaner innovative technologies & industrial methods. 			
	<ul style="list-style-type: none"> Informing MYTILINEOS' key suppliers about the Company's Code of Conduct for Suppliers and Business Partners. 			
	<ul style="list-style-type: none"> Assessment of the environmental and social impacts of the activity of the Company's key suppliers. 			
Supporting selected actions of high social value that strengthen the balanced co-existence with the local communities and the wider society. Related Sustainable Development Goals SDGs: 1, 2, 3, 4, 9, 11, 17	<ul style="list-style-type: none"> Inclusion of social and environmental criteria in the purchasing process. 			
	<ul style="list-style-type: none"> Implementation of MYTILINEOS social investments in line with the Sustainable Development Goals. 			
	<ul style="list-style-type: none"> Emphasis on the support of local community-oriented infrastructure and services projects. 			
	<ul style="list-style-type: none"> Initiatives to enhance the employability of young people in the industrial sector. 			

 New practices in the context of the specific objectives whose implementation has not yet begun.
 Existing Company practices incorporated, in 2017, within the specific set of targets.
 Corporate practices already applied.
 Practices with the highest priority, involving greater effort in their implementation.



The table below presents the contribution of MYTILINEOS to the achievement of the Sustainable Development Goals and the respective national priorities.

Sustainable Development Goals & sub-targets directly or indirectly related to the activity of MYTILINEOS	The contribution of MYTILINEOS (Cumulative data 2016 - 2019)	
	(1.2) We contribute to the reduction of the percentage of men, women and children living in poverty in all its forms. (1.5) We contribute to the reduction of the exposure and vulnerability of the poor and of those in vulnerable situations, to economic and social problems.	<ul style="list-style-type: none">Through the direct and indirect jobs that we maintain, we support the income of more than 31, 000 people⁴.As we consider the reduction of unemployment to be a key factor for alleviating poverty, we have created 521 new jobs in the framework of our activity.We support and cover the daily needs, on an annual basis, of 180 families facing serious economic and health problems, in our local communities.We have provided access to the labor market to 51 young unemployed engineers, through the implementation of custom-developed vocational training and skills development programs.Moreover, through the four (4) core social programs and initiatives we implemented, we have alleviated the consequences of poverty for more than 394 people (adults and children) in financial difficulty and social exclusion, ruling out all forms of discrimination.
	(2.1) We contribute to ensuring access to sufficient and nutritious food throughout the year, for children in vulnerable situations. (2.2) We contribute to the reduction of all forms of malnutrition, and we address the nutritional needs of children and adolescents.	<ul style="list-style-type: none">We have offered 97,668 hot and nutritious school meals to 943 students of 47 schools with an increased rate of food insecurity, in the prefectures of Attica, Viotia, Kavala, Trikala and Fokida.We have ensured the conditions for feeding 90 living in extreme poverty, by building a new dining hall and upgrading the restaurant equipment of St. Nicolas Preparatory School in Ghana.
	(3.2) We contribute to the reduction of the number of deaths of newborns and children under 5 years of age. (3.6) We contribute to the reduction of the number of deaths from injuries caused by road traffic accidents. (3.7) We help avoid deaths and illnesses caused by hazardous chemicals and air, water and soil pollution and contamination.	<ul style="list-style-type: none">We have completed the upgrade/creation of seven (7) Emergency Departments (for child injuries) in the country's Public Hospitals and Health Centers, directly benefiting more than 40,000 children annually.We implement specialized Safe Driving training programs with over 700 direct beneficiaries (employees, professional drivers and school students in our local communities).We support in practice information campaigns at schools and Local Health Units across Greece, having so far informed more than 10,000 children, parents and teachers, by publishing 30,000 specialized brochures annually ("Trauma prevention at School", "Trauma prevention at Home" and "Sports & Safety").We recorded zero incidents of degradation of the natural environment and zero incidents of occupational diseases from our productive activity. We keep greenhouse gas emission levels below the statutory maximum limits.
	(4.1) We contribute to ensuring that all boys and girls complete equitable and quality primary education. (4.3) We contribute to ensuring equal access for all to quality technical and vocational training as well as access to tertiary education. (4.4) We contribute to the increase of the number of young people who have the appropriate vocational and technical skills, providing them with access to employment and decent jobs.	<ul style="list-style-type: none">We supported, for three years, 56 students from vulnerable social groups, helping them improve their prospects of completing their basic education through their participation in program "I'M IN", designed to tackle school dropout.We created 172 new, quality vocational training and internship positions.We created 10 school libraries in an equal number of primary schools and kindergartens in the prefectures of Viotia, Magnesia and Preveza, benefiting 1,722 pupils and 176 teachers.We offered modern technological equipment to equipped 50 schools in various Greek regions.We offered 49 scholarships to the Youth Entrepreneurship Summer School of the Athens University of Economics and Business (AUEB) and to the Scholarships Program of the University of Piraeus.We supported S.T.E.M. education programs, by offering 44 educational robotics kits to a corresponding number of schools that cannot afford to buy them.We also offered provided 2 robots and 18 robot kits to the Centre for Educational Robotics and Sciences of Crete, to be used for holding more than 100 workshops covering the entire range of S.T.E.A.M. activities, held during the 3rd Educational Robotics and S.T.E.A.M. Festival of Crete, benefiting over 1,000 children and adults.We strengthened the professional skills of 303 people through the #skills4engineers program.We completed the construction of a secondary school in Nigeria and the supply of modern classroom equipment to a primary school in Uganda, offering access to education to more than 200 children.
	(5.1) We support the efforts to end of all forms of discrimination against women everywhere.	<ul style="list-style-type: none">We are opposed to all forms of discrimination against women.Percentage of women in the Company's Board of Directors: 2016: 14% - 2019: 18%Percentage of women in direct employment: 2016: 13% - 2019: 18%Percentage of women in positions with extended responsibility: 2016: 18% - 2019: 18%

Sustainable Development Goals & sub-targets directly or indirectly related to the activity of MYTILINEOS	The contribution of MYTILINEOS (Cumulative data 2016 - 2019)	
	(6.1) We contribute to the efforts to achieve universal and equitable access to safe drinking water for all. (6.2) We contribute to the efforts to achieve adequate and equitable access to sanitary facilities for all (6.3) We contribute to the protection of water resources as well as to a substantial increase in water recycling and reuse. (6.4) We contribute to the efficient use of water and to ensuring sustainable water abstraction.	<ul style="list-style-type: none">We protect against any risk of pollution the water resources that we use in our activity.Through our responsible practices, the main sources which we use to withdraw water from (the sea, groundwater, public water supply companies) are not affected by factors such as water depletion in the aquifer, shortage of water, limitation of the capacity of water-related ecosystems to perform their functions and reduction of drinking water availability.We are managing responsibly a controlled network of low-depth wells (boreholes) which allows water to be replenished naturally after withdrawal (renewable sources).We ensure the availability and the sustainable management of water and sanitary facilities for nearly 2,000 citizens of the local settlements of Aspra Spitia, Antikyra and Ag. Nikolaos, in the prefecture of Viotia, supplying them with nearly 1 million m³ of drinking water annually.A specific programme to reduce the consumption of industrial use and drinking water is implemented in the Metallurgy Sector, with the first results being particularly positive. The Company's basic specific consumptions per ton of products produced (hydrated alumina and aluminium) are significantly lower compared to the base year (2017).By recycling water discharges for reuse in our power plants in the Energy Center of Ag. Nikolaos (Viotia), we avoid, on an annual basis, the need to withdraw an additional 5-6 million m³ of seawater, which would otherwise be required.
	(7.1) We contribute to ensuring universal access to affordable, reliable and modern energy services. (7.2) We contribute to increasing the share of renewable energy in the energy mix. (7.3) We aim to improve energy efficiency. (7.a) We enhance access to "clean" energy research and technology, by promoting renewable forms of energy and investments in energy infrastructure and cleaner energy technology.	<ul style="list-style-type: none">Market share of the retail market for electric power: 2016: 2.69% - 2019: 5.14% (increased by 91%).We participate in three (3) European research projects on energy efficiency and the reduction of the electric power purchase cost for the final consumer.Portfolio of RES projects in operation: 2016: 130 MW - 2019: 211 MW (increased by 62%).Electric power generated from RES projects: 2016: 175,530 MWh - 2019: 429,603 MWh (increased by 144.7%), thus avoiding the release to the atmosphere of nearly 720,000 tons of CO₂ emissions.Specific Consumption - alumina production (GJ / t of alumina produced) 2016: 10.4 TJ - 2019: 8.33 TJ (decreased by 20%).Specific Consumption - aluminium production (GJ / t of aluminium produced) 2016: 53.7 TJ - 2019: 48.78 TJ (decreased by 10%).
	(8.1) We contribute to the economic development of the country. (8.4) We decouple our economic growth from environmental degradation and we promote sustainable production and consumption. (8.5) We contribute to full and productive employment and decent jobs for all women and men and for young people. (8.7) We contribute to the elimination of forced and child labor. (8.8) We protect labor rights and we promote safe working conditions for all employees without discrimination.	<ul style="list-style-type: none">With our overall business activity, we create an added value of €1,058 million equal to 0.6% of the country's GDP (GDP 2019: €187,457 m. - Source: Eurostat).Zero incidents of degradation of the natural environment from our production activity - Greenhouse gas emissions below the statutory ones - Implementation of responsible and sustainable practices in the mining activity.Our labor practices comply as a minimum with all the provisions of the legislation force and respect the fundamental principles laid down in the International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work.We created 306 new jobs for young people <30 years of age.We further reduced the exceptionally low percentage of part-time employees. 2016: 1.16% - 2019: 0.07 (reduction by 94%).Our full compliance with the national laws in each country where we operate and the fulfilment of the commitments we have taken in the context of our participation in international Sustainable Development Initiatives (UN Global Compact), result in the avoidance of incidents of child and forced labor incidents.Injury rate (direct employees) 2016: 0.21 - 2019: 0.04 (reduction by 90.5%).Injury rate (indirect employees) 2016: 0.49 - 2019: 0.19 (reduction by 61%).Zero accidents & Occupational diseases.

4. Study of Socio-Economic Impact of MYTILINEOS 2019

Sustainable Development Goals & sub-targets directly or indirectly related to the activity of MYTILINEOS



(9.2) We contribute to sustainable industrialization and to increasing employability rates in the industrial sector.

(9.4) We contribute to the upgrading of the industry by adopting a greater number of 'clean' and environmentally sound technologies and industrial processes.

(9.5) We help enhance scientific research for upgrading the technological capabilities of the industrial sectors.



(11.1) We contribute to strengthening local infrastructure.

(11.4) We contribute to the effort to protect and safeguard the cultural and natural heritage.

(11.5) We contribute to the reduction of the number of people affected by natural disasters.



(12.4) We contribute to the sound management of all waste in accordance with internationally agreed frameworks.

(12.5) We contribute to the reduction of waste generation through prevention, reduction, recycling and reuse.



(13.1) We strengthen the adaptive capacity of our activity to natural disasters and climate-related hazards.

(13.3) We contribute to the improvement of education and awareness-raising on climate change mitigation, adaptation, impact reduction and early warning in the event of natural disasters.



(14.1) We contribute to the prevention of all forms of marine pollution, especially from industrial activities.

The contribution of MYTILINEOS (Cumulative data 2016 - 2019)

- **Total number of direct employees:** 2016: 1,888 - **2019: 2,436 (increased by 29%)**.
- Implementation of the salaried employment (internship) program **“ENGINEERS IN ACTION”**. A model **“School for Engineers” of a high standard**, which has been consistently providing Greek industry and entrepreneurship with talented and competent executives.
- In the Metallurgy Sector, the **€15 million** investment in the new modern alumina calcination plant for the replacement of outdated technology and high thermal consumption units, was successfully completed.
- Innovative 10-year collaboration of the MYTILINEOS Metallurgy Sector with General Electric (GE) for implementation of **the world's first Digital Smelter, an innovative digital solution in the electrolysis process**, designed to optimize productivity and reduce energy costs.
- **Investments worth over €4.8 million** for meeting needs related to local infrastructures & services of direct public benefit. *(supply of vehicles to municipalities, renovation of access infrastructure to playgrounds / churches / municipal libraries, paving and maintenance of central and rural roads, repairs to school buildings, financing of studies for the modernization of a biological treatment plant / the supply of water to a settlement / the construction of a local community public transport hub etc.)*
- We support studies for Cultural Routes & Archaeological Park projects, which are gradually extending to almost all the regions of the country.
- We upgraded the energy efficiency of the Gymnasium-Lyceum school complex and nearby indoor gym of the Municipality of Rafina-Pikermi, **where the educational and sports activities of 1,700 children from the fire-stricken areas of the Municipality and the adjacent Municipalities take place**.
- **Donation of six (6) autonomous fire trucks** to the Hellenic Fire Service Headquarters, reinforcing the operational readiness of the service.
- We participate, through the Metallurgy Sector, in **4 European research projects** on the development of technologies that will allow the holistic exploitation of bauxite residues, with **investments of a total value of €1.5 million** for the equipment of pilot units at the aluminium plant.
- We drastically increased the amount of waste from our activity that was recycled, reused and/or utilized in other industrial uses: 2016: 36,000 tons - **2019: 151,000 tons (increased by 320%)**
- We commit ourselves to doing the following by 2021: (a) to adapt our financial reporting on the analysis of the risks and impacts of climate change, following the recommendations of the **Task Force on Climate-related Financial Disclosures (TCFD)** international initiative and (b) to join the **CDP Climate Change** international sustainable development initiative.
- We participate in the international **Aluminium Stewardship Initiative (ASI)** as a Production & Manufacturing member. Our objective over the next two years is to obtain the relevant certification by integrating our Sustainable Development commitments into the value chain of the Metallurgy Sector. For MYTILINEOS, joining the ASI initiative reflects the Company's solid commitment, fully aligned with the vision of the European Union, to move swiftly towards carbon-neutral production, as well as to achieve the target of 100% RES sourcing for its Metallurgy Sector by 2030.
- We implemented the special programme **“Information and awareness-raising of the school community on forest fire prevention and response, forest protection policies and practices” in 50 primary and secondary schools** from all over Greece, directly benefiting **1,000 students and 50 teachers**.
- Regarding the use and discharge of seawater in our activities and in particular in the cooling process of the cogeneration (Combined Heat & Power plant of the Metallurgy Sector), the relevant legislative provisions defining the framework for avoiding any environmental impact are strictly adhered to. In addition, in collaboration with the authoritative organization Hellenic Marine Research Centre (HMRC), we have already carried out **4 research studies** to monitor the status of living organisms on the seabed of Antikyra Bay. The studies are carried out in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment and Energy and the Water Management Directorate of the Decentralized Regional Administration). **The findings of the recent studies, carried out in 2018 and 2019, have shown in both cases the ecological status to be stable, with improvement trends recorded at several observation stations. These studies will be continued for at least five more years.**

Sustainable Development Goals & sub-targets directly or indirectly related to the activity of MYTILINEOS



(15.1) We contribute to the protection of natural habitats and the prevention of loss in biodiversity.



(16.2) We help reduce all forms of corruption and bribery.

(16.5) We contribute to the efforts to end child abuse and exploitation.



(17.17) We focus on corporate partnerships and effective public-private and civil society partnerships.

The contribution of MYTILINEOS (Cumulative data 2016 - 2019)

- **There have been no incidents of biodiversity degradation from the Company's activities**, while the planned environmental rehabilitation activities for land areas used in mining operations are implemented annually.
- So far, we have rehabilitated **82.27%** of the total land area used for our mining activity, increased by **25% since 2016**.
- We have reforested a total area of **572,000 m²** as part of the construction and operation of RES units. At the same time, we carry out annual bird fauna monitoring studies, while the movement of animals is not hindered as there is no fencing and the disturbance to birds is also negligible, while technical systems for their protection are installed where this is necessary.
- **ZERO TOLERANCE** of all forms of corruption and bribery across all our activities.
- We organized **12** information seminars in 10 Greek cities on the subject of children and cybercrime, titled **“Protect Your Child from Cybercrime”**, which directly benefited **3,166 parents and children**.
- We supported in Greece the Council of Europe's **“ONE in FIVE”** campaign to stop sexual violence against children. We have undertaken to produce **20,000 DVDs** with the campaign's information material*. The campaign visited over **85** municipalities and **50** cities in Greece and was hosted on **164** television shows.
- **We have held 4 thematic consultations** with our Social Partners, at local level, in the context with our activities related to the Sustainable Development Goals.
- We work with **10** domestic Sustainable Development organizations.
- We have long-standing partnerships with more than 20 **voluntary and non-governmental organizations**.
- We are constantly developing new partnerships with academic institutions on the effective achievement of the sustainable Development Goals.
- **We implemented a 3-year community service program** in partnership with the Municipality of Levadia, under which we provided specific materials and financial resources for the renovation of public infrastructures, **while at the same time promoting the employment of nearly 90 unemployed citizens**.
- We participate in **10 international ESG/CSR indicators**, aiming to be assessed and draw on best practices for our continuous improvement.



21,197.6 Tj

Total
Energy Production

Materiality process

Materiality analysis of sustainability issues GRI 102-46

Seeking to provide the fullest possible information to its shareholders, to investors and to all its other Social Partner groups, MYTILINEOS' approach to Materiality consists of the following two strands of work: (a) the identification of the significant Financial issues which allow the Company's financial growth, performance and position to be evaluated, and (b) the identification of the Material Non-Financial issues which specify the positive or negative impacts of its activities on its Social Partner groups, on the natural environment and on the wider society.

The Materiality process, i.e. the process of identifying, understanding and prioritizing the sustainability issues, is one of the key elements in the Company's responsible operation. Through the assessment of the Material Non-Financial issues, MYTILINEOS enriches and shapes its strategy on Sustainable Development, with the aim of operating responsibly in all its activities, at local, national and international level.

This is a process that has been constantly evolving over the years and in which the individual assessments of the Material issues carried out by each Business Activity Sector are brought together and used as the basis for the prioritization of the respective issues which takes place centrally, and vice versa. At the same time, the Company's open dialogue with its Stakeholders, in addition to enhancing its ability to understand the impact of its activities, enriches this process with new inputs.

- In 2019, MYTILINEOS, based on the Materiality, Completeness and Stakeholder Inclusiveness principles of the GRI Standards, performed the Materiality analysis of the identified sustainability issues which are related to the scope of its activities. New elements introduced in this year's process were the following:
- The creation of a new custom matrix presenting the sustainability issues in correspondence with the internal and external sources used by the Company in order to best determine them as identified ones.
 - The presentation of the individual sustainability issues, previously grouped into broader categories for the purposes of their identification and prioritization by the Social Partner groups, so that the impacts of individual issues and the relevant needs and expectations of the Social Partners can be assessed individually.
 - The introduction of a new online platform for the prioritization of the identified issues, offering access to qualitative data and relevance factors for every Business Activity Sector, with a view to further improving the internal consultation on updating these issues, which is carried out on an annual basis.
 - The conduct of an online survey of 1,222 individuals, bodies and organizations representing all of the Company's Social Partner groups.

A detailed presentation of the stages in the process of identifying the Material Non-Financial issues for the year 2019 is given below:

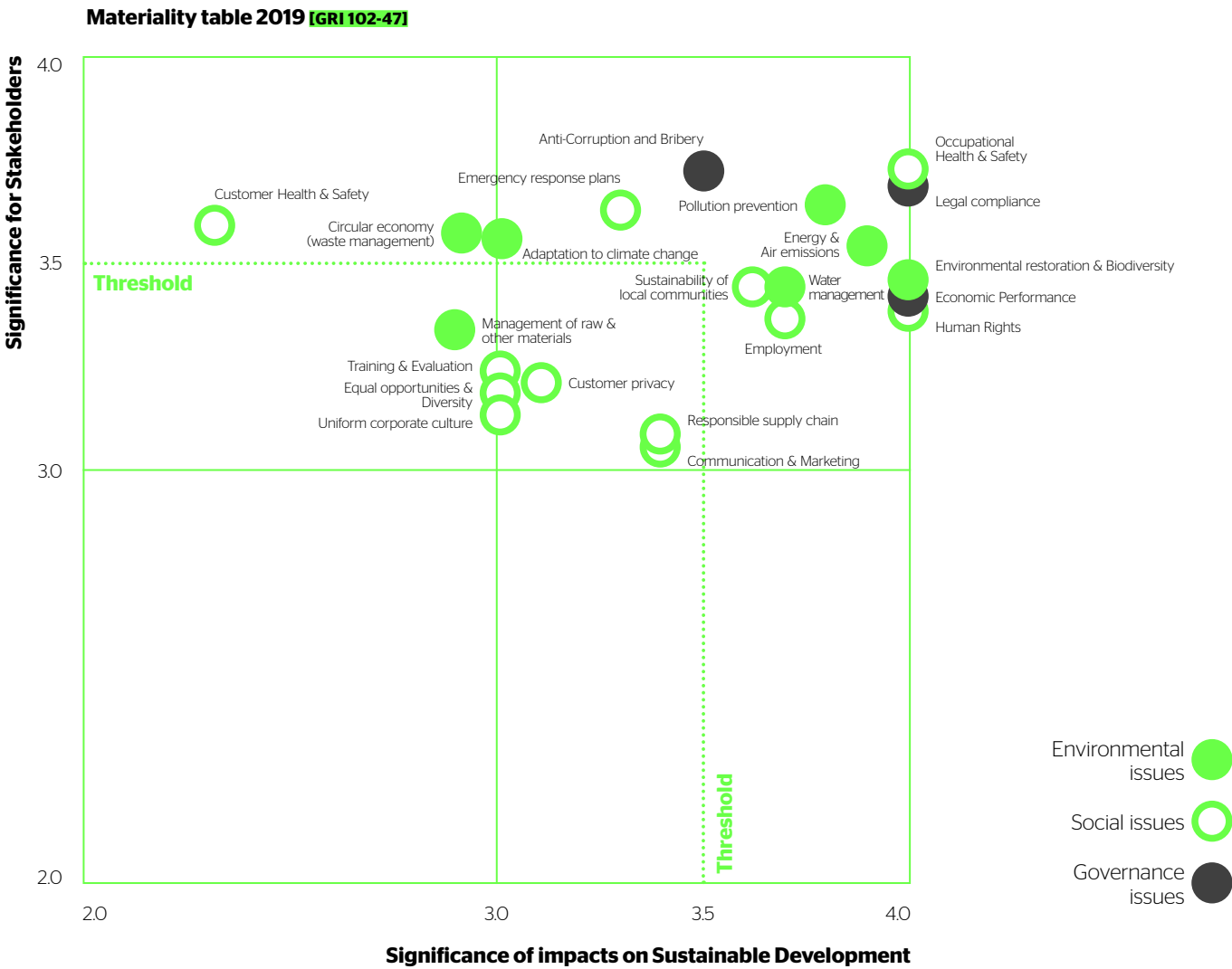
Identification Stage	Sources used in the sustainability issues identification process
PRINCIPLE: Stakeholders inclusiveness PRINCIPLE: Sustainability Context	<ul style="list-style-type: none">• MYTILINEOS' CSR policy & strategic priorities.• Business mission & values.• Codes of Business Conduct.• Overview of the items discussed in the meetings of the Company's Executive Committee.• 10 International Standards and CSR / Sustainable Development initiatives (UNGC, SDGs, TFCD, OECD, CDP, GRI, ISO26000, TI, PRI, SASB etc.).• 15 ESG investment indicators (FTSE4Good, Bloomberg, Thompson Reuters, Arabesque, ISS, MSCI etc.).• Content of publications in the press by and about the Company, as well as general publicity in this area.• Basic overview of the competitive environment.• Requirements under the European and Greek legislation.• Ways of communication with the Stakeholders.

22 issues identified in total

Prioritisation Stage	Synthesis of findings from the prioritization of the issues identified within & outside the company
PRINCIPLE: Stakeholders inclusiveness PRINCIPLE: Materiality	Within the Company <ul style="list-style-type: none">• Use of a new online application for the prioritization of the identified issues, with reference to their relevance for MYTILINEOS, their impact on Sustainable Development at local and national level, and their correlation with the Sustainable Development Goals.• Working meetings of the CSR Teams of the Company's Business Activity Sectors for prioritizing the identified issues – Confirmation and approval of the results by the respective Directorates-General of the Business Activity Sectors – Synthesis of the individual results and determination of the final value for each identified issue. Outside the Company <p>To determine the significance of the influence of each identified issue on the Social Partners' assessments and decisions, an electronic questionnaire was sent to 1,222 individuals, bodies and organizations, of which 35% sent back their responses. This was followed by the synthesis of the results obtained, taking into account the degree of significance given by each Social Partner group for each identified issue, based on their cooperation with the Company, after which the final value for each identified issue was determined.</p>

15 issues characterised as Material



The 15 material issues (with value >3.5 / 4 on the evaluation scale) include: a) the 4 most important issues for the Stakeholders, b) the 6 most important issues in terms of their impact on Sustainable Development and c) the 5 issues important both for Stakeholders and for their effects on Sustainable Development.



Validation Stage	
PRINCIPLE: Stakeholders inclusiveness PRINCIPLE: Completeness All Material issues were validated	Corporate social responsibility (CSR) Committee The responsibility for validating the Material issues and granting final approval for their disclosure in the Company's Annual Report and Sustainable Development Report, rests with the Corporate Social Responsibility Committee, to which the steps of the relevant methodology, its individual results and relevant Materiality graph for 2019 were presented in a special meeting of the Committee held for this purpose.

A supplementary table is given below, presenting the grouping of the Material issues on the basis of: (a) the resources utilized by the Company in the context of its activity, as these are mentioned in its Business Model, (b) the Sustainable Development Goals to which MYTILINEOS contributes through the management of

the respective Material Issues, and (c) the Environmental, Social and Governance (ESG) performance indicators managed by the Company in order to reflect its ability to create value and formulate effective long-term strategies.

Categories of Resources	Issues	Related SDGs	ESG Criteria
Financial	Financial position	8	
Industrial	Pollution prevention	12, 14, 15	
Natural	Environmental restorations & Biodiversity	15	
	Energy & Air emissions	7, 13	
	Water management	6, 12	
	Adapting to climate change	13	
	Circular economy	6, 8, 12	
	Management of raw and materials		
Human	Occupational Health & Safety	3, 8	
	Employment	8, 9	
	Human rights	5, 8, 10, 16	
	Employee Training & Development		
	Equal opportunities & Diversity		
Uniform corporate culture			
Social	Sustainability of local communities	8, 11	
	Emergency response plans		
	Customer Health & Safety	3, 12	
	Customer privacy		
	Responsible Supply Chain		
	Communication & Marketing		
		Anti-Corruption & Bribery	16
	Legal compliance		

Material Issues - Other significant Issues



Stakeholder Engagement

Relationships and cooperation with Stakeholders are structural elements of the MYTILINEOS Business Model, as a function of its mission and strategy. These different Stakeholder groups are recorded, ranked and characterized as “key groups” for the Company, on the basis of specific criteria and in correlation with: (a) the position they hold within its sphere of influence, (b) the degree of significance and relativity attributed to or existing in its activities and (c) the way in which they affect its ability to fulfil its vision and mission.

MYTILINEOS' Social Partners definition table **GRI 102-42**

	Metallurgy Sector	Electric Power & Gas Trading Sector	EPC & Infrastructure Projects Sector
Category A: Stakeholder groups that affect, and are significantly affected by, the Company's Business Activity Sector.	<ul style="list-style-type: none">• Employees• Customers• Local community / Local government• Suppliers	<ul style="list-style-type: none">• Employees• Customers• Local community / Local government• Suppliers• Regulators	<ul style="list-style-type: none">• Employees• Customers• Suppliers• Local community / Local government
Category B: Stakeholder groups that affect the operation of the Company's Business Activity Sector, but are affected by it in a more limited way.	<ul style="list-style-type: none">• Regulators• Press representatives• Academic community	<ul style="list-style-type: none">• Press representatives• Business organizations• Sustainable Development organizations	<ul style="list-style-type: none">• Business organizations• Regulators & Sustainable Development organizations
Category C: Stakeholder groups that affect and are affected by, the Company's Business Activity Sector in a limited way only.	<ul style="list-style-type: none">• Business organizations• Sustainable Development organizations• Non-Governmental Organizations	<ul style="list-style-type: none">• Non-Governmental Organizations• Academic community	<ul style="list-style-type: none">• Press representatives• Non-Governmental Organizations• Academic community

Notes:

1. In defining the Stakeholder groups, use was made of the 5 basic criteria (dependence, responsibility, intensity, influence and outlook) according to the AA1000 Stakeholder Engagement - 2015 international standard, leading to the classification of Social Partners in the above three main categories.
2. The group of shareholders/investors is not included in the above table since its supervision, as a key group, is carried out centrally by MYTILINEOS' Directorate-General for Investor Relations and Corporate Governance.

MYTILINEOS promotes regular communication with its Stakeholder groups; the frequency of such communication stems from the type of relationship built with each group, aiming to

understand their expectations and respond promptly to matters of concern to them, while at the same time maintaining and strengthening its “social license to operate”.

Ways of communication & cooperation between
MYTILINEOS and its Stakeholder Groups

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
Employees	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Instituted annual employee performance and skills evaluation processOpen, daily communication via the HR-Business Partner roleContinuing education and trainingPolicies disclosure, whenever requiredRegular and extraordinary meetings between management and employees (annual institution of hierarchy conferences, annual meetings between the Management and employees in groups of 25 people)Annual Sustainable Development Report	<ul style="list-style-type: none">Uniform corporate cultureStrengthening corporate innovation.Personnel evaluation system and incentivesTraining & skills developmentWork quality and employee development issuesTraining & skills developmentInformation about the Company's good practicesAdapting to Climate ChangeInvestments in RES project
Investing community (Shareholders - Investors - Financial analysts)	<ul style="list-style-type: none">Extraordinary and regular shareholders meetings on an annual basisAnnual presentations of financial results (press Releases, teleconferences, Internet)Materiality process**Disclosure of business developments (press Releases, Internet)Annual meetings with financial analystsDaily communication through MYTILINEOS' Investor Relations DepartmentAnnual Financial Report and Sustainable Development Report	<ul style="list-style-type: none">Prospect of MYTILINEOS' inclusion in the FTSE4Good Sustainability IndexThe Company's performance in international ESG indicators.Corporate GovernanceClimate Change: Prospect of adaptation to the TCFD recommendationsAdoption of the SASB methodology
Suppliers & Business partners	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Regular (even daily) communication through the Company's purchasing departments per Business Activity SectorSocial and environmental impact assessment every 3 years	<ul style="list-style-type: none">MeritocracyStabilization and further reduction of air emissions from the Company's activitiesAdded value of long-term partnershipsBolstering local employmentExpansion of support for Greek suppliers
Customers	<ul style="list-style-type: none">Promotion and information about products and services (continuous communication of the responsible departments)Annual Stakeholder Consultation processMateriality process**Daily communication through the Company's Commercial DirectoratesCooperation in the context of the annual customer satisfaction surveys	<ul style="list-style-type: none">Competitiveness and customer serviceAdapting to Climate Change:Pollution preventionRES & Biodiversity
Local Government (local communities)	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Regular and extraordinary communication ('open door' policy, meetings, participation in local events or consultations, whenever deemed necessary)Annual communication as part of the implementation of the social policy of MYTILINEOSAnnual Sustainable Development Report	<ul style="list-style-type: none">Support of local infrastructure and local cultural and sports activitiesBolstering local employment.The Company's environmental footprint
Business organizations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Communication on annual basis (provision of data and information, meetings, participation in consultations)Participation in events whenever deemed necessary	<ul style="list-style-type: none">Social footprint of MYTILINEOS in its local communities

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
Regulatory bodies & Sustainable Development organizations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Regular and extraordinary communication (provision of data and information through questionnaires, meetings, participation in consultations, whenever requested)Participation in events held by Sustainable Development organizations on an annual basis	<ul style="list-style-type: none">Inclusion of ESG criteria in the financing of Company investmentsTraining of executives in dealing with Corruption and BriberyRenewable sources of energy by 2025Incorporation of TCFD recommendationsGreater development of Diversity & Inclusion issuesIncrease in the number of women on the Company's Board of Directors
Academic community	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Forms of cooperation on an annual basis in the framework of the implementation of research programs and implementation of the Company's social policy	<ul style="list-style-type: none">As mentioned in the "Thematic Consultation 2019" sectionDevelopment of partnerships (e.g. scholarships, traineeships)Support of schools with materials and equipment
Press representatives	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Direct daily communication through MYTILINEOS' Communication departmentDisclosure of business developments (press Releases, Internet)Arrangement of briefing meetings with Greek and foreign journalists on an annual basis	<ul style="list-style-type: none">Progress of Company affairs regarding: (a) Natural Gas and the Company's dominant position in terms of its LNG market share, and (b) in the retail market for electricityThe activity of METKA EGN.The new CCGT unit and the Company's contribution on the path to lignite phase-out"Green aluminium" / recycling scrap – The contribution of EPALME and the reduction in energy costs by the shift to RESThe Company's financial figuresThe Company's Eurobond issuance and the universal acceptance of MYTILINEOS in the international marketsThe Company's environmental footprint and CSR actionsInnovation, pioneering role in private economy, extroversion, broader institutional interventionsMore opennessPresentation of CSR program at the end of each year to the media representativesHigher publicity at local level of the Company's CSR-related activities
Volunteer Associations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*Materiality process**Electronic platform for submitting social requests, available throughout the yearMeetings with NGO representatives, whenever deemed necessary based on the result of their requests' evaluationAnnual Sustainable Development Report	<ul style="list-style-type: none">Development of synergies to support actions around the strategic action lines of MYTILINEOS' social policyHighlighting the positive impact on society

* The participation of the particular Stakeholder Group in this form of cooperation depends on the subject of the Consultation.
** Participation in the relevant Social Partners survey carried out every two years.

The institution of Stakeholders Consultation process [GRI 102-43]




The Stakeholders Consultation is the application in practice of MYTILINEOS' long-standing commitment to responsible entrepreneurship and to open, social dialogue as a key element of the social resources it harnesses, to ensure its sustainability and to create added value for society at large.

As an institution established by MYTILINEOS, the Consultation is governed by specific principles and has specific goals (mytilineos.gr/Uploads/Social_Partners_Consultation_Process_2018_en.pdf), and is carried out annually with absolute consistency. The effectiveness and transparency of the Consultation is ensured through the CSR Governance system,

under which the individual CSR teams of the MYTILINEOS Business Activity Sectors record and evaluate all proposals, ideas and concerns expressed by the Social Partners. Once this has been done, the most important issues are forwarded to the respective General Directorates for decision-making regarding the responses to them and, where feasible, their integration in the corporate strategy. [GRI 102-21]

Since 2015, the institution of Consultation has been taking place primarily in the form of thematic dialogue forums held locally and of electronic consultations.

MYTILINEOS Thematic Consultations Table (Metallurgy Sector 2015 – 2019)

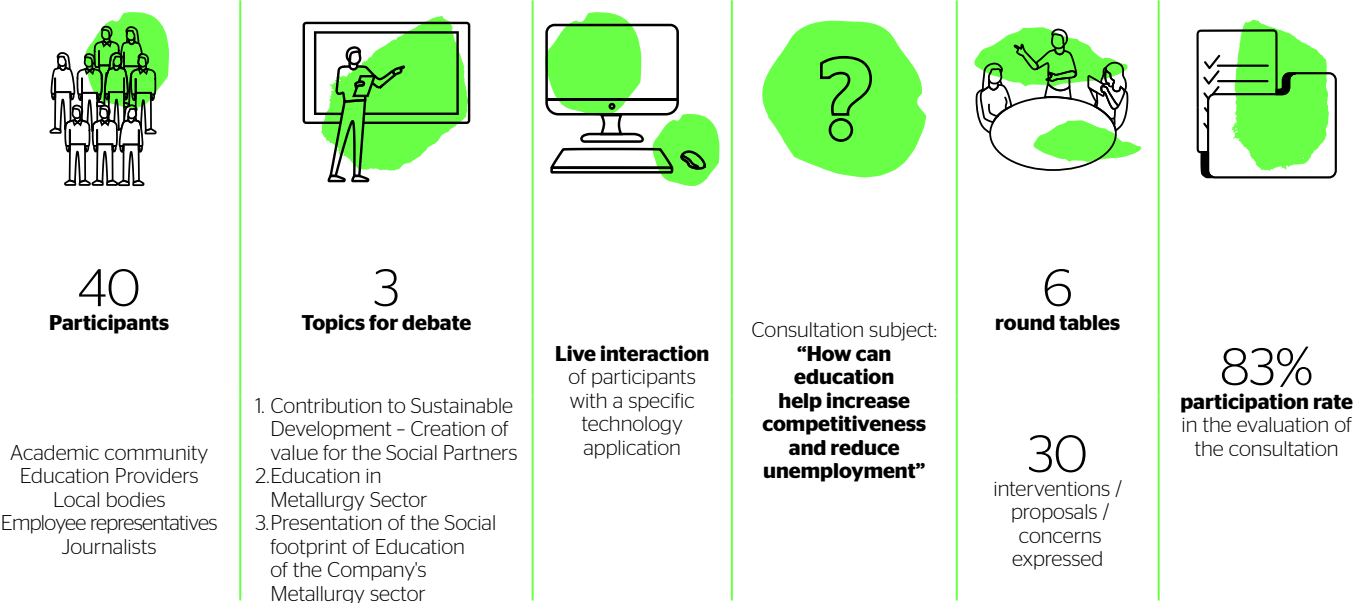
Thematic Consultation	Subject Coverage		Evaluation	Distinctions
2019	"Education – Skills development & Creation of quality jobs"	Quality Planning Organization	4.50/5	
2018	"Developing a Responsible Supply Chain"	Quality Planning Organization	4.46/5	 
2017	"Translating entrepreneurship into Value for Society"	Quality Planning Organization	4.53/5	
2016	"We talk about the Environment"	Quality Planning Organization	4.46/5	
2015	"Health & Safety at the workplace"	Quality Planning Organization	4.50/5	

Thematic Consultation 2019

The Metallurgy Sector of MYTILINEOS held its 5th thematic (and 10th consecutive) consultation with its Social Partners, which was titled **"Education – Skills Development and Creation of quality jobs"**.

The purpose of the consultation was to have a constructive dialogue between the Company and representatives from the academic community, education providers, business organizations and local bodies, journalists and employees, about the contribution of the State, the civil society and the business community to the achievement of Sustainable Development Goal 4 (Quality Education).

Thematic Consultation 2019: "Education – Skills development & Creation of quality jobs"



The Consultation concluded with the presentation of the results by the representatives of the working groups, in response to which the Company's representatives presented its initial position. Overall, all the proposals and interventions of the participants were recorded, so that they could be evaluated and integrated, as far as possible, into the existing practices of the MYTILINEOS Metallurgy Sector. [GRI 102-44]

Results and Key interventions/proposals General:

- Strengthening critical thinking at various stages of development (children – adolescents – young persons)
- Education must be founded on a knowledge – based economy
- School students – Educators – Educational system: The Education triangle is outdated
- Specialization of education
- Participation of employees in the planning of educational programs
- Development of soft skills
- Focus on Digital skills and on the computational thinking of young persons
- Modernization of education through the use of technology
- Actions for the exchange of experiences between schools and universities in Greece with their counterparts abroad
- Investing in Experiential Education, which stimulates creativity

Addressed to MYTILINEOS:

- MYTILINEOS should implement initiatives for the education of refugees
- MYTILINEOS should cooperate with the educational bodies regarding skills that a future employee would like to have before entering the labor market
- More education hours and new training initiatives for Metallurgy employees
- MYTILINEOS should intensify its partnerships with local bodies on issues pertaining to education, and the local bodies should do the same with other companies
- Support of new education projects in schools

MYTILINEOS also proceeded to evaluate the Consultation, by posting to all participants a custom satisfaction questionnaire and inviting responses on a scale of 1 (low to 5 high). Three aspects of the Consultation were evaluated: **(a)** Overall Image, **(b)** Planning and **(c)** Organization. A number of individual variables were used in each category and the respondents were also able to make comments and suggest improvements. The respondents' response reached 83%, while the Consultation, as evaluated by the participants (with overall score of 4.5/5), was characterized as a useful and positive initiative with several innovative elements.

Response to Stakeholders' requests

Thematic Consultation 2018 “Developing a Responsible Supply Chain”	
Key issues raised by the Stakeholders of the MYTILINEOS Metallurgy Sector who participated in the special thematic dialogue organized by the Company in 2018.	Metallurgy Sector Response GRI 102-44
More purchases from Greek suppliers.	The Metallurgy Sector has always sought and continues to seek partnerships with Greek manufacturers and producers, provided there is added value. However, purchasing imported products from Greek resellers at higher prices is not part of the Company's purchasing policy.
With regard to supply requests made to the Purchasing department, it should be possible to jointly formulate technical specifications.	This is a good practice, which is applied when feasible.
Request for improvements in the technical description and planning of the work requested by the Company as a whole, to allow for better management of personnel time.	Improving technical descriptions and work planning is always one of the Company's priorities, as the benefits, including better management of personnel time, are important for the Company and its partners.
Better forecasting of the Company's annual needs/contracts for spare parts and provision of improved related updates to suppliers.	As part of the strategic planning of its purchases, the Metallurgy Sector is constantly striving to improve the forecasts of its annual needs in materials and services and the provision of related updates to suppliers.
Availability of a list of approved suppliers of materials and possibility of submitting automated electronic offers for materials. It was also proposed that companies offering materials should be separated from those offering services.	As already mentioned in the past, the list of approved suppliers of materials and services is in the Company's SAP. Regarding the availability of automated electronic offers for materials, this is considered on a case-by-case basis, for limited application.
It was proposed that the Metallurgy Sector examine its purchasing policy, according to which it seeks the best possible quality at the cheapest possible price, thus leading specific suppliers to a dead end.	The Procurement Policy of the Metallurgy Sector is aimed at the constant optimization of the Total Cost of Ownership (TCO) for all Materials and Services purchased, and the Sector's approach to purchases is shaped on this basis. In any case, however, we reiterate that both the prices and the rules governing these purchases are determined by the market.
Regarding the testing of new products (from start to implementation), the view was expressed for the need to improve the response time of the Company's departments (users) to the suppliers recommending these products. There should be continuous cooperation in areas in need of improvement.	There is cooperation with the suppliers in the testing of new products, and we very much rely on it. As far as the response time for the tests is concerned, it is not always possible to shorten this time because of the nature of these tests.
Proposal for interaction between the Company and suppliers who have SAP available, for timely information updates about the Company's stock quantities.	Cooperation with suppliers on the Company's and suppliers' inventory issues. However, there is still no provision for interaction between supplier SAP systems and Company ones, as proposed.

Thematic Consultation 2018 “Developing a Responsible Supply Chain”	
Key issues raised by the Stakeholders of the MYTILINEOS Metallurgy Sector who participated in the special thematic dialogue organized by the Company in 2018.	Metallurgy Sector Response GRI 102-44
Provision of more support by the Company to contractors on Health & Safety issues (training and prevention).	The 3-monthly meetings between the Company and contractors are taking place as per usual and the topics discussed in these meetings include, inter alia, health and safety issues of concern to the Company and to the contractors.
Resumption of the 2-monthly meetings between the Company and contractors, which offer possibilities for improvement.	
Systematic feedback was requested after an order is awarded, regarding the reasons why one of the participants was not selected.	Information and feedback to suppliers about whether an order was awarded or not is provided once the respective tender procedure is concluded. However, as has been said in the past, the Company's procedures expressly prohibit the disclosure of financial data and other information to tenderers, and this is also appreciated by the suppliers.



377,752.7 MWh

production by RES in 2019,
increased by 54,8%

Economic performance in 2019 & outlook for 2020

Economic performance in 2019

<div>8</div> <div>RECENT WORK AND ECONOMIC GROWTH</div> <div> </div>	<div>Impact on Sustainable Development</div> <div>4,00</div>	<div>Significance for Stakeholders</div> <div>3,45</div>
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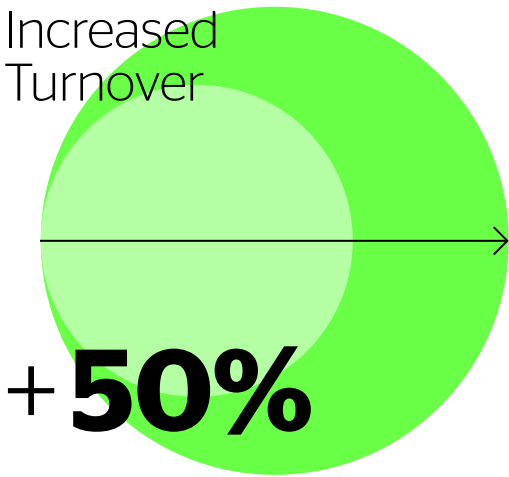
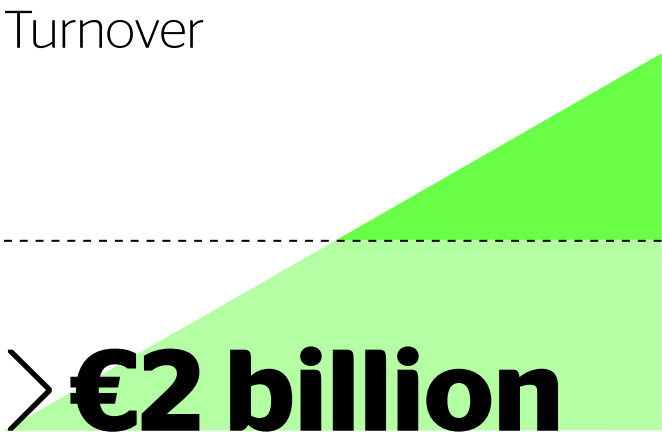
Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI103-1b]		Issue of increased significance to:
<div>Where the impacts occur:</div> <p>In the national economy and employment, in the local communities as well as in the economic transactions and the flow of money, between the Company and the main groups of the Stakeholders.</p>	<div>The management of the topic by MYTILINEOS contributes to the Sustainable Development:</div> <ul style="list-style-type: none"> In the economic liquidity and the guarantee of the Company's ability to finance and develop its activities with the aim of its sustainability. Further development of the Company's ability to respond to economic environmental and social challenges arise. In the utilization of financial resources with the aim of creating added value for the basic groups of its Stakeholders. 	<ul style="list-style-type: none"> Shareholders/Investors Local Communities NGOs Regulatory bodies <p>in the context of their cooperation with MYTILINEOS.</p>
<div>By whom are the impacts caused:</div> <p>The effects are caused by the Company's Business Activities Sectors and its subsidiaries.</p>		

“2019 has been another year of growth for MYTILINEOS, with turnover exceeding the €2.0 billion mark for the first time. The 50% increase in turnover in 2019 demonstrates the Company's ability to continue to grow despite significant market headwinds in the Metallurgy business.

It also confirms the quality of our diversified business model, which has consistently enabled us to generate significant free cash flows throughout various cycles. In addition, our successful debut Euro bond issuance demonstrates the attractiveness of the Company's integrated business model to investors globally.”

Evangelos G. Mytilineos
Chairman of the Board of Directors and Chief Executive Officer



More specifically: [GRI 103-3a-ii]

- Turnover registered a 47.8% increase and stood at €2,256.1 million against €1,526.5 million in 2018, mainly due to the strong growth of the Electric Power & Gas Trading Sector.
- Earnings before interest, tax, depreciation and amortization (EBITDA) stood at €313.1 million against €283.5 million in 2018, registering a rise by 10.4% attributable to the increased performance of the Electric Power & Gas Trading Sector, the strong profitability maintained by the Metallurgy Sector despite the soft pricing environment, and the positive contribution of the

- new International Renewables and Storage Development (RSD) Uni), which during 2019 was still part of the EPC & Infrastructure Projects Sector.
- Net profits after tax and minority interests rose to €144.9 million against €141.2 million in 2018.
- Earnings per share (EPS) stood at €1.014 against €0.988 for 2018.
- The proposed dividend for financial year 2019 stands at €0.36 per share.

Outlook for 2020 GRI 102-6

In the Metallurgy sector, the growth rate of aluminium demand worldwide is expected to remain positive; at the same time, supply is increasing due to planned start-ups / expansions in some aluminium plants outside China, thus driving the balance of quantities to positive ground. As a result, stocks are expected to increase worldwide to decade-high levels, giving rise to predictions of pressure on international aluminium prices. The emergence and spread of COVID-19 affected the real economy and the movement of products, fueling market concerns and causing a drop in all prices, including London Metal Exchange ones, while at the same time strengthening the dollar against other currencies. In the meantime, however, the FED announced a monetary easing plan, causing the dollar to slide. On the raw materials and natural gas price side, a downward trend is already emerging, which is expected to further strengthen and improve production costs, while also limiting the negative impact of low sale prices on financial results. The Company's Metallurgy Sector is already making headway in its digital transformation (Industry 4.0), **in particular in the area of digital smelting, through the partnership launched with General Electric.** This partnership is expected to yield reduced power consumption levels in the Electrolysis line. At the same time, working groups have been set up to explore new ideas for the implementation of Industry 4.0 in other industrial activities.

For the EPC & Infrastructure Projects Sector, 2020 is expected to be a year of transition, evolution and new opportunities. The Company will focus on developing its activities in countries with particularly demanding requirements, with its status and know-how giving it a special place in the global market. Where good investment opportunities are identified, MYTILINEOS intends to make use of its significant project financing capabilities, in order to create even higher added value for both its clients and its shareholders. The strategy of the Sector's EPC business line aims to increase its signed backlog in 2020 by undertaking new projects and investments in targeted markets and by focusing on the timely execution of existing contracts. The planning and overall prospects for the Sector's individual activities are detailed in the Company's Annual Report. Among them, of particular relevance to Sustainable Development are the following:

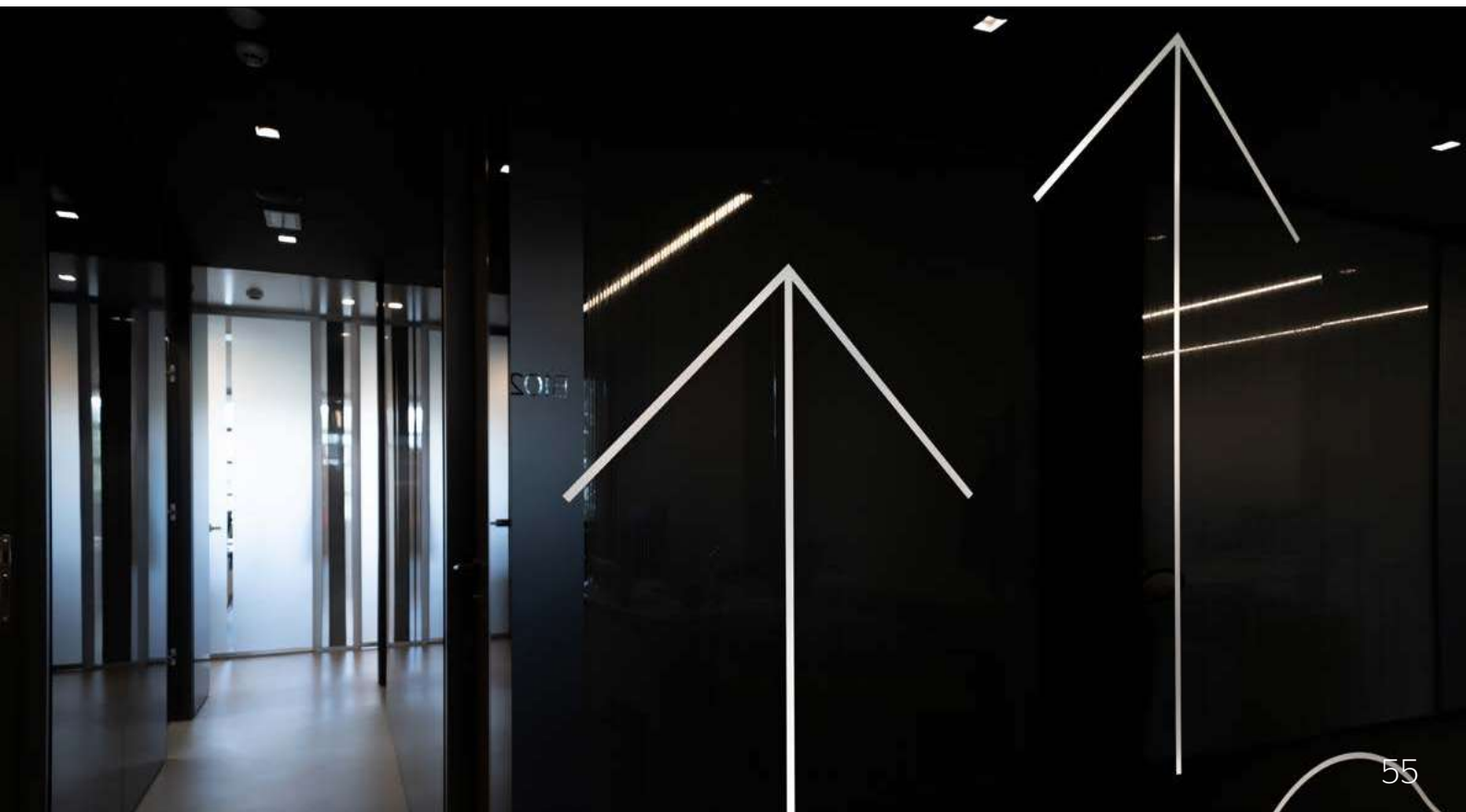
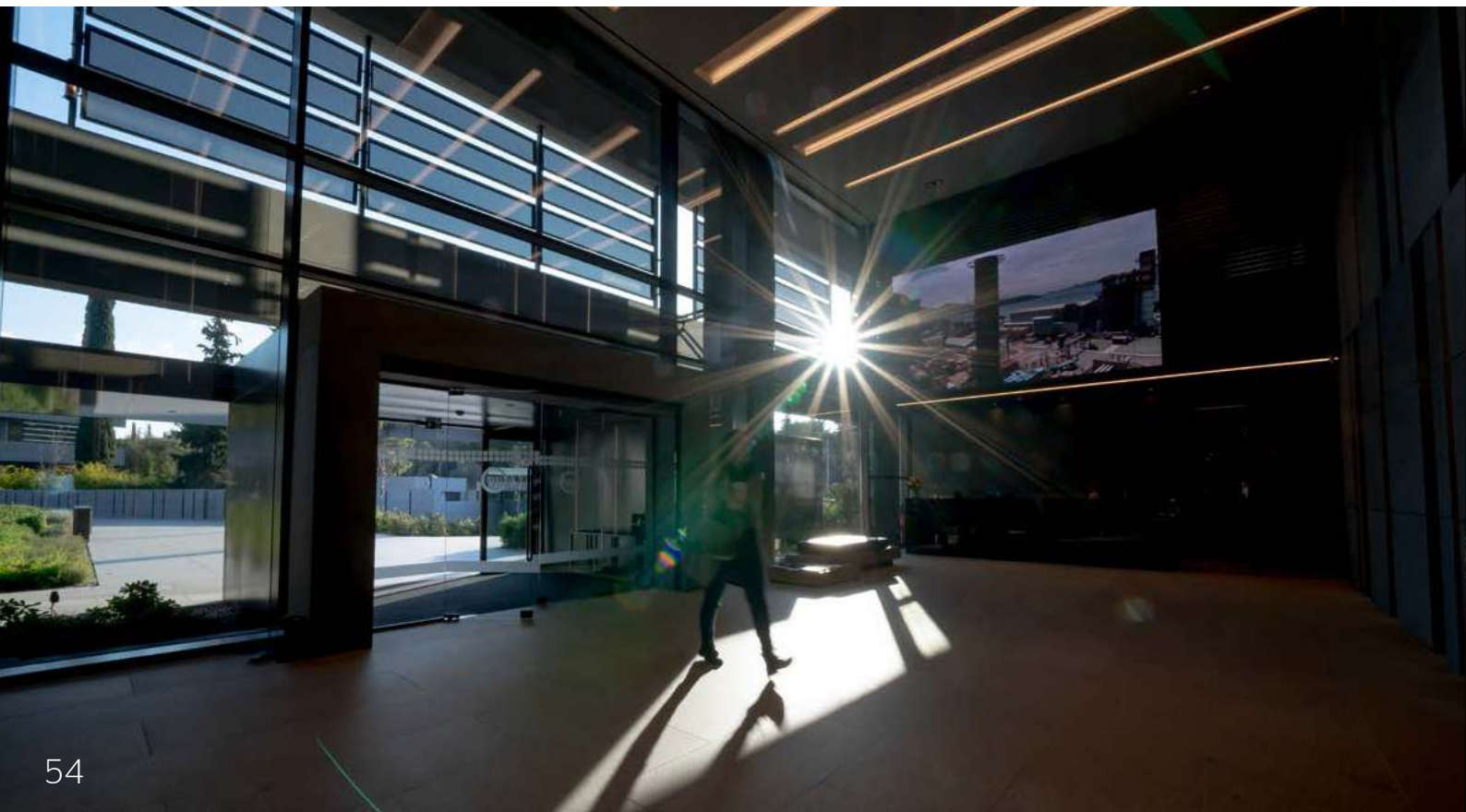
- In field of Waste Management, MYTILINEOS has identified great potential for expansion, driven by its increased expertise in circular economy solutions. In particular, it is expanding into the management of solid waste, through the development of biogas and waste management plants, for which it also selectively examines project financing as an option. In the area of sludge and wastewater management, it is implementing a plan for its organized penetration, initially in Europe, the Middle East and Africa, also making use of the added value contributed by the particular expertise of its subsidiary Zeologic, through

which it acts as a pioneering technology provider in this particular market.

- The Sector will continue to seek hybrid / off-grid projects, capitalizing on its relevant experience and knowledge, gained from similar successfully completed projects. At the same time, it will continue to implement the strategy of expanding and developing its presence in major energy upgrading and energy conservation projects in the Greek market and in selected foreign markets. Finally, it will intensify its presence in projects concerning new technologies coupled with the provision of energy solutions, with a view to developing new, diversified activities with added value for the sector.
- Together with the forthcoming completion of the full acquisition of its subsidiary METKA EGN and its rapid evolution into one of the world's largest manufacturers of photovoltaic and energy storage projects, MYTILINEOS announced the addition to its organizational structure of a new Business Activity Sector - the International Renewables and Storage Development (RSD) Sector. The RSD Sector, already recognized worldwide as a reliable EPC contractor for photovoltaic projects and energy storage facilities, is also transformed into a major developer. Together with the strong acceleration in climate-change-related investments, the RSD Sector will focus to stabilize its economic aggregates for 2020 while laying the foundations for further growth in the coming years.

As regards the Electric Power & Gas Trading Sector, MYTILINEOS, with ~ 14 GW of total installed capacity from thermal power plants and RES projects currently in operation, has consolidated its position as the largest private vertically integrated electric power and gas company and has achieved the critical size required in order to fully benefit from the expected full liberalization of the domestic electricity and gas markets. In 2020, the financial results of the Electric Power & Gas Trading Sector are expected to be strengthened due to:

- The decrease in natural gas prices.
- The increase of the installed capacity from RES projects, by fully operating, throughout the year, the three new Wind Farms with a total capacity of 34.5 MW and launching the operation of one additional Wind Farm with a capacity of 11 MW.
- The increased volume of the electric power and gas supply activity.
- The expansion of the Company's electric power trading activity to additional countries.



Environment

Alignment to UN Global Compact Principles

PRINCIPLE	PRINCIPLE	PRINCIPLE
7 th	8 th	9 th

Material Issues

- Environmental Restoration & Biodiversity
- Energy & Air Emissions
- Pollution Prevention
- Water Management
- Circular Economy (Waste Management)
- Adaptation to Climate Change

Alignment to UN Sustainable Development Goals

6 CLEAN WATER AND SANITATION 	7 AFFORDABLE AND CLEAN ENERGY 	8 DECENT WORK AND ECONOMIC GROWTH
12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	13 CLIMATE ACTION 	14 LIFE BELOW WATER
15 LIFE ON LAND 		

“Guided by our principles, **we are committed to sustainable development** through rigorous and innovative practices at all levels of our operational chain.”

Specific environmental targets	Targets 2019	Performance 2019	Targets 2020
Incidents of deterioration of the natural environment	0	0	0
Fluorine emissions (kg/tAl) ¹	<1.5	1.4	<1.3
Carbon tetrafluoride emissions (kg CF ₄ /t Al) ²	<0.05	0.06	< 0.06
Specific energy consumption (Gj/t of alumina produced) ³	<9	8.33	< 8.5
Specific energy consumption (Gj/t of aluminium produced) ⁴	<50	48.78	< 50
Total water withdrawal (industrial use & drinking, m ³ /day) ⁵	<12,950	13,278	≤13,000
Drinking water consumption by local settlements (Winter season, OCT to APR – m ³ /day) ⁶	<2,400	2,799	< 2,800
Drinking water consumption by local settlements (Summer season, MAY to SEP – m ³ /day) ⁷	<3,100	3,583	< 3,500
Quantity of bauxite residue disposals to third parties (t/year) ⁸	>90,000	78,300	> 100,000
Rehabilitation percentage of usable land areas from the mining activity	>82%	82.27%	> 83%
Air emissions (Scope 1 & 2 – tCO ₂ /year) ⁹	n/a	7,562.1	≤7,410
Serious Environmental Incidents ¹⁰	0	0	0
Validated daily average values exceeding 105% of CO and NO _x ¹¹ emission limit values	0	0	0

1&2. Specific targets of the Metallurgy sector that contribute to the reduction of air pollutant emissions.

3&4. Specific targets of the Metallurgy sector for the stabilization of energy consumption.

5,6&7. Specific target of the Metallurgy sector that contributes to the conservation of natural resources.

8. Specific target of the Metallurgy sector that contributes to the reduction of solid waste (bauxite residues).

9. Specific target of the EPC & Infrastructure Projects sector for the reduction of air pollutant emissions.

10&11. Special targets of the Electricity Sector for the prevention of pollution.

Environmental policy

Measuring the impact of MYTILINEOS' business activity on the natural environment is an ongoing process that is constantly evolving.

The Company **is committed to the stabilization and reduction of its environmental footprint**, through the implementation **of an integrated Environmental Management System certified in accordance with the ISO 1401/2015 international standard**.

The system is supported by individual **environmental policies, targeted investments aimed at upgrading its production processes**, by taking advantage of new developments in related technologies, and by applying the **Best Available Techniques per Business Activity Sector**.

Core elements of MYTILINEOS' Environmental policy:

- Adherence to the agreements and commitments that MYTILINEOS has undertaken over and above its statutory obligations.
- Integration of Sustainable Development principles in the Company's decision-making and operation processes.
- Assessment of the impacts of the Company's activities on the environment, identification and assessment of potential risks, adoption of the necessary precaution measures, and conduct of regular inspections and audits to confirm their implementation and assess their efficiency.
- Control and reduction of air emissions, in tandem with correct management and continuous reduction of solid and liquid waste, through using recovery, reuse and recycling techniques where feasible.
- Responsible use of energy, water and other natural resources.
- Protection of biodiversity and ecosystems.
- Prevention of all identified pollution risks.
- Readiness and effective response to emergency environmental incidents and correction of all deviations by implementing corrective action plans.
- Study, maintenance and evolution of appropriate prevention and suppression means, especially in cases where installations are modified.
- Correction of all confirmed deviations, by introducing and implementing improvement / restoration plans and preventive action plans.
- Continuous briefing, training and awareness-raising activities for personnel per Business Activity Sector, adapted to the duties and needs of each employee in order to promote an environmentally responsible culture.
- Acknowledgment of Social Partners' needs and expectations regarding environmental issues, demonstrating increased awareness of them and promoting a climate of cooperation.
- Encouraging associates (contractors, suppliers, clients) to take action regarding environment-related issues and to enhance their environmental awareness.
- Organization of regular internal and external audits to assess the performance of the Environmental Management System, the achievement of the targets set and the application of the relevant regulations and principles.

In the context of the organization and monitoring of the Environmental Management system, the environmental managers in each of Business Activity Sector of the Company, safeguard on a daily basis the proper environmental operation of all industrial units, while the CEO and the Executive Committee every 3 months, are getting informed and they evaluate the progress and performance on key environmental issues giving appropriate directions when required.

MYTILINEOS as a member of the “ASI” international initiative

In November 2019, the Company joined the International Aluminium Stewardship Initiative (ASI) as a [Production & Transformation member](#). The ASI Standard sets out 59 criteria under the three main pillars (Governance – Environment – Society) covering major issues such as climate change, biodiversity and human rights, with a view to ensuring compliance of the aluminium value chain with sustainability commitments. For MYTILINEOS, joining the ASI initiative reflects its solid commitment, fully aligned with the vision of the European Union, to moving swiftly towards carbon-neutral production and to achieving the target of 100% RES sourcing for its Metallurgy sector by 2030.

Environmental legislation

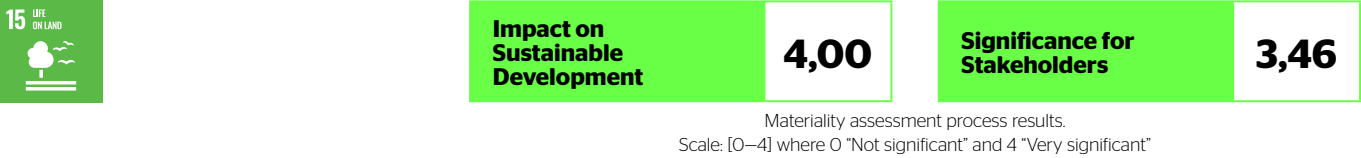
A key element of MYTILINEOS' business activity is compliance with the environmental legislation; this is an issue of paramount importance, not falling short in significance of issues the Company manages in the context of its ongoing and responsible development. This stance, constituting a key component of the Company's overall environmental policy, is primarily based on the principle of adhering to the requirements of the law and to the agreements and voluntary commitments undertaken by its Business Activity Sectors. Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the Company's operational units, is a process conducted internally, on a regular basis and by specialized personnel in each Business Activity Sector, as well as annually, by a recognized independent external organization that undertakes to audit and certify the environmental management system in place.

Environmental expenditures

In 2019, the environmental expenditures of MYTILINEOS amounted to €61 million and concerned the disposal of waste, the management of air emissions including related costs, environmental restoration, and environmental prevention & management actions.



Environmental Restoration & Biodiversity



Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: In the area where the mining activities of DELPHI-DISTOMON take place, as well as in protected areas of the Natura Network where the Company's RES plants operate.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">In the conservation of mountain ecosystems, including biodiversity.In the restoration of the exploitable land that was affected by the business activity.To increase forestry and reforestation at local and national level.	<ul style="list-style-type: none">Regulatory bodiesLocal communitiesSustainable Development OrganizationsAcademic communityShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are caused by the subsidiaries of MYTILINEOS: DELPHI – DISTOMON, Aeoliki Sidirokastrou S.A., Aeoliki Evia Pyrgos S.A. and Aeoliki Evia Chelona S.A.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide specific information and data to all MYTILINEOS' Stakeholder groups, so that they can understand the Company's approach, which relies on a combination of elements to prevent, manage and restore the inevitable impacts on the areas used for its business activity, while minimizing any effects on biodiversity. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The key challenge for the Company is to safeguard biodiversity and restore the natural landscape in usable land areas associated with bauxite mining activities as well as with the development and operation of Renewable Energy Sources (RES) projects.

Major risks [GRI 102-15]

- Negative impacts from the Company's activities on the flora and fauna in protected areas or in areas of a high biodiversity value, are a permanent potential risk. Failure to monitor and manage these risks may cause delays in obtaining relevant permits for future projects, as well as loss of the Company's social license to operate with a negative impact on its reputation and financial position.
- Any deviation from the Environmental Terms Approval Decisions may cause both the degradation of the natural environment and the suspension of the project with immediate financial consequences for the Company.

Risk Management / Control Practices [GRI 103-2a]

In the Metallurgy sector, the area of the aluminium production plant does not fall under any category of areas protected by law, while the mining activity carried out by DELPHI – DISTOMON company, a subsidiary of MYTILINEOS, which concerns primarily **underground work sites in the area of Fokida**, is performed with respect to the area's biodiversity. Before each new mining activity begins, **Environmental Impact Assessments and Environmental Rehabilitation Plans** are carried out and used as a basis for the mining phase but also for the rehabilitation phase. The areas where mining will take place, to be followed by rehabilitation, are pinpointed with precision, and the planning for each mining exploitation is developed considering the need to **minimize deteriorations to the natural environment and the landscape**.

Measures taken to prevent significant adverse effects on the environment:

- Use of the existing road network and prohibition of opening new roads.
- Use of existing access land works and in-site installations.
- Prohibition of depositing or managing sterile limestone waste from the mining process on the soil.
- Systematic maceration of all mining work areas for dust emission suppression.
- The management of all types of non-hazardous waste complies with the provisions of the applicable laws, while the disposal of these wastes takes place only through certified bodies/contractors.

Moreover, a detailed mapping of the form and type of the vegetation that is established, so that rehabilitation can be based on

the unique features of the local ecosystem. **The environmental policy** of DELPHI – DISTOMON (alhellas.com/en-us/enviromental-policy/enviromental-policy) **emphasizes its commitment** to the protection of biodiversity and helps further contain any adverse effects, which are already quite limited in scope and temporary in nature.

The Company is also committed to securing the financial resources required to support adherence to the environmental terms and the performance of rehabilitation works, whose costs are included in advance in the budget of the corresponding project.

The closing-down and remediation plan for every site is specified by the Environmental Terms Approval Decision, and it is updated on a regular basis, while the project manager is obliged to submit to the competent Environment Department of the Regional Unit of Fokida, in the first month of each year, a topographical diagram (to a scale of 1:2000) together with a technical report, which presents and describes the progress of the remediation works.

DELPHI-DISTOMON has been systematically active for more than 47 years in environmental rehabilitation and all its inactive quarries have been restored. Environmental remediation is carried out through systematic tree planting of approximately 15-20,000 tree/seeds per year, while during 2019, **19,532 forest seedlings were planted**.

Until today, DELPHI-DISTOMON has planted approximately 1,158,500 trees covering a total afforested area measuring over 1.8 km². In addition, 74.5 km of fencing have been installed (to protect the tree planting), together with a 715 km long network of watering-irrigation pipes for those trees.

It should also be mentioned that over the last 6 years, on average, 250,000 tons of sterilized limestone are produced during the mining process. This quantity has been disposed to already existing sinkholes of surface and underground construction sites and thus **not a single square meter of land had to be binded for the disposal of this type of waste**.

In the Electric Power & Gas Trading sector and with respect to the activities which concern the construction and operation of wind farms located near or inside areas designated as Special Protection Areas, a key prerequisite is the development of the respective environmental impact studies foreseen (specific ecological assessment, annual monitoring of the protected area), to confirm that there are no impacts or, in cases where there are impacts, to describe the measures which may be adopted in order for these impacts to be avoided. **In line with the above, the impacts in the locations of the Company's activities are negligible in terms of pollution (gaseous, solid or liquid waste), the movement of animals is not obstructed as there is no fencing, and the disturbance to the local population of birds is negligible, while where this is necessary,**

technical systems for the protection of birds are installed.

Furthermore, concerning the restoration of the environment, the Company applies and systematically promotes the obligation to reforest areas destroyed by fire (areas under reforestation), in accordance with the applicable laws and the instructions of the corresponding Forest Departments. Over the next two years, it is estimated that the Company will have forested over 570,000 m² of such areas in total.

Results [GRI 103-3a-ii]

- During 2019, **no incidents occurred involving a deterioration of biodiversity** because of the Company's activities, while the works scheduled for the rehabilitation of used areas were carried out as planned.
- MYTILINEOS became one of the first 9 member companies of the Sustainable Development Council of Hellenic Federation of Enterprises (SEV), participating in the International Business for Nature Alliance to protect biodiversity and ecosystems.** The SEV Council for Sustainable Development as a member of the World Business Council for Sustainable Development WBCSD, after co-signing the Lisbon Declaration paved the way for Greek companies to contribute to tackling the global challenge of environmental balance and sustainability and to highlight the strategies they are implementing, the commitments they have made as well as the good practices they carry out.
- Concerning mining operations, at the end of 2019: (a) the total area of land used for mining operations stood at 120,000 m², **decreased by 4.8%** compared to 2018, (b) the total area of land in the remediation process stood at 206,000 m², also decreased by 6.8% from the previous year, while (c) the area of land whose soil has been rehabilitated since the beginning of the mining activity, as a percentage of the total land area used for mining operations, stood at **82.27%, increased by 1.4%** compared to 2018.
- Regarding the activities of the construction and operation of wind farms, in 2019 two bird population monitoring studies were carried out, in compliance with the relevant Environmental Terms Approval Decisions, while reforestation of a total area of **572 acres** was successfully completed

The table on the right represents the very limited impacts of the construction and operation of the Company's wind farms located in protected areas (e.g. Natura 2000 Network).

“Our commitment in action: By 2021, MYTILINEOS will be included in the international **CDP Climate Change Sustainability Initiative.**”

Operational sites under lease by MYTILINEOS in protected areas [GRI 304-1]

1. Wind Farm in the locality “Koryfi” of the Municipality of Sintiki (Regional Unit of Serres), with a power capacity of 17.0 MW, in operation, owned by the company Eoliki Sidirokastrou, situated at an average distance of 1.5 km within the boundaries of the Natura 2000 area “GR 1260001” and at a distance or of more than 7.0 km from the area “GR 1260008”.

Concerns the lease of 80.2 acres of land from Public Properties Company S.A. Area of operational site: 0.12 km².

2. Wind Farm in the locality “Koryfi” of the Municipality of Sintiki (Regional Unit of Serres), with a power capacity of 15.0 MW, in operation, owned by the company Eoliki Sidirokastrou, situated at an average distance of 1.0 km within the boundaries of the Natura 2000 area “GR 1260001” and at a distance or of more than 7.5 km from the area “GR 1260008”.

Concerns the lease of 27182 acres of land from the Municipality of Sintiki. Area of operational site: 0.035 km².

3. Wind Farm in the locality “Pyrgos” of the Municipality of Karystos (Regional Unit of Evia), with a power capacity of 15.3 MW, currently in trial operation since April 2019, owned by the company Eoliki Evias Pyrgos, situated as follows: (a) At a maximum distance of 1,000 m from the outer boundaries of the area with code number “GR 2420012”, which is the “Mt Ochi, Coastal Area and Islets” Special Protection Area (SPA) for birds. Seven (7) Wind Turbines are located within this area. (b) At a maximum distance of 200 m from the outer boundaries of the area “GR 2420001”, which is the Special Management Area” (SMA) “Mt Ochi - Karystos Plain - River - Cape Kafiareas - Marine coastal area” of the Natura 2000 Network. Two (2) Wind Turbines are located within this area.

Lease of 579 acres from private land owners holding the ownership rights to the “Dafniza - Kalipeti” private forest. Area of operational site: 0.033 km².

4. Wind Farm in the locality “Chelona” of the Municipality of Karystos (Regional Unit of Evia) with a power capacity of 8.1 MW, in trial operation since October 2019, owned by the company Eoliki Evias Chelona, situated at a maximum distance of 200 m from the outer boundaries of the Special Protection Area (SPA) for Birds “Mt Ochi, Coastal Zone and Islets”, with code number “GR 2420012”, belonging to NATURA 2000 network. Seven (7) Wind Turbines are located within this area.

Area of operational site: 0.130 km².

Biodiversity value of protected area [GRI 304-2]

The “GR 1260001” area encompasses wetlands and mountainous ecosystems of great national and international importance. It supports rich -in terms of both numbers and diversity- bird populations, including rare and endangered species The wetland is of great importance as a feeding ground for birds of prey nesting in the nearby forests, as a winter site and stopover site for migratory birds, as well as a breeding ground for a significant number of birds. The increased biological productivity, the existence of rare plant species and of equally rare and diverse fauna (fish, mammals, amphibians, reptiles), increase even more the area's biodiversity value.

As was the case in 2018, the annual bird fauna monitoring study was again carried out in the area of the Wind Farms in 2019 and is pending submission, within the first quarter of 2020, to the competent service responsible for monitoring the Protected Areas of the Natura 2000 Network. No impacts on the protected area, as the operation areas of the Wind Farms are located in the area's peripheral zone, away from the Priority Habitats. **An automated bird collision avoidance system has been installed in the second one of these Wind Farms.**

In the Natura area “GR2120012” (Mt Ochi, Coastal Area and Islets), 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The protected area “GR2420001” (Mt Ochi - Karystos Plain - River - Cape Kafiareas - Marine coastal area) is mainly mountainous, with a relatively wild and difficult to access coastline in the northeastern foothills of Mt Ochi. 16 habitats in this area are listed in Annex I of Directive 92/43/EEC, of which Habitat 1120* - Marine vegetation areas with Posidonia (Posidonion oceanicae) is a priority habitat. Four (4) species of reptiles, two (2) of invertebrate and two (2) of mammals are listed in Annex II of Directive 92/43/EEC and in article 4 of Directive 2009/147/EC. The two species of mammals (Mediterranean monk seal and otter) are priority species. In 2019, an annual bird fauna monitoring study was carried out to assess the limited impact of the Wind Farm's trial operation on the area's fauna, to ensure compliance with the relevant Environmental Terms Approval License.

The Natura area “GR24200012” (Mt Ochi, Coastal Zone and Islets) is mainly mountainous, with a relatively wild and difficult to access coastline in the steep northern and eastern foothills of Mt Ochi. 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The species that characterize the Special Protection Area (SPA) are Puffinus yelkouan (Yelkouan shearwater), Larus audouinii (Audouin's gull), Hieraaetus fasciatus (Bonelli's eagle), Bubo (Eurasian eagle-owl) and Emberiza caesia (Cretzchmar's bunting), whereas its delimitation species are Phalacrocorax aristotelis (great cormorant), Circaetus gallicus (short-toed snake eagle), Falco peregrinus (peregrine falcon), Apus melba (pallidswift), Lullula arborea (woodlark), Anthus campestris (tawny pipit).

In 2019, an annual bird fauna monitoring study was carried out and is pending submission, within the first quarter of 2020, to the competent service responsible for monitoring the Protected Areas of the Natura 2000 Network. Limited impacts on the area's flora due to the operation of the work site for the construction and, later on, the trial operation of the wind power station, in accordance with the relevant Environmental Terms Approval License. **An automated bird collision avoidance system has been installed in this Wind Farm.**

Energy & Air emissions



Impact on Sustainable Development	3,90	Significance for Stakeholders	3,54
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Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: In the areas where the aluminum and alumina production plants as well as the company's thermal power plants operate.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">To increase the percentage of renewable energy sources in the energy mix nationally.Improving energy efficiency and promoting investment in energy infrastructure and cleaner energy technology.	<ul style="list-style-type: none">Regulatory bodiesLocal communitiesSustainable Development OrganizationsAcademic communityShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are caused by Business Sector of Metallurgy and Electric Power of MYTILINEOS and its subsidiary KORINTHOS Power, while indirect participation may have key suppliers of the Company.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholder groups, so that they can understand how the Company is managing the unavoidable impact of its business activity on air quality. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The Company's electric power generation and aluminium production activities are the primary sources of its energy consumption and carbon dioxide (CO₂) emissions, with significant operating costs. CO₂ emissions contribute to the greenhouse effect and reinforce the phenomenon of climate change, with impacts on the natural and man-made environment. Control, stabilization and commitment to reduce the aforementioned gas emissions are among the most important environmental challenges of the Company.

Major risks [GRI 102-15]

- Any deviations from the legislation in force on industrial emissions or from amendments thereto, may cause additional atmospheric pollution and result in penalties affecting the Company's financial results by forcing it to purchase more greenhouse gas emissions allowances, as well as its capacity to retain existing or to attract new employees, customers, investors or other business partners.
- A further increase in the price of CO₂ emission allowances (€/t), as this may be shaped by the future EU policies on energy and climate, is likely to affect future compliance costs, either directly or indirectly through the consumption of electricity.

Risk Management / Control Practices [GRI 103-2a]

- MYTILINEOS is committed to stabilizing and reducing emissions, so as to minimize the impact on air quality in the areas where it operates. In this respect, the Company:
- Is closely following the relevant developments in the legislation and takes preventive measures in order to minimize any potential adverse effects.
 - Invests in renewable energy sources and in the use of digital industrial methods in the production stages, with the aim of saving energy, reducing dependence on fossil fuels and reducing emissions of gaseous pollutants. Specifically, in 2020 the prospect is to increase the installed capacity of Renewable Energy Sources having in full operation, throughout the year, the three new Wind Farms with a total capacity of 34.5 MW and putting into operation 1 additional Wind Farm with a capacity of 11 MW.
 - By expanding its activity in recycling aluminium scrap from end-of-life products and by acquiring the relevant know-how, it greatly strengthens its efforts to substantially reduce the use of raw materials (bauxite) and save energy.
 - By systematically applying Best Available Techniques (BATs) in its production processes and by using more environment-friendly fossil fuels such as natural gas in nearly all its industrial units, it aims to improve its energy efficiency and reduce dust emissions.
 - Ensures the proper maintenance and the best possible operation of the machinery in its industrial plants, while investing

- in their modernization with new technological installations, where feasible.
- Monitors on a monthly basis its emissions of CO₂, Fluorine and PFCs (Perfluorocarbons) and implements timely corrective actions and appropriate technical interventions to ensure that the respective annual emissions are below its statutory requirements and are maintained at the lowest possible level. In key production units, such as for example in the Combined Heat and Power (CHP) plant, an online parameter monitoring system has been installed, which automatically activates alarms if the maximum limits set are exceeded.
 - Carries out checks of other pollutant emissions (NO_x, SO_x and particles) by means of continuous and periodic sampling measurements. In the Aluminium production plant, equipment has been installed to monitor and record dust emissions and take relevant measurements, in accordance with the environmental legislation and the Company's standards. Measures to suppress diffuse dust are also taken, such as maceration of roads and raw materials, as well as tree-planting.
 - In all its existing industrial plants, it has obtained all statutory greenhouse gas emission licenses. Moreover, appropriate emission monitoring and reporting infrastructure has been deployed and is in operation.
 - In the production of electricity, due to the nature of the activity, the Company focuses on maintaining the operation of thermal power plants at the highest efficiency levels in Greece, making the best use of natural gas as a primary fuel. MYTILINEOS thermal power plants use natural gas to generate electricity. It is a fossil fuel with a lower carbon content than other fossil fuels, with no release of SO₂ and particles, with lower NO_x emissions (mainly NO₂) compared to the limits allowed by applicable law and low CO₂ emissions (70%) compared to lignite plants.
 - Participates, through the Metallurgy and Electric Power sectors, in the EU Emissions Trading Scheme (EU ETS), according to which from 2013 onwards all procedures for calculating and verifying air emissions comply with the EU ETS Phase III (2013-2020) regulations, under which compliance costs are higher due to the allocation of fewer allowances relative to the actual emissions.
- The Company might be obliged to undertake significant investments in the future, as a result of the requirement for compliance with the new, amended legislation and the new regulations.

Results [GRI 103-3a-iii]

The total energy consumption from the business activity of MYTILINEOS in 2019 has **increased by 8.5%** compared to 2018, mainly due to the increase in production and, consequently, the extended working hours of the thermal plants of the Company's Electric Power & Gas Trading sector.

Total energy consumption (Tj)* [GRI 302-1]	2017	2018	2019	Diff. %
Energy consumption (Non-Renewable sources)	42,423.6	38,804.3	43,010.9	10.8%
Natural Gas	42,066.3	38,421.8	42,577.9	
Mazout	304.8	260.7	280.1	
Gas oil	45.3	115.2	138.7	
Heating oil	6.4	4.4	7.1	
Gasoline	0.8	2.2	6.7	
Energy purchased for consumption	10,257.3	10,400.5	10,342.1	-0.6%
Quantity of energy produced	18,897.0	18,565.9	21,197.6	14.2%
IPP	13,807.8	13,533.2	15,667.5	
CHP	4,185.0	4,153.6	4,167.4	
RES	904.2	878.2	1,362.6	
Quantity of energy exported (sold)	18,562.3	18,235.1	20,816.5	14.2%
IPP	13,473.1	13,203.3	15,286.4	
CHP	4,185.0	4,153.6	4,167.4	
RES	904.2	878.2	1,362.6	
Total energy consumption	53,015.6	49,535.6	53,734.1	8.5%

* Total energy consumption = Power consumption from Non-Renewable Sources + Energy purchased for consumption + Energy produced - Energy sold.

Despite the increase in overall consumption, improvements were noted in terms of energy intensity indicators. More specifically: **(a) a reduction by 15.3%** was recorded in energy consumption **per ton of alumina produced** and **(b) a reduction by 1.8%** was noted in the energy consumption **per ton of aluminium produced**, due to the work quality inspections carried out, the

Energy consumption from conventional energy sources, such as natural gas, **increased by 10.8%**, while overall electricity consumption remained almost unchanged, recording a slight **decrease by 0.6%**.

improvements in equipment and processes, the optimization of parameters and the sensitization of the personnel involved through custom-developed action plans. On the contrary, in the Electric Power sector, **the energy consumption in production per TJ of electric power generated has increased only slightly by 1.2%**.

Energy intensity figures [GRI 302-3]	2017	2018	2019	Diff. %
Specific consumption in alumina production (GJ/t of alumina produced) ¹	101	9.8	8.3	-15.3%
Specific consumption in primary aluminium production (GJ/t of aluminium produced) ¹	509	49.7	48.8	-1.8%
Specific consumption in secondary aluminium production (GJ/t of secondary aluminium produced) ¹	n/a	n/a	4.8	-
Specific product consumption (TJ/TJ of electric power generated) ²	1.69	1.68	1.70	1.2%

1. Combined consumption of natural gas, fuels & electric power.
2. Combined consumption of natural gas & electric power.

The MYTILINEOS Metallurgy and Electric Power sectors produced 99% of the Company's total direct and indirect carbon dioxide (CO₂) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (consumption of natural gas), while indirect (Scope 2) emissions correspond primarily to

the consumption of electric power. In 2019, **direct and indirect emissions increased by almost 6%** as a result of the corresponding increase in gas consumption for the generation of electricity, but also and due to slightly increase in indirect emissions due to the inclusion of the data of three new subsidiaries, as well as of the new MYTILINEOS corporate headquarters, in the sustainability reporting boundaries.

Regarding other significant air emissions:

- The increased electric power generation caused a **15.7% increase in nitrogen oxide (NOx) emissions**.

Sulphur oxide (SOx) and fluorine emissions decreased by 0.5% and 1.2% respectively, whereas
- PFC emissions** increased by 6%, despite the constant efforts and the systematic checks that were made, in tandem with appropriate technical interventions which were also undertaken, in order to control them in the electrolysis process of anhydrous alumina to produce primary cast aluminium.

Air emissions (t CO ₂ eq)	2018	2019	Diff. %
Direct greenhouse gas emissions (Scope 1) [GRI 305-1]	2,555,713.6	2,798,068.3	9.5%
Fuels (CO ₂ : 100%)	2,162,139.5	2,398,364.3	10.9%
Fuels (CO ₂ : 74% - PFCs: 26%)	388,437.4	396,284.3	2.0%
Transport (CO ₂ : 100%)	5,136.7	3,419.7	-33.4%
Indirect greenhouse gas emissions (Scope 2) [GRI 305-2]	1,819,624.6	1,841,255.3	1.2%
Electricity (CO ₂ : 100%)	1,819,624.6	1,841,255.3	1.2%
Total (Scope 1 & 2)	4,375,338.2	4,639,323.6	6.0%
Indirect greenhouse gas emissions (Scope 3) [GRI 305-3]	2,577.2	1,828.1	-29.0%
Transport of products (CO ₂ : 100%)	1,449.5	615.2	-57.6%
Business travel (CO ₂ : 100%)	675.0	736.9	9.2%
Employee commuting (CO ₂ : 100%)	452.7	476.0	5.1%
Other significant air emissions [GRI 305-7]	5,341.6	5,555.2	14.2%
SO _x (t/year)	3,651.1	3,634.0	-0.5%
NO _x (t/year)	1,342.3	1,553.3	15.7%
CF ₄ (t/year)	11.2	11.8	5.4%
C ₂ F ₆ (t/year)	1.3	1.4	7.7%
Fluorine (t/year)	261.5	258.3	-1.2%
Particles (t/year)	74.2	94.3	27%
Volatile organic compounds (t/year)	-	2.0	-

1. The year 2018 has been set as the new baseline year for this factor due to the application of the national emissions factor gCO₂/kWh (source: Eurostat Electricity conversion data for Greece). This factor was applied for the first time in all of the Company's Business Activity Sectors in 2018, for reasons of harmonization following the corporate transformation in 2017.
2. Gross Location Base: Use of the emissions factor based on data published by the State at regional or national level. In addition, due to lack of other data for calculating market-based emissions, use was made of the average emissions factor for the total electricity generation in the country.
3. The quantity of pollutant emissions (Scope 3) is partly covered. In particular, data come from the EPC & Infrastructure Projects Sector, except in the category of employee travel, in which the respective performance of the Electric Power sector is also included

Regarding specific CO₂ emissions (direct and indirect) per ton of production of the Company's main products, the following changes in performance were recorded: (a) **a decrease by 0.8%** in the production of hydrated alumina, (b) **an increase by 2.1%** in

the production of aluminium, and (c) **a reduction by nearly 2% in air emissions** per TJ of electric power generated, mainly due to the increased production of RES plants.

Specific air emissions (t CO ₂ eq) [GRI 305-4]	2017	2018	2019	Diff %
t CO ₂ (scope 1 & 2) / t of hydrated alumina produced	0.624	0.609	0.604	-0.8%
t CO ₂ (scope 1) / t of hydrated alumina produced	0.495	0.473	0.466	-1.5%
t CO ₂ (scope 2) / t of hydrated alumina produced	0.128	0.136	0.138	1.5%
t CO ₂ (scope 1 & 2) / t of aluminium produced	10.21	10.37	10.59	2.1%
t CO ₂ (scope 1) / t of aluminium produced	2.06	2.06	2.14	3.9%
t CO ₂ (scope 2) / t of aluminium produced	8.16	8.31	8.45	1.7%
t CO ₂ (scope 1 & 2) / TJ of electric power generated	n/a	94.1	92.4	-1.8%
t CO ₂ (scope 1) / TJ of electric power generated	n/a	93.5	91.9	-1.7%
t CO ₂ (scope 2) / TJ of electric power generated	n/a	0.6	0.5	-16.6%

Adaptation to climate change



Impact on Sustainable Development	3,00	Significance for Stakeholders	3,52
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts of climate change may occur on industrial units, RES plants, mines and construction sites of Business Sectors and its subsidiaries of MYTILINEOS, as well as on the boundaries of their operation.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">To strengthen the resilience and adaptability of its production process to natural disasters and the risks posed by climate change.To promote mechanisms to increase the ability to organize and manage climate change in the most sensitive areas of local communities.	<ul style="list-style-type: none">Local communitiesShareholders / InvestorsCustomersNGOsSustainable Development OrganizationsRegulatory bodiesAcademic communityMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The Company's Business Sectors and its subsidiaries are directly involved in these effects, while its supply chain may also have indirect participation.		

Management Approach [GRI 102-11] [GRI 103-2c]

This purpose of this disclosure is to inform Social Partners about the steps to be taken by the Company in connection with its adaptation to climate change or, in other words, with the reduction of its vulnerability to the climate change phenomenon, by focusing on the following three main areas of work: (a) examining future climate forecasts at local level, to identify potential risks and the possibility of integrating the issue of climate change adaptation into its business decision-making, (b) avoiding or minimizing climate-change-related damage and, where possible, taking advantage of opportunities to adapt to changing circumstances, and (c) implementing measures to respond to existing or projected impacts. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

MYTILINEOS owns coastal industrial facilities and operates, through the EPC & Infrastructure Projects sector, in countries where the effects of climate change are more intense. Through its mining activity related to natural resources, the Company may also face a range of challenges and problems caused by the changes in the climate. The key challenge for the Company is to assess the vulnerability of its business activities to climate change, considering existing and expected climate events and the impacts expected to occur.

Major risks [GRI 102-15]

In the context of the above challenges and depending on the results of the evaluation, in the coming years the Company may have to take action in order to ensure its adaptation to climate changes which are considered important for the operation of its industrial plants. Such action will ensure that the means will be in place to address events including, among others, the destruction of infrastructure due to extreme weather conditions, the reduction of available water resources due to lower rainfall, the loss of working days due to extreme temperatures, as well as the need to integrate climate change into the planning, monitoring and operation of mining activities, and to reinforce the measures and actions for environmental protection and restoration, for all of which the Company will have to incur with direct financial and economic impacts.

Risk Management / Control Practices [GRI 103-2a]

Given that MYTILINEOS' future investments will be largely determined by its climate change strategy, the Company has already incorporated in its strategic priorities the implementation of a study to identify the risks and opportunities of climate change on its activity. By 2022, the Company plans to adapt to the climate-related financial risk disclosures framework, by following the recommendations of the **Task Force on Climate-Related Financial Disclosures (TCFD)** regarding the analysis of the risks and impacts of climate change, as well as to join the **CDP - Climate Change** international initiative in 2021.

Results [GRI 103-3a-ii]

The main activities which have already been initiated and seek to ensure the adaptation of the Company's activities to climate change are the following:

- In the Electric Power & Gas Trading sector, the major risks have been assessed and no apparent need to adopt specific targeted measures has been identified. In what concerns the Company's thermal plants, Emergency Response Plans have been developed to address the occurrence of extreme natural phenomena (heatwave, frost, storm, flood etc.), while special flood studies have also been carried out where streams are located in the vicinity of the Company's power plants. With regard to the operation of RES plants, wind turbines are fitted with safety systems which in the event of very strong winds switch the turbines off and move their blades to a secure position, while solar collector panels have hail resistant by manufacture.
- In the EPC & Infrastructure Projects sector, appropriate protection measures against extreme weather events are adopted and implemented within the boundaries of the Company's installations and work sites, to ensure that all conditions resulting in deviations from the sector's smooth operation are dealt with effectively.
- In the Metallurgy sector, particularly in the context of mining activities, no particular impacts have been identified so far in the Company's underground sites requiring the implementation of specific adaptation measures.

Concerning the efforts to tackle climate change, the Company is:

- expanding the development and utilization of Renewable Energy Sources.
- systematically investing in the optimization of the production processes of the Metallurgy sector with new technological equipment, while the target it has set for 2030 is to secure electrification exclusively from renewable sources, reducing its industrial environmental footprint to zero.
- promoting the expansion of the use of Natural Gas, as a stage of mild transition to the “green energy” era, in all its industrial plants as well as in its new business investments in the Electric Power sector, such as the new gas-fired combined cycle (CCGT) power plant, whose construction began in 2019 and which will be ready in late 2021. The plant will employ cutting-edge technology which will make it the most powerful and energy-efficient power plant in Greece and one of the largest power plants in Europe.



“Measurable results help us **learn and evaluate our processes** to improve our output and strengthen our commitment to the Global Sustainable Development Goals”

Pollution prevention



Impact on Sustainable Development	3,80	Significance for Stakeholders	3,64
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts take place in the operating areas of the industrial Business Units, the subsidiaries and the main suppliers of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">In the prevention of any land and sea pollution.In the environmentally proper management of all waste in accordance with internationally agreed frameworks and reduction of their emissions into the air, water and soil in order to reduce their impact on human health and the environment.Reduction of waste production through prevention, recycling and reuse.	All Stakeholders' groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: Directly involved in these impacts are the Metallurgy and Electric Power Business Sector of MYTILINEOS, the subsidiaries DELFI-DISTOMON and KORINTHOS Power, while indirect participation in them may have key suppliers of the Company.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholder groups, so that they can understand how the Company is managing the risks of pollutions and spills directly associated with its safe and socially and environmentally responsible operation. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The main challenges for the Company are the effective prevention of the likelihood of any form of pollution of the natural environment from its production activity, as well as of any major industrial accidents.

Major risks [GRI 102-15]

The possible deterioration of the quality of the air and of surface and ground waters, and the pollution of the soil from industrial accidents are permanent potential risks. Failure to prevent and manage the above risks could have a significant impact on the Company's economic, industrial and social capital, limiting its capacity to create value. From the Company's perspective, the increased financial costs for dealing with these incidents, any likely administrative sanctions and penalties, the potential inability to continue its business activities and the loss of its “social license to operate”, are some of the potential negative impacts affecting the protection of its employees, the environment and the Company's own viability.

Risk Management / Control Practices [GRI 103-2a]

Pollution risk management requires the implementation of precautionary and repressive measures in all areas of MYTILINEOS Business Activity Sectors. Specifically:

In the case of the **Metallurgy sector**, an **Industrial Safety Management System** is in place, which covers all the sector's activities, designed to prevent and respond to major industrial accident hazards by ensuring that a series of actions and parameters aimed at preventing the occurrence of such incidents are followed. The main objective is to avoid any incident involving a degradation of the environment.

- The preventive measures consist of the following:
- Strict compliance with the approved Environmental Terms of the Metallurgy activity.
 - The continuous measurement and monitoring of gas emissions and water discharges from point sources,
 - Compliance with the measures foreseen in the Safety Study (SEVESO III - implementation of JMD 172058/2016).
 - The final disposal of non-hazardous waste in insulated areas with the construction of a geological barrier of low water permeability, as well as the corresponding disposal of hazardous waste in specially constructed and insulated with geomembrane and geotextile cells
 - Implementation of Best Available Techniques in the management of industrial waste. (electric filters, bag filters, primary industrial waste treatment, biological wastewater treatment, safety oil taps, sewer oil traps, tank level meters, waste quality meters, specially designed waste disposal sites, etc.)
 - Good knowledge of and training in Emergency Response Plans (EPs).
 - The storage and use of chemicals under the instructions of the Safety Data Sheets
 - The systematic visual inspections of the facilities
 - The unloading of fuel oil from tankers with the precautionary use of a floating anti-pollution dam, and
 - Systematic monitoring of the quality of the natural recipients (aquifer - sea) and comparison with standard quality values.

An example is the discharge of the seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy sector, where in addition to the strict compliance with the relevant provisions of the law determining the framework for preventing any environmental impact, the Company commissions an authoritative organization (Hellenic Centre for Marine Research - HCMR) to conduct a research study form monitoring the status of living organisms in the Antikyra Bay seabed. The studies carried out by the Company in accordance with the applicable Environmental Terms are communicated every year, together with their results, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment and Energy and the Water Management Directorate of the Decentralized Regional Administration). The findings of the recent studies carried out in 2018 and 2019 show a stable ecological status, with improvement trends at several observation stations. These studies will be continued for at least five more years.

In what moreover concerns the unavoidable incidents involving spills of lubricants in the context of mining activities in the tunnels of underground quarries, which are very small and superficial and are mainly caused by wear and tear of lubricant pipes and by damages to machinery by falling stones or rocks, the subsidiary DELPHI - DISTOMON takes steps to prevent and reduce the annual number of such incidents by adopting the following practices: (1) Purchasing supplies (lubricant pipes) with the best quality available in the market, to ensure their maximum possible durability; (2) implementing, on an annual basis, custom-developed seminars to raise awareness among personnel of the need to report and log such incidents, in line the Company's policy on the protection of the environment, as well as of specific techniques to contain the extent of the spills in the soil; and (3) responding immediately to such incidents, by carefully collecting the quantity of contaminated soil and forwarding it to the hazardous waste disposal area for appropriate handling and (4) implementing regular and preventive maintenance of equipment and its components.

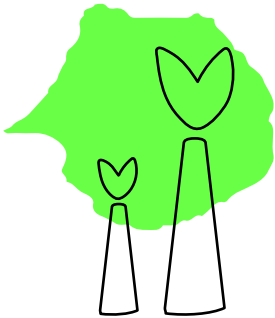
In the Electric Power sector and the EPC & Infrastructure Projects sector, in all production units (thermal plants, RES plants, complex construction plants and work sites) all potential risks are identified in order to address in a timely manner and minimize the consequences of unforeseen malfunctions and accidents. In particular, the following apply:

- All procedures provided for in the Environmental Management Systems and Emergency Response Plans, as well as the operating and maintenance instructions for installations,
- the instructions for monitoring air emissions,
- the best available options for the re-use, recycling and disposal of the various types of waste generated,
- personnel training,
- preventive maintenance programs,
- selection of state-of-the-art equipment,
- safety basins and
- systematic visual environmental inspections of installations.

Results GRI 103-3a-ii

During 2019, no incidents occurred involving any kind of pollution of the natural environment by production activities or involving industrial accidents in all Business Activity Sectors of the Company, while air emissions remained below the statutory maximum limits for yet another year.

Regarding the unavoidable incidents of oil spills in the context of the mining process, a total of 143 such incidents occurred in 2019 (2018: 207), representing a decrease by 31% compared to 2018. GRI 306-3



Water management



Impact on Sustainable Development	3,70	Significance for Stakeholders	3,44
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Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts take place in the areas (e.g. Corinthian gulf) of the industrial units, across all its business sectors and the subsidiaries of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Access to safe, accessible drinking water and sanitation facilities for workers and local settlements.In the efficiency of water use and in ensuring its sustainable pumping in the context of industrial activity.Encourage the participation of local communities in improving water management.	<ul style="list-style-type: none">CustomersLocal communitiesRegulatory bodiesAcademic community <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are caused by the Metallurgy and Electric Power sectors of MYTILINEOS, while the Company's subsidiaries DELPHI-DISTOMON and EPALME, as well as the local settlements adjacent to the Aluminium plant, may also be indirectly involved.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Social Partners, so that they can understand how the Company is managing water resources, seeking to maximize the overall social and environmental benefits of its business activity. Meeting the water supply needs of the industrial units of the Company's Metallurgy and Electric Power sectors, as well as the water supply needs of its local communities in the region of Viotia, require the extraction and use of significant quantities of water. Recognizing the importance of this natural resource, the Company takes initiatives to ensure the efficient use of water, the conservation of the water resources used and the responsible management of water discharges. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Maintaining the rational withdrawal, use, consumption and discharge of water is a key challenge for the Company, which is a major user of seawater and a consumer of ground water in specific sectors and areas of activity.

Major risks [GRI 102-15]

- The potential reduction of aquifer reserves (ground water) which the Company uses for its production activities as well as for covering the water supply needs of its local communities' settlements. This potential risk may result in the reduction or suspension of production, in complaints from the local communities and in increased operating costs through the use of water supplied by public utilities as an alternative source.
- An additional potential risk concerns possible future changes in the water withdrawal limits and water discharge parameters provided for in the Environmental Terms Approval Decisions of the Company's industrial plants, in particular in the Metallurgy and Electricity sectors, which may result in increased capital costs and in operational maintenance costs associated with the development of alternative water reserves.

controlled and takes place in accordance with the parameters determined by the environmental terms and regulations under which the facilities of the company's Business Activity Sectors have obtained their environmental licenses. In the Metallurgy sector, which produces that largest quantity of liquid waste, the largest part of this waste is recycled within the production process itself.

- To identify and assess the likelihood of future regulatory changes affecting sustainability issues, including water, the Company communicates regularly with the competent authorities and with the regulatory bodies involved.
- Aiming to constantly improve and enrich its practices in this area, the Company participates voluntarily since 2016 in the **CDP - Water Security** global sustainable development initiative, by disclosing comprehensive data about its practices in the management of water resources and having its impact and performance compared to those of the largest companies globally.
- The environmental officers in each one of the Company's Business Activity Sectors ensure that the progress made towards the targets set is monitored and that water resources are managed responsibly in the context of the activities of all the Company's industrial plants.

Risk Management / Control Practices [GRI 103-2a]

- The use of water in all the Company's activities complies entirely with the Environmental Terms Approval Decisions of all its industrial plants.
- Water withdrawals from ground water in the Metallurgy sector are obtained from a controlled network of **low-depth wells (boreholes) which allows water to be replenished naturally after withdrawal (renewable sources)**. A special study carried out by the Company in 2019 regarding the management of water withdrawals from the network of boreholes in relation to the total capacity of the wider area's aquifer, showed that the average quantity of water entering the aquifer on an annual basis (rainfalls, snowfalls etc.) reaches 83.3 million m³. According to the water use permit issued, the Company has the right to withdraw 6.75% of this total quantity, however **its actual withdrawal rate is even lower, standing at approximately 6% and ensuring the preservation of the water level in the aquifer and consequently in the boreholes, something that is also confirmed by the regular checks of the water level at all the wells**.
- Water recycling and reuse programs are implemented to the maximum extent possible in the Metallurgy sector's production processes or secondary uses, together with rainwater collection and utilization practices.
- Water consumption targets are set on an annual basis for each production sector.
- As regards the management of the liquid waste and water discharges resulting from MYTILINEOS' activity, this is fully



Results [GRI 103-3a-ii]

In 2019, no water withdrawal source was negatively affected by the business activity of MYTILINEOS. [GRI 303-2]

Water withdrawals [GRI 303-1]	2017	2018	2019
Surface water (m³)			
Volume of seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy sector. The limit to the volume of water withdrawn annually is determined by the Water Resources Management Directorate of the Sterea Regional Administration.	159,367,229	162,930,049	162,296,520
Ground water (m³)			
Volume of industrial, brackish and drinking water, used primarily to meet the manufacturing / processing, energy and water supply needs of the Company's industrial facilities. This quantity is obtained from a network of 17 wells, owned by the Metallurgy sector, which the Company operates in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration.	8,152,581	8,133,185	8,223,555
Municipal water supply companies and other public water utilities (m³)			
Volume of water from municipal reserves and public services that meets the needs of the buildings and especially the industrial facilities of MYTILINEOS.	29,421	99,836	74,571
Discharges of waste water from another organization (m³)			
Seawater returned by Motor Oil and used in the desalination process for the production of industrial use water in a thermal power plant of the Electric Power sector.	213,762	234,715	186,580.3
Rainwater (m³)			
Rainwater collected directly in a special reservoir configured in the area of a disused mine, used by MYTILINEOS' subsidiary DELPHI – DISTOMON, for wetting the roads and watering the surrounding restored area and for the Fire Brigade and firefighting	7,000	7,000	7,000

In total, almost 170.8 million m³ of water were withdrawn for use, **596 thousand m³ less compared to 2018**, while the quantity of used water returned back to the water basins after appropriate quality treatment and in accordance with the approved environmental terms per Business Activity Sector, stood at 164.2 million m³, decreased by almost 1.4 million m³ from 2018.

As a result, **water consumption** reached **6.5 million m³**, registering an increase by **14.5%**. The increase in consumption concerned primarily seawater, which was consumed during the cooling process of the Electric Power sector's thermal plants, which recorded more hours in operation compared to 2018, due to increased production.

Total water Consumption (all business sectors)	2017	2018	2019	Diff. %
Total water withdrawal (m³)	167,769,993	171,404,785	170,788,226	- 0.3%
Total water discharge (m³)	162,010,558	165,700,673	164,254,655	- 0.9%
Total water consumption (m³)	5,759,435	5,704,112	6,533,571	14.5%
	Consumption analysis	Consumption analysis	Consumption analysis	
Seawater	1,280,247	1,101,131	2,038,418	
Ground water	4,288,664	4,291,821	4,352,849	
Municipal water supply companies and other public water utilities	29,421	99,836	74,571	
Other sources	161,103	211,324	67,733	

Only **1.1%** of total consumption concerned water supplied by the **public water supply company**. While **1,139,060 m³**, representing **17.1% of total water consumption** or **26.2% of ground water consumption**, concerned the supply of drinking water to the settlements of Aspra Spitia, Antikyra and Agios Nikolaos in Viotia, to meet their needs.

Regarding the Company's efforts to manage water efficiently in the production process, especially in the Metallurgy sector, which manages **99.8%** of the total quantity of water withdrawals, **further improvements in specific water consumptions were recorded** per ton of both hydrated alumina and primary aluminium produced.

Metallurgy Sector Specific water consumptions (m³)	2017	2018	2019
Water consumption / ton of hydrate alumina production (m³)	4.64	4.09	3.98
Water consumption / ton of primary aluminium production (m³)	2.52	2.49	2.43

The amount of water reused in other Company plants, **thus preventing an equivalent volume of water withdrawals, amounted to 6.7 million m³** (2018: 5.06 million m³), corresponding to **3.93%** of total water withdrawals, **increased by almost 35% from 2018**. [GRI 303-3] Of this total quantity, 99.6% concerns water recycled/reused in the Electric Power sector and, in particular: **(a) the reuse of 6,696,207 m³ of discharged seawater** from the cooling network of the Combined Heat and Power (CHP) plant, for cooling the thermal power plant in the area of Ag. Nikolaos, Viotia, and **(b) the recycling of 22,961 m³** of liquid waste from the from the Heat Recovery Boiler of the combined-cycle thermal power plant in Agioi Theodoroi, Korinthia. The remaining quantity concerns the use of 7,000 m³ of collected rainwater in the bauxite mining activity.

In addition, in the Metallurgy sector, which implements the **“Black Belt” project, a major initiative for saving drinking and industrial-use water, a remarkable reduction by 29.5% (or 67,000 m³) in the consumption of drinking water has been observed in the aluminium plant since 2018**, after the water-cooled air conditioners (which used drinking water for their operation) were replaced with air-cooled air units.

Finally, in 2019 MYTILINEOS participated **for the 4th consecutive year** in the CDP-Water Security international sustainable development initiative. According to the evaluation results, **the Company's performance improved in 6 out of the 11 individual assessment areas, thus enabling it to maintain its position in the “MANAGEMENT LEVEL”** ranking, which affirms that MYTILINEOS takes coordinated action on water management issues. The Company's official report as well as the relevant CDP assessment are available from the MYTILINEOS corporate website, at the following address: (mytilineos.gr/en-us/participation-in-socially-responsible-investment/details#tab-cdp-water)



Circular economy (Waste management)



Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts take place in the industrial units of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">In waste reduction through prevention, recycling and reuse.In the reuse of materials, expanding the life cycle of products in order to reuse them, creating additional economic value.In the reduction of wastewater that does not undergo treatment as well as in the substantial increase of recycling and reuse of water at national level.	<ul style="list-style-type: none">CustomersLocal communitiesSustainable Development OrganizationsShareholders / InvestorsAcademic communityMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholder groups, so that they can understand how the Company manages the waste resulting from its production process, given that proper waste management contributes to its efficient operation and to its compliance with the environmental legislation, while minimizing the environmental impacts for all recipients. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The collection, management and reduction of waste are key elements of MYTILINEOS' environmental policy. Waste (bauxite residues) generated as a result of the production process in the Metallurgy sector accounts for the largest volume of the Company's solid waste. A key challenge for MYTILINEOS is to improve in this area, which depends to a large extent on the utilization of this waste either by itself, through its participation in European pilot programs or by making it available for the production of other industrial materials. Until its final disposal, this particular type of waste is accumulated in a specific designated area which, for the purposes of measuring MYTILINEOS' environmental footprint, is considered as a Controlled Landfill for Non-Hazardous Waste operating in accordance with the licensing acts of the Sterea Regional Administration and the Viotia Prefectural Administration.

Additional permanent challenges for the Company in this area are (a) the management of all hazardous and non-hazardous waste, placing emphasis on reuse and recycling methods and, in the particular case of bauxite residues, on utilization methods, and (b) the reduction of the amount of waste to be landfilled, thus helping minimize the impact on the environment and on human health while also reducing operating costs.

Major risks [GRI 102-15]

The gradual reduction of available bauxite disposal sites constitutes a key environmental risk for the MYTILINEOS' Metallurgy sector, with possible negative effects on the Company's financial performance.

Risk Management / Control Practices [GRI 103-2a]

- The management and reduction of waste are key elements of the Company's environmental policy. A network for the collection of waste for reuse and recycling has been designed and is in operation in every production facility.
- In cases where recycling cannot be completed on-site (i.e. in the Company's facilities), waste is disposed of through the Company's cooperation with alternative waste management systems organizations which have the statutory approvals of the Hellenic Recycling Agency, as well as with licensed (per waste category) waste collection, transportation, management and recovery contractors in Greece and abroad.
- The Company continues to consistently invest in the installation of pilot units for the development of research on the utilization of bauxite residues, by participating in European programs concerning the use of energy-efficient “green” technologies for the production of useful products and materials, as well as for the development of technologies for the extraction of rare earth elements. In this context, part of the bauxite residues, on an annual basis, are converted by specific

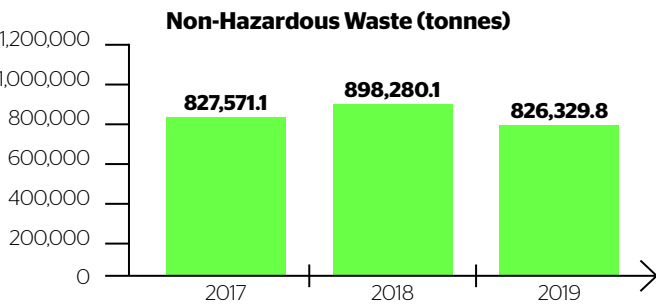
processes into cast iron (raw material for the steel industry) as well as into molded stone wool which is used to meet internal needs of the plant.

- In the Metallurgy sector, which accounts for 99% of the Company's total waste (of which 95% are bauxite residues), the aluminium production plant maintains and uses specially configured sites for the final disposal of waste (Controlled Landfill for Hazardous Waste and Controlled Landfill for Non-Hazardous Waste) in the area of Agios Athanasios, **while bauxite residues (non-hazardous waste) are deposited at the same gradient with that of the natural relief of the disposal site.**
- As regards the management of the water discharges resulting from MYTILINEOS' activity, this is fully controlled and takes place in accordance with the parameters determined by the environmental terms and regulations under which the facilities of the company's Business Units have obtained their environmental licenses.
- In the Metallurgy sector, which produces the largest quantity of liquid waste, the largest part of this waste is recycled within the production process itself. More specifically, the aluminium production plant uses an underground system of water or effluents collection pipes, which leads to a liquid industrial waste treatment plant featuring settling basins, an oil separator and a multi-layered activated carbon filter. The pH value, temperature and flow are constantly measured and monitored online. There is also a safety tank with a capacity of 1,330 m³, to which waste is fed, when necessary, by an automatic diversion system.
- Moreover, three Biological Treatment Facilities are in operation in the Metallurgy sector, covering the aluminium production plant's and the local communities' needs in water: The Biological Treatment Facility in Aspra Spitia & Antikyra, the Biological Treatment Facility in Agios Nikolaos, with a capacity of 200 residents, serving the homonymous settlement, and the Plant's Biological Treatment Facility with a capacity of 2,000 people, serving the plant's population. The Biological Treatment Facility in Aspra Spitia & Antikyra was the first biological treatment facility for urban waste water in Greece and was built together with the settlement, by the company Degrémont France. Following its upgrade in 1995, the facility has a capacity of 10,000 people. In accordance with the Environmental Terms Approval Decision, monthly analyses are carried out by the scientific quality control laboratory, which has been accredited by the Hellenic Accreditation System in accordance with the ELOT EN ISO 17025 standard. During the bathing season (May – September), seawater samples are taken at eight (8) locations in the Antikyra Bay. These locations include the sea point exit of the treated water pipe from the Biological Treatment Station of Aspra Spitia & Antikyra. The results related to this location have demonstrated that the samples taken comply with the legally required limits for exceptional-quality coastal water and are completely free of pathogenic micro-organisms.

Results GRI 103-3a-ii

In 2019, **the Company's total waste amounted to 849.1 thousand tons, reduced by 7.5% from 2018** (918.5 million tons), which came mainly from the individual reduction of 8.7% of non-hazardous waste in the Metallurgy Sector. Almost 95% of the total quantity of waste produced concerned sterile and residues of bauxite, while the remaining 5% included aluminium, industrial and urban waste and materials that are collected and include metals scrap (e.g. iron and steel), batteries of vehicles, tyres, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, lamps and consumables of printers⁴ and photocopy machines.

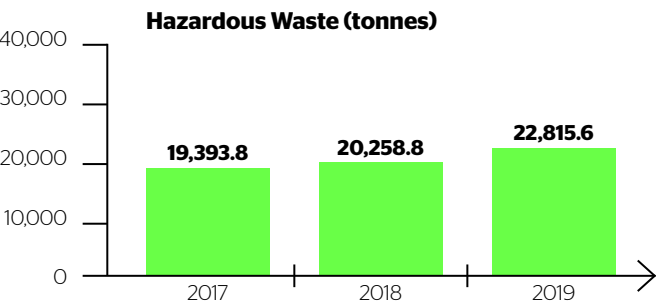
The total **waste reused, recycled and used** in various ways, either by the Company itself or through third parties, **reached 17.9%** (2018: 17.7%) of the total waste produced (including bauxite residues. In this respect, more than **141,000 tons of bauxite residues** were made available to the cement industry and for other uses, a quantity **increased by 18.6% compared to 2018**



Non-Hazardous Waste (tonnes) GRI 306-2	2019
Controlled Landfill (Accumulation area for Bauxite Residues)	659,457.5
Controlled Landfill	6,490.8
Recycling / Reuse internally and at third party facilities	147,578.6
Storage for recovery	10,297.3
Storage in third-party facilities	2,495.6
Recovery / Exchange	9.9
Total	826,329.8

(corresponding to an additional 22,000 tons). **By adopting this practice, the Company has already reduced the annual quantity of Bauxite residues deposited in the area it has designated for this purpose, by about 10% since 2016.**

MYTILINEOS' environmental R&D activities focus on **the exploitation of bauxite residues and the implementation of innovative methods for the production of alumina from alternative sources**. In 2019, the **“SCALE”, “REMOVAL” and “ENSUREAL”** projects were continued, under which **€1.5 million** were invested in the aluminium plant for the installation of one pilot unit for the production of Scandium concentrate and one pilot pyrometallurgy unit, which are expected to operate in 2020. At the same time, the Company's Metallurgy sector launched its participation in two new five-year research projects, **“BIORECOVER”** and **“AISiCa”**, in which it will provide know-how and by-products from the alumina production process.



Hazardous Waste (tonnes) GRI 306-2	2019
Controlled Landfill for hazardous waste	16,783.1
Recycling/Recovery/Reuse internally and at third party facilities	4,028.0
Recovery / Exchange	1,693.0
Storage for recovery	256.1
Incineration	17.4
Storage in third-party facilities	38.1
Total	22,815.6

4. They are not included in the overall calculation of the weight of hazardous waste.

More specifically:



2019 saw the continuation of the research project **SCALE** (Production of Scandium compounds and Scandium-Aluminium alloys from European resources), which aims to obtain Rare Earths and, in particular, Scandium (Sc) compounds and Scandium-Aluminium alloys from residues of the European metallurgical industry, such as Bauxite Residues. This project, with a total budget of €7 million, is **coordinated by MYTILINEOS' Metallurgy sector** and implemented by a consortium of 19 partners from 9 European countries, among which is the National Technical University of Athens (NTUA). **The construction of a pilot plant has been successfully completed in the Metallurgy sector's facilities, to be used for the extraction of bauxite residues in an acidic environment for the production of Sc concentrate which will be further utilized in a pilot plant of another partner. The pilot plant will be operational in 2020 and is expected to utilize 2.5 tons of bauxite residues per month of operation.**

Scandium is a metal, classified as a rare earth element, whose global production does not exceed 15 tons (mainly from industrial by-products) and is used in "emerging" technological applications such as: (a) "Electrolytic" gas-fired power generation (SOFC), whose efficiency is twice that of today's thermal power plants, (b) very high resistance Aluminium-Scandium alloys, such as the Al-Sc-Mg alloy used by AIRBUS in 3D component printing technology (scale-project.eu/).



The ENSUREAL (Ensuring sustainable alumina production) research project, aiming to develop new methods of alumina production from alternative sources such as poorer bauxite deposits and bauxite residues, is progressing. In the framework of this project, the extraction of cast iron and alumina from bauxite residues will be tested on pilot basis in MYTILINEOS' Metallurgy sector, using a combination of pyrometallurgy and hydrometallurgy treatments. The first medium-scale smelting tests using Greek bauxite and bauxite residues were carried out successfully in Norway. **In the framework of the program, the pyrometallurgy pilot unit of the Metallurgy sector will be reopened in 2020.** (ensureal.com/).



The SIDEREWIN (Sustainable Electro-Wining of Iron) research project, coordinated by ArcelorMittal, aims to test, on a pilot basis, a new sustainable technology for producing iron by alkaline electrolysis. **The MYTILINEOS Metallurgy sector, in collaboration with NTUA, are already examining the use of bauxite residues as an alternative source of iron in this process. The project; early results, on a laboratory scale, have achieved current efficiencies over 75%.** (siderwin-spire.eu/content/home).



The research project RemovAL (Removing the waste streams from the primary Aluminium production and other metal sectors in Europe), coordinated by MYTILINEOS' Metallurgy sector, was also continued. The project has a total budget of €11.5 and its Consortium numbers 27 partners, which include the largest alumina producers outside Asia (RUSAL, RIO TINTO, ALCOA), the European Aluminium Association and the International Aluminium Institute. The RemovAL project intends to test, on a pilot basis, different technologies for the utilization of bauxite residues. The technologies and pilot plants to be used in most cases have already been developed in previous or ongoing research projects and through RemovAL will be brought together and utilized as a common base for a European network of industrial symbiosis. **In the framework of the project, a workshop titled “Towards an EU regulatory framework boosting use of slags and residues of the metal sector” in November 2019 in Brussels. The workshop brought together more than 50 participants from the European Commission and the aluminium, steel and copper metallurgy industries, who discussed the opportunities and legislative/regulatory challenges facing the various metallurgical industries across Europe in connection with the utilization of their by-products.**

Concerning liquid waste, during 2019 the efforts for the best possible management continued, in order to protect the natural environment and benefit the human health. The table below presents the Company's water discharges and their respective

treatment methods. Data on the quality of discharged water are also displayed, which, as noted, are lower – and, in several cases, much lower – than the statutory limits.

Table of water discharges **GRI 306-1**

Business Activity Sector	Water discharge category	2019 (m³)	Destination	Quality of water discharges, including treatment method (2019)	
				Results	Limits
Metallurgy Sector	From the cooling process of the Combined Heat and Power (CHP) plant	160,358,102	Discharge to the sea (determined by legislation)	Temperature	
				23°C	34°C
				pH	
				8.2	6 - 9
	Waste water, including rainwater, measured at the point of exit from the primary treatment facilities	454,381	Discharge to the sea (determined by legislation)	Primary treatment (settlement of floating particles, filtration of supernatant fluid, chlorination, discharge)	
				Temperature	
				23.6°C	35°C
				pH	
				7.4	6 - 9
				Biochemical Oxygen Demand (BOD5)	
				<6 mg/l	40 mg/l
				Chemical Oxygen Demand (COD)	
				<10mg/l	150 mg/l
				Total Solids (TDS)	
				780 mg/l	1500 mg/l
				Total Suspended Solids (TSS)	
				6.71 mg/l	40 mg/l
				Sulphides	
				Not detectable	1 mg/l
	Brackish water discharge	3,378,200	Discharge to the sea (determined by legislation)	No particular treatment. Concerns clean water from licensed boreholes used exclusively in the cooling circuit of the Foundry and of the Anodes Production line.	
	Waste water from the mining process	19,055	Subsoil	No particular treatment. This waste is water (from licensed boreholes or water collected in underground mining sites) used in the mining process, which with the addition of inert bauxite or limestone dust (depending on the particular mining activity), becomes a liquid mix that ends in the aquifer.	
	Water used for road wetting, Watering – Environmental restoration	19,070	Subsoil	No particular treatment. Concerns water from licensed boreholes.	
	Wastewater measured at the point of exit from the primary treatment facilities	8,107	Asopos River (determined by the legislation)	pH	
				8.08	6.5 - 8.5
				Biochemical Oxygen Demand (BOD5)	
				3.42 mg/l	<25 mg/l
				Chemical Oxygen Demand (COD)	
				16.33 mg/l	<125 mg/l
				Suspended solids 103°C	
				2.84 mg/l	<25 mg/l
				Total dissolved solids 180°C	
				315 mg/	<1,500 mg/l
	Waste water from mining site workshops	1,040	Watering of rehabilitated areas.	Cleaning of liquid waste from sites using a system of physical separation. The results of the analyses (BOD, COD, E-coli, TSS, chlorine, nitrogen & phosphorus) provide water suitable for irrigation.	
Electric Power Sector	Industrial service water in the power generation process	16,133	Disposal to a MotorOil liquid waste treatment plant	In the amount of industrial service water intended for disposal to Motor Oil, pH is set to be within a specific range (6.5 - 9) and temperature < 45°C.	



Other significant environmental issues

Raw & other materials

As regards the use of natural resources, the quantity of bauxite used in the Metallurgy sector to produce aluminium and alumina in 2019 remained stable compared to 2018, while the total quantity of natural gas used in the Electric Power sector, which is not recyclable and is not a renewable source, increased by 10%. The EPC & Infrastructure Projects sector does not manage primary natural resources, but instead uses semi-finished or finished products. In detail:

In the **Metallurgy sector**, approximately 2.58 million tons of raw materials were used in 2019, to produce primary aluminium products, a quantity marginally increased by 4.5% from 2018. Of this total quantity, 82% was bauxite, while the remaining 18% regarded the use of other raw materials from non-renewable sources. MYTILINEOS, in its effort to limit the consumption of natural resources and to reduce the energy required in aluminium production, has adopted in its production process the practice of recasting aluminium waste (scrap) that replaces the use of raw materials. Furthermore, in this direction, the Company has also expanded its activities in the industrial production, treatment and trading of metals and in particular of aluminium alloys and their products, investing in the know-how of optimal treatment of aluminium scrap, so as to be able, in the years to come, to produce raw materials again, spending a much lower quantity of energy

and thus significantly cutting costs and mitigating the impact on the environment.

The **EPC & Infrastructure Projects sector** does not manage primary natural resources, but instead uses semi-finished or finished products, according to the detailed plans/drawings and procedures for each project, which specify with great accuracy each material to be used, its manufacturing method and its exact position and operation. The percentage of recycled materials used in the implementation of projects in the EPC & Infrastructure Projects sector showed a notable increase **by 6.2%**. Additionally, a key criterion in the design stage of the projects that the Company is carrying out as an EPC Contractor is the maximum possible use of recyclable materials. The Company's requests for proposals and contracts with suppliers of materials and equipment contain a specific clause regarding their compliance with the requirements of the ISO-14001 International Standard, specifically referring to the prohibition of using environmentally hazardous materials and the obligation to make the maximum possible use of recyclable materials.

In the **Electricity Sector**, the raw material used in power plants is natural gas, which is not recycled nor is it a renewable source. The annual consumption of natural gas in the thermal units of the Company is associated with fluctuations in electricity production on an annual basis.

Weight (in tons) of materials used in the production and packaging of the Company's main products **[GRI 301-1]**

	2017	2018	2019	Basic Materials
Metallurgy Sector				
Raw materials	2,206,869	2,230,841	2,265,428	Bauxite, Alumina, Aluminium Scrap
Materials (not incorporated in the end product)	235,968	230,818	312,339	Anodes, Lime, Soda, Coke
Packaging materials	987	978	1,308	Pine planks
Total	2,469,091	2,443,739	2,579,075	
Recycled materials	-	2,885.6	39,921	Aluminium scrap
Percentage of recycled input materials [GRI 301-2]		0.1%	1.54%	
EPC & Infrastructure Projects Sector				
Materials (not incorporated in the end product)	242.0	252.68	256.0	Welding gases, Oxygen
Semi-finished products	866.4	577.94	649.3	Steel
Packaging materials	5.9	6.4	4.5	Nylon
Total	1,114.2	837.0	909.8	
Recycled materials	-	191.1	235.2	Steel
Percentage of recycled input materials [GRI 301-2]		24.3%	25.8%¹	

1. Of the 909.8 tons of total weight of materials used and incorporated in the end product, steel (in the form of plates, merchant bars or other project materials) accounted for approximately 588 tons. Around 40% of the EU's total steel production comes from electric arc furnaces, in which steel is produced from 100% recycled raw material (scrap) (Source: eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013.0407:FINEL:PDF, Strasbourg, 11.6.2013.COM(2013) 407 final, p.27). Thus, 235.2 tons (40% of 588 tons) correspond to recycled steel.



ESG KPI's

<div>E</div> Environmental KPI's	2017	2018	2019	Diff (%) (2019 vs 2018)
Percentage of industrial units and RES units with ISO 14001 - 2015 certification	80%	82.6%	84.1%	1.7%
Total bauxite consumption (tons)	1,855,677	1,873,622	1,871,395	-0.1%
Total natural gas consumption (mio Nm³)	1,063.3	1,031.4	1,133.7	10%
Total water consumption (mio m³)	5.76	5.70	6.53	14.5 %
Environmental expenditures (mio €)	20.1	32.8	61.0	85.9%
Direct GHG emissions (Scope 1, CO₂ thousand tons / year)	2,612.1	2,555.7	2,798.1	9.5%
Indirect GHG emissions (Scope 2, CO₂ thousand tons / year)	2,327.6	1,819.6	1,841.3	1.2%
Other emissions (Scope 3, CO₂ thousand tons / year)²	2,141.8	2,577.2	1,828.1	-29%
Total NOx emissions (tons / year)	1,356.7	1,342.3	1,553.3	15.7%
Total SOx emissions (tons / year)	3,619.9	3,651.1	3,634.0	-0.5%
Dust emissions (tons / year)	69.9	74.2	94.3	27%
Fluorine emissions (tons / year)	254.7	261.5	258.3	-1.2%
Emissions CF₄ (tons / year)	9.27	11.2	11.8	5.3%
Emissions C₂F₆ (tons / year)	1.12	1.3	1.4	7.6%
Specific CO₂ emissions (t CO₂ Scope 1 & 2 / ton of Bauxite produced)	0.018	0.019	0.012	-36.8%
Specific CO₂ emissions (t CO₂ Scope 1 & 2 / ton of Alumina produced)	0.70	0.609	0.602	-1.1%
Specific CO₂ emissions (t CO₂ Scope 1 & 2 / ton of primary Aluminium produced)	12.0	10.37	10.59	2.1%
Specific CO₂ emissions (t. CO₂ Scope 1 & 2 / ton of secondary cast Aluminium produced)	-	-	0.33	n/a
Specific CO₂ emissions (t CO₂ Scope 1 & 2 / TJ of electricity produced)	94.1	94.1	92.4	-1.8%
Specific CO₂ emissions (t CO₂ Scope 1 & 2 / ton of processed metal produced)	-	7.3	5.5	-24.6%
Total energy production (TJ)	18,897.0	18,565.3	21,197.6	14.2%
Energy production from RES (% of total energy production)	4.8%	4.7%	6.4%	36.2%

<div>E</div> Environmental KPI's	2017	2018	2019	Diff (%) (2019 vs 2018)
Total energy consumption (TJ)	53,015.0	49,535.6	53,734.1	8.5%
Electricity consumption (% of total energy consumption)	19.3%	21%	19.2%	-8.6%
Specific energy consumption (GJ / ton of hydrated Alumina produced)	10.1	9.8	8.3	-15.3%
Specific energy consumption (GJ / ton of primary Aluminium produced)	50.9	49.7	48.8	-1.8%
Specific energy consumption (GJ / ton of secondary cast Aluminium produced)	-	-	4.8	n/a
Specific energy consumption (TJ / TJ of energy produced)	169	168	1.7	1.2%
Total water withdrawals (mio m³)	167.8	171.4	170.8	-0.4%
Total water withdrawal from surface waters (mio m³)	159.4	162.9	162.2	-0.4%
Total water withdrawal from groundwater supplies (mio m³)	8.2	8.1	8.2	1.2%
Total water withdrawal from public water supply utilities (m³)	29,421	99,836	74,571	-25.3%
Water savings in the production process (% of total water withdrawals)	3.1%	2.9%	3.9%	34.5%
Water consumption / ton of hydrated Alumina produced (m³)	4.64	4.09	3.98	-2.6%
Water consumption / ton of primary Aluminium produced (m³)	2.52	2.49	2.43	-2.4%
Total solid waste production (thousand tons)	846.9	918.5	849.1	-7.5%
Total hazardous waste (thousand tons)	19.4	20.2	22.8	12.9%
Total non-hazardous waste (thousand tons)	827.6	898.2	826.3	-8.0%
Solid waste reused or recycled (% of total solid waste produced)	9.3%	17.7%	17.9%	1.1%
Percentage of recovery in areas used during the mining process	80.0%	81.1%	82.27%	1.4%
Incidents of non-compliance with environmental laws and regulations & relevant fines	0	0	0	0%

1. 3 new plants (2 industrial and 1 RES) were added, of which 2 of did not have this certification and are planned to obtain it by 2021.
2. The amount of Scope 3 emissions is partially covered. Specifically, the data come from the EPC & Infrastructure Projects sector in addition to the category of employee movements, which includes the performance of the Electricity Sector.



Social Performance

Alignment to UN Global Compact Principles

PRINCIPLE 1 st	PRINCIPLE 2 nd	PRINCIPLE 3 rd
PRINCIPLE 4 th	PRINCIPLE 5 th	PRINCIPLE 6 th

Material Issues

- Occupational Health & Safety
- Employment
- Human Rights
- Sustainability of Local Communities
- Emergency Management Plans
- Customer Health & Safety

Alignment to UN Sustainable Development Goals

3 GOOD HEALTH AND WELL-BEING 	4 QUALITY EDUCATION 	5 GENDER EQUALITY
8 DECENT WORK AND ECONOMIC GROWTH 	11 SUSTAINABLE CITIES AND COMMUNITIES 	12 RESPONSIBLE CONSUMPTION AND PRODUCTION

“Commitment to the safety and wellbeing of our people **is our on-going priority** and mission.”



Specific Social Targets

	Targets 2019	Performance 2019	Targets 2020
Number of fatalities	0	0	0
Frequency of accidents (direct employees) ¹	< 0.20	0.04	< 0.18
Frequency of accidents (indirect employees) ²	< 0.35	0.19	< 0.30
Incidents of occupational diseases	0	0	0
Full-time employee's retention rate	>90%	93.5%	>90%
Training man-hours per employee	>21	24.6	>23
Percentage of employees who received a performance review ³	> 80%	56.0%	> 80%
Incidents of Human Rights violation ⁴	0	0	0
Incidents of discrimination	0	0	0
Percentage of women in work (Direct employees)	14%	18%	>16%
Percentage of women in positions of extended responsibility	19%	17.7%	20%
Incidents of non-compliance with labor laws and regulations and social issues	0	0	0

1&2. Injury Rate / 200.000 work hours (IR).
3. Percentage of all direct employees. The corresponding percentage of total eligible employees is 93%, up 13% from 2018. The term eligible includes employees who meet the requirements to be included in the annual performance appraisal process. More specifically, the employees who work in the Company for a period of less than 6 months are not included, as well as special categories of employees based on role / object.
4. It includes the issues mentioned in the relevant section pages 114-115.

Occupational Health & Safety



Impact on Sustainable Development	4,00	Significance for Stakeholders	3,72
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Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: To the employees themselves, their families but also to third parties who work or visit the work areas of the Company's Business Activity Sectors, subsidiaries and permanent contractors and suppliers.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Promotion of working conditions for all employees without discrimination.Reduction of incidents and accidents at work and reduction of road accidents at national level.Decent work – Creation of quality jobs.	All Stakeholders' groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts are caused by the Company's Business Activity Sectors and its subsidiaries, as well as by the independent contractors and main suppliers who cooperate with the Company.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to help MYTILINEOS' Stakeholders establish the best possible understanding of how the Company is managing this particular material issue, whose contribution to its responsible and sustainable development is crucial. [GRI 103-2b]

Occupational Health and Safety has always been fundamental to the operation of MYTILINEOS and a primary business goal. As a responsible organization, MYTILINEOS acknowledges its responsibility to ensure the best possible Health & Safety conditions in all its work areas, as well as the right of its employees and of the employees of the independent contractors executing operations in its premises, to work without exposing themselves to any risk of injury or occupational disease. [GRI 103-1a]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Because of the nature of their operations, the Company's activity sectors are exposed to Occupational Health and Safety risks (minor accidents, accidents with work time loss, occupational diseases and fatalities) which can have significant or less significant social impacts, not only for the employees and their families but also for third parties such as the employees of independent contractors, the Company's business partners, student trainees and trainee employees, as well as all types of visitors to their premises. In addition, these issues may cause impacts involving loss of employee satisfaction and morale, increased accident/absenteeism management costs and adverse effects on the image and reputation of MYTILINEOS. The Company acknowledges that the elimination of accidents and occupational disease incidents at the workplace and especially at its production facilities, promotes continuous, sustainable and productive employment and decent work, while it also plays a decisive role in boosting its competitiveness.

Major risks [GRI 102-15]

- **Direct or Indirect Accident Risks:** Indirect Accident Risks create the conditions which lead to accidents and include the physical layout, functionality, access-evacuation routes, lighting and temperature of work areas. Direct Accident Risks lead to accident or occupational disease and include natural, chemical and biological factors.
- **Non-Accident Risks** involve organizational, psychological and ergonomic factors that may not lead to an accident but affect the employees' mental and physical health in the short or the long run.

Risk Management / Control Practices [GRI 103-2a]

- Occupational Health and Safety is a line of responsibility that starts from the Management and Directorates General and extends across all stages of production of each MYTILINEOS Business Activity Sector. To address the relevant risks, the Company has in place and is strictly implementing security systems and safety measurements to assess their impact on the human body and to identify any need for interventions in all its work areas (offices and industrial facilities). At the same time, continuous progress and improvement depends greatly on both the preventive actions undertaken and the broader experience that the Company gains from every individual incident and near accident, while educating and training its personnel is crucial in order to maintain and further develop an accident prevention mentality.
- MYTILINEOS adheres without fail to the applicable Greek and European laws in force and the regulatory provisions on Occupational Health & Safety. In many cases, the compliance of the Company's Business Sectors with the relevant legislation is achieved by the Company imposing itself much

stricter limits through the relevant Management programs and systems in place.

- The systematic and continuous efforts to foster and promote a Health and Safety culture that encourages all personnel to act responsibly for their own personal safety as well as for the safety of those around them, is a long-standing commitment in daily operations.
- The Company also develops and implements processes and actions that further improve the level of Health and Safety by building on the findings of planned or emergency safety inspections carried out by customers, business partners, by specially trained staff of our Company, public bodies and independent organizations.
- MYTILINEOS applies in all its Business Activity Sectors an Occupational Health & Safety Management System designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture. The system is certified in accordance with **the OHSAS 18001:2007 and the ISO 45001:2018 international standards and, by the end of 2019, covered 84% of all the Company's production plants** which are in permanent operation. MYTILINEOS is already in the process of transitioning the certification of its Occupational Health and Safety Management System in all new production units to the **new ISO 45001:2018** standard. This process is expected to be completed by the end of 2021.
- The individual relevant policies, which result from the respective **commitments** (mytilineos.gr/en-gr/ygeia-asfaleia/ygeia-asfaleia#tab-main-target-and-commitments) by Business Activity Sector, make a crucial contribution to the improvement of Health and Safety performance by applying best practices as a primary business objective.
- In addition, every three months the CEO and the Executive Committee are informed of and assess the Company's progress and performance regarding Health & Safety and provide appropriate guidance.



Key elements of the MYTILINEOS Occupational Health and Safety policy

- Full compliance with the applicable laws on Occupational Health & Safety and with other relevant rules and regulations.
- Constant recognition and assessment of occupational risks and adoption of measures to control and mitigate them.
- Establishment of preventive action programs to improve work conditions, as well as of preventive and corrective action plans, procedures and instructions, to ensure that risks are minimized or altogether eliminated.
- Systematic measurement, assessment and effort to reduce the levels of exposure to harmful factors, and continuous monitoring of the employees' health.
- Open and transparent communication on all issues regarding Health and Safety.
- Briefing, awareness raising and training of employees in Health and Safety issues, to eliminate incidents at the workplace.
- Systematic inspection of the organization and of the processes and procedures in place, to ensure their continuous updating and improvement, the respect of rules and the achievement of the targets set.
- Constant efforts to ensure alignment with the relevant international standards and implementation of Occupational Health and Safety best practices.

In terms of the organization of the Occupational Health & Safety function, relevant Departments are in operation in each MYTILINEOS' Business Activity Sector, together with committees on special Health & Safety issues in the Metallurgy Sector and the EPC & Infrastructure Projects Sector, covering all employees.

Moreover, to safeguard and further develop a positive culture promoting the safety and health of the Company's human capital, special Committees are in operation in key activities, in which direct and indirect employees are represented and take active part in the procedures to determine how health and safety are managed at the workplace.

In the Metallurgy Sector (anhydrous and hydrated alumina and primary aluminium production and other related activities, and operation of port facilities for loading and unloading products and raw materials), an official Plant Health & Safety Committee (PHSC) is in place, in which 100% of the Company's employees are represented. The Committee consists of 6 members who are elected by the Sector's employees. The following additional Safety Committees have also been established, led by Management Executives and composed of representatives from all Plant departments: Work at a Heights Committee, Lockout-Tagout & Confined Spaces Committee, Circulation Committee, Contracting and Training Committee. The issues discussed by the Committees cover the ones related to the Plant's main processes, while proposals for the improvement or revision of these procedures are also discussed. **[GRI 403-1]**

In the EPC & Infrastructure Projects Sector, the Health & Safety Committees operate at facility level (in every work site or plant) and represent 100% of the Company's direct employees and more than 90% of the employees of independent contractors. More specifically, at the Volos Plant there is a three-member Health & Safety Committee consisting of employees, trade union representatives and members of the Management, which is set up in accordance with the provisions of the Greek law. The Safety Technician and the Occupational Physician are in constant cooperation with the Committee for issues related to hygiene, safety and the protection of employees. The Committee' members, the Safety Technician, the Occupational Physician and the Company's representatives participate in training programs on Health & Safety and in relevant official information conferences. Moreover, in every work site facility, specialized personnel are constantly present for handling Health & Safety issues, First Aid provision services (personnel & equipment) are in place, while an ambulance and an Occupational Physician are present to offer first aid and deal with emergencies. **[GRI 403-1]**

In the Electric Power Sector, no official Occupational Health & Safety (OHS) Committee has been set up. A consultation process on OHS issues is however applied, with the active participation of personnel from the company's Energy Centers, on these issues, in the framework of the Health & Safety at Work System. Relevant consultations take place at least twice per year, in order to promote the implementation of the Company's OHS policy in force, to communicate information on OHS actions and programs and to involve the employees, through their active participation in the consultation process, in the management of occupational risk. Moreover, in the context of the OHS audits carried out in accordance with the Management System, a mechanism has been established to monitor the application of implementation of the OHS regulations in the facilities and activities of the Energy Complexes of Central Offices, stores and RES facilities. **[GRI 403-1]**

Health and hygiene issues are also key to the quality of life of employees and, by extension, of the communities in which the Company operates. MYTILINEOS has been consistently investing in this area, monitoring, assessing and controlling all work environment parameters in an effort to constantly improve the good health of employees and ensure healthy living conditions at the workplace. Exposure to dust, noise, high temperatures and to substances such as fluorine compounds, sulphur dioxide, carbon monoxide and aromatic polycyclic hydrocarbons, are the main factors monitored systematically. Employees also undergo regular medical examinations as a function of their job, while additional examinations by the occupational physicians ensure comprehensive monitoring of their health. Finally, in order to constantly improve the health of employees, the occupational physicians help promote a healthy lifestyle at the workplace, while the Company also offers medical care plans, over and above the statutory ones.

Results **[GRI 103-3a-iii]**

- MYTILINEOS attaches the utmost priority to the Health & Safety of its employees in the work areas of all its Business Units daily. **The Company continues to take constant care to ensure the achievement of the only acceptable target “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES”**, which is one of the major challenges for the industrial and construction sectors. The Company's key concern is to maintain Health & Safety indicators at the best possible level in all its facilities (offices, industrial plants and work sites).
- Safety conditions and performance in almost all MYTILINEOS activities are assessed on an annual basis. In 2019, **22 inspections and audits were successfully carried out** in all the Company's Business Activity Sectors (10 by independent bodies, 6 by clients, 3 by business partners and 3 by the Labor Inspectorate). Moreover, 2019 was **a year of significant improvement in all occupational health and safety** indicators regarding directly and indirectly employed personnel. These improvements are due both to the availability and use of personal and collective protection measures at work and to the continuous training of employees and supervisors in occupational safety and health.
- MYTILINEOS understands that the best approach to fulfilling its core Health and Safety objective and commitments is by constantly striving to create a uniform culture, through information updates, training and awareness-raising activities addressed to all employees. The Company's main initiatives for 2019 are presented below, while its relevant awareness-raising practices are presented here: mytilineos.gr/en-us/ygeia-asfaleia/ygeia-asfaleia



Employee awareness initiatives [GRI 103-3a-iii]

Metallurgy Sector:
“Safety Days 2019”

The aim of this particular initiative is for the Metallurgy Sector employees to become aware of the high priority that MYTILINEOS gives to safety at work, as because of the nature of their activities, they must incorporate it in their daily tasks. It was considered that the optimal way in which to engage them in promoting this aim, would be by implementing a series of educational and experiential activities. **Thus, over a period of 10 days, more than 900 employees divided in groups visited four (4) specially configured training stations at the plant’s premises**, where they learned about chemical and thermal hazards, the correct use of Personal Protective Equipment and, with the help of virtual reality, what to watch out for when working at heights, how to react in case of a load dropping, and how to spot “dead angles”. At the same time, an exhibition was organised of paintings of the employees’ children and posters made by employees, displaying important messages about effective safety solutions.

This initiative met with very positive responses, with employee satisfaction reaching 95%.



Central Function:
“Safe Driving” Training Program

MYTILINEOS, in cooperation with the Road Safety Institute “Panos Mylonas” and the Safe Driving School of former racing driver Iaveris, organised a specialised training program on Safe Driving for its employees in Athens, Thessaloniki, Volos and Ag. Nikolaos, Viotia.

Under the guidance of specialist trainers, the programme was organised in two modules: **(1)** basic training, which was addressed to all employees and combined theoretical training with a custom-designed experience using specialised simulators, where employees could check their reflexes under various driving conditions and also had the opportunity to experience a collision in which the car they drove also overturned, and **(2)** practical training, which took place in a special racing circuit for all professional drivers of the company.

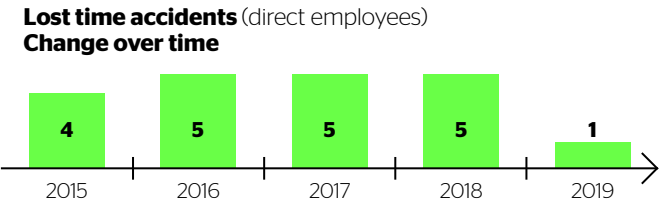
For MYTILINEOS, the program’s objective was to raise the employees’ awareness of critical road safety issues and to help them to develop a responsible driving behaviour that will help prevent and avoid road accidents.

More than 500 Company employees participated in this initiative and, upon its completion, spoke about a major life experience, which teaches or educates & sensitizes drivers to behave more sensibly in order to reduce the likelihood of becoming involved in a road accident.



Direct employees

- **The zero work-related fatalities and occupational diseases targets were achieved.**
- One (1) lost time accident was recorded, resulting in a **significant decline in the number and in the lost time accidents rate by 80% and 84% respectively**, compared to the previous year. Regarding the road accident recorded, this happened to an employee while on the move inside the Thessaloniki Industrial Area (VIPE). As a result, the employee was in pain and complained of myalgia, without however sustaining other injuries and traumatic alterations, and was able to return to work in a healthy condition.
- The rate of work days lost (due to accidents) stood at **0.58 days per 200,000 work hours, decreased by 70.4%** from the corresponding figure for 2018.
- The total number of visits to the medical stations stood at **27, decreased by 47% from 2018.**
- In the Metallurgy Sector, **one year of operation without accidents with interruption of work was completed.**
- **No employees** were involved in activities with a risk of exposure to work-related diseases. [GRI 403-3]



Increased emphasis was placed, for yet another year, on the prevention of major accidents through training. A total of **18.937 training hours** in Health and Safety were implemented in all Business Sectors, representing an **increase by 40% from the corresponding figure for 2018, while nearly 65% of the Company’s direct employees participated in them.** The training focused on the following key sections:

- Identification of Risks
- Fire protection - Use of fire extinguishers
- Rescue Techniques at Heights
- Safety of new employees
- Safe Work at Heights - Falls
- Work in Confined Areas
- Hazard Assessment
- Communication system in underground holdings
- Safe movement of Pedestrians, Machinery & Vehicles
- Harmful agents in underground premises (inhalable-respirable)
- Musculo-skeletal risks
- Lifting Machinery
- Emergency Plans
- Safety of High-Pressure Hydraulic Tools
- Safe performance of electrical work
- Protection program for welders
- Safety of Metal Scaffoldings
- Lockout-Tagout of Facilities
- Health & Safety in the offices
- Emergency First Aid at Work
- “Safety at Work” introductory training
- Safe lifting of loads
- Scaffolding installation
- Cleanliness of premises
- Emergencies

Health & Safety Indicators [GRI 403-2a]	2015	2016	2017	2018	2019
Injury Rate (IR) / 200,000 work hours					
IR (Total Rate)	0.17	0.21	0.15	0.25	0.04
IR (Men)	0.19	0.24	0.18	0.24	0.05
IR (Women)	0.00	0.00	0.00	0.30	0.00
Lost Days Rate (LDR) / 200,000 work hours					
LDR (Total Rate)	1.45	5.93	2.91	1.96	0.58
LDR (Men)	1.65	6.74	3.47	2.19	0.70
LDR (Women)	0.00	0.00	0.00	0.80	0.00
Occupational Diseases Rate (ODR) / 200,000 work hours					
ODR (Total Rate)	0	0	0	0	0
ODR (Men)	0	0	0	0	0
ODR (Women)	0	0	0	0	0
Absenteeism Rate (AR) (Days on which employees are absent as a percentage of the total number of working days.)					
AR (Total Rate)	-	1.31%	2.89%	8.1%	2.4%
AR (Men)	-	1.31%	2.44%	8.9%	2.1%
AR (Women)	-	0.62%	5.36%	5.1%	3.7%

The injury rate includes accidents and lost time accidents involving the loss of ≥ 3 work days.
Days lost due to accidents are calculated starting on the day after the incident and refer to actual days.

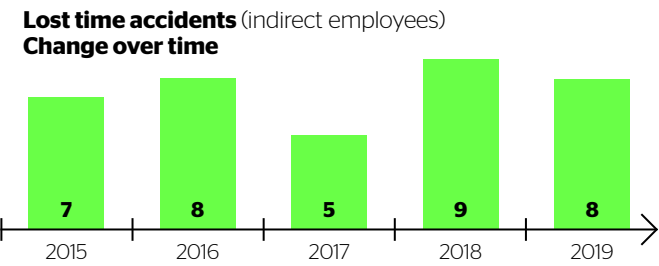


“We constantly improve
our safety measures
and procedures to
minimise accidents.”

Indirect Employees

Managing the safety of the personnel of independent contractors is a particular challenge for MYTILINEOS. The Company is consistent in its efforts in this area and focuses on the need to alter everyone's behavior and mentality about accident prevention. For example, contractors who employ a significant number of personnel at the facilities of the Metallurgy Sector's aluminium plant, are required to implement an OHSAS 18001 or ISO 45001 certified Occupational Health & Safety management system, while the company evaluates regularly their performance using specific criteria. Similarly, the management of Health and Safety issues in the EPC & Infrastructure Projects Sector is governed by a series of actions that should be implemented by associated contractors, for proper implementation of the Health & Safety system prepared for each project separately and for taking appropriate measures in the context of the project that they undertake.

- The zero work related fatalities targets were achieved.
- Eight (8) lost time accidents were recorded, resulting in a decline by 11% and 29.6% respectively, in the number of accidents and in the lost time accidents rate, compared to the previous year.



Health & Safety Indicators [GRI 403-2b]	2015	2016	2017	2018	2019
Injury Rate (IR) / 200,000 work hours					
IR (Total rate)	0.37	0.49	0.19	0.27	0.19
IR (Men)	0.38	0.50	0.20	0.28	0.20
IR (Women)	0.00	0.00	0.00	0.00	0.00

The injury rate includes accidents and lost time accidents involving the loss of ≥ 3 work days.

Finally, 59 (2018:43) incidents were reported and investigated, which, if left unexplored, could pose a potential risk for employees (near-accidents), were recorded in production processes, representing an increase of 37%. At the same time, the collection

- A total of 50 visits to the medical stations were recorded, a number increased by 13.6% since 2018.
- More than **3,700 indirect employees were trained** in Health and Safety issues.

With a view to strengthening and consolidating a common safety culture among all MYTILINEOS' business partners, a custom-designed training program on the prevention of major accidents was again implemented this year in all Business Activity Sectors, **attended by more than 3,700** indirect employees. The following are the basic educational sections of the program:

- Introductory contractor training
 - General safety rules
 - General Risks and Regulations in the Plant
 - Specific Electrical Hazards in the Electrolysis Line
 - Fire safety – Use of fire extinguishers
 - Safe Work at Heights – Falls
 - Risks of portable tools
 - Hazard Assessment
 - Communication system in underground activities
 - Safe movement of Pedestrians, Machinery & Vehicles
 - Harmful Factors in underground activities
- Musculo-skeletal risks
 - Lifting Machinery
 - Emergency Plans
 - Safety of High-Pressure Hydraulic Tools
 - Safe performance of electrical work
 - Road Safety
 - Use of Personal Protective Equipment
 - Emergency First Aid at Work
 - “Safety at Work” introductory training
 - Manual handling of loads
 - Cleanliness of premises
 - Emergencies

of health-related data in the Company's core activities was continued, contributing to the effort to ensure a safe working environment.

Employment



Impact on Sustainable Development	3,70	Significance for Stakeholders	3,36
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: In all work areas of MYTILINEOS' Business Activity Sectors and subsidiaries.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">• Employees• Shareholders / Investors• Regulatory bodies <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The Business Activity Sectors of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/suppliers may also be indirectly involved.	<ul style="list-style-type: none">• Curbing unemployment and poverty at local and national level.• Strengthening the economy of local communities.• Enhancing employability in the industrial sector.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Social Partner groups, so that they can understand how the Company is managing its Human Capital in the framework of its new operational structure. [GRI 103-2b]

As an employer, MYTILINEOS contributes to one of the most widely accepted social goals, namely to improve living standards through full-time and safe employment and decent work. Retaining existing jobs and creating new ones is a strategic choice which the Company has made in order to achieve growth in all areas directly or indirectly related to its activities. The Company's labor practices comply as a minimum with all the provisions of the legislation in force and respect the fundamental principles laid down in the International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work. [GRI 103-1a]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

- Employment, as an internationally recognized objective related to economic and social progress, is considered as an extremely important issue for MYTILINEOS' Business Activity Sectors, because of the high localization and large number of their employees. Creating opportunities for long-term employment does not only benefit the Company's business activities but has also a positive impact on its local communities, contributing to their sustainability.
- In addition, issues concerning decent working conditions (such as, for example, working environment, wages, benefits, working time, rest periods, leaves of absence, disciplinary and redundancy practices, protection of motherhood and other welfare issues) are of top priority for the Company, as they directly affect the satisfaction of employees and are key factors for their retention.

Major risks [GRI 102-15]

The decline in employee satisfaction, commitment and effectiveness and the departure of talented employees, which may be due to their lack of adaptability to changes in corporate organization and in processes, and to their difficulty in assimilating the Company's values and understanding its Code of Business Conduct, as these have changed following the completion of the Company's corporate restructuring. This risk may result in the loss of valuable knowledge and expertise gained through their employment, as well as in loss of the financial investment made and of the time required for their training. The Company may also incur increased costs for the renewal of specialist personnel.

Risk Management / Control Practices [GRI 103-2a]

To address these risks, the Company has implemented systems and practices concerning:

- the timely and continuous provision to employees of information about changes in structures and processes due to the corporate restructuring, and
- the development of programs for formulating the new integrated corporate culture, based on the employees' shared values and their behaviors.

Key elements of the Company's approach to Employment

- Attraction and retention of competent executives, continuous improvement of employer-employee relations and implementation of modern systems for employee performance evaluation.
- Promotion of the Code of Business Conduct to all personnel, ensuring that the latter are fully familiar with it, and avoidance of direct or indirect discrimination in all work practices.
- Recognition of the importance of healthy and secure employment for all personnel and business partners, and continuous improvement in this area.

- Focus on localization, giving priority to the recruitment of employees from its local communities.
- Ensuring the flow of information and the timely communication of organizational changes through the appropriate communication channels, including e-mail, the SharePoint application and non-electronic means of communication such as evening consultation events with members of the Company's top management, written announcements posted in production work areas and, more generally, open communication with employees through the HR-Business Partner role in each Business Sector.
- Protection of the personal data of employees, allowing their use only by authorized persons and only in cases where this is required by the law for purposes related to the functioning of industrial relations and to the Company's business activity.
- Exclusion of any possible arbitrary or discriminatory practice in terminating employment relationships with employees and boosting local employment at domestic and international level based on the Company's activity.
- The General Management of the Human Resources Central Function of MYTILINEOS is responsible for establishing and implementing the framework for the management and development of the relevant policies and practices, as well as for providing professional support to the Business Activity Sectors for dealing with issues regarding to human resources.

Management - Employee relations

One of the main goals of MYTILINEOS, as an important social entity, is the fulfilment of its social role. The Company seeks to ensure the well-being of its employees, as it considers them as an important factor for its growth. Therefore, employees are considered to be "integrated" within the Company, beyond the employment-remuneration provision relationship that formally connects them with it, in the sense that the continuous improvement of their capabilities and of the outcome of their work is inextricably linked to the Company's progress. The company's Management has set as its priorities the safety of its employees and the protection of their interests and rights in the framework of sound corporate management, given that one of the key success factors is the employees' full dedication to their duties. Thus, employees can communicate with authorized members of the Management about all matters of concern to them and are provided with timely answers and solutions.

MYTILINEOS also ensures that its employees are informed in a timely manner prior to the implementation of major changes corporate operations which might affect them significantly. Although not mentioned in the business collective agreements, the duration of any notice of change varies depending on the significance of the change and the Business Activity Sector involved. The following examples are indicative: [GRI 402-1a]

- In the Metallurgy Sector, the Plant Steering Committee holds weekly meetings to discuss matters concerning Safety, the Environment, Production and Finance, as well as organizational / operational changes (if any), with the participation of all Company Managers. The results of these meetings are immediately communicated to all other employees by the company's Executives.

- In the EPC & Infrastructure Projects Sector, a reasonable notice period applies, depending on the circumstances and in consultation with the employees' elected representatives, to ensure that employees are notified in the best possible way. The Management meets regularly with the Board of the Employees' Union to inform them of any issues that may concern them. In extraordinary cases, the meeting and the provision of information by the Company to the Board of the Employees' Union precedes the implementation of any positive or negative change that affects employees, with provisions made for the time necessary to disseminate the information and hold consultations.



Results GRI 103-3a-iii

- In 2019, the Company established a new, revised recruitment policy and procedure. The purpose of the policy is to ensure adherence to meritocracy and equal treatment in the selection of personnel, based on the candidates’ capabilities and their suitability given the requirements of the particular jobs, as well as optimal leverage of the employees’ potential with regard to their development and career path prospects in the Company.
- Direct employment, as recorded at the end of 2019, drove up to **2,436** the total number of the Company’s employees, of which 90% are employed in Greece.
- In 2019, the total number of employees of permanent independent contractors executing significant operations for the Company (such as mining, construction of new projects, maintenance services, transports etc.), as well as the number persons employed by MYTILINEOS under long-term work contracts or employment contracts, stood at 1,226, raising the number of the Company’s direct and indirect employees to 3,662 persons, thus **increasing total employment by 8.3%** from 2018.
- In terms of bolstering local employment, the Company maintained for yet another year its very high rates, as **9.3 out of 10** of its direct and indirect employees come from the communities in the immediate vicinity of its industrial units but also from the wider region.
- Moreover, MYTILINEOS, as a supporter of the “GEFYRA” program, created **122 quality “pre-labor-market” posts**, 72 more than in 2018, based on the concepts of apprenticeship, internship and traineeship, with the aim of bridging the skills gap and of transforming many of these posts into permanent jobs.

Workforce Data (direct employees) GRI 102-8	2017	2018	2019
Analysis / Gender			
Total	2,021	2,087	2,436
Men	1,710	1,723	1,996
Women	311	364	440
Analysis / Employment contracts by gender			
Permanent	1,785	1,873	2,147
Men	1,521	1,559	1,779
Women	264	314	368
Temporary	236	214	289
Men	189	164	217
Women	47	50	72
Analysis / Employment contracts by country			
Permanent	1,785	1,873	2,147
Greece	1,766	1,845	2,001
Ghana	4	6	2
United Kingdom	9	8	25
Spain	-	2	20
Nigeria	1	-	-
Puerto Rico	-	3	-
Saudi Arabia	-	1	1
Turkey	3	3	4
Chile	2	5	44
Kazakhstan	-	-	36
Australia	-	-	11
Uganda	-	-	3
Temporary	236	214	289
Greece	151	103	163
Algeria	14	7	6
Ghana	31	60	56
United Kingdom	12	12	-
Iraq	8	-	-
Spain	-	3	47
Kazakhstan	9	14	-
Spain	7	8	8
Uganda	-	4	-
Puerto Rico	4	-	-
Chile	-	3	-
Turkey	-	-	0
Korea	-	-	6
Tunisia	-	-	3
Analysis / Employment types by gender			
Full-time	2,006	2,069	2,418
Men	1,710	1,721	2,002
Women	296	348	416
Part-time	15	18	19
Men	-	2	4
Women	15	16	15

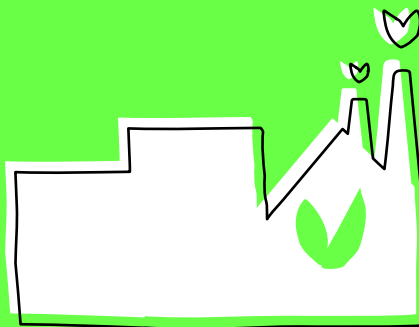
Workforce Data (direct employees) GRI 401-1	2017	2018	Recruitments 2019		2017	2018	Departures 2019	
Analysis / Gender								
Total	321	429	659	27%	226	384	384	16%
Men	253	311	503	25%	203	314	301	15%
Women	68	118	156	35%	23	70	83	19%
Analysis / Age group								
< 30 years old	137	210	297	101%	86	151	193	66%
30 – 50 years old	167	197	318	19%	109	180	147	9%
> 50 years old	17	21	44	10%	31	53	44	10%
Analysis / Country								
Greece	269	346	435	20%	194	339	310	16%
Algeria	-	2	1	17%	-	9	2	33%
Ghana	29	38	40	69%	2	7	42	72%
United Kingdom	-	6	15	60%	-	7	11	44%
Nigeria	6	4	-	-	-	3	-	-
Iran	5	3	-	-	1	9	-	-
Spain	-	5	62	93%	-	-	-	-
Uganda	-	4	3	100%	-	-	-	-
Puerto Rico	3	0	-	-	10	1	-	-
Kazakhstan	7	14	33	92%	-	8	10	28%
Chile	-	7	49	111%	-	1	5	11%
Turkey	-	-	1	25%			4	100%
Australia	-	-	11	100%			-	-
Korea	-	-	6	100%			-	-
Tunisia	-	-	3	100%			-	-

In all regions where MYTILINEOS operates, the compensation and benefit plans offered to its employees are as a minimum in full compliance with the labor legislation and with the business collective agreements, where applicable. Any compensations over and above the statutory ones are based on the employees’ individual performance, which is reviewed and assessed annually. The objective in adopting this approach is to ensure meritocracy in earning levels, guarantee competitive earnings as a function of the conditions in the business environment that affect the company’s competitiveness and lay the foundations for long-term cooperation with its people.

Moreover, MYTILINEOS provides a number of benefits to full-time employees in all levels of its hierarchy, which remained unchanged in 2019. These benefits vary between activity sectors and include medical care, life insurance, disability/incapacitation coverage, retirement provision, maternity/paternity leave, and the granting of loans in cases of emergency. These benefits are non-discriminatory and are governed by the principles of equal treatment and transparency, setting clear policies in each personnel category. GRI 401-2

Overview of performance in 2019

- **Direct employment increased further by 16.7%** (2018: 3.2%).
- The **high proportion (88.1%) of employees** working under a **permanent employment contract was maintained** (2018: 89.7%).
- **The retention rate of full-time employees** rose to **93.5%** (2018: 90.7%).
- The low rates of **fixed-term employees (12%)** and **part-time employees (0.7%)** were maintained, supporting the long-term relations between the Company and its people.
- **The participation of women in direct employment rose to 18%, increased by 17.6%** compared to the base year (2017).
- Also, **the percentage of female full-time employees, rose to 17.2%, increased by 17.6%** compared to the base year (2017).
- **More than 5 out of 10 employees are covered by operational collective bargaining agreements.** [GRI 102-41]
- **The return to work and retention rates of employees who took parental leave, amounted to 93% and 90% respectively.** [GRI 401-3]
- A total of **281 new jobs were created (of which 131 in Greece)**, covering the needs in all the Company's Business Activity Sectors.
- The employee turnover rate decreased **by 11% and stood at 5.16%** (2018: 5.8%).
- **The 24% of the total new hires (659) were women.**
- Moreover, 48% of new the new hires involved young employees <30 years, **whose participation in direct employment showed a significant increase by 10% compared to 2018.**



Human Rights



Impact on Sustainable Development	4,00	Significance for Stakeholders	3,42
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: In all work areas of the Business Activity Sectors and subsidiaries of the Company and of its contractors and suppliers.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Protection of labor rights.Strengthening social and economic integration for all, irrespective of age, gender, disability, race, nationality, origin, religion, economic situation or other characteristic.Strengthening employment in the industrial sector.	<ul style="list-style-type: none">EmployeesSuppliersShareholders / InvestorsNGOsAcademic communityRegulatory bodiesMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Social Partner groups, so that they can understand how the Company is managing its Human Capital in the framework of its new operational structure. [GRI 103-2b]

MYTILINEOS ensures labor relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promoting the fundamental principles of the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) respect for the freedom of association and the effective recognition of the right to collective bargaining, (b) elimination of all forms of forced or compulsory labor; (c) effective abolition of child labor, and (d) the elimination of all discrimination in respect of employment and occupation.

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The key challenge for the Company is to maintain its strong focus on the protection of Human Rights and especially of labor rights, as this helps to further strengthen a working environment that promotes the improvement of employees on a personal and professional level, and also ensures that the Company is not involved in circumstances of violation of these rights, which may be caused by another company or by State bodies, natural persons or other groups with which the Company cooperates within the scope of its activity.

Major risks [GRI 102-15]

- As there is no formal due diligence procedure for safeguarding the protection of Human Rights, MYTILINEOS recognizes risks related to human rights, both within its working environment and in the business environment of its main suppliers and partners. These risks (such as activities that may affect or involve children, culture of corruption, inequalities in the workplace, limitation of human rights at the level of local communities etc.) are emerged mainly from the Company's official materiality process which addresses industry-specific human rights issues, and may affect the Company's financial, human and social capital, through their likely impact on its reputation and its “social license to operate”, also may lead to legal sanctions as well as to emergency measures beyond those imposed by normal business conditions.
- Moreover, through the EPC & Infrastructure Projects sector, the Company owns work sites in countries abroad and cooperates with suppliers of developing countries in the Middle East and Africa, where there is a risk of occurrence of incidents of Human Rights restriction or violation, which may even cause the suspension of works for some time, at a direct financial cost to the Company.

Risk Management / Control Practices [GRI 103-2a]

- MYTILINEOS is committed to the first six Principles of the UN Global Compact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights. The Company's commitment to monitoring and publishing the impacts of its activity in this area, together with the Code of Business Conduct, which is addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's working environment.
- MYTILINEOS monitors the relevant labor legislation (national, European, ILO), including reports on child labor, respect for human rights and work conditions, and is fully aligned with the collective bargaining agreements and the relevant international conventions. The Company's employees may without any restriction whatsoever participate in trade unions and

- professional associations.
- Labor rights are an issue of major significance for all employees. The Company's direct employees are covered by business collective agreements, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. Also, Employees Unions are in place in the Metallurgy Sector and the EPC & Infrastructure Projects Sector. In the latter, a first-degree trade union body is established and functions at business-unit level (Volos plant), whose members are elected by the general assembly of the plant's employees, with representatives also elected to the second-degree trade union organization (Volos Labor Centre) and to the Panhellenic Metal Workers' Federation (POEM).
 - The Company, through the basic grievance mechanism provided in its Code of Business Conduct for reporting violations of the Code (anonymous or named reports by phone, fax, post, as well as by e-mail to the Regulatory Compliance Division), turns its commitment to action, by enabling its employees to raise any concerns, as well as to report incidents of Human Rights violations. Moreover, the Company warrants that no action shall be taken against any employee who reports in good faith any actual or alleged inappropriate conduct.
 - As regards its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that must be followed, to ensure that the Health & Safety system for employees is properly implemented and the appropriate measures are taken. At the same time, the contracts signed with contractors and suppliers include an explicit provision about the Company's Code of Business Conduct, to safeguard the respect for Human Rights and to prevent conditions of corruption and bribery
 - Finally, **the Company is also committed to conduct risk assessments in its production plants and offices of its Business Sectors to identify potential effects on key Human Rights protection areas**, in accordance with the methodology proposed by the **Global Compact (Global Compact Self-Assessment Tool - Human Rights section)** and to publish the relevant findings. This process is supported by both daily communication and employee management procedures and systems implemented by the Human Resources General Division.

Results [GRI 103-3a-ii]

- In 2019, **no incident of Human Rights violation was reported to the Human Resources General Division or to the Regulatory Compliance Division through the formal procedure** in place for reporting violations of the Company's Code of Business Conduct.
- In 2019, the Company implemented for the 3rd consecutive year the self-assessment process regarding the protection of Human rights in its Business Sectors, in line with the methodology recommended by the Global Compact (Global Compact

Self-Assessment Tool - Human Rights). **According to the results of the self-assessment process, no areas were identified in which the deficiencies observed could jeopardize the protection of Human Rights in the Company's activities.** The key areas examined in accordance with the above process, which was also supported by daily communications and the Human Resources General Division systems, are summarized in the table below. [GRI 412-1]

Assessment Areas	Results
Occupational Health & Safety	<p>During the self-assessment exercise, no deficiencies were established in terms of procedures or policies regarding the Health and Safety of employees.</p> <ul style="list-style-type: none">• The Company ensures that its workers are provided safe, healthy, suitable and sanitary work facilities.• The Company ensures that its workers are provided with the protective equipment and training necessary to perform their tasks safely.• The Company promotes the active participation of its employees in the Health and Safety procedures at the workplace.• Overall, the policy, the scheduled planned actions for the achievement of the targets set and the initiatives adopted voluntarily by the Company to ensure the Health and Safety of employees, are rigorously applied, as presented in the relevant section of this report.
Personnel Work Hours, Wages And Leaves	<p>For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates.</p> <ul style="list-style-type: none">• The Company confirms that all employees have a formal employment status.• It also ensures that weekly work is limited to 40 hours; however, due to the workload in various activities, groups of employees may be called upon to work beyond 40 hours.• The Company has procedures in place for planning, recording and monitoring each employee's work hours to check any overtime, while also providing employees with a reasonable break time during work (as laid down by the law and the industrial standards).• The Company ensures the wages of its employees in all cases of sick or parental leave and holiday leave, in accordance with the international standards.• No incident of a violation of these rights was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct.
Fair Treatment of Employees	<ul style="list-style-type: none">• In accordance with the Code of Business Conduct and the Internal Regulation Code, the Company protects its employees from all forms of harassment at the workplace, as well as from physical, verbal, sexual or psychological abuse and harassment and from threats of any kind.• The Company also respects the privacy of its employees' personal data whenever it collects personal information or checks work areas.• No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the company's Code of Business Conduct.

Assessment Areas	Results
Freedom of Association	<p>The legal framework on labor includes provisions on the recognition and safeguarding of the employees' right to freedom of association and collective bargaining, which MYTILINEOS fully respects. The employees' right to freedom of association is recognized in all its Business Activity Sectors. During 2019, no areas were identified and no incidents were reported in connection with a threat to or violation of this right. This has been the result of the implementation of a specific social negotiation process, whose fundamental prerequisite is the commitment of the Company's Management and of its employees to detailed arrangements on social and labor issues, taking into consideration the rights and interests of both sides.</p> <p>No incident of a violation of this right was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the company's Code of Business Conduct. [GRI 407-1]</p>
Impact on Local Communities	<ul style="list-style-type: none">• The Company, through the mechanisms for formal and informal interactions with local communities which it maintains in each one of its Business Activity Sectors, with the exception of industrial units located in demarcated Industrial Areas, ensures that the concerns of local communities regarding any general impact of its activity are recorded and takes, where necessary, appropriate measures.• It also takes the necessary measures to ensure that the security system of its premises or such arrangements in place are consistent with the international law enforcement principles and the use of power. <p>In this respect, in 2019 no circumstances were identified to justify the likelihood of incidents of human rights violations at community level. The Company's activity does not limit but on the contrary, ensures access by the citizens to resources or various other methods of living. For example, in the case of the Metallurgy Sector, the Company's drilling network serves local communities with more than 900,000 m³ of drinking water annually. Moreover, the consultation process and, by extension, cooperation with the local Municipalities during the development and operation of RES projects is systematic, with the Company investing significant funds in the development and improvement of local infrastructure with mutual benefits.</p>
Child Labour	<p>MYTILINEOS does not employ persons under the age of 15 or 18 for work. As a result, no Company activity in Greece presents any risk (significant or non-significance) of child labor incidents or of any conditions likely to drive young employees to hazardous work. [GRI 408-1]</p>
Forced Labour	<p>In compliance with the Constitution of Greece (art. 22 par. 4), which protects the freedom of work, MYTILINEOS prohibits all forms of forced or compulsory labor in its work areas. As a result, no Company activity in Greece presents any significant risk of conditions that may lead to incidents of forced labor.</p> <p>In 2019, no complaint or incident of forced or compulsory labor was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 409-1]</p>
Discrimination	<p>MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.</p> <p>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 406-1]</p>

“We are implementing the appropriate policies to ensure **the promotion of equal opportunities** while covering all labour and human rights at all levels of operation.”



Sustainability of local communities



Impact on Sustainable Development	3,63	Significance for Stakeholders	3,45
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI103-1b]		Issue of increased significance to:
Where the impacts occur: Mainly in the communities adjacent to the Company's industrial units in Greece and abroad, but also in the wider Greek territory.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Upgrading local infrastructures and paying particular attention to the needs of those who are in a vulnerable situation, such as women and children.Strengthening the local and national economy and development.Strengthening the protection and preservation of the cultural and natural heritage.	<ul style="list-style-type: none">Local communities,Regulatory bodies,Academic communityNGOs.ShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide MYTILINEOS' Social Partners with access to information regarding the development of the Company's social role as a responsible corporate citizen. The Company's objective is to familiarize itself with the needs and priorities of its local communities, so that its development efforts are as compatible as possible with the needs and priorities of its local communities and of the broader Greek society. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Social engagement reinforces the preventive approach policy adopted by MYTILINEOS, mitigating the unpredictable non-financial risks and contributing to the preservation of its “social license to operate” along with its good reputation. A key challenge for the Company is to match its contribution to the needs and priorities of the communities in which it operates, considering local issues as well as the national priorities for Sustainable Development. Information exchange, consultation and negotiation are useful tools in fostering a participatory approach to the identification and implementation of MYTILINEOS' social investments. This is a constantly evolving effort taking various forms, whose combination results in the Company's commitment to respond to the diverse expectations of its local communities, by actively contributing to the growth of the local employment and economy, to the protection of the environment, to the promotion of health and safety, to the efforts to combat poverty, to strengthening social inclusion and ensuring access to education, and to assist in development of the professional skills of the new generation.

Major risks [GRI 102-15]

The Company's failure to promptly identify and manage the frequently changing social, economic and cultural characteristics of its local communities may reverse the existing assumption that the Company is fully integrated in these communities and has common interests with them. This may affect the preservation of the Company's “social license to operate” and thus also restrict its future growth.

Risk Management / Control Practices [GRI 103-2a]

- The General Management of each Business Sector of MYTILINEOS is responsible for managing relationships with the local communities where the Business Sector operates. The main objective is to identify any negative impacts from the Company's business activity and to minimize them through its responsible business conduct and activity.
- Moreover, a Corporate Social Responsibility team has been appointed and is operating in each Business Sector. This team is managing the implementation of the Company's social policy, the annual Stakeholder engagement process, the use of local social media and the organization of visits of members of the local community to the Company's facilities, when this is requested.
- The Company communicates with its local communities in a clear and transparent way, opting for an “open door” policy, applied in the areas where the Company's industrial plants are located.
- The collaboration of MYTILINEOS with the wider society as well as with the local communities where its operations are located is ongoing, multi-dimensional and substantial. The initiatives

taken by the Company are linked to the needs of each community and of the wider region and are shaped through open dialogue with the local social partners, by conducting surveys to identify material issues as well as opinion surveys, and by organizing annual thematic or general open consultations with representatives of the local communities, in order to discuss and follow up on specific topics of local interest.

Key elements of MYTILINEOS' social policy:

- Bolstering local employment:** As the core activities of MYTILINEOS are primarily located in the Greek regions, the Company acknowledges and accepts its share of the responsibility to contribute to the development and preservation of the prosperity of the local communities. In all the geographical regions where the Company's operations are located, its human resources are sourced in their majority from the local population.
- Supporting local economic growth:** All Business Sectors of the Company subscribe to the same principle of giving priority to the selection of local suppliers, provided that these meet their specific needs and particular requirements. (For information on this topic, please consult the latest study of the MYTILINEOS Socio-economic Impact in Greece, available at the following address: mytilineos.gr/en-us/how-we-create-value/how%20we%20create%20value#tab-mytilineos-socio-economic-impact-in-greece)
- A substantial contribution through the annual Social Investment Program implementing social programs and initiatives:** The Company aspires to help strengthen social cohesion, strategically seeking to maximize its mobilization by participating in selected actions in sectors directly connected to: (a) its culture and corporate values, (b) the impacts of its business activity, (c) the basic social needs that have emerged during the financial crisis and continue to exist, and (d) the Sustainable Development Goals.
- In tandem with the above and building on its constructive relationship with social bodies over the years,** MYTILINEOS applies a specific way of managing and evaluating social requests, which reinforces transparency and ensures the sustainability of its social investments. (More information is available at the following address: mytilineos.gr/en-us/empraktos/)
- Specialized executives in each Business Activity Sector manage the Company's relations with its local communities and, in collaboration with Corporate Social Responsibility Central Function of MYTILINEOS, implement the annual stakeholder and local communities consultation process at local level (see here the [process principles](#)), in order to record local needs and explore new partnership opportunities.

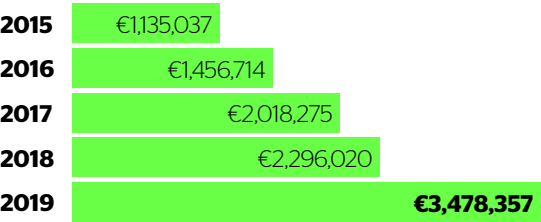
Results [GRI 103-3a-ii]

Stakeholder Engagement

For the last ten years, MYTILINEOS has been consistently holding its established Open Social Dialogue events with its Stakeholder groups. The Company is one of Greece's pioneers in this field, as this approach establishes the conditions for defining new attitudes and practices in its relationships with Stakeholders, taking as its starting point the characteristics of its Business Sectors. In line with the above, the Metallurgy sector of MYTILINEOS held its 5th consecutive thematic consultation with its Stakeholders, entitled **“Education - Skills Development and Creation of quality jobs”**. (Relevant details are presented in the corresponding section of this Report.)

Social Investments [GRI 203-1] [GRI 413-1a-iv]

In 2019, the Company, continuing to implement **its social policy** through the Social Contribution Program **“IN PRACTICE”**, increased **its social investment by 51.5%** relative to 2018 **to over €3.4 million**, implementing actions in basic social sectors. The amount invested in local infrastructure and services public benefit reached €2.3 million



Analysis of social investments in 2019		
Social Sectors	Relevant SDGs	% of total social investments
Local infrastructure & services	SDG 11	67.1%
Support of culture/sports	SDG 11	20.7%
Reinforcement of quality education	SDG 4	4.3%
Access to health services	SDG 3	3.7%
Alleviation of poverty and unemployment	SDG 1	2.9%
Reduction of food insecurity	SDG 2	1.3%

Local employment and growth

Over the last 10 years, MYTILINEOS has created more than 950 new jobs taking also into account the Company's employment figures for 2019. Moreover, the Company, acknowledging its significant share of the responsibility to generate income in its local communities, pursued its policy of boosting local employment, **with more than 9 out of 10 direct and indirect employees coming from the local population**. It also supported the national and local supply chain by sourcing from it revenue generating products, services, jobs **(retaining more than 1,200 indirect jobs from direct suppliers in connection with all Company activities during 2019)**, creating wages consumed in the market and generating induced jobs, wages and taxes paid to the State.

Social benefits from the development of RES projects

The added value created by the Company's business operation over time, through the development of Renewable Energy Sources (RES) projects by its Electric Power sector, refers not only to its contribution to the achievement of the national environmental goals but also to the significant associated benefits offered to the local communities. Thus, in 2019, the total investment in supporting infrastructure and services projects aimed at improving the lives of local residents in Municipalities where new RES projects are in operation or are to be developed, stood **at over €820,000**. Over the years, these investments have mainly involved the following: Asphalt paving and maintenance of main and rural roads, extension of water supply networks of settlements, repair or construction of municipal buildings and facilities in cooperation with the municipalities concerned and according to their needs, as well as donations of vehicles and equipment necessary for the operation of municipal services and fire protection.

Key Social Initiatives & Programs

INITIATIVE

MYTILINEOS, delivering on its commitment to provide safe schools for children in the areas stricken by the recent wild-fires, undertook and completed the energy efficiency upgrade and the improvement of the safety and functionality of the Gymnasium-Lyceum School Complex and the Indoor Gym of the Rafina-Pikermi Municipality, choosing to undertake the most modern interventions to the outer shell of the buildings and to their electromechanical (E/M) systems.
Impact: The interventions undertaken maximized the energy efficiency for the School Complex and the Indoor Gym, **achieving savings of 45% and 40%, respectively, compared to the existing situation**. At the same time, additional interventions were found necessary, including: Fire protection study, installation of a new lift and other improvements for people with reduced mobility, installation of a lightning protection and surge arrester system, and maintenance and enrichment of green areas. With a total value exceeding **€700,000**, this particular social investment **currently covers all educational and athletic needs of 1,700 school students and children from various areas of the Municipality of Rafina and other adjacent municipalities**.

INITIATIVE

MYTILINEOS, in the context of strengthening public-private partnerships in the Corporate Social Responsibility area, was one of the four companies which participated in the cleaning of the plot located in the fire-stricken area of Mati, Attica, in which around 20,000 tons of burnt wood and mixed materials (from the fires of 23-24 July 2018) had accumulated, representing a dangerous source of new fires for the local community.

INITIATIVE

Offer of 6 all-terrain (4x4) fire trucks with a carrying capacity of 600 liters of water to the Hellenic Fire Service Brigade and of **4 vehicles** to the Hellenic Police.
Impact: This particular initiative contributes significantly to the upgrading of the equipment and technical means which the Hellenic Fire Service requires in order to cover its daily operational needs, while at the same time it has a wider reach across all of society, as it will serve to protect the life and the property of the Greek people as well as the country's forest wealth.

PROGRAM

“Engineers in Action”
MYTILINEOS’ “Engineers in Action” Program is now the reference point for young people and young engineers who are starting their careers. In 2019, the 4th cycle of the program began, which was extended to the Central Function the Company as well as to all the Business Activity Sectors.
Impact: The Program seeks to provide 15 participants with a comprehensive work experience, which will be the trigger for a successful professional career. Through this program,

MYTILINEOS seeks to create a model and high level “School of Engineering”, which will consistently feed the Greek industry and entrepreneurship of tomorrow, with talented and capable executives. The Company gives great importance to the “Engineers in Action” Program, as it actively contributes to the healthy development of the Greek labor market, while aiming to reduce the gap between the market and the theory of education. The vision of the Program is to establish itself in the consciousness of Greek engineers as an opportunity for personal and professional advancement, which will prevent them from seeking similar opportunities abroad, supporting the national economy.

PROGRAM

“Information and awareness-raising of the school community on forest fire prevention and response, forest protection policies and practices”, in collaboration with the Hellenic Society for the Protection of Nature. The program comprises the following main activities: (a) oak tree-planting and seeding action in areas affected by fires, (b) provision by highly qualified scientists of detailed information on fire prevention (with a possible small-scale pilot research activity involving the identification of fire hazards in a settlement), and (c) creation and production of a “10 Dos and Don'ts of correct tree planting” poster, together with an informative leaflet with instructions and details on correct planting, for distribution to all participating schools.
Impact: The expected results of the program, scheduled to be completed by the end of the school year 2019-2020, focus on: (a) achieving a fuller understanding of the importance and value of forests, (b) providing the best possible information on the prevention of forest fires, and (c) raising awareness of the problems that are caused at national and global level by the depletion of forest areas and have a significant impact on society at large, thereby enhancing the environmental awareness of **nearly 1,000 school students and 50 educators in 50 schools**.

INITIATIVE

In 2019, MYTILINEOS continued to provide financial support to **50 families** that have joined the “AROGI” (ASSISTANCE) foundation of the Holy Metropolis of Thebes & Livadia, facing serious financial and health problems. The Company supported their daily subsistence needs, while it also provided heating oil to foundations of the Metropolis, covering the heating needs of **70 citizens**, and supported the operation of the Social Grocery of the Municipality of Karystos, **directly benefiting 130 families and a total of 105 children and 16 persons with disabilities**.

PROGRAM

“Community service” of the Municipality of Livadia
This concerns the long-standing collaboration of the Metallurgy sector of MYTILINEOS with the Municipality of Livadia for the implementation of the Municipality's community service program. The Company offers specific material and financial resources for the implementation of selected projects (e.g. road construction projects, renovations of public buildings, etc.)

aimed at improving the Municipality’s services that directly serve citizens on a daily basis, while also addressing the issue of unemployment by promoting the employment of long-term unemployed citizens in these activities.

Impact: For yet another year, the Company in 2019 provided material and financial resources worth **€100,000** for maintaining and upgrading social infrastructure, upgrading the operation of municipal services, improving the natural environment, and supporting the local market, while at the same time successfully reconnecting **89 long-term unemployed citizens with the labor market**.

PROGRAM
“Holistic Support for Families in Economic Difficulty and Social Exclusion”, in collaboration with the Association “Together for the Child”.

Impact: The program has improved the living conditions of 22 families, directly benefiting 57 people (30 adults & 27 children), through diverse targeted interventions in various areas of their lives. For a period of seven months, all beneficiaries were offered food, psycho-social support and education, together with extra-curricular activities for children and, most importantly, **support for adults who were able to work, to help their integration in the labor market. By the end of the program, five (5) members of different families (38.5%) had already joined the labor market, while another four (4) were motivated and are currently in the process of taking job interviews.**

PROGRAM
Support program for the “Medium-Term Accommodation Facility for Women at Risk”, in collaboration with “Médecins du Monde” (MdM).

Impact: Recognizing the lack in accommodation facilities for homeless women and mothers with children, MYTILINEOS **was the first company to support “RAMONA”, the new medium-term accommodation facility of MdM.** With this initiative, the Company has contributed substantially to the objective of finding sustainable integration solutions for these individuals, which it closely monitors in collaboration with MdM. More specifically, the Company: (a) covered the maintenance costs for the building where the Facility is housed, (b) provided a total of 19 women and 7 children, ruling out all forms of discrimination, with accommodation in their own individual rooms with private shower and a refrigerator, as well as with personal and baby hygiene products, food and coverage of their subsistence expenses for a period of nine months.

PROGRAM
#skills4engineers, in collaboration with the Social Enterprise “Knowl”.

Impact: The 3-month intensive skills development cycle #skills4enginers was completed with **great success**, while the results of the program’s evaluation are also particularly positive. In particular, **1,415 training hours** were offered covering **36 subject areas**, thanks to the invaluable contribution of **41 distinguished Advisers/Trainers** with many years of

professional experience. **A total of 18 young engineers have already found jobs that matched their professional goals**, out of a total of 27 participants/beneficiaries who have successfully completed the program, while the remaining nine (9), fully empowered and motivated by the program, continue to actively seek a job in the labor market. It should be noted that many of them have received job offers and are crediting this to the program, thanks to which they also feel confident and more certain of themselves in seeking a job that is close to their immediate interests.

PROGRAM
“Solidarity Subscription” ” of the “sxedia” (“raft”) street magazine.

Impact: The Company participated for the 2nd consecutive year in the magazine’s “Solidarity Subscription” program, in which by securing 150 subscriptions for a period of six months, it contributed to the financial support, in-office work and participation in life coaching and computer learning courses of the magazine’s vendors, who come from vulnerable social groups such as the homeless, the unemployed and, in general, people who have been proven to live below the poverty line.

PROGRAM
“DIATROFI” (“NUTRITION”), in collaboration with the Prolepsis Institute.

Impact: MYTILINEOS ensured the distribution of **32,904** healthy meals in total, for the third consecutive year, to **273 students of 7 schools** of Prefecture of Attica and Viotia, reducing the individual high food insecurity indexes while at the same time helping the students improve their dietary habits.

PROGRAM
“Upgrading of Emergency Departments in Hospitals and Pediatric Clinics in the country”, in collaboration with the “Pediatric Trauma Care” Society.

Impact: By offering the necessary medical equipment, MYTILINEOS has helped upgrade **3 new Emergency Departments** at: (1) the Argos General Hospital – Nafplio Hospital Unit, (2) the Pediatric Clinic of the Health Centre of Ithaca, and (3) the ER of the Pediatric Clinic of the Katerini University General Hospital, **which serves more than 22,000 children on an annual basis.** Moreover, it published 30,000 custom-designed leaflets (**“Safety at School”, “Safety at Home” and “Play Sports with Safety”**), which were distributed in 40 presentations of the “Child Accident Prevention” program, disseminating related information to **2,475 people (children and teachers).**

PROGRAM
“Making children smile”, in collaboration with the “mission ANTHROPOS” organization.

Impact: The Company **offered free dental checks to 500 children from vulnerable social groups, as well as dental treatment to 350 of them, ruling out all forms of discrimination.** The children who participated in the program were

between the ages of 6 and 18 and came from the Social Services of Municipalities, Public Benefit Foundations and non-profit organizations, all of which are based in the Prefecture of Attica.

PROGRAM
“Lending Libraries”, in collaboration with the “Greek Book Club”.

Impact: MYTILINEOS created **7 new school libraries** in an equal number of schools in the Prefectures of Magnesia and Preveza, which **already serve 1,352 children and 116 teachers.**

PROGRAM
Scholarships” and “School electronic equipment renewal”

Impact: The Company invested **€40,000** to cover the needs for modern electronic equipment of **26 schools** in the prefectures of Viotia and Attica. At the same, it secured **20 scholarships for students of its employees** in the framework of its collaboration with the Athens University of Economics and Business for the implementation of the 10th Youth Entrepreneurship Summer School, and also offered **five (5) scholarships** to the University of Piraeus scholarship program for young people from economically disadvantaged families.

PROGRAM
“#Skills4engineers”, in collaboration with Social Business “Knowl”.

Impact: Professional skills enhanced 303 people through the implementation of 2 open skills seminars. One on **“Project Management”** (154 people) and one on **“How 2 skill the engineers”** (149 people) recording very high satisfaction ratings for the general organization, educational content and speakers from all participants.

PROGRAM
“S.T.E.M. Education – Educational Robotics”, in collaboration with the Educational Robotics & Science Organization “WRO Hellas”.

Impact: 23 educational robotics sets were offered to an equal number of schools that could not buy them, **covering 35% of all new schools that benefited from the program during 2019.** The equipment will remain with the schools permanently, to be used by as many students wishing to do so as possible. In addition, **2 robots and 18 robot kits** were provided to the **Centre for Educational Robotics and Sciences of Crete**, to be used for holding more than **100 educational workshops** covering the entire range of S.T.E.A.M. subjects during the 3rd Educational Robotics and S.T.E.A.M. Festival of Crete, **benefiting over 1,000 children and adults.**

PROGRAM
“The Tipping Point”, in collaboration with the Organization «The Tipping Point».

Impact: The program is implemented in **15 schools** throughout Greece, where for the first time and with the use of technology,

through live mentoring lasting 30 minutes, **696 students** and with the help of **26 teachers**, regardless of geographical area, economic and social status can speak with successful professionals and receive answers to questions about their future.





€3,478,357

in social investments
in 2019

Emergency Response Plans



Impact on Sustainable Development	3,30	Significance for Stakeholders	3,62
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts can occur in the Company's industrial plants and facilities as well as in the nearby local communities.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Implementation and promotion of integrated Policies and plans to effectively manage emergencies at all levels, so as to protect the natural environment and the well-being of society at local and national level.	<ul style="list-style-type: none">Local communitiesEmployeesRegulatory bodiesAcademic communityCustomersShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: May be caused by MYTILINEOS' Business Activity Sectors, its subsidiaries and the strategic suppliers and contractors working with them.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to inform MYTILINEOS stakeholders about the readiness and immediate response of the Company to emergencies, in order to ensure the continuity of its operation and to effectively limit the potential social consequences for employees and the local communities, the environment, its reputation, as well as its financial results. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The Company's high degree of readiness and prompt response to extraordinary incidents both within and outside the boundaries of its activity, ensuring the uninterrupted operation of both its industrial plants and its operational installations (underground mining sites and construction sites).

Major risks [GRI 102-15]

The Company recognizes as a risk the low degree of readiness and response to extraordinary incidents (fires, explosions, high volume materials, land subsidence, release of chemical substances to the environment, transportation of products, waste, natural hazards such as weather conditions and seismic events, health and safety incidents and other hazards) with serious consequences for its employees, the local community and the natural environment but also for the smooth operation of its activities and thereby for its reputation and its financial results.

Risk Management / Control Practices [GRI 103-2a]

Appropriate **Emergency Prevention and Response Plans** (for fire, explosion, leakages, natural phenomena, extreme weather conditions etc.) are applied in all Business Activity Sectors of the Company, in order to deal effectively with all incidents that result in deviations from their normal operation with serious consequences for the environment and for the health and safety of employees and of the local communities.

- In the Metallurgy sector, an Emergency Response System has been deployed in the facilities of Ag. Nikolaos, Viotia, covering the following: (a) an integrated Internal Emergency Plan (IEP) which also includes special evacuation plans, (b) systematic training of personnel, and (c) planning and implementation of readiness exercises in accordance with the annual plan and adaptation to the requirements of the IEP.
- In the Electric Power sector, a package of emergency response measures is applied in the sector's energy complexes, RES plants and offices, comprising the following: (a) Emergency Team or Emergency Manager, (b) documented Emergency Incident/Accident Response Procedures, (c) implementation of Emergency Management Plans, and (d) implementation of personnel drills and training exercises in accordance with the special Evacuation Plans and the Building Emergency Instructions.
- In the EPC & Infrastructure Projects sector, appropriate Emergency Prevention and Response Plans are in place to deal effectively with all abnormal emergency operating conditions. Emergencies (extraordinary incidents) are considered to be those events that result in deviations from the Sector's smooth operation with serious consequences for the environment and for the employees' Health & Safety. In order to protect the workforce and the environment in the event of such an incident, Emergency Plans have been prepared and

are applied. Also, in EPC projects, each construction site has its own emergency plan, appropriate to the nature of its activities and to the risks identified and assessed. The emergency plans are documented, accessible and clearly communicated to all personnel, who are trained to understand these plans and to thoroughly familiarize themselves with their roles and responsibilities in the event of an emergency, through the implementation of regular readiness exercises.

Results [GRI 103-3a-ii]

- In 2019, **there were no industrial accidents or environmental incidents with an impact on the natural environment or on public health.**
- New Emergency and First Aid Teams were established in the three buildings of MYTILINEOS' Headquarters, also receiving relevant training.
- A total of **50 emergency preparedness Exercises were carried out in the production units of the Electric Power and Metallurgy sectors.**
- Specifically, in the Metallurgy sector **17 exercises were carried out**, covering three main types of emergency, namely **(a) handling accidents, (b) fire** and **(c) freeing locked-in / trapped people - interventions in enclosed spaces and at heights**, attended by 129 employees in total. The exercises were carried out in the context of the operation of a **“Mobile Emergency Response Unit”**, which consists of 18 Fire Protection Team employees. The staff is well trained in fire safety and facility maintenance and this team is actively supported by approximately 100 volunteer firefighters from the plant's other units, who receive proper training and are periodically retrained. In addition to conducting and analyzing emergency response exercises, the Fire Protection Team uses appropriate certified, mobile equipment and related means of assistance to help local authorities address incidents in the wider area, offering effective and prompt assistance as needed.

Customer Health & Safety



Impact on Sustainable Development	2,30	Significance for Stakeholders	3,58
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Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: Impacts can occur in the areas where MYTILINEOS operates as well as in the areas of activity of its corporate customers who market the Company's final products for use.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">• Employees• Regulatory bodies• Academic community• NGOs• Customers• Suppliers• Shareholders• Media representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: Impacts are caused by the Business Activity Sectors of MYTILINEOS, its subsidiaries and the Company's corporate customers.	<ul style="list-style-type: none">• Protection of the consumers' health and safety when using products and services.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide MYTILINEOS' Stakeholders with access to information on the steps that the Company takes in order to safeguard the quality of its products so that they are safe, irrespective of the existence or otherwise of legal and regulatory safety requirements. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

- In the Metallurgy sector, the impacts of the Company's primary products on health and safety are related to the final use of the secondary products to result from its manufacturing clients. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accordance with the expectations and requirements of its clients.
- In the EPC & Infrastructure Projects sector, in addition to taking into account the internationally applicable regulations on the design of all manufacturing projects, the Company monitors in detail their quality metrics and characteristics from the supply of materials, industrialization and their assembly / integration into a final product, in order to ensure that the stated requirements of the clients are met.
- In the Electric Power sector, it is very important for MYTILINEOS to ensure the maximum possible availability of its thermal plants for the generation of electric power, as well as the continuous improvement of the quality of the energy supplied and of the services accompanying it, while at the same time taking advantage of new developments in such areas as electromobility, energy efficiency and net metering.

Major risks [GRI 102-15]

Any deviation from the quality specifications of the Company's products and services affects its responsible operation, which in turn impacts on its customers' satisfaction levels, its good reputation and credibility and, by extension, its financial results.

Risk Management / Control Practices [GRI 103-2a]

All Company's Business Activity Sectors apply an **ISO 9001/2018** certified Environmental Management System, which is supported by individual Quality policies specific to each Sector.

- In the Metallurgy sector, the Company's laboratories, whose role in the quality program is pivotal, systematically control all production stages, from raw materials to finished products. In this respect, the officially issued Safety Data Sheets (SDS) describe the risks associated with the product as well as all necessary precautions which must be taken to avoid these risks. The Company is committed to take steps to ensure the best quality in its products, in response to the expectations and requirements of its clients, providing them with products (alumina and primary aluminium) and related services that fully meet their quality requirements. Moreover, the sector's activities have been aligned with the provisions of the EU "REACH" Regulation on the effective management of the chemical substances used in industrial processes, while methodologies for the identification and analysis of operational risks as well as of opportunities for improvement, such as risk assessment, are also applied in the framework of ISO 9001/2015. Finally, the sector's quality control laboratory has been accredited by the

Hellenic Accreditation System S.A. (ESYD) in accordance with the requirements of the ISO 17025:2005 International Standard, for the chemical analysis of bauxites, alumina and aluminium and its alloys.

- In the EPC & Infrastructure Projects sector, in all stages of the manufacturing process the strictest international quality criteria and the requirements of specialized international specifications and codes are applied, in order to ensure the quality of the heavy and/or complex metal structures, engineering and industrial projects which the sector undertakes to produce. For every construction project undertaken by the Company and prior to the start of construction, a Hazard and Operability Study (HAZOP) is carried out. The purpose of this study is to identify and resolve any issues which may represent risks to personnel or equipment and which have not been identified at the project study and design stages.
- In the Electric Power and Gas Trading sector, the target is to ensure the reliable supply of electricity on the Network (ADMIE) and natural gas to businesses, professionals and households, meeting the customers' needs for competitive prices through a range of specially configured, modern and reliable energy conservation procedures, advices & services.

Results [GRI 103-3a-ii]

- In 2019, there were no cases of non-compliance with regulations and voluntary codes related to the impact on health and safety of the MYTILINEOS products and services. [GRI 416-2]
- In the Metallurgy sector, where labelling requirements apply to the products for sale, for every consignment of aluminium, a "Certificate of Conformity" states compliance with the specifications. In addition, other certificates are issued, with the necessary information, in particular as regards substances that may have an environmental or social impact.
- In the EPC & Infrastructure Projects sector, the Company's projects are in full agreement with the terms of the respective contracts and with the Company's contractual obligations to its customers, to whom all Health, Safety and Environment related information is delivered, such as: (a) Use, maintenance and disposal instructions for the entire equipment and for all materials supplied (Operation & Maintenance Manuals), (b) clearly visible labelling of all materials and equipment (trademarks, warnings and related instructions), and (c) instructions for use-recycling, in the form of Material Safety Data Sheets (MSDS) for all hazardous materials.

Other significant Social issues

Employee Training & Evaluation

The activity of MYTILINEOS in different sectors gives rise to different training needs, while offering to employees a wide range of knowledge and affording them the opportunity to develop management and problem resolution skills, as they are daily confronted with new local and international challenges. The Company's vocational training and development program continued in 2019, aimed at improving the employees' professional skills and capabilities required to cope with the current and future business challenges as well as their personal life. In particular, **€406,322 was invested** for the implementation of **59,794 training man-hours** (2018: 43,950) **increased by 30.4%**, compared to the respective number of hours in 2018.

The Company's training program, **which was attended by 80.5% of its direct employees**, focused primarily on the following six key areas, **which absorbed nearly 96% of the total number of training hours**:

1. Occupational Health & Safety
2. Job training within the department (In-business training)
3. Technical training
4. Development of skills and personal capabilities **(increase by 338% from 2018)**
5. IT training and
6. Training in internal procedures and management systems.

As regards the skills management programs, 8 in-house programs (accounting for 668 training man-hours) and 52 external

programs (accounting for 6,910 training man-hours), were implemented with the participation of 626 employees. The individual objectives of these programs were to develop and improve skills in specific areas such as: Training of trainers, Effective Coaching, Best Negotiation Techniques, Human Resources Management, Change Management, Effective Meeting Techniques, improving customer service team leadership, skills and knowledge improvement, and reminding employees of Safety Instructions. **[GRI 404-2]**

Moreover, the employee performance evaluation procedure was continued in 2019, in accordance with the Company's uniform evaluation system, with almost **56%⁵ of employees from all categories of personnel participating in this procedure**. The Performance Management System is under review, with the aim of achieving, in 2020, its optimized and differentiated implementation with regard to a number of key points. The objectives of the Performance Management System are the following:

- To support the implementation of the strategy through individual, measurable goals,
- to enhance the employees' understanding of the Company's expectations (quantitative results) and of the skills required of them,
- to provide the framework for productive discussions on performance and developmental feedback,
- to empower Team Leaders to reward high performance, reinforce the people's engagement and contribute to the corporate results.

Workforce data (Direct employees)	Average training man-hours per employee [GRI 404-1]			Percentage of employees who received a performance evaluation review [GRI 404-3]		
	2017	2018	2019	2017	2018	2019
Analysis / gender						
Total	22.7	21.6	24.55	80.8%	72.9%	56.0%
Men	24.4	22.6	26.14	80.6%	76.6%	59.3%
Women	13.1	13.5	17.32	82.3%	55.6%	40.9%
Analysis/ employee category						
Executives	23.7	32.6	24.45	80.1%	78.8%	48.2%
Administrative employees	15.8	14.5	16.70	91.5%	62.4%	48.8%
Workers and technical staff	27.0	24.5	29.05	82.8%	80.5%	64.0%

5. Percentage on the total number of direct employees. The corresponding percentage for employees who met the conditions to be included in the annual performance appraisal process (ie those working in the Company for less than 6 months, as well as special categories of employees based on role / object) reaches 93% increased by 13% from 2018.

Diversity & Equal opportunities

The provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to the abilities that they have in order to respond to their assigned roles, is a core value of MYTILINEOS. In addition, the Company, faithful to its commitment to apply best practices

of Corporate Governance, intends to apply the Diversity principle (the basic parameters being, inter alia, gender, age, experience, skills and knowledge) in the composition of its Board of Directors, its senior executives force and in its direct employees, where feasible. With the main part of the company's activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the specifications of each activity sector) are the main issues in promoting equal opportunities and diversity at the workplace.

Diversity of MYTILINEOS' Governance bodies and personnel categories [GRI 405-1]	2017	2018	2019
Board of Directors			
Men	87.5%	81.8%	80.0%
Women	12.5%	18.2%	20.0%
<30 years old	0.0%	0%	0.0%
30 – 50 years old	0.0%	27.3%	20.0%
>50 years old	100.0%	72.7%	80.0%
Executive Committee			
Men	83.3%	83.3%	83.3%
Women	16.7%	16.7%	16.7%
<30 years old	0.0%	0.0%	0.0%
30 – 50 years old	33.3%	33.3%	33.3%
>50 years old	66.7%	66.7%	66.7%
Executives			
Men	77.3%	81.2%	82.2%
Women	22.7%	18.8%	17.8%
<30 years old	4.3%	2.4%	0.0%
30 – 50 years old	75.7%	68.2%	70.6%
>50 years old	19.2%	28.8%	29.4%
Employees of nationality other than Greek	-	9.4%	2.5%
Administrative employees			
Men	68.4%	64.6%	65.8%
Women	31.6%	35.4%	34.2%
<30 years old	10.1%	11.5%	15.9%
30 – 50 years old	66.4%	67.7%	65.4%
>50 years old	23.4%	20.7%	18.7%
Employees of nationality other than Greek	-	6.6%	2.7%
Workers and technical staff			
Men	98.0%	97.5%	98.4%
Women	2.0%	2.5%	1.6%
<30 years old	13.5%	11.8%	10.3%
30 – 50 years old	74.2%	74.7%	73.8%
>50 years old	12.3%	13.5%	15.9%
Employees of nationality other than Greek	-	5.3%	4.0%

Supply chain management

Geared towards strengthening its competitive position, MYTILINEOS seeks to optimize its suppliers by establishing and maintaining value-added relationships, focusing on reducing the total cost of products or services, on transparency in cooperation and on the promotion of a responsible supply chain.

MYTILINEOS develops long-term partnerships with a number of suppliers, while it manages others on a short-term horizon, based on the competition in the market. The object and the type of the required supply will determine the priority to be placed on local suppliers, based on their economic, qualitative and time-related solvency, the cost of their products or services and their ability to ensure the required quality to cover the procurement needs, in line with predetermined specifications, set by the Company's Business Activity Sectors.

The “**Suppliers & Business Partners Code of Conduct**” of MYTILINEOS sets out the Company's minimum requirements/ expectations from its supply chain actors regarding issues related to Responsible Entrepreneurship, as a key precondition for entering into any commercial association with them.

The sections of this Code address issues such as the Protection of the Environment, the Safeguarding of Health & Safety, Work Conditions, Ethics & Integrity. This initiative aims at committing suppliers to good sustainable development practices which will in turn bring two-way benefits.

At the end of 2019, the number of MYTILINEOS' active suppliers and business partners in Greece and abroad stood at over 9,600. Compared to 2018, the main change recorded in the basic structure of the Company's supply chain was the integration of the suppliers of the subsidiaries METKA EGN and EPALME. In addition, increased expenditures were recorded in suppliers abroad (design services, construction and maintenance of RES projects, etc.), due to the activity of the new Business Activity Sector of International Development of Renewable Sources and Energy Storage of MYTILINEOS **[GRI 102-10]**.

In 2019 MYTILINEOS' total outlays to its suppliers for the production of its products, the supply of services and the development of its projects amounted to more than **€1.95 billion** while the amount allocated to domestic suppliers reached **€777.5 m.** further contributing to the support of indirect jobs and the creation of local income in all geographical areas we operate. **[GRI 204-1]**

The main objective of the Company, by 2025, is to include requirements related to sustainable development in the selection process of key suppliers and to commit existing ones to good and responsible practices, with a view to developing partnerships to better understand the impacts and to mutually harmonize objectives and expectations.

Protection of customers' personal data

The protection of natural persons against the processing of personal data is a recognized national and European objective in the context of building efficient, reliable and transparent institutions and is of the utmost importance for MYTILINEOS. The compliance with the legislation, which the Company applies across all its Business Activity Sectors, contributes to avoiding direct financial consequences but also to its customers' loyalty and satisfaction. The collection and processing of personal data by MYTILINEOS is carried out only in accordance with the General Data Protection Regulation (GDPR) of the European Parliament and of the Council and with the generally applicable legislation, and only in cases where this is required in connection with the functioning of industrial relations and with the Company's business activity. The Company allows access to those data by authorized persons only and takes increased security measures to protect this data from loss, erroneous handling, unauthorized access, modification or disclosure. In 2019, MYTILINEOS notified the Hellenic Data Protection Authority of an isolated phishing incident in a metallurgical worker's email account, concerning unauthorized access to the employee's email addresses and further sending of phishing emails to them. As a remedy, additional emails were sent from the employee's email account to all contacts, advising them of the incident and providing them with instructions on how to deal with it. **[GRI 418-1]**

Basic Description of MYTILINEOS' Supply Chain [GRI 102-9]		
Basic business activities requiring services or products from the supply chain	<ul style="list-style-type: none">• Production & Maintenance of alumina chemical industry and of primary aluminium metallurgy.• Plant production for the purchase of raw or other materials.• Construction for the purchase of equipment for EPC projects implementation• Logistics regarding the methods and time of products' delivery to different countries.• Operation and Maintenance of Energy Centers (thermal power stations)• Development, construction and maintenance of Renewable Energy Sources projects (wind farms, solar parks, hydroelectric projects)• Retail activity• Studies - Investments.• Administrative, Financial, Legal and other services	
	<ul style="list-style-type: none">• Raw material producers• Energy and Natural Gas suppliers• Subcontractors• Manufacturers• Distributors / Forwarders• Suppliers of spare parts/materials• Wholesalers• Suppliers of consultancy services & studies	
Supply Chain Data	2018	2019
Total number of suppliers	7,283	9,639
Geographical distribution	Greece: 82% Abroad: 18%	Greece: 82.6% Abroad: 17.4%
Total expenditure	€1,206,607,399	€1,954,923,114
Geographical distribution [GRI 204-1]	Greece: 69.9% Abroad: 30.1%	Greece: 34% Abroad: 66%



Responsible communication and product labelling

The appropriateness of the forms of communication and marketing applied by MYTILINEOS is ensured by monitoring and incorporating all developments in current legislation and by applying responsible practices governing below-the-line promotion of its products and subsidiaries, the above-the-line communication at central level and the communication of sponsorships and social programs.

The Company seeks to provide transparent information and to ensure that its messages are fully understood by all its current and potential clients. In particular, the advertising and promotion of electricity supply services is carried out in compliance with the applicable legislation on advertising relating to consumer protection and the use of personal data, as in force.

MYTILINEOS keeps abreast of developments in the relevant legislation and voluntary codes of conduct, in order to ensure the lawfulness of its communication and promotions. To this end, the Company's communication associates are bound by the Greek Code of Advertising-Communication Practice, compliance

with which is established on an advisory, preventive and/or suppressive basis by the Communication Control Board, in line with Greek laws. The principles of the Greek Code of Advertising-Communication require that all promotions should be lawful, decent, honest and truthful, should be prepared with a due sense of social responsibility and in line with the principles of fair competition, as this is generally accepted in the market.

During 2019, there were no incidents of non-compliance with the regulations and voluntary codes on marketing communications, including product promotion and sponsorships, involving the implementation of the MYTILINEOS communication strategy. Moreover, the Company's products are not subject to any restrictions as regards their sale to specific markets and no significant issues of concern were raised by the Company's Social Partner groups in connection with products and their marketing communication **GRI 417-3**

Regarding the provision of verifiable and clear information on its products for the purposes of labelling, MYTILINEOS complies fully with the relevant requirements. In all cases, customers have at their disposal the tools allowing them to check all significant information provided and to proceed to the corresponding tests, if they so wish. In 2019 there were no incidents of non-compliance with the regulations regarding information and labelling of the Company's products. **GRI 417-2**

Type of information related to product labelling [GRI 417-1]				
Major categories of products subject to the following information requirements	Aluminium	Alumina	EPC projects	Metal & Machinery Constructions
Information on the origin of product elements or ingredients.	100%	100%	100%	100%
Information on content, particularly regarding substances which may have an environmental or social Impact.				
Information on the safe use of the product or service.	Non-applicable requirements			
Information on the product's disposal method and its potential environmental/ social impact.				
<div><p>In the Metallurgy sector, the labelling requirements regard the products for sale (aluminium billets & slabs as well as calcined and hydrated alumina.) For every aluminium or alumina cargo, a Certificate of Conformity is issued containing all information required for the material.</p><p>In the EPC & Infrastructure Projects sector, the Company's projects and services are in full agreement with the contracts and the contractual obligations towards its customers, to whom all information and warnings about Health, Safety and Environment are delivered, such as:</p><ul style="list-style-type: none">• Instructions for use, maintenance and discarding for the entire equipment (Operation & Maintenance Manuals) and the materials supplied.• Labelling of all materials and equipment (trademarks, warnings and relevant instructions) in a conspicuous position.• Instructions for use-recycling, in the form of Material Safety Data Sheets (MSDS) for all hazardous materials.</div>				

ESG KPI's

S Social KPI's	2017	2018	2019	Diff. (%) (2019 vs 2018)
Number of direct employees	2,021	2,087	2,436	16.7%
Number of indirect employees	884	1,292	1,226	-5.1%
Employee Turnover ¹	-	5.8%	5.16%	-11%
Percentage of full-time employees covered by business collective agreements	5.76	60%	53%	-11.6%
Retention rate of full-time employees	92%	90%	93%	3.3%
Percentage of women (direct employees)	15.4%	17.4%	18%	3.4%
Percentage of women in positions with extended responsibility ²	22.7	18.8%	17.7%	-5.8%
Percentage of employees <30 years old (direct employees)	11.2%	10.9%	12%	10.1%
Percentage of employees who received formal performance evaluation reviews ³	80.8%	72.9%	56.0%	-23.2%
Training man-hours (direct employees)	45,833	43,950	59,794	36%
Average training hours per employee	22.7	21.6	24.55	13.4%
Total training cost (€)	315,000	392,362	406,322	3.5%
Training cost per employee (€)	155.8	188.0	166.7	-11.7%
Human Rights violation incidents ⁴	0	0	0	0%
Discrimination incidents	0	0	0	0%
Percentage of industrial plants and RES units with OHSAS 18000 or ISO 45001 certification	80%	82.6%	84%	1.7%
Work-related fatalities (direct & indirect employees)	0	0	0	0%
Lost Time Injury incidents (direct employees)	3	5	1	-80%
Lost Time Injury incidents (indirect employees)	5	9	8	-11%
Lost Time Injury rate per 200.000 working hours (direct employees)	0.15	0.25	0.04	-84%
Lost Time Injury rate per 200.000 working hours (indirect employees)	0.19	0.27	0.19	-29.6%
Lost days due to accidents per 200.000 working hours (direct employees)	2.91	1.9	0.58	-80%

S Social KPI's	2017	2018	2019	Diff. (%) (2019 vs 2018)
H&S training man-hours (direct & indirect employees)	44,500	46,580	47,017	0.9%
New Jobs ⁵	95	45	281	524%
Percentage of employees from local communities	88%	93.6%	93.2%	-0.4%
Social Investments (m. €)	2.02	2.29	3.47	51.5%
Incidents of non-compliance with laws & regulations in terms of labor and social issues	0	0	0	0%

1. Number of voluntary departures to the average number of direct employees of the Company in the specific year. (Cases of termination of fixed-term contracts are not considered as voluntary departures for the issuance of this index).

2. Percentage on the staff of the Company.

3. Percentage of all direct employees. The corresponding percentage for employees who met the conditions to be included in the annual performance appraisal process (i.e., those who work for the Company at shorter intervals of 6 months, as well as special categories of employees based on role / object) reaches 93% increased by 13% from 2018.

4. Includes topics such as: forced & child labor, health and safety, working hours, staff salaries and leave, fair treatment, freedom of association, restriction of the rights of the population of the local communities, etc.

5. Number of new recruitments - Number of total departures in that year.



Governance

Alignment to UN Global
Compact Principles

PRINCIPLE
10th

Material Issues

- Anti-Corruption & Bribery
- Legal Compliance

Alignment to UN Sustainable
Development Goals



“The experienced management team of MYTILINEOS **has proven to be extremely effective** with a collective ability to develop the business in a sustainable way.”



Special Governance Targets	Targets 2019	Performance 2019	Targets 2020
Confirmed conditions that support the development of corruption and bribery	0	0	0
Financial charges from violation of the Code of Business Conduct (€)	0	0	0
Confirmed cases of non-compliance with regulations and legislation (on issues economic, environmental, labor & social)	0	0	0

Anti-Corruption and Bribery



Impact on Sustainable Development	3.50	Significance for Stakeholders	3,71
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Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts of corruption in all its forms are an obstacle to Sustainable Development and can occur across the entire range of the Company's operation, with consequences for its local communities, the wider business environment and society as a whole.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Elimination of all forms of corruption and bribery.	All Stakeholders' groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts may be caused by MYTILINEOS' Business Activity Sectors, employees, subsidiaries, business partners and supply chain.		

Management Approach [GRI 102-11] [GRI 103-2c]

MYTILINEOS acknowledges that transparency is guaranteed in all transactions developed in the context of its business activities is a key point for sustainability and further its development in the context of its international activity.

The purpose of this disclosure is to inform the Social Partners of MYTILINEOS on the way the Company manages both the absolute restriction of its exposure to corruption & bribery, as well as strengthening the culture of compliance with the anti-corruption legislation. [GRI 103-2b]

Addressing corruption and bribery is of major significance for MYTILINEOS, because: (a) it contributes to improve risk identification, assessment and management, as well as compliance with the laws, which for MYTILINEOS is a non-negotiable principle in every geographical region or country where it operates, (b) it serves its business goals (such as fulfilling the relevant tender requirements for construction projects), and (c) it strengthens the Company's protection against fraud, embezzlement and abuse, further enhancing its corporate image.

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

MYTILINEOS acknowledges that corruption, bribery, fraud and money laundering undermine the ethical environment of businesses and have a wide range of negative impacts that include violations of Human Rights, adverse impacts on the environment, distortion of the competition and prevention of the distribution of wealth and to economic development. These impacts are a serious obstacle to sustainable development, have a disproportionate impact on poor communities and erode the very fabric of society.

Major risks [GRI 102-15]

By undertaking turn-key energy projects in developing countries with a high risk of corruption, according to the annual Transparency International Corruption Index, MYTILINEOS may be exposed to risks involving facilitation payments or the extension of other benefits to the local partners in order to ensure the continuation of the projects' smooth operation.

Any deviation from the Company's principles and ethical practices jeopardizes its good reputation and credibility, the confidence of the stakeholders in it and, by extension, its financial results and its ability to undertake new projects.

Risk Management / Control Practices [GRI 103-2a]

Addressing corruption and bribery is a key element of the MYTILINEOS "Code of Business Conduct" and "Suppliers and Business Partners Code of Conduct". **Also, the reference for the Company when it comes to addressing this issue is the principle of integrity, which relates to its long-standing commitment to zero tolerance of corruption and bribery and is implemented by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging conditions giving rise to corruption, extortion or bribery.**

- MYTILINEOS has been formally committed to the 10th principle of UN Global Compact, whereby 'Businesses should work against corruption in all its forms, including extortion and bribery and facilitation payments'. This principle acts as a catalyst in establishing a culture of ethics across the Company.
- MYTILINEOS has in place prevention and detection systems and controls to ensure that suppliers are properly selected, disputed payments are avoided and the payments due are made correctly and are entered in the Company's accounting books in an accurate and transparent manner.
- In countries with a high risk of corruption, the Company establishes a grievance mechanism to which all direct or indirect employees have access for the purpose of submitting complaints, made anonymously or under the complainant's name, of violations of the Company's policies on personal data protection, bribery and corruption, as well as of violations of human rights or of the Company's Code of Business Conduct.

The Company protects complainants from eventual retaliation, on condition that the complaint is made in good faith, even if it is not corroborated by the result of the investigation undertaken in response to it.

- MYTILINEOS' "Suppliers & Business Partners Code of Conduct" aims at tackling conditions of corruption and bribery in the supply chain. Unannounced audits on suppliers intend to secure the Code's application and to offer recommendations for corrective measures likely to be required.

Key elements of MYTILINEOS' policy on the prevention of corruption and bribery

- Analysis of the prevailing conditions and identification of potential risks or threats which may encourage the occurrence of such incidents in the corporate environment, through a third-party screening and due diligence process. This practice covers corporate activities that involve the risk of occurrence of incidents of corruption and bribery, such as charitable contributions, sponsorships, gifts and hospitality, third party audits in relation to lists of individuals or entities subject to restrictions in connection with the financing of terrorism and human rights violations, brokering services and advisory services, with a view to establishing respective prevention procedures where these are not in place.
- Ensuring that all transactions carried out on behalf of the Company by its shareholders, employees and major business partners and suppliers, are characterized by a high level of integrity. Through established procedures, applying primarily in the Purchases-Procurement Departments and in project management for the selection of suppliers and other business partners, controls are carried out annually of the conditions under which every single transaction takes place, in order to identify and eliminate those that may possibly give rise to incidents of corruption or fraud.
- The Company's operation as a "Responsible Corporate Citizen", is demonstrated by its participation in international transparency advocacy initiatives (UN Global Compact), national working groups and, more generally, by its commitment to ethical business practices and sound corporate governance.

The Legal and Regulatory Central Function, under which the Company's Compliance Division comes, has been entrusted the creation and implementation of mechanisms to safeguard the Company protection from corruption and bribery at both preventive and control levels.

Results [GRI 103-3a-ii]

- In 2019, MYTILINEOS applied all necessary internal procedures to safeguard its policy. Through the screening mechanisms applied in its Purchases-Procurement Departments, which have investigated both the process for the selection business partners and all types of transactions, **no confirmed incidents** of corruption were identified that could possibly lead to dismissal or disciplinary action against employees, nor any corruption-related incidents resulting in the termination or non-renewal of cooperation with business partners or public judicial cases against the Company or its employees for corruption. [GRI 205-3]
- The Regulatory Compliance Division undertook and completed the renewal of the Code of Business Conduct, which attaches increased emphasis to the importance for the Company of ethical business culture in all its activities and to the priority given by the Management to transparent procedures and zero tolerance of violations of the rules and policies in place. The renewal process focused strongly on the importance of anti-corruption and anti-bribery practices, the safeguarding of healthy competition, the protection of personal data and the through screening of business partners prior to the conclusion of agreements, laying down rules and responsibilities for all employees in their daily work.
- Moreover, the Company mapped and classified its employees according to the type of their work and the extent of their exposure to the risks of corruption and personal data breach. For each one of the above categories, relevant educational material was created with a view to providing employees with effective related training (in 2020), by means of a training program whose contents cover theory, analysis of case studies relevant to their daily work, activities intended to raise their awareness of impending risks and a methodology for response to and, where required, escalation of incidents.
- Finally, in July 2019 the criminal proceedings against Mr. Evangelos Mytilineos, Chairman and CEO of the Company, regarding accusations of bribery allegedly committed in 2003, were discontinued.



Legal Compliance



Impact on Sustainable Development	4,00	Significance for Stakeholders	3,71
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Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Issue [GRI 102-46] [GRI 103-1b]		Issue of increased significance to:
Where the impacts occur: The impacts of non-compliance with laws and regulations occur primarily within the operational boundaries of the Company and of its subsidiaries, strategic partners and suppliers. They can also extend to the entire economy and – in the context of sustainable development – to the environment, as well as to society as a whole.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Enforcement of and compliance with non-discriminatory laws aimed at promoting sustainable development.	All Stakeholders' groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts may be caused by MYTILINEOS' Business Activity Sectors, employees, subsidiaries, business partners and supply chain.		

Management Approach [GRI 102-11] [GRI 103-2c]

For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the laws in force and the principles of operation applicable in every geographical region or country where it operates. Compliance with the legislation (environmental, social and product-related) is a core element of the Company’s business activity and a major issue of equal significance with the other issues that the Company is managing in the context of its ongoing and responsible development. This stance is based, first and foremost, on the principle of adhering to the provisions of the law, as well as to the agreements concluded and the voluntary commitments made by the Company through its Business Activity Sectors. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Maintaining regulatory compliance at environmental, social and product level, in order to ensure that the overall corporate activity is lawful, meets high standards of responsible entrepreneurship and strengthens the climate of trust between the Company and its Social Partners who interacting with it (customers, employees, suppliers, administrative authorities etc.).
Cases of non-compliance could have a significant impact on the profitability, financial position and cash flows of MYTILINEOS and, consequently, on its ability to meet its obligations.

Major risks [GRI 102-15]

- Risks of an economic nature, which may arise from possible unfavorable outcomes of legal disputes regarding non-compliance with the legislation in general
- Possible non-compliance of the Company with its obligations under the environmental legislation and, more specifically, with the terms of the environmental licenses of its industrial plants. In this case, the competent authorities may impose fines or sanctions, and may also withdraw or refuse to renew permits and approvals in the event of a breach of the applicable regulations.
- The Company operates in countries with emerging economies, where institutional functions may be affected by political conditions and changes there to. This could negatively affect the activities of MYTILINEOS in the context of obtaining and maintaining permits and approvals.

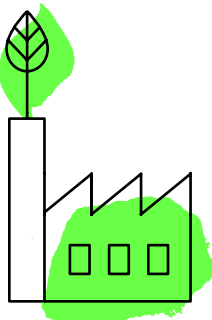
Risk Management / Control Practices [GRI 103-2a]

- In order to prevent the aforementioned risks, the Company: (a) complies with the legal and regulatory requirements of the geographical regions in which it operates, even if such laws and regulations are not adequately implemented; (b) ensures that its relations and activities comply with the established and applicable institutional framework; (c) is kept informed of its applicable legal obligations; and (d) reviews its compliance with applicable laws and regulations on a regular basis.
- Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the Company’s operational units, is a process conducted internally, on a regular basis, in each Business Unit, by qualified personnel, as well as annually, by a recognized independent organization which undertakes to audit and certify the Company’s environmental management system.
- Finally, as a member of the UN Global Compact, the Company strives to ensure that its business practices are fully aligned with the Compact’s internationally recognized Ten Principles. Furthermore, under its Corporate Social Responsibility Policy in place, the Company undertakes to adopt a responsible, sustainable and ethical business conduct that is regularly evaluated on the basis of the results achieved, and to improve

its environmental and social performance as well as its performance regarding transparency and corporate governance.

Results [GRI 103-3a-ii]

Compliance with the applicable legislation, as well as the updating and implementation of the environmental rules concerning the activity of MYTILINEOS, in 2019, **resulted in the absence of incidents of non-compliance with the legislation and with the applicable regulations at environmental, social and economic level.** [GRI 307-1]



Corporate Governance [GRI 102-18]

This section covers the main developments concerning the MYTILINEO's corporate governance for the year 2019. The detailed data are extensively presented in the “Corporate Governance Statement” section of the Company's Annual Report. The corresponding indicators are reported in the GRI Content Index (pages 164, 165 and 171) which also includes references to the Company's Annual Report and in the present Report.



Board of Directors & Company structure

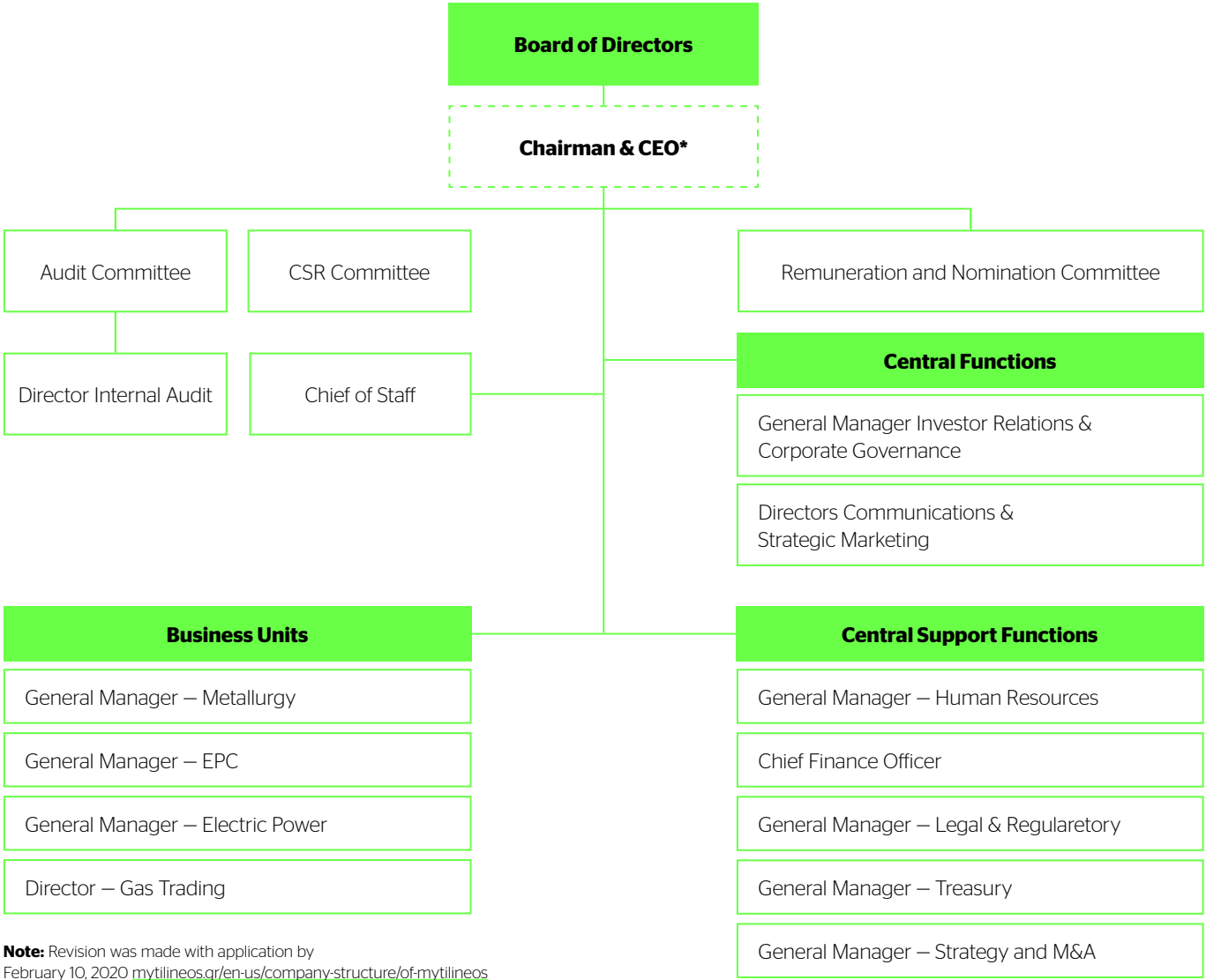
The Company is managed by a Board of Directors consisting of eleven (11) members with a high degree of independence. The Board of Directors is responsible for managing (administering and disposing of) the Company's assets as well as for representing it, with the aim of strengthening its economic value and profitability and of safeguarding the Company's interests. The Board of Directors holds regular meetings at least once per month, and extraordinary meetings whenever important issues arise or decisions need to be made. The regular meetings of the Board of Directors are usually attended by all Board members. Thus far, the Board of Directors has never postponed making a decision because of lack of quorum.

The organizational structure, i.e. the allocation to sectors of the business activities that create the Company's added value and the determination of the central services and functions that ensure support, synergies, compliance with the applicable laws and regulations, operates under the responsibility of the CEO, supported by the CEO's Office which acts as the organization's coordinator and resolves matters for which the CEO's intervention is not necessary.

Main developments in the Company's Corporate Governance in 2019

Corporate Governance Code

Up to and including financial year 2018, MYTILINEOS had voluntarily subscribed to the “Hellenic Corporate Governance Code for Listed Companies”. As of 01.01.2019, following a relevant resolution of its Board of Directors, adopted on 15.11.2018 and aimed at ensuring transparency and responsible operation in all its areas of activity, the Company voluntarily adopted the UK Corporate Governance Code (THE UK CORPORATE GOVERNANCE CODE – 2018), as posted on its website (mytilineos.gr/en-us/corporate-governancecode/) and on the website of the UK Financial Reporting Council (FRC) (frc.org.uk/directors/corporate-governance-and-stewardship/uk-corporategovernance-code/). Based on the highest international standards of entrepreneurship, MYTILINEOS strives for closer engagement with its investors, with the ultimate aim of unlocking further value for its shareholders. Drawing on the best corporate governance practices, the Company formulates its strategy and develops the general guidelines, policies, principles and values that govern its operation, while at the same time ensuring transparency and safeguarding the interests of its shareholders. **In the first year of the new Code's integration, the Company has already achieved its alignment with 60% of the relevant requirements.**



Evaluation of the Board of Directors

In November 2019, the Remuneration and Nomination Committee engaged an external consultant to evaluate the effectiveness of the Board of Directors elected by the General Assembly in 2018 and of the Board's committees (procedures and behaviors, with a focus on key issues). The methodology followed consisted in the completion of a qualitative questionnaire, followed by structured face-to-face interviews with every Director, covering both Board procedures and behaviors. The external consultant also attended a meeting of the Board. The findings and recommendations will be submitted to the Remuneration and Nomination Committee and, subsequently, to the Board of Directors before the 2020 General Meeting. The Board of Directors will adopt an Action Plan and the Remuneration and Nomination Committee will monitor its progress.

Board Remuneration Policy

The Company proceeded established a policy for the remuneration of the members of the Board of Directors (Board Remuneration Policy), which conforms to the EU Shareholder Rights Directive II (SRD II), was approved by resolution of the Annual General Meeting of 2019 and shall be effective for is valid for four (4) years from the date of its approval, unless revised and/or amended earlier by another resolution of the General Meeting. The Policy has been developed with support from an independent remuneration consultant (Korn Ferry) and in accordance with the SRD II, which was transposed into Greek law by Law 4548/2018.

The Policy sets out in detail, on the one hand (i) the current rights of the Directors and the Company's obligation to them and, on the other hand (ii) the terms under which remuneration will be offered, in the future, to current and/or new Directors during its Term. In addition, it considers European best practices for listed companies, whilst reflecting the current arrangements regarding the remuneration of Executive Directors. Finally, the Policy takes into consideration the provisions of the Company's Articles of Association, the Company's Corporate Governance Code and the Company's Internal Regulation Code.

“Through our new, optimised corporate structure and governance, **we strive for closer engagement** with our investors with the ultimate aim of unlocking further value for our shareholders.”



Other significant Governance issues [GRI 102-18]

Governance of Corporate Social Responsibility

Management of the issues related to Corporate Social Responsibility and Sustainable Development is exercised by the Senior Management Team of MYTILINEOS and covers all policies and actions aimed at meeting the expectations of its Social Partners, over and above the Company's legal and regulatory obligations. The management of these issues is implemented through the CSR corporate governance system, with the following objectives:

- To highlight the scope and breadth of the relevant CSR concepts, with the ultimate goal of preventing business, social and environmental risks.
- To identify and implement policies and initiatives that will substantially contribute to the achievement of Sustainable Development (Agenda 2030) and the respective national priorities.
- To balance the economic, social and environmental implications of the company's activities, while creating value for the Shareholders and all other key Social Partner groups in general.

MYTILINEOS' Corporate Social Responsibility governance system has the following structure:

CSR Committee [GRI 102-32]

The Corporate Social Responsibility Committee ensures that the Company's mission is implemented, through the activity of MYTILINEOS, with respect and responsibility towards employees, the natural environment and the wider society, and that this approach is an essential element of all Company decision making. The Committee may also act in an advisory capacity to the Company's Executive Committee in connection with matters pertaining to Sustainable Development. It also reviews and approves the material issues that determine the structure of the annual MYTILINEOS Sustainable Development Report.

The Corporate Social Responsibility Committee was established by resolution of the Board of Directors dated 17.11.2010. Its composition, as amended by the Board of Directors resolution of 07.06.2018, comprises seven (7) members, as follows: Three members of the Board of Directors, of which one (1) executive member and two (2) non-executive members, the Special Advisor to the CEO on CSR, the Human Resources General Manager, the Corporate Social Responsibility Manager and the Corporate Communication Manager.

The Chairman is appointed by the Committee members in a meeting of the Committee held for this purpose and may be replaced by unanimous decision of the Committee members.

CEO's Office General Management

With its crucial coordinating role and also through the specialized CSR Support Service that forms part of it, the CEO's Office General

Management sets the short-term strategic priorities as well as the long-term overall CSR strategy of the Company. It is also responsible for providing support to all Business Units of the Company, in order to ensure compliance with the relevant standards and with the CSR goals of MYTILINEOS.

Business Activity Sectors

The Heads of the Business Sectors are actively involved in the management of social and environmental issues, providing the respective CSR teams of their Sector with the necessary directions and ensuring the Key Performance Indicators (KPI's) are in line with the Group's strategic goals. The individual CSR teams operate within the scope of specific and clearly defined duties and obligations, to implement the central strategic objectives and policies, as well as the CSR programs.

Consultation with Stakeholders & Local communities

The institution of Consultation is a long-established principle of MYTILINEOS' responsible operation, contributing to greater transparency and to the further improvement of the CSR strategy and initiatives of its individual Business Sectors.

Codes of Conducts

The following codes are basic elements of the Company's CSR governance system:

- a) **The MYTILINEOS "Code of Business Conduct"**, which refers to the rules of acceptable conduct regarding the conduct of the company's Management towards employees, the principles of professional ethics and the rules that govern the conduct of employees between themselves and towards third parties.
- b) **The MYTILINEOS "Suppliers and Business Partners Code of Conduct"**, which describes the Company's minimum requirements/ expectations of its supply chain actors regarding ESG-related issues as a prerequisite for the establishment of a commercial cooperation between the two parties.

Organization and implementation of risk management [GRI 102-11] - [GRI 102-15]

The Company has defined risk as a set of uncertain and unpredictable situations that may affect all its activities, its business operation and its financial performance, as well as the implementation of its strategy and the achievement of its goals.

In line with this approach, it has established a specific risk management approach in all its areas of activity where certain risks have been recognized as follows:

- Identification and assessment of risk factors.
- Planning of the risk management policy.
- Implementation and evaluation of the risk management policy

The Company has established specific and comprehensive Enterprise Risk Management (ERM) processes. All senior executives are involved in the identification and initial assessment of risks, so as to facilitate the work of the Executive Committees of each Business Unit, as well as of the Board of Directors of each legal person, in the planning and approval of specific actions in the context of the approved ERM processes.

With regard to Non-Financial Information, since 2010 MYTILINEOS has introduced a specific Stakeholder engagement process for evaluating the materiality of the sustainability issues which are related to its activity. This process, combined with the corresponding prioritization of these issues by the Company's Business Units, is at the core of the accountability policy applied by the Company. The process for determining the material sustainability issues is an ongoing exercise that is constantly developed and improved. The purpose of this process is to highlight the issues that reflect the MYTILINEOS's significant environmental and social impacts and influence substantially the decisions of its Stakeholders. By identifying and understanding the material sustainability issues, the Company formulates and develops its uniform business strategy and its aims, targets and social and environmental initiatives.

Last but not least, the Company conducts regular internal audits to ensure the appropriate and effective implementation of the risk identification and assessment processes and of the management policies for such risks.

Internal Control System

In addition to any other provisions of the Statement of Corporate Governance and what has been described above in connection with the competences of the Audit Committee, the Company's Internal Audit Division is an independent organizational unit which reports to the Board of Directors. Its competences include, among others, the assessment and improvement of the risk management and internal control systems, as well as the monitoring of the compliance with the established policies and procedures as these are determined by the Internal Regulation Code, the legislation in force and the regulatory provisions.

Moreover, the following are examined and analyzed on a continuous basis:

- The efficiency of the Company's accounting and financial systems, audit mechanisms, quality control systems, health & safety and environmental systems, and business risk management systems.
- The drafting of the financial statements and of other important data and information intended for disclosure.
- The reliability, the qualifications and the independence of the chartered auditors.
- Cases of conflict between the private interests of the members of the Board or executives of the Company and the latter's interests.
- Relations and transactions of the Company with affiliated companies as well as relations of the Company with companies in whose share capital members of the Company's Board of Directors participate with a percentage of at least 10% or shareholders of the Company participate with a percentage of at least 10%.
- The legality of the fees and any kind of bonuses to the members of the management with regard to the decisions of the competent bodies of the Company.

Finally, the Board of Directors re-examines in a continuous and consistent way the corporate strategy and the principal business risks, especially in a constantly changing financial and business environment. Moreover, the Board receives at regular intervals from the Audit Committee reports on the activities of the audits carried out, based on the annual schedule of audits planned by the Company's Internal Audit Department. The above allow the Board to form a detailed opinion of the effectiveness of the systems, processes and regulations of the Company.

The external auditors do not offer to the Company non-audit services which are prohibited, as per the provisions of article 5 of Regulation (EU) 537/2014 of the European Parliament and of the Council and of law 4449/2047. 4449.2017.

ESG KPI's

G Governance KPI's	2018	2019	Diff. (%)
Corporate Governance Code	Greek Corporate Governance Code – 2013	UK Corporate Governance Code – 2018	
Code Business Conduct	2 nd Edition 2016	3 rd Edition 2019	
Suppliers & Business Partners Code of Conduct	2 nd Edition 2018	3 rd Edition 2019	
Diversity Policy	Yes	Yes	
Board Members	11	11	0%
Board Members' term of office (years)	4	4	0%
Average age of Board Members (years)	57,6	58,6	
President duality	Yes	Yes	
Appointment of Independent Vice-Chairman ¹	No	No	
Executive Members on the Board	3	3	0%
Non-Independent Members on the Board	8	8	0%
Independent Members on the Board	7	7	0%
Non-Independent Members on the Board	4	4	0%
Independent, Non-Executive Members on the Board	7	7	0%
Women on the Board	2	2	0%
Voting standard	Majority	Majority	
Number of Board Meetings	58	50	
Number of members present in <75% of Board meetings	0	0	0%
Remuneration & Nomination Committee	Yes	Yes	
Independent Board Members on the Remuneration & Nomination Committee (%)	100%	100%	0%
Audit Committee	Yes	Yes	
Independent Board Members on the Audit Committee (%)	100%	100%	0%
Corporate Social Responsibility Committee	Yes	Yes	
Political contributions	Not allowed	Not allowed	

G Governance KPI's	2018	2019	Diff. (%)
Financial charges imposed for violations of the Code of Business Conduct (€)	0	0	0%
Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	0	0%
Confirmed incidents of corruption and bribery	0	0	0%

1. Although there is no Independent Vice President, one of the improvements implemented in the context of the reorganization of the Company's Board of Directors in 2018 was the appointment of a Lead Independent Director



Sustainability Standards & Assurance

“Based on our corporate values and backed by our business activities **we create value** for the environment, the economy and society.”

ESG Reporting Guide 2019 - Athens Stock Exchange

ESG Table Index

The Athens Stock Exchange has been participating in the Sustainable Stock Exchanges (SSE) initiative of the United Nations since 2018, which promotes the dissemination of best practices for the publication and integration of non-financial data, aiming at developing sustainable investments in local capital markets. Following the call for action of the organizations that promote sustainable development, the Athens Stock Exchange proceeded with the issuance of the “Reporting Guide of non-financial information”, seeking to promote and strengthen the

ESG information publishing practices applied by Greek listed companies. Below is the MYTILINEOS' table of response to the indicators of the ESG Information Publishing Guide of the Athens Stock Exchange (where C: Basic metrics, A: Advanced metrics, SS: Sector-Specific metrics) which are based on practices aligned with international sustainability guidelines and reporting frameworks like: GRI, SASB, GLOBAL COMPACT, IIRC, CDP,TCFD and Greek Sustainability Code.



ESG Classification	ID	Metric Title	References (Sustainable Development Report 2019)
E Environment	C-E1	Direct emissions (Scope 1)	Material Issue: Energy & Emissions (p. 66–69)
	C-E2	Indirect emissions (Scope 2)	
	C-E3	Energy consumption within the organization	
	A-E1	Other indirect emissions (Scope 3)	
	A-E2	Climate Change risks & opportunities	Material Issue: Adaptation to Climate Change (p. 70–73)
	SS-E1	Emissions management strategy	Environmental Policy (p. 59–61) Material Issue: Energy & Emissions (p. 66–69)
	SS-E2	Air pollutant emissions	Material Issue: Energy & Emissions (p. 66–69)
	SS-E3	Water consumption	Material Issue: Water Management (p. 78–81)
	SS-E4	Water management	Material Issue: Circular Economy (p. 82–87)
	SS-E5	Waste management	
S Society	SS-E8	Critical materials	Raw & other Materials (p. 88)
	SS-E9	Chemicals in products	Material Issue: Customer Health & Safety (p. 128–129)
	C-S1	Female employees	ESG KPI's (p. 136)
	C-S2	Female employess in managerial positions	
	C-S3	Turnover rates	

ESG Classification	ID	Metric Title	References (Sustainable Development Report 2019)
G Governance	C-S4	Employee training	Employee Training & Evaluation (p. 130)
	C-S5	Human rights policy	Material Issue: Human Rights (p. 112–117)
	C-S6	Collective bargaining agreements	ESG KPI's (p. 136)
	A-S1	Stakeholder engagement	Stakeholder Engagement (p. 43–51)
	A-S2	Employee training expenditure	ESG KPI's (p. 136)
	SS-S1	Product recalls	They do not exist
	SS-S2	Customers privacy	Protection of customers' personal data (p. 133)
	SS-S4	Labour law violations	Material Issue: Legal Compliance (p. 144–145)
	SS-S5	Data security and privacy	Protection of customers' personal data (p. 133)
	SS-S6	Health & Safety Performance	Material Issue: Occupational Health & Safety (p. 95–104)
	SS-S7	Marketing practices	Responsible communication and product labelling (p. 134)
	SS-S8	Customer satisfaction	
	C-G1	Sustainability Oversight	Governance of Corporate Social Responsibility (p. 150)
	C-G2	Business ethics policy	Material Issue: Anti-Corruption and Bribery (p. 141–143) Code of Business Conduct mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects
	C-G3	Data security policy	mytilineos.gr/el-gr/privacy-policy/disclaimer
	A-G1	Business model	How we create value (p. 28)
	A-G2	Materiality	Materiality Process (p. 38–42)
	A-G3	ESG targets	(p. 58, 94, 140)
	A-G5	External Assurance	Independent Assurance Statement (p. 160)
	SS-G1	Business Ethics violations	ESG KPIs (p. 153)

UN Global Compact Communication on Progress (Advanced level)

The United Nations Global Compact is a commitment platform and a practical framework for businesses which voluntarily declare their pledge to serve the Sustainable Development agenda and promote responsible business practices. MYTILINEOS, has declared, since 2008, its commitment to uphold the ten principles of the Global Compact, disclosing on an annual basis its relevant performance (Communication of Progress) in

the context of its broader activity. The table below presents the company's exposure to the 10 Principles of the Global Compact while in the address: mytilineos.gr/en-us/csr-reports/publications, is available its independent report, about the fulfilment of the 21 criteria under the **UNGC Advanced COP SelfAssessment 2018 (Updated 19 August 2016)**.

<div>The 10 Principles of the UN “Global Compact”</div>		<div>References (Sustainable Development Report 2019)</div>
1 st	Businesses should support and respect the protection of internationally proclaimed human rights.	Society <ul style="list-style-type: none">Occupational Health & Safety (p. 95)Employment (p. 105)Human Rights (p. 112)Sustainable Local Communities (p. 118)Emergency Response Plans (p. 126)Customer Health & Safety (p. 128)Other significant social issues (p. 130)
2 nd	Businesses should make sure that they are not complicit in human rights abuses.	
3 rd	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	
4 th	Businesses should uphold the elimination of all forms of forced and compulsory labour.	
5 th	Businesses should uphold the effective abolition of child labour.	
6 th	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Environment <ul style="list-style-type: none">Environmental Restoration & Biodiversity(p. 62)Energy & Emissions (p. 66)Adaptation to Climate Change(p. 70)Pollution Prevention (p. 74)Water Management (p. 78)Circular Economy (Waste Management) (p. 82)Other Significant Environmental issues(p. 88)
7 th	Businesses should support a precautionary approach to environmental challenges.	
8 th	Businesses should undertake initiatives to promote greater environmental responsibility.	
9 th	Businesses should encourage the development and diffusion of environmentally friendly technologies.	Governance <ul style="list-style-type: none">Anti-Corruption & Bribery (p. 141)Legal Compliance (p. 144)
10 th	Businesses should work against corruption in all its forms, including extortion and bribery	



The Greek Sustainability Code

The Greek Sustainability Code constitutes an official framework with regards to non-financial data according to the EU Guidelines. It responds to the requirements of the Greek legislation as depicted in the provisions N.4403/2016 in combination with the circular No. 62784/06-06-2017 of the Ministry of the Economy and Development. It responds to the need for measuring the economic, environmental and social performance of Organizations/

Businesses with the goal to strength their competitiveness in terms of incorporating the principles of Sustainable Development and Corporate Responsibility in their operation. The table below presents the MYTILINEOS’ response to the Greek Sustainability Code criteria (LEVEL A) which are based on the following international standards: GRI, GLOBAL COMPACT, EFFAS, ISO & EMAS.

Pillar	Criteria	References (Sustainable Development Report 2019)
Strategy	Strategic Analysis & Action	<ul style="list-style-type: none">ESG Performance Statement (p. 6)Message from the Chairman (p. 11)Strategic Priorities (p. 22)Our approach to Sustainable Development (p. 30)Materiality Process(p. 38)
	Materiality	<ul style="list-style-type: none">Materiality Process (p. 38)
	Objectives	<ul style="list-style-type: none">Our approach to Sustainable Development (p. 30)ESG Targets (p. 58, 94, 140)
	Management of Value Chain	<ul style="list-style-type: none">Supply chain Management (p. 132)Stakeholders Engagement (p. 43)
Procedure Management	Responsibility	Governance <ul style="list-style-type: none">Anti-Corruption & Bribery (p. 141)Legal Compliance (p. 144)
	Rules & Processes	<ul style="list-style-type: none">Our approach to Sustainable Development (p. 30)Materiality Process (p. 38)Corporate Governance (p. 146)
	Monitoring	<ul style="list-style-type: none">ESG KPIs (p. 90, 136, 152)Our approach to Sustainable Development (p. 30)Participation in Sustainable Development initiativesCSR & Sustainable Development commitmentsIntegration Value Creation ScorecardParameters of Sustainable Development Report (p. 8)
	Incentive and reward systems for Sustainable Development	<ul style="list-style-type: none">Annual Report 2019 (Remuneration Policy and Remuneration of Board Members) (p. 84)
	Stakeholder engagement	<ul style="list-style-type: none">Stakeholders Engagement (p. 43)
	Product Responsibility and innovation	Society <ul style="list-style-type: none">Customer Health & Safety (p. 128)Other Significant Social Issues (p. 130)
Environment	Usage of Natural Resources	Environment <ul style="list-style-type: none">Environmental Restoration & Biodiversity (p. 62)Energy & Emissions (p. 66)Adaptation to Climate Change (p. 70)Pollution Prevention (p. 74)Water Management (p. 78)Circular Economy (Waste Management) (p. 82)Other significant environmental issues (p. 88)
	Resource Management	
	Climate relevant emissions	
Society	Employment Rights	Society <ul style="list-style-type: none">Occupational Health & Safety (p. 95)Employment (p. 105)Human Rights (p. 112)Sustainable local communities (p. 118)Emergency Response Plans (p. 126)Customer Health & Safety (p. 128)Other significant social issues (p. 130)
	Equal Opportunities	
	Qualifications	
	Human Rights in the Supply Chain	
	Corporate Citizenship	
	Initiatives and Political Influence	

This statement has been translated from the original Greek version

INDEPENDENT ASSURANCE STATEMENT

To the Management of MYTILINEOS HOLDINGS S.A.

The 2019 Sustainable Development Report (“the Report”) of MYTILINEOS HOLDINGS S.A. (“the Company”) has been prepared by the Company’s Management, which is responsible for the collection and presentation of the information contained therein. Our responsibility is to carry out a “limited level” assurance engagement on the Report.

Our responsibility in performing our assurance engagement is solely to the Company’s Management and in accordance with the terms of reference agreed between us. We neither accept nor assume any responsibility and for any other purpose, to any other person or organization. Any reliance any third party may place on the Report is entirely at its own risk and responsibility.

Work scope and criteria

The assurance engagement has been planned and performed in accordance with International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (ISAE3000 (revised)), in order to provide a limited level assurance opinion on:

1. Adherence to the AccountAbility Principles (“Inclusivity”, “Materiality” and “Responsiveness”) against the relevant criteria found in the AA1000APS.
2. Accuracy and completeness of quantitative data and plausibility of qualitative information related to the GRI General and Specific Disclosures (indicated in the assurance column of the GRI Content Index), against the GRI Standards “In accordance – Core” requirements.
3. Adherence to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the “Advanced” level, mentioned in the “GC Advanced COP Self-assessment” document.
4. Accuracy of the linkage between the United Nations’ (UN) Sustainable Development Goals and the material topics, against the GRI organization’s publication named “SDG Compass Linking the SDGs and GRI”.

What we did to form our conclusions

In order to form our conclusions in relation to the scope and criteria mentioned above, we undertook (but were not limited to) the steps outlined below:

- ▶ **Interviewed certain Executives of the company** in order to understand the current status of corporate responsibility and sustainable development activities and progress made during the reporting period.
- ▶ **Reviewed the Company’s approach to stakeholder engagement** through interviews with executives responsible for engagement activities at corporate level and reviews of selected documentation.
- ▶ **Reviewed the Company’s processes for determining the Report’s material topics**, as well as the coverage of these material topics within the Report, against material topics emerged from Media Review, Corporate Responsibility Reports of selected peers and discussions held with Company executives.
- ▶ **Interviewed executives who are responsible for managing, collating and reviewing the sustainability data** that are linked to the GRI General and Specific Disclosures under the scope of our assurance engagement (indicated in the assurance column of the GRI Content Index), for both internal information and disclosure to third parties purposes.

- ▶ **Reviewed the Report for the appropriate transposition and presentation** of the sustainability data linked to the GRI General and Specific Disclosures under the scope of our assurance engagement (indicated in the assurance column of the GRI Content Index), a task that also included discussions regarding limitations and assumptions relating to how these data are presented within the Report.
- ▶ **Reviewed information or explanations to substantiate** key data, statements and assertions regarding the sustainability disclosures under the scope of our assurance engagement.
- ▶ **Reviewed the Company’s UNGC CoP** against the criteria for the “Advanced” level mentioned in the “GC Advanced COP Self-assessment” document.
- ▶ **Reviewed the linkage** between the material topics and the UN’s Sustainable Development Goals, against the against the GRI organization’s publication named “SDG Compass Linking the SDGs and GRI”.

Level of assurance

The evidence gathering procedures were designed to obtain a limited level of assurance (as set out in the ISAE 3000 standard (revised) on which we formed our conclusions. The extent of these evidence gathering procedures is less than those designed to obtain a reasonable level of assurance and therefore a lower level of assurance is provided. This is also expressed by the ‘moderate’ level of assurance, under AA1000AS, according to which “the assurance provider achieves moderate assurance where sufficient evidence has been obtained to support their statement, such as the risk of their conclusion being in error is reduced but not reduced to very low or zero”.

Limitations of our review

- ▶ Our review was limited to the Greek version of the Report. In the event of any inconsistency in translation between the Greek and English versions, as far as our conclusions are concerned, the Greek version of the Report prevails.
- ▶ The scope of our work did not include any review of third party activities or performance, nor attending any stakeholder engagement activities. In addition, it did not include any review of the accuracy of research results assigned to third parties, nor Information Technology systems used by third parties.
- ▶ Our review did not include financial data and the corresponding narrative text and testing of the Information Technology systems used or those upon which the collection and aggregation of data was based by the Company.
- ▶ We do not provide any assurance relating to information regarding the Company’s future performance such as estimates, expectations or targets, or their achievability.

Conclusions

Based on the scope of our review our conclusions are outlined below:

1. **Adherence to the AccountAbility Principles (“Inclusivity”, “Materiality” and “Responsiveness”) against the relevant criteria found in the AA1000APS.**

***Inclusivity:** Has the Company been engaging with stakeholders across the business to develop its approach to sustainability?*

- ▶ Nothing has come to our attention that causes us to believe that any key stakeholder groups have been excluded from stakeholder engagement activities, or that the Company has not applied the Inclusivity principle in developing its approach to sustainability.

***Materiality:** Has the Company provided a balanced representation of material topics concerning its sustainability performance?*

- ▶ Nothing has come to our attention that causes us to believe that the Company's materiality determination approach does not provide a comprehensive a balanced representation of its material sustainability topics.

Responsiveness: Has the Company responded to stakeholder concerns?

- ▶ We are not aware of any matters that would lead us to conclude that the Company has not applied the Responsiveness Principle in considering the topics to be included in the Report.

2. Accuracy and completeness of quantitative data and plausibility of qualitative information related to the GRI General and Specific Disclosures (indicated in the assurance column of the GRI Content Index), against the "In accordance – Core" requirements of the GRI Standards.

How plausible are the statements related to the GRI General and Specific Disclosures under scope?

- ▶ We reviewed information or explanations on selected statements claims on the Company's sustainability activities presented in the Report and we are not aware of any misstatements in the assertions made.

How complete and accurate are the quantitative data linked to the GRI General and Specific Disclosures under scope?

- ▶ Nothing has come to our attention that causes us to believe that quantitative data linked to the GRI General and Specific Disclosures under scope has not been collated properly at corporate level.
- ▶ We are not aware of any errors that would materially affect the data as presented in the Report.

Does the Report meet the GRI Standards requirements for the "In accordance – Core" option?

- ▶ Based on our review, nothing has come to our attention that causes us to believe that the Report does not meet the requirements of the GRI's "In accordance – Core" option, as presented in the GRI Content Index.

3. Adherence to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the "Advanced" level, mentioned in the "GC Advanced COP Self-assessment" document.

Does the Company's UNGC CoP adhere to the requirements of the criteria for the "Advanced" level, mentioned in the "GC Advanced COP Self-assessment" document?

- ▶ Nothing has come to our attention that causes us to believe that the Company's UNGC CoP is not fairly stated, according to requirements of the criteria for the "Advanced" level, mentioned in the "GC Advanced COP Self-assessment" document.

4. Accuracy of the linkage between the United Nations' (UN) Sustainable Development Goals and the material topics, against the GRI organization's publication named "SDG Compass Linking the SDGs and GRI".

Is the linkage between the United Nations' (UN) Sustainable Development Goals and the Report's material topics, in accordance with the GRI organization's publication named "SDG Compass Linking the SDGs and GRI"?

- ▶ Nothing has come to our attention that causes us to believe that the linkage between the Company's material topics and the UN's Sustainable Development Goals, has not been performed in accordance with the GRI organization's publication named "SDG Compass Linking the SDGs and GRI".

Independence

We have implemented a set of audit quality control policies and practices which meet the requirements of the International Standards on Quality Control issued by the International Auditing and Assurance Standards Board (IAASB). We conducted our engagement in compliance with the requirements of the IFAC Code of Ethics for Professional Accountants ("the Code"), which requires, among other

requirements that the members of the engagement team, as well as the assurance Firm, are independent of the client, including not being involved in writing the Report. EY has systems and processes in place to monitor compliance with the existing independence rules as they are defined by the Code. EY and all professional personnel involved in this engagement have met these independence requirements.

Assurance team

The professionals who participated in the engagement are members of and are supported by the EY Climate Change and Sustainability Services global network, which undertakes similar engagements in Greece and at a Global level.

Athens, 25 May 2020

For and on behalf of

ERNST & YOUNG (HELLAS)

Certified Auditors Accountants S.A.

Vassilios Kaminaris





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GRI Content Index - General Disclosures GRI 102-55

GRI Standard	Disclosure	Page number(s) and/or URL(s)	External Assurance
GRI 101 Foundation 2016	[GRI 101 does not include any disclosures]		
General Disclosures			
GRI 102 General Disclosures 2016	Προφίλ Οργανισμού		
	102-1 Name of the organization	(p. 17)	●
	102-2 Activities, brands, products, and services	(p. 17)	●
	102-3 Location of headquarters	(p. 21)	●
	102-4 Location of operations	(p. 20)	●
	102-5 Ownership and legal form	mytilineos.gr/en-us/shareholders/information	●
	102-6 Markets served	(p. 17, 54)	●
	102-7 Scale of the organization	(p. 19)	●
	102-8 Information on employees and other workers	(p. 108)	●
	102-9 Supply Chain	(p. 132)	●
	102-10 Significant changes to the organization and its supply chain	(p. 132)	●
	102-11 Precautionary Principle or approach	(p. 62, 66, 70, 74, 78, 82, 95, 105, 112, 118, 126, 128, 141, 144, 151)	●
	102-12 External Initiatives	(p. 22) - mytilineos.gr/en-us/participation-in-socially-responsible-investment/details - mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility	●
	102-13 Membership of associations	(p. 22) - mytilineos.gr/en-us/participation-in-socially-responsible-investment/details - mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility	●
	Strategy		
	102-14 Statement from senior decision-maker	(p. 11-13)	●
	102-15 Key impacts, risks, and opportunities	(p. 63, 67, 71, 75, 79, 83, 96, 106, 113, 119, 127, 129, 142, 145, 151)	
	Ethics & Integrity		
	102-16 Values, principles, standards, and norms of behavior	(p. 15)	●
	Governance		
	102-18 Governance structure	(p. 146-150), Annual Report: a: (p. 72, 77, 79, 86, 92, 95), b: (p. 96)	●
	102-19 Delegating authority	Annual Report: (p. 72)	
	102-20 Executive-level responsibility for economic, environmental and social topics	Annual Report: b: (p. 76)	
	102-21 Consulting stakeholders on economic, environmental, and social topics	Annual Report: a: (p. 86), b: (p. 74)	
	102-22 Composition of the highest governance body and its committees	Annual Report: a-i, a-ii, a-iii, a-iv, a-v, a-vii: (p. 75, 76, 77, 78, 79, 88, 89, 90, 91, 93, 95, 97, 102, 103)	
	102-23 Chair of highest governance body	Annual Report: a: (p. 76), b: (p. 76, 87, 88)	
	102-24 Nominating and selecting the highest governance body	Annual Report: a: (p. 76, 77, 78, 88, 89, 102, 103), b-i, b-ii, b-iii, b-iv: (p. 72, 76, 77, 78, 88, 89, 102, 103)	

GRI Standard	Disclosure	Page number(s) and/or URL(s)	External Assurance
(continued...) GRI 102 General Disclosures 2016	102-25 Conflicts of interest	Annual Report: a: (σελ 75), b-i, b-iii: (σελ 68, 90)	
	102-26 Role of highest governance body in setting purpose, values, and strategy	Annual Report: (p. 73, 74)	
	102-28 Evaluating the highest governance body's performance	Annual Report: (σελ 77, 78)	
	102-32 Highest governance body's role in sustainability reporting	(p. 150)	
	102-35 Remuneration policies	Annual Report: a-i, a-ii, a-iii, a-v: (p. 83, 84, 86) b: (p. 84)	
	102-36 Process for determining remuneration	Annual Report: a: (σελ 85), b: (σελ 85), c: (σελ 85)	
	102-37 Participation of interested parties in the determination of fees	Annual Report: a: (p. 86)	
	Stakeholder Engagement		
	102-40 List of stakeholder groups	(p. 44, 45)	●
	102-41 Collective bargaining agreements	(p. 111)	●
	102-42 Identifying and selecting stakeholders	(p. 43)	●
	102-43 Approach to stakeholder engagement	(p. 44-47) - mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-stakeholder-engagement	●
	102-44 Key topics and concerns raised	(p. 43-49)	●
	Organizational Profile		
	102-45 Entities included in the consolidated financial statements	(p. 8)	●
	102-46 Defining report content and topic Boundaries	(p. 38, 52, 62, 66, 70, 74, 78, 82, 95, 105, 112, 118, 126, 128, 141, 144)	●
	102-47 List of material issues	(p. 39)	●
	102-48 Restatements of information	(p. 9)	●
	102-49 Changes in reporting	(p. 9)	●
	102-50 Reporting period	(p. 8)	●
	102-51 Date of most recent report	June 2019	●
	102-52 Reporting cycle	(p. 8)	●
	102-53 Contact point for questions regarding the report	(p. 9)	●
	102-54 Claims of reporting in accordance with the GRI Standards	(p. 8)	●
	102-55 GRI content index	(p. 166-174)	●
	102-56 External assurance	(p. 160-163)	●

GRI Content Index – Material Topics [GRI 102-55]

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
Economic Performance				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: Annual Report (p. 14-21) b. Boundaries: (p. 52) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: Annual Report (p. 2) b. The purpose of the management approach: Annual Report (p. 14-29)	-	●
	103-3 Evaluation of the management approach	a-i. Internal review & external verification a-ii. Results: (p. 53) – Annual Report (p. 114-120)	-	●
GRI 201 Economic performance	201-1 Direct economic value generated and distributed	(p. 26-27)	-	
	201-3 Defined benefit plan obligations and other retirement plans	Annual Report (p. 177)	-	
	201-4 Financial assistance received from government	No financial support was received from government in 2019	-	
GRI 204 Procurement Practices	204-1 Proportion of spending on local suppliers	(p. 132)	-	
Environment				
Environmental restoration & Biodiversity				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 63) b. Boundaries: (p. 62) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 63) b. The purpose of the management approach: (p. 62) c. Management approach components: (p. 62-64)	-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 64-65) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 304 Biodiversity	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	(p. 65)	-	
	304-2 Significant impacts of activities, products, and services on biodiversity	(p. 65)	-	
Energy & Air emissions				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 67) b. Boundaries: (p. 66) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 67) b. The purpose of the management approach: (p. 66) c. Management approach components: (p. 66-69)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 68-69) a-iii. Major Adjustments: There have been no major adjustments	-	●

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
GRI 302 Energy	302-1 Energy consumption within the organization	(p. 68)	-	●
	302-3 Energy intensity	(p. 68)	-	
GRI 305 Emissions	305-1 Direct (Scope 1) GHG emissions	(p. 69)	-	●
	305-2 Energy indirect (Scope 2) GHG emissions	(p. 69)	-	●
	305-3 Other indirect (Scope 3) GHG emissions	(p. 69)	-	
	305-4 GHG emissions intensity	(p. 69)	-	
	305-6 Emissions of ozone-depleting substances (ODS)	There are no such emissions	-	
	305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	(p. 69)	-	
Adaptation to climate change				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 71) b. Boundaries: (p. 70) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 71) b. The purpose of the management approach: (p. 70) c. Management approach components: (p. 70-71)	-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 71) a-iii. Major Adjustments: There have been no major adjustments	-	●
	201-2 Financial effects and other risks and opportunities for the organization's activities due to climate change		The Company has already committed to conducting a study to determine the risks and opportunities from the effects of climate change on its activity. By 2022, the Company plans to adapt its financial information to the analysis of the risks and effects of climate change, following the recommendations of the Task Force on Climate - Related Financial Disclosures (TCFD), as well as its integration into the international standard, CDP Climate Change in 2021.	
Pollution Prevention				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 75) b. Boundaries: (p. 74) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 75) b. The purpose of the management approach: (p. 74) c. Management approach components: (p. 74-75)	-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 76) a-iii. Major Adjustments: There have been no major adjustments	-	●
	306-2 Waste by type and method of disposal	(p. 84)	-	●
	306-3 Significant spills	(p. 76)	-	

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
	303-2 Water sources that are significantly affected by water pumping	(p. 80)		
	307-1 Non-compliance with environmental laws and regulations	(p. 145)	-	
Water management				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 79) b. Boundaries: (p. 78) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 79) b. The purpose of the management approach: (p. 78) c. Management approach components: (p. 78-79)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 80-81) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 303 Néző	303-1 Water withdrawal by source	(p. 80)	-	●
	303-2 Water sources significantly affected by withdrawal of water	(p. 80)	-	
	303-3 Water recycled and reused	(p. 81)	-	
Circular Economy (Waste Management)				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 83) b. Boundaries: (p. 82) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 83) b. The purpose of the management approach: (p. 82) c. Management approach components: (p. 82-83)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 84) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 306 Waste	306-1 Water discharge by quality and destination	(p. 86)	-	●
	306-2 Waste by type and disposal method	(p. 84)	-	●
	306-3 Significant spills	(p. 76)	-	
Other significant topics				
GRI 301 Materials	301-1 Materials used by weight or volume	(p. 88)	-	
	301-2 Recycled input materials used	(p. 88)	-	
Social				
Occupational Health & Safety				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 95-96) b. Boundaries: (p. 95) c. Specific limitation regarding the topic Boundary: None	-	●

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 96) b. The purpose of the management approach: (p. 95) c. Management approach components: (p. 95-99)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 99-104) a-iii. Major adjustments: (p. 104)	-	●
GRI 403 Occupational Health and Safety	403-1 Workers representation in formal joint management-worker health and safety committees	(p. 98)	-	
	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	a. (p. 101) b. (p. 104)	-	●
	403-3 Workers with high incidence or high risk of diseases related to their occupation	(p. 101)	-	
Employment				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 105-106) b. Boundaries: (p. 105) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 106-107) b. The purpose of the management approach: (p. 105) c. Management approach components: (p. 105-107)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 108-111) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 401 Employment	401-1 New employee hires and employee turnover	(p. 109)	-	●
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	(p. 109)	-	
	401-3 Parental leave	(p. 111)		
GRI 402 Labor/ Management Relations	402-1 Minimum notice periods regarding operational changes	a. (p. 106-107)	-	
Human Rights				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 112 - 113) b. Boundaries (p. 112) c. Specific limitation regarding the topic Boundary: No supplier evaluation survey was conducted in 2019	-	●
	103-2 The management approach and its components	a. How the organization manages the topic:(p. 113) b. The purpose of the management approach: (p. 112) c. Management approach components: (p. 112-113)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 114-115) a-iii. Major adjustments: There have been no major adjustments	-	●

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
GRI 406 Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	(p. 115)	-	
GRI 407 Freedom of Association and Collective Bargaining	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	(p. 115)	-	
GRI 408 Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor	(p. 115)	-	
GRI 409 Forced or Compulsory Labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	(p. 115)	-	
GRI 412 Human Rights Assessment	412-1 Operations that have been subject to human rights reviews or impact assessments	(p. 114)	-	
Sustainability of Local Communities				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 119) b. Boundaries: (p. 118) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 119-120) b. The purpose of the management approach: (p. 118) c. Management approach components: (p. 118-120)	-	●
	103-3 Αξιολόγηση διοικητικής προσέγγισης	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 120) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 203 Indirect Economic Impacts	203-1 Infrastructure investments and services supported	(p. 120-123)	-	●
GRI 413 Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	a-iv. local community development programs based on local communities' needs: (pages 120-123)	-	
GRI 415 Public Policy	415-1 Political contributions	They are not allowed under the Company's Code of Conduct mytilineos.gr/en-us/codes-and-policies/of-mytilineos (p. 14)	-	
Emergency Response Plans				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 127) b.Boundaries: (p. 126) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 127) b. The purpose of the management approach: (p. 126) c. Management approach components: (p. 126-127)	-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 127) a-iii. Major Adjustments: There have been no major adjustments	-	●
MYTILINEOS: Internal metric	Implementation of Emergency Preparedness Exercises	(p. 127)		
Customer Health and Safety				

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 129) b.Boundaries: (p. 128) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 129) b. The purpose of the management approach: (p. 128) c. Management approach components: (p. 128-129)	-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 129) a-iii. Major adjustments: There have been no major adjustments	-	●
GRI 416 Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	(p. 129)	-	
Other significant topics				
GRI 404 Training & Education	404-1 Average hours of training per year per employee	(p. 130)	-	●
	404-2 Programs for upgrading employee skills and transition assistance programs	(p. 130)	-	
	404-3 Percentage of employees receiving regular performance and career development reviews	(p. 130)	-	●
GRI 405 Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	(p. 131)	-	
GRI 204 Procurement Practices	204-1 Proportion of spending on local suppliers	(p. 132)	-	
GRI 417 Marketing and Labeling	417-1 Requirements for product and service information and labeling	(p. 134)	-	
	417-2 Incidents of non-compliance concerning product and service information and labeling	(p. 134)	-	
	417-3 Incidents of non-compliance concerning marketing communications	(p. 134)	-	
GRI 418 Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	(p. 133)	-	
Governance				
Anti-corruption and Bribery				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (p. 142) b. Boundaries: (p. 141) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 142) b. The purpose of the management approach: (p. 141) c. Management approach components: (p. 141-142)	-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 143) a-iii. Major Adjustments: There have been no major adjustments	-	●

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission	External Assurance
GRI 205 Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	(p. 143)	-	●
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	There have been no incidents of legal action for anti-competitive behavior, anti-trust or monopoly practices during the reporting period.	-	
Legal Compliance				
GRI 103 Management Approach	103-1 Explanation of the material topic and its boundaries	a. Why the topic is material: (145) b. Boundaries: (p. 144) c. Specific limitation regarding the topic Boundary: None	-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 145) b. The purpose of the management approach: (p. 144) c. Management approach components: (p. 144-145)	-	●
	103-3 Αξιολόγηση διοικητικής προσέγγισης	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 145) a-iii. Major Adjustments: There have been no major adjustments	-	●
GRI 307 Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	(p. 145)		
GRI 419 Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	There were no significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area against MYTILINEOS in 2019	-	

Index of Key Terms

Direct employees

Total number of employees who are employed by the Company and are included in its payroll system in accordance with national law.

Recycled raw materials

Materials that replace primary materials and are purchased or acquired from internal or external sources and that are not by-products and outflows of the Company.

Recycling and reuse of water

The treatment of used water and sewage through another cycle before rejection for final treatment and disposal in the environment.

R.E.S. (Renewable Energy Sources)

Energy sources that can be renewed in a short time through a natural cycle. (eg Geothermal, Wind power, Solar, Hydroelectric, Biomass)

Restorations (Restored Areas)

Areas where there is operational activity or affected by operational activities and in which rehabilitation measures have restored the environment to its original state or to a state where a healthy and functional ecosystem exists.

Wind Farm

Wind Power Plant

Self-assessment of human rights

Corporate internal evaluation process that applies a number of criteria for respecting and supporting human rights. The issues included in the evaluation indicatively are: forced & child labor, health and safety, working hours, staff salaries and leave, fair treatment, freedom of association, restriction of population rights of local communities, etc.

Sustainable development

Growth in a way that respects the environment and uses natural resources harmoniously so as not to affect the ability of future generations to meet their needs.

Parental permission

Permission granted to male and female employees due to childbirth.

Discrimination

The action and effect of unequal treatment of individuals by imposing unequal burdens or deprivation of benefits instead of equal treatment of each individual based on his value. Disturbance, which is defined as a series of comments or actions that are undesirable, or reasonably considered undesirable by the person to whom they are addressed, can also be considered as discrimination.

Leakage

Unexpected release of a dangerous substance that can affect human health, soil, vegetation, surface and groundwater.

Fatalities

The death of an employee that occurs during the current reference period and is due to an injury at work or illness that he suffered or was transmitted to while working at the Company.

Indirect employees

Total number of self-employed workers and permanent independent contractors who perform very important tasks for the company on a long-term basis.

Impact

The term refers to important economic, environmental and social effects that are: positive, negative, existing, potential, direct, indirect, short-term, long-term, voluntary, involuntary.

Employees from local communities

Peoples who have either been born or have the legal right to reside for an indefinite period of time in the same geographical location as the Company's operating facilities. The geographical definition of the term "local" may include society around activities, an area within a country or a country.

Vulnerable groups

A vulnerable group is a group or subgroup of individuals with a particular physical, social, political or economic status or a trait that puts the group at greater risk of being harmed or at risk of being severely affected by the social, economic or environmental impacts

resulting from Company functions. Vulnerable groups may include children and young people, the elderly, people with disabilities, refugees, households affected by HIV / AIDS, indigenous people and ethnic minorities.

Committees on Health & Safety issues

Occupational Health and Safety Committees

Supply chain

A series of activities or partners that provide products or services to the Company.

Lost Days Index

The impact of occupational accidents and diseases as expressed through the time that workers were left out of work. It is expressed in the total number of lost days per 200,000 working hours of human resources during the reference period

Occupational disease index

The incidence of occupational diseases per 200,000 hours of work in the whole workforce in the reporting period.

Employee Mobility Index (Voluntary Departures)

It concerns the number of voluntary departures to the average number of direct employees of the Company in the reporting year.

Injury Index

The frequency of injuries with work interruption per 200,000 hours of work in the whole workforce in the reporting period.

Carbon Dioxide Equivalent (CO₂ eq)

Equivalent to CO₂ (carbon dioxide) is the global unit of measurement used to compare greenhouse gas emissions, based on the planet's gas heating potential. The equivalent CO₂ of a gas is determined by multiplying the tones of the gas by the corresponding global heating potential.

Forced labor

Any work or service required by a person under the threat of punishment and for which that person has not been

voluntarily offered (DOE 29, Forced Labour Convention).

Water consumption

The amount of water that results from removing the total amount of water pumped is the amount of water returned to the original pumping source (after treatment).

Social investment

Total investment in local communities refers to actual expenditure incurred during the reference period. The Company calculates the investments made to the local communities as the sum of the voluntary donations plus the capital investments in the wider local community. Voluntary donations and financial resources investments to the wider local community may include: (a) charitable donations / contributions, NGOs and academic or research (b) funds to support local community infrastructure (such as sports facilities or sports facilities). (c) the direct costs of social programs, (d) costs / sponsorships of cultural and educational events / actions. Investments in the local community include investing in infrastructure that is primarily driven by basic business needs or facilitates the Company's business operations such as compensatory benefits in the development of RES projects. The Company monitors donations and investments to local communities in cash at the end of the reporting period

Social product

The total amount referred to as a Social Product of MYTILINEOS includes: a) fees and benefits to employees, b) expenses to domestic suppliers, c) total taxes to the Greek state, d) payments to capital providers, e) investments, f) environmental protection costs and g) social investments.

Circular Economy

The circular economy is an economic model that focuses on reducing the waste of resources used in the production process, emphasizing the utilization of renewable resources, the recovery and reuse of products, but also the production of energy from the waste of production processes, the preservation of a product.

in good working order for a long time, the use of products to provide services to multiple users and the use of the service offered by a product.

Waste disposal method

The method by which waste is treated or disposed of, including the following: reuse, recycling, recovery, landfill, storage at the Company's facilities, etc.

Non-renewable materials

Resources that are not renewed in the short term, such as minerals, metals, oil, gas, or coal.

Non-renewable energy sources

Energy sources that cannot be renewed, reproduced, increased or produced in a short period of time through a natural cycle. Non-renewable energy sources include: Fuel refined from petroleum or crude oil such as gasoline, diesel, heating oil – Natural gas such as compressed natural gas (CNG) and liquefied natural gas (LNG) – Combustion gas and oil refining – Coal – Nuclear energy.

NGOs

Non-governmental organization

Material Issues

Issues that reflect the economic, environmental and social effects of the Company's activity and at the same time significantly affect the evaluations and decisions of its Stakeholders.

Environmental laws and regulations

It refers to the regulations related to any type of environmental issue (ie, emissions, liquid effluents and waste, as well as the use of materials, energy, water, and biodiversity) that apply to the Company.

Areas with high biodiversity

Areas that are not subject to legal protection but have been recognized due to the important biodiversity characteristics of some governmental and non-governmental organizations.

Reference period

Specific time covered by the published data. For MYTILINEOS, the reference

period is the year that begins in January and ends in December.

Global Sustainable Development Goals (SDGs)

On September 25, 2015, at the UN headquarters in New York, 193 representatives of states and governments from around the world pledged to adopt 17 Global Targets to take action against three major challenges over the next 15 years (up to in 2030): extreme poverty, inequality and climate change.

Percentage of full-time employees at work

Number of full-time employees at the end of the reference period x 100 / Number of full-time employees at the end of the previous year.

Significant functional changes

Changes in the operation of the Company that have significant positive or negative consequences for employees. Such changes may include, for example, restructuring, assignment to third parties, closure, expansion, new opening, acquisitions, sale of all or part of the entity or mergers.

Significant impact on biodiversity

Effects that may adversely affect the integrity of a geographical area or region, either directly or indirectly. This happens through the substantial change of ecological features, structures and functions of the whole area in the long run. This means that the habitat, the level of its population and the specific species that make the habitat important cannot be maintained.

Total water withdrawal

The total water extracted within the body's limits from all sources (including surface and groundwater, rainwater and public water supply) for each use during the reference period

Total water discharge

All liquid effluents discharged during the reference period in groundwater, surface water, sewers leading to rivers, oceans, lakes, wetlands, treatment plants, and groundwater.

Local community

Individuals or groups of people who live and / or work in areas that have a positive or negative economic, social or environmental impact from the organization's activities. The local community may include individuals living close to the organization's activities and even isolated settlements within walking distance of the activities, and which may be affected by the operation of those activities.

Local supplier

An organization or individual who provides a product or service to the organization and which has its headquarters in the same geographical market as the organization that compiles the report. The geographical definition of the term "local" may include society around activities, an area within a country or a country.

