MYTILINEOS Holdings S.A.

2024 CDP Corporate Questionnaire 2024

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Terms of disclosure for corporate questionnaire 2024 - CDP

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04/09/2025, 06:52 am

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:
☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:
☑ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:
☑ Publicly traded organization

(1.3.3) Description of organization

Metlen Energy & Metals (former MYTILINEOS – Energy & Metals) is a global industrial and energy company, distinguished by its strategic positioning in the energy transition and green metallurgy sectors. Listed on the Athens Stock Exchange, Metlen reported a consolidated turnover of 5.492 billion in 2023 and employs 6,583 individuals directly and indirectly, engaging over 14,000 suppliers globally. The company underwent a significant organizational transformation in 2023, establishing two primary business segments: the Energy Sector and the Metallurgy Sector, aimed at enhancing competitiveness and fostering synergies across its operations. Energy Sector Metlen stands as Greece's largest private energy utility, encompassing the development, construction, and operation of thermal and renewable energy projects, as well as electricity and natural gas supply. The new structure of the Sector has five new activities: M Renewables where the entire RES portfolio was consolidated, M Energy Generation & Management for the management of production and energy units, M Energy Customer Solutions for the retail supply of energy and natural gas as well as new retail products and services, M Integrated Supply & Trading for B2B customers and M Power Projects for conventional power generation projects, energy transition projects etc. The sector's key activities include: Protergia: Supplies electricity and natural gas to the retail market, offering energy efficiency and smart city services. Energy Management: Manages an energy portfolio exceeding 2 GW, incorporating thermal and renewable energy sources. Natural Gas Supply and Management: Provides competitive energy products and services to large B2B customers. Solar and Energy Storage: Manufactures and contracts solar and energy storage projects worldwide. Power Projects: Executes large-scale conventional and energy transition projects. The Energy Sector is highly

integrated, requiring specialized supplies and services from a diverse supply chain spanning Europe, China, the Middle East, and Africa. Its customer base includes commercial, industrial, and residential clients, along with international power generation and distribution companies. Metallurgy Sector Metlen is a leader in the metallurgy sector, operating Europe's only vertically integrated bauxite, alumina, and primary cast aluminum production unit. The sector includes: Aluminium of Greece: Produces 185,000 tons of primary cast aluminum and 860,000 tons of alumina annually. Secondary Aluminum Production: Achieves a capacity of 65,000 tons per year, promoting the circular economy and reducing energy consumption and emissions. The Metallurgy Sector procures bauxite primarily from Greece, Turkey, Montenegro, Latin America, and West Africa, and caustic soda from multiple global regions. It markets alumina products mainly in Europe and North Africa, and aluminum products globally, serving industries such as construction, automotive, transport, and electronics. Infrastructure & Concessions Metlen has established two subsidiaries to expand its infrastructure and concessions business: METKA ATE: Specializes in infrastructure projects including roads, buildings, railways, and waste management, leveraging its financial strength and industry expertise. M CONCESSIONS: Focuses on bidding, financing, designing, constructing, operating, and maintaining infrastructure projects, particularly in Public-Private Partnerships (PPP) and concessions. These subsidiaries aim to capture a significant share of the market for upcoming infrastructure projects in Greece and abroad, supporting sustainable development initiatives. Overall, Metlen Energy & Metals continues to drive growth and innovation in the energy and metallurgy sectors, aligning with global trends in energy transition and digital transformation. The company's commitment to sustainable development and the circular economy underscores its strategic direction and operational excellence.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/30/2023

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:
☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:
☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:
☑ 5 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 5 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 3 years
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

5491685000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

	Does your organization use this unique identifier?	Provide your unique identifier
ISIN code - bond	*Select from:* ☑ Yes	*GRS393503008*
LEI number	*Select from:* ☑ Yes	*213800KT8MEUJEJ2KW41*
D-U-N-S number	*Select from:* ☑ Yes	*72-844-1382*

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ Greece

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: ☑ Yes, for some facilities	*We can provide data on the main business activities of the Metals and Energy sectors based in Greece.*

[Fixed row]

(1.8.1) Please provide all available geolocation data for your facilities.

Row 1

(1.8.1.1) Identifier

Aluminium of Greece

(1.8.1.2) Latitude

38.360981

(1.8.1.3) Longitude

22.692499

(1.8.1.4) Comment

Primary aluminium production plant

Row 2

(1.8.1.1) Identifier

EPALME

(1.8.1.2) Latitude

38.309683

(1.8.1.3) Longitude

23.628218

(1.8.1.4) Comment

Secondary aluminium production plant

Row 3

(1.8.1.1) Identifier

Thermal Power plant

(1.8.1.2) Latitude

38.35855

(1.8.1.3) Longitude

22.688926

(1.8.1.4) Comment

Thermal Power plants IPP1 and IPP2.

Row 4

(1.8.1.1) Identifier

Thermal Power plant

(1.8.1.2) Latitude

37.923896

(1.8.1.3) Longitude

23.069034

(1.8.1.4) Comment

Thermal Power plant Korinthos Power
[Add row]

(1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain

☑ Electricity generation

Other divisions

☑ Battery storage

☑ Gas storage, transmission and distribution

☑ Smart grids/demand response

(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

Coal - Hard

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Lignite

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Oil

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Gas

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

2041

(1.16.1.3) Gross electricity generation (GWh)

5275.1

(1.16.1.4) Net electricity generation (GWh)

5102

(1.16.1.5) Comment

Metlen is already operating since 2008 a 334 MW High Efficiency Combined Heat and Power (CHP/High Efficiency CHP) plant in Ag. Nikolaos, Viotia, while the 444.48 MW Combined Cycle Thermal Power Plant (CCGT) in the same area, which was under the commissioning stage since January 2011, entered commercial operation in June 2011. The Combined Cycle Thermal Power Plant (CCGT) of 436.6 MW located in Korinthia which was under the commissioning stage since October 2011, entered commercial operation in April 2012. In 2021, in the facilities of the energy center Ag. Nikolaou in Boeotia have been added the new technology gas unit, which with the start of operation in 2023 will strengthen the Greek energy grid with additional power 826 MW. The unit is the largest, most efficient and most modern in Greece and one of the largest power stations in Europe. The 9HA.02 gas turbine of General Electric (GE), the first type "H" installed in Greece, was installed in the new unit and when put into operation will deliver 826MW to the grid, with 63% thermal efficiency, contributing to the country's energy security.

Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Geothermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Hydropower

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

0.8

(1.16.1.3) Gross electricity generation (GWh)

1.12

(1.16.1.4) Net electricity generation (GWh)

1.11

(1.16.1.5) Comment

Hydro power plant located in Greece

Wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

237.2

(1.16.1.3) Gross electricity generation (GWh)

563.9

(1.16.1.4) Net electricity generation (GWh)

558.3

(1.16.1.5) Comment

Wind energy system portfolio

Solar

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

607.8

(1.16.1.3) Gross electricity generation (GWh)

548.6

(1.16.1.4) Net electricity generation (GWh)

543.1

(1.16.1.5) Comment

Solar energy system portfolio

Marine

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Total

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

2886.8

(1.16.1.3) Gross electricity generation (GWh)

6388.7

(1.16.1.4) Net electricity generation (GWh)

6204.5
[Fixed row]

(1.18) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.

Row 1

(1.18.1) Mining project ID

Select from:
☑ Project 1

(1.18.2) Name

Delphi-Distomon S.A.

(1.18.3) Share (%)

100

(1.18.4) Country/Area

Select from:

☑ Greece

(1.18.5) Latitude

38.552844

(1.18.6) Longitude

22.411641

(1.18.7) Project stage

Select from:

☑ Production

(1.18.8) Mining method

Select from:

☑ Underground

(1.18.9) Raw material(s)

Select all that apply

☑ Bauxite

(1.18.10) Year extraction started/is planned to start

1975

(1.18.11) Year of closure

2040

(1.18.12) Description of project

Delphi-Distomon S.A. supplies bauxite to Metlen Group's primary aluminium production plant (Aluminium of Greece).
[Add row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 2 suppliers

(1.24.7) Description of mapping process and coverage

Metlen aims to primarily work with suppliers embracing the UN Global Compact (UNGC) principles by 2025, contributing to the Sustainable Development Goals (SDGs). The company's evaluation process helps identify critical issues and support key suppliers' improvement in sustainable practices. In 2023, Metlen continued

integrating sustainable development into its supply chain, aiming to establish a register of key suppliers that meet ESG criteria. This process aligns with the Supplier and Partner Code of Conduct and Responsible Supply Chain Policy. The Sustainable Development Division developed an evaluation methodology based on ESG criteria, collaborating internally with Procurement and Purchasing Departments across various sectors. The company assesses suppliers' sustainability risks and collaborates with those lagging in ESG performance, offering support through adaptation plans to improve their management of relevant ESG issues. The evaluation process, gradually integrated across all business sectors, focuses on material issues linked to the SDGs, such as environmental compliance, health and safety management, human rights protection, ethics, and integrity. In 2023, Metlen launched the "Metlen Responsible Supply Chain platform," a digital tool developed by the Sustainable Development Division to manage ESG supply chain assessments efficiently. This platform enables the company to collect, evaluate, and monitor the ESG performance of suppliers annually. Digitalization enhances efficiency, enabling the Sustainable Development Division and procurement teams to work closely in tracking each supplier's ESG performance. After reviewing supplier responses, each supplier receives a final score based on their maturity and approach to managing relevant ESG issues, considering industry and geographical context. Suppliers can access the platform to review their overall performance and compare it with the average performance of other companies in their sector using the NACE classification. Metlen's priority is to enhance the maturity of key/critical suppliers for better sustainability management. In 2023, it created a register of such suppliers, both in Greece and abroad, based on criteria like ensuring uninterrupted operations, high purchase volumes, difficulty in replacement, and repeated cooperation. These criteria were defined with input from various divisions and departments.
[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☑ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

The company's use of plastic is in very small quantities and relates mainly to quantities through goods purchased. The disposal of the company's products (aluminium, electricity etc.) is plastic free.
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

1

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

This time horizon reflects the current and immediate future objectives and operations. This timeframe is consistent with Metlen investment plan "2020-2025" and the risk analysis performed in terms of investment decisions. Among the risks factors considered are the ones related to climate change, both transition and physical and acute.

Medium-term

(2.1.1) From (years)

3

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

This time horizon reflects the transition risks framework with a potential impact on the company's strategy. This timeframe is consistent with Metlen investment plan "2020-2025" and the relative internal financial projections, and 202010 years equals 2030, date of the public commitments of Metlen: the company expects to reduce by 30% (base year 2019) its absolute CO2 emissions as well as its relative emissions (expressed in t CO2 per kWh generated and t CO2 per ton of aluminium produced).

Long-term

(2.1.1) From (years)

10

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ No

(2.1.3) To (years)

30

(2.1.4) How this time horizon is linked to strategic and/or financial planning

This time horizon reflects the end of life of some industrial aspects, products and facilities. It refers to the long-term company strategy and the long term company targets on decarbonization set by 2050 (202030).
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process	Biodiversity impacts evaluated before the mining project development stage
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts	*Select from:* ☑ Yes, in all cases

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term
☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:
☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply
☑ Site-specific
☑ Local
☑ Sub-national
☑ National

(2.2.2.12) Tools and methods used

International methodologies and standards
☑ IPCC Climate Change Projections

Databases
☑ Nation-specific databases, tools, or standards
☑ Regional government databases

Other
☑ External consultants
☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought
☑ Avalanche
☑ Wildfires
☑ Heat waves
☑ Cold wave/frost
☑ Cyclones, hurricanes, typhoons
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers
☑ Employees
☑ Investors
☑ Local communities
☑ Regulators

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

Metlen conducted an in-depth analysis to identify climate-related risks and opportunities within its Business Sectors as part of the TCFD implementation project. This process involved a comprehensive review of Metlen's activities, data analysis, and stakeholder consultations. As a result, risks and opportunities related to climate change were identified, impacting various aspects of Metlen's operations. The identified risks and opportunities were assessed based on two main criteria: • Materiality of consequences: Evaluated over short-term (2022-2025), medium-term (until 2030), and long-term (until 2050) horizons, considering financial impact. • Level of certainty: Analyzed through confidence (availability of reliable data), sensitivity (variations in parameters), and outcome likelihood (direction and rate of change). Based on these criteria, risks and opportunities were categorized into four groups for each Metlen Business Sector: 1. High importance and high certainty: These are quantitatively analyzed using climate scenarios and Metlen's future data. Proactive measures are planned to integrate these into future policies. 2. High importance and low certainty: Monitored systematically, and management plans will be developed if they become significant. Immediate action is not required. 3. Low importance and high certainty: These are observed without needing detailed management plans. 4. Low importance and low certainty:

Considered non-material. Climate-related risks are integrated into Metlen's Risk Registry. The Risk Department, in collaboration with Business Units and the Sustainable Development Division, identifies and assesses these risks annually using a risk management approach. The severity and likelihood of each risk/opportunity are analyzed to prioritize them. These are then presented to the Executive Committee alongside other types of risks, and major climate-related risks/opportunities are included in Metlen's Sustainable Development Report, outlining the management approach. Climate risks and opportunities play a vital role in Metlen's strategy, investment decisions, and operations management. As an industrial company involved in Metallurgy, EPC, Electric Power, and Gas Trading, Metlen faces various climate-related risks that could significantly impact its financial position, operations, earnings, reputation, and access to capital. Acute physical risks, like extreme weather events and high temperatures, are relevant across Metlen's activities, affecting plants, facilities, and construction sites. For instance, in the Metallurgy Sector, risks such as reduced water resources due to low rainfall, loss of working days from extreme temperatures, and the need to adapt mining activities to climate change are of high priority. Metlen ensures that appropriate measures are in place to address these risks. The transition to a low-carbon future presents additional regulatory challenges, especially for industries like primary aluminium and natural gas-based power production that are hard to decarbonize. Climate and energy regulations may have significant financial and non-financial impacts. These could include stricter emissions reporting requirements, the use of low-emission energy sources, increased CO2 prices, and reduced exposure to fossil fuels. Metlen closely monitors legal compliance and actively participates in regulatory consultation groups to ensure all relevant risks are included in its risk management system.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ Sub-national

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ WRI Aqueduct

Other

☑ Desk-based research

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Groundwater depletion

☑ Increased levels of environmental pollutants in freshwater bodies

☑ Saline intrusion

☑ Water availability at a basin/catchment level

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ Regulators

☑ Water utilities at a local level

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

Our organization employs a systematic process to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities. We evaluate various risk types, including groundwater depletion, saline intrusion, water availability at the basin level, and increased pollutant levels in freshwater bodies. This assessment involves data collection and analysis, stakeholder engagement, and regular monitoring. We integrate these findings into our decision-making processes to mitigate risks and capitalize on opportunities, ensuring long-term sustainability in our operations.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.6) Mining projects covered

Select all that apply

☑ All disclosed mining projects

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ As important matters arise

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ A specific environmental risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ Sub-national

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Internal company methods

International methodologies and standards

☑ Environmental Impact Assessment

Databases

☑ Nation-specific databases, tools, or standards

Other

☑ External consultants

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Declining ecosystem services

☑ Increased ecosystem vulnerability

☑ Operations in or adjacent to areas important for biodiversity

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ NGOs

☑ Regulators

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

Our organization employs a comprehensive process to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities related to biodiversity. We consider various risk types, including declining ecosystem services, increased ecosystem vulnerability, and operations adjacent to areas critical for biodiversity. This involves gathering and analyzing data, engaging with stakeholders, and conducting regular impact assessments. The insights gained are integrated into our strategic planning and operational decisions, allowing us to mitigate risks and enhance our positive contributions to biodiversity conservation.
[Add row]

(2.2.3) Provide mining-specific details of your organization's process for identifying, assessing, and managing biodiversity impacts.

Row 1

(2.2.3.1) Mining project ID

Select from:
☑ Project 1

(2.2.3.2) Extent of assessment

Select from:
☑ Full-scale environmental and social impact assessment

(2.2.3.3) Impacts considered

Select all that apply
☑ Direct impacts
☑ Indirect impacts
☑ Cumulative impacts

(2.2.3.4) Scope defined by

Select all that apply

☑ Governmental agency requirements

☑ Company own standards and/or policies

(2.2.3.5) Aspects considered

Select from:

☑ Ecosystem services

(2.2.3.6) Baseline biodiversity data available

Select from:

☑ Yes

(2.2.3.7) Environmental Impact Statement publicly available

Select from:

☑ No

(2.2.3.8) Please explain

At Metlen, our mining operations focus on bauxite extraction to support our primary aluminum production. We follow a comprehensive approach to identifying, assessing, and managing biodiversity impacts in line with both regulatory requirements and our internal sustainability standards. 1. Extent of Assessment: We conduct a full-scale Environmental and Social Impact Assessment (ESIA) for our mining activities. This extensive assessment ensures that we capture all potential biodiversity impacts across different phases of our operations, from exploration to extraction and rehabilitation. 2. Impacts Considered: Our assessment covers direct, indirect, and cumulative impacts. Direct impacts include changes to land use and habitat alteration, while indirect impacts consider effects on surrounding ecosystems, such as water bodies or air quality. Cumulative impacts involve long-term effects that may arise from combined mining activities over time. 3. Scope Defined By: The scope of our biodiversity impact assessment is defined by governmental agency requirements, ensuring compliance with national regulations, as well as our company's own standards, which often exceed regulatory requirements. This dual approach ensures that we address all biodiversity-related risks comprehensively. 4. Aspects Considered: We pay close attention to ecosystem services, recognizing the critical role they play in maintaining biodiversity. We evaluate how our mining operations might affect ecosystem services like water purification, soil stabilization, pollination, and natural habitat provision and threatened species ensuring that these aspects are protected or restored throughout our activities. By integrating these elements into our biodiversity management process, we aim to minimize our environmental footprint, mitigate potential risks, and contribute positively to the ecosystems surrounding our mining operations.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

At Metlen, we recognize the interconnected nature of environmental dependencies, impacts, risks, and opportunities, especially from our mining activities and sites of RES systems. We adopt an integrated approach to assess these interconnections for sustainable operations. 1. Environmental Dependencies: Our operations depend on natural resources like water, energy, and bauxite. Through a detailed resource management plan, we monitor resource availability and identify vulnerabilities. For instance, water is essential for mining processes, so we regularly monitor sources to detect potential shortages affecting operations. 2. Environmental Impacts: We conduct Environmental and Social Impact Assessments (ESIAs) to evaluate our activities' effects on ecosystems, biodiversity, air, and water resources. These assessments identify direct, indirect, and cumulative impacts. For example, we mitigate land disturbance impacts by implementing habitat restoration and rehabilitation practices. 3. Risk Assessment: We use a structured risk management process to identify, evaluate, and prioritize environmental risks based on severity and likelihood, including climate change risks such as emissions regulations, water scarcity, and extreme weather. This helps us develop strategies to reduce vulnerability, like implementing water-saving technologies or using renewable energy sources. 4. Opportunities Assessment: We identify opportunities by monitoring environmental trends and regulations, such as investing in energy-efficient technologies, waste material utilization, or expanding renewable energy use. Transitioning to low-carbon energy sources, for example, can reduce operational costs and improve market competitiveness. Interconnections Assessment Process: Metlen employs an integrated management system to evaluate how dependencies, impacts, risks, and opportunities are interconnected. Cross-functional teams from sustainability, risk management, operations, and procurement ensure a holistic view. We use scenario analysis and data modeling to understand how changes in one aspect (e.g., water availability) affect others (e.g., production efficiency, regulatory compliance). Outcome: This approach allows us to: • Mitigate risks by adapting strategies to reduce critical resource dependency. • Identify opportunities, such as energy efficiency improvements and circular economy practices. • Build a resilient, sustainable business model aligned with environmental goals. By continuously assessing these interconnections, we ensure strategic decisions that contribute to long-term sustainability and reduce our environmental footprint.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

☑ Areas of high ecosystem integrity

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

At Metlen, we have established a structured process to identify biodiversity priority locations, especially since our operations, including bauxite mining for our primary aluminum plant and the construction of wind and photovoltaic parks, often occur near or within Natura-designated areas. This process ensures that we recognize, assess, and manage biodiversity impacts to minimize environmental disruption. Our process begins with a comprehensive environmental and social impact assessment (ESIA), which includes a detailed mapping of the areas surrounding our operations. This assessment identifies sensitive habitats, endangered species, and ecosystems. We utilize geographic information system (GIS) tools and collaborate with biodiversity experts to overlay our operational sites with designated conservation areas, such as Natura 2000 sites, to pinpoint high-priority locations. We adhere to national and international biodiversity regulations, as well as Natura 2000 guidelines. In addition, we consult with governmental agencies, local communities, NGOs, and environmental experts to identify critical biodiversity areas that may be affected by our activities. This engagement ensures we are aware of all legal requirements and local conservation priorities. Metlen conducts extensive field surveys before any development to gather data on local flora and fauna. These surveys help us understand the presence of rare, endangered, or protected species. We monitor these species throughout our operations to track any potential changes in biodiversity, ensuring that priority locations are identified and managed effectively. We analyze both direct and indirect impacts on biodiversity, including potential habitat loss, species displacement, or changes to ecosystem services. If a site is identified as a biodiversity priority, we implement mitigation measures such as habitat restoration, buffer zones, and conservation offsets to minimize negative impacts. For instance, we may adjust the placement of wind turbines or photovoltaic panels to avoid disrupting key habitats or migration paths. Metlen employs a continuous monitoring program to track biodiversity in and around priority locations, ensuring that any changes are detected early. Data collected through monitoring informs our adaptive management strategy, allowing us to adjust operations as needed to protect biodiversity effectively. This approach ensures we respond promptly to any emerging threats to priority species or habitats. We are committed to transparent reporting on biodiversity impacts and mitigation measures. Regular reports are published detailing our efforts to protect priority biodiversity locations, and we actively participate in conservation initiatives to promote sustainable practices across our industry. By following this systematic process, we ensure that biodiversity priority locations are identified, protected, and managed in alignment with best practices and regulatory standards.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ Yes, we will be disclosing the list/geospatial map of priority locations

(2.3.6) Provide a list and/or spatial map of priority locations

Metlen_list_of_priority_locations.pdf
[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ Absolute decrease

(2.4.5) Absolute increase/ decrease figure

0

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Metlen has established an Enterprise Risk Management (ERM) framework to effectively manage risks and seize opportunities in pursuit of strategic objectives. This framework, grounded in best practices, emphasizes the identification, analysis, and assessment of risk factors and controls, aligning risk management with the organization's risk appetite. The Board of Directors, Management, and the Enterprise Risk Management Office advocate for a culture that integrates risk management into all systems, processes, activities, and decision-making across the organization. To enhance this Risk Management System, we implement the following actions: Conduct risk assessments using both top-down and bottom-up approaches. Utilize a specialized function for financial risk management, which monitors risks using various derivative instruments. Carry out risk-based audits through the internal audit function, incorporating findings into risk and control scores managed by the ERM office. Risks are prioritized on a five-point scale based on significance, considering the impact, probability of occurrence, and control environment. The impact is evaluated across three dimensions: Financial, Health-Safety-Environment, and Reputational. The highest financial impact at the enterprise level—considered substantive—is defined as equivalent to 15% of our Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA). In our 2023 TCFD Report, we publicly disclosed the financial implications of key climate risks and opportunities, categorized as follows: Low (L): Economic impact below 1 million (insignificant to minor). Moderate (M): Economic impact between 1 million and 10 million. High (H): Economic impact ranging from 10 million to 50 million (significant). Very High (VH): Economic impact exceeding 50 million (critical). These figures are informed by climate scenario analyses and transition scenario evaluations, which consider economic and energy variables such as commodity prices, interest rates, CO2 prices, technology types, and energy demand.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Regarding opportunities, Metlen is strategically positioned to capitalize on energy megatrends primarily through the development and operation of Renewable Energy Sources, with network upgrading projects internationally, and by leveraging the developing markets of hydrogen production (H2) and Carbon Dioxide Capture, Utilization, and Storage (CCUS). Additionally, benefits for the company's business strategy arise both from the various ways of utilizing natural gas within the context of the energy transition and from the increasing incorporation of recycled aluminum into its product mix, aiming for greener outputs.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:
☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

All the company's Business Sectors apply an ISO 14001 -2015 certified Environmental Management System, supported by specific environmental policies. In parallel, the systematic application of Best Available Techniques (BATs) across all business activities is a significant factor that contribute to the company's business growth and drive its commitment to the protection of the environment. The company has a specific standard-guide to manage the withdrawals and discharges in all processes to guarantee the compliance with current legislation and avoiding any environmental impact. All the plants and sites have technical instructions under this guide to determine the parameters/contaminants to be controlled, measurement points, frequency of measurement, limit values and who will carry out each measurement. There are no potential water-related impacts on ecosystem or human health. Moreover, all company's sectors follow the MYTILINEOS Measures & Principles for the protection of the natural environment, such as: a) Adherence to the agreements and commitments that the Company's Sector has undertaken over and above its statutory obligations, b) Organization of regular internal and external inspections to assess the performance of the Environmental Management System, c) Prevention of all risks of pollution, d) Assessment of the impacts of the company's activities on the environment, e) Control and continuous reduction of liquid waste and f) Correction of all deviations identified.
[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Other, please specify **:**Thermal pollution

(2.5.1.2) Description of water pollutant and potential impacts

One of the main pollution risk prevention measures implemented in the Business Sector is the constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against 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 Business Unit. The seawater is not burdened with other water pollutants except for the thermal pollution due to the cooling process, which may affect the ecological status of Antikyra Gulf seabed.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Other, please specify **:**Compliance with effluent quality standards

(2.5.1.5) Please explain

In addition to the strict compliance with the relevant provisions of the law determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authoritative organization (Hellenic Centre for Marine Research – HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed. The studies carried out by the Company 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, Energy and Climate Change, and the Water Management Directorates of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of studies carried out in 2019 and 2020,

and of the more recent ones from 2021, 2022 and 2023, show a stable ecological status, with improving trends recorded at several observation stations. These studies will continue over the next five years. During 2023, 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. For more information please refer to Metlen 2023 Sustainable Development Report, Pollution prevention section (p. 76-79).
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We evaluated climate change risks only within our direct operations, because the upstream/downstream value chain climate change risks have not the potential to have a substantive effect on Metlen's activities.

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We evaluated water risks only within our direct operations, because the upstream/downstream value chain water risks have not the potential to have a substantive effect on Metlen's activities.

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Not an immediate strategic priority

(3.1.3) Please explain

Risks related to plastics have zero effect on Metlen's activities.

Biodiversity

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Biodiversity risks have not the potential to have a substantive effect on Metlen's activities.
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Under the EU climate change policy, METLEN is subject to the EU Emissions Trading Scheme (EU-ETS), which requires compliance with the Paris Agreement. As carbon prices rise, the company faces increased costs for purchasing GHG emission allowances. Our generation business operates under EU Directive 2003/87/EC, which mandates acquiring CO2 emission rights (EU Allowances or EUAs) for thermal power plants. The EU ETS, effective since January 2005, is currently in its fourth phase (2021-2030), requiring all power generators to purchase CO2 allowances to offset emissions. For our metallurgy business, partial free allocation of allowances has been granted per amended EU rules, and a scheme compensating indirect emission costs, tied to electricity prices, was implemented in Greece during the third phase. Additionally, the Greek Government is preparing a notification to the European Commission for a compatible state-aid scheme for the fourth phase of the EU ETS, aimed at maximizing compensation for costs that cannot be passed on through aluminium prices.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The implementation of the EU-ETS, especially in its fourth phase (2021-2030), may significantly impact Metlen Group's financial position, performance, and cash flows in the reporting year. The increase in carbon prices and the requirement to purchase additional greenhouse gas (GHG) emission allowances could lead to higher operational costs, particularly for our thermal power plants, which must acquire and surrender CO2 emission rights under the EU-ETS. For our metallurgy business, although partial free allocation of allowances has been granted, the remaining costs that are not covered by this allocation could still impact profitability. These increased costs could reduce our operating margins, thereby affecting our overall financial performance. Moreover, any rise in carbon prices would lead to increased expenses, resulting in a negative effect on cash flows. However, the Greek government is preparing a state aid scheme to compensate for indirect emission costs (such as CO2 costs included in electricity prices), which could partially offset the financial burden. This compensation, once approved, could help mitigate some of the negative impacts on our financial position. In summary, while the EU-ETS represents a financial risk due to increased costs, the compensation measures expected by the Greek government could help alleviate this impact to some extent. Nonetheless, continuous monitoring and strategic planning will be essential to manage these risks effectively.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

550000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

1050000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased carbon prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy & Energy sectors of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative

Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The sum of difference between projected allocated and reported CO2 emissions in our currently participating ETS schemes of each sector activity multiplied by the projected carbon value resulting from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased prices of CO2 emission allowances constitute a high potential risk for the Metallurgy and Energy sectors as they may lead to a further increase in the cost of purchasing allowances. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). Increased prices of emission allowances continue to be a potential risk, high for the Energy sector and very high risk for the Metallurgy sector. In this scenario, the cost increase based on each sector's projected CO2 emissions appears to be significantly higher than the existing policies scenario.

(3.1.1.26) Primary response to risk

Pricing and credits

☑ Other pricing or credit, please specify **:**we employ hedging strategies to minimize the impact from the price volatility of CO2 emissions rights.

(3.1.1.27) Cost of response to risk

3000000000

(3.1.1.28) Explanation of cost calculation

The figure we report as a cost of response to risk equals to the annual environmental investments in 2023 related to climate change and our overall estimation to response to this risk is primarily the monitoring of CO2 emissions reduction initiatives implementation, with specific projects and investments in each sector and an ambitious RES investments plan by 2030.

(3.1.1.29) Description of response

Since 2013, we have not been allocated free CO2 emission rights and as our thermal power plants currently emit approximately 0.35 tonnes of CO2 per MWh generated, increased prices of CO2 emission rights will affect our operating costs. Although we employ hedging strategies to minimize the impact from the price volatility of CO2 emissions rights, and despite our recently announced ESG-related initiatives which are expected to significantly reduce our CO2 footprint by 2030, we must still acquire sufficient amounts of CO2 emission rights per year, and, accordingly, there can be no assurance on the price level that such CO2 emission rights will be obtained in any future year.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to national legislation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Sea Golf of Antikira

(3.1.1.9) Organization-specific description of risk

Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for cooling purposes. Withdrawals/discharges are directly measured; consumption is calculated. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume may affect our operation increasing costs, forcing us to find alternative ways of water supply or forcing premature closures. In addition, the volume of the sea water which returns back to the sea after the cooling process may affect the status of living organisms (benthic biocoenoses, with emphasis on thermophile species) on the Antikira Gulf seabed in terms of its pH and temperature.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Exceptionally unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk related to the seawater usage of our Combined Heat and Power (CHP) plant could have substantial implications for Metlen's financial position, performance, and cash flows. Any regulatory changes that restrict the allowable volume of seawater withdrawals could significantly impact our operational efficiency. This may lead to increased costs as the company seeks alternative water supply sources, potentially requiring investment in new infrastructure such as desalination plants or water recycling systems. Such capital expenditures would affect our cash flows and may reduce available funds for other strategic projects or investments. If restrictions on seawater usage force operational limitations or premature closures, the company's electricity and heat production capacity could be reduced, directly impacting revenue streams. Lower production levels would translate into decreased sales, negatively affecting profitability and the overall financial performance of the CHP plant. This scenario may also increase fixed costs per unit of production, further eroding profit margins. Additionally, environmental concerns related to the temperature and pH changes of discharged seawater could result in regulatory fines, legal liabilities, or the requirement to implement costly mitigation measures to minimize ecological impacts. This could increase operating expenses and potentially affect Metlen's reputation, leading to challenges in maintaining licenses or permits for continued operation. If stricter regulations are enforced, there could also be an impact on Metlen's ability to attract financing, as lenders and investors are increasingly focused on environmental compliance and sustainability. This may result in higher borrowing costs or restricted access to capital, further affecting the company's financial flexibility and cash flow. In summary, this risk poses a significant challenge to Metlen's financial position in the medium term by potentially increasing operational costs, reducing production capacity, and exposing the company to regulatory compliance expenses. Proactive risk management and investment in alternative water solutions or technologies will be essential to mitigate the financial impact and maintain long-term financial stability.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Other engagement, please specify **:**Engage with regulators/policymakers

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

There is no separated cost to managing the water risks. The cost of response is related with the research study to monitor the status of living organisms, on the he Antikyra Gulf seabed, as mentioned above. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of 8-10 million in annual basis.

(3.1.1.29) Description of response

Engagement with public policy makers - Strengthen links with local community - Cooperation with governmental research organizations. Our strategy is applied on an annual basis and consists of the following elements: 1) Compliance with the environmental legislation (including water management) is a core priority of Metlen. This view, which also serves as the foundation of the company's environmental policy, aims to drive the continuous improvement of its environmental footprint and is based, first and foremost, on the principle of adherence to the provisions of the law, as well as to the agreements concluded and the voluntary commitments. 2) Metallurgy Sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, which are responsible for controlling its activity and environmental performance. 3) Company's Stakeholder Engagement process expresses, in a systematic way, the long-standing principle to engage in a consistent and honest open dialogue with its Stakeholders. In this context, thematic consultations on Environmental issues take place giving the opportunity to our social partners to raise its concerns or expectations 4) Finally, the Metallurgy Sector appoints, on an annual basis, an authoritative organization Hellenic Centre for Marine Research - HCMR) to conduct of a research study to monitor the status of living organisms, on the he Antikyra Gulf seabed.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Other market risk, please specify **:**Increased power and gas sales prices due to climate change mitigation policies

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Metlen Company operates in a dynamic energy landscape, where climate change mitigation policies are increasingly shaping the market. As governments and regulatory bodies implement measures to reduce greenhouse gas emissions, the risk of increased power and gas sales prices poses a significant challenge to Metlen. Higher electricity and gas sales prices due to climate change policies may impact Metlen's competitiveness in the market. Consumers may seek more affordable options, potentially leading to a decline in demand for the company's products and services.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Decreased revenues due to reduced demand for products and services

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk could impact Metlen's financial position, performance, and cash flows. As climate change mitigation policies intensify, we anticipate a steady increase in power and gas prices, leading to higher operational costs. This increase could erode profit margins, particularly if we face challenges in passing these costs on to customers due to competitive market pressures. The rising energy expenses may reduce Metlen's EBITDA, affecting profitability and potentially resulting in lower earnings before interest and taxes (EBIT). As a result, the company might experience reduced free cash flows, limiting our ability to invest in growth initiatives, sustainability projects, or technological advancements necessary to maintain competitiveness. Moreover, Metlen's credit ratings could be negatively affected if profitability continues to decline, which might increase the cost of borrowing or reduce access to external financing. This would place additional pressure on cash flows, making it more challenging to fund day-to-day operations, repay debt, or support capital expenditures. A prolonged increase in energy costs could also make our products less competitive, leading to a potential reduction in sales volumes and revenue. The combined effect of reduced sales, higher costs, and increased borrowing expenses may weaken the company's overall financial health, potentially affecting shareholder returns and long-term financial resilience. In summary, this risk poses a significant challenge to Metlen's financial stability over the medium term, necessitating strategic cost management, efficiency improvements, and the adoption of energy-efficient technologies to mitigate the impact on financial performance and cash flows.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

20000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

95000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased power and fossil fuel (NG) prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The projected electricity and gas consumption of Metallurgy sector multiplied by the projected electricity and gas values derived from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased power and fossil fuel (NG) prices are a very high potential risk of increased operating costs for the Metallurgy Sector, based on the Sector's projected power and gas consumption. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). In this scenario, these prices are even higher, therefore continue to be a very high potential risk of increased operating costs in the Metallurgy sector.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

1000000

(3.1.1.28) Explanation of cost calculation

Since the cost of the Company's sub-sector M Renewables (RES systems) planned investments is already included in the Risk 1 response cost above, we have assigned a value of 1,000,000 as an estimation cost which related to Engagement activities of the Company.

(3.1.1.29) Description of response

Metlen is investing in a diversified energy portfolio that includes both conventional and renewable energy sources. This approach can help mitigate the impact of rising costs in a transitioning energy market. Also engaging in constructive dialogues with policymakers and regulatory authorities can help Metlen advocate for supportive policies that strike a balance between environmental goals and economic sustainability.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Other policy risk, please specify :Emerging regulation: Increased power and fossil fuel (NG) prices)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Metlen, as a prominent aluminum production company, heavily relies on stable and affordable electricity and natural gas (NG) prices to sustain its operations and competitiveness. However, the risk of rising electricity and fossil fuel prices poses a significant challenge to the company's aluminum production processes. As an aluminum production company, Metlen operates energy-intensive smelting and refining processes. These processes require substantial amounts of electricity and NG to power the furnaces and other equipment necessary for aluminum production. The risk is related with the escalation of production costs. Competing against companies in regions with more favorable energy prices could put Metlen at a disadvantage.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the risk of rising electricity and natural gas (NG) prices could significantly affect Metlen's financial position, performance, and cash flows. As a highly energy-intensive aluminum production company, any increase in energy costs will directly lead to higher production expenses, reducing profit margins. Given that energy accounts for a significant portion of total production costs, even moderate price increases could result in substantial cost escalations. This risk is likely to reduce Metlen's EBITDA and overall profitability, as passing on these increased costs to customers may not be feasible in a competitive market. As a result, the company could experience a decline in gross margins, affecting earnings before interest and taxes (EBIT). This impact may be further amplified if competitors in regions with more favorable energy prices are able to maintain lower production costs, resulting in potential market share loss for Metlen. Reduced profitability in the medium term may also influence Metlen's credit ratings, which could increase borrowing costs or limit access to external financing. This would place additional strain on cash flows, potentially affecting the company's ability to fund essential investments, such as technological upgrades or sustainability projects aimed at improving energy efficiency. Furthermore, higher energy prices could increase working capital requirements as operating expenses rise, resulting in tighter cash flow management. This situation may impact Metlen's liquidity and limit its capacity to meet short-term financial obligations, pay dividends, or pursue growth opportunities. In summary, the risk of escalating electricity and NG prices presents a substantial threat to Metlen's financial stability in the medium term, with the potential to diminish profitability, strain cash flows, and challenge the company's ability to maintain its competitive position in the aluminum market.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

300000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

400000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased power and fossil fuel (NG) prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The projected electricity and gas consumption of Metallurgy sector multiplied by the projected electricity and gas values derived from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased power and fossil fuel (NG) prices are a very high potential risk of increased operating costs for the Metallurgy Sector, based on the Sector's projected power and gas consumption. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). In this scenario, these prices are even higher, therefore continue to be a very high potential risk of increased operating costs in the Metallurgy Unit.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase investment in R&D

(3.1.1.27) Cost of response to risk

8000000

(3.1.1.28) Explanation of cost calculation

Since the cost of the Company's sub-sector M Renewables planned investments is already included in the Risk 1 response cost above, we have assigned a value of 8,000,000 as an estimation cost which related to R&D initiatives and specific energy efficiency initiatives of the Metallurgy sector.

(3.1.1.29) Description of response

Metlen is investing in energy-efficient technologies and practices to reduce electricity and NG consumption during the aluminum production processes. Also, integrating renewable energy sources, such as solar or wind power, into the Company's energy mix can help offset the reliance on fossil fuels and stabilize electricity costs in the long term.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Other acute physical risk, please specify **:**Rising air temperatures and reduced efficiency of natural gas-fired power plants.

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

With global temperatures on the rise due to climate change, the ambient air temperatures surrounding the power plants are increasing. This elevation in temperature can have several adverse effects on the efficiency and overall operation of natural gas-fired power plants, including: Reduced Power Output: Higher air temperatures decrease the density of air, leading to a lower mass flow rate of air entering the combustion chamber. This results in reduced power output from the turbines, directly impacting electricity generation capacity. Reduced Turbine Efficiency: Gas turbines' efficiency is closely related to the temperature difference between the inlet air and the exhaust gases. As the temperature differential decreases due to rising ambient temperatures, the efficiency of the turbines declines, leading to higher fuel consumption for the same electricity output. Increased Cooling Demand: Gas-fired power plants rely on cooling systems to maintain operational temperatures. As ambient temperatures rise, the demand for cooling systems escalates, putting additional stress on water resources and increasing operational costs. Increased in mean air temperatures can lead to reduced production (and revenues) due to lower efficiency.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the long-term, the risk of rising ambient air temperatures due to climate change could significantly impact Metlen's financial position, performance, and cash flows, particularly in its natural gas-fired power plants. As temperatures increase, the efficiency of these power plants is expected to decline, resulting in reduced electricity generation capacity and lower overall power output. This reduction in output may lead to decreased revenue over time, especially if Metlen is unable to meet electricity demand or contractual obligations. The decline in turbine efficiency due to reduced temperature differentials will result in higher fuel consumption for the same level of electricity generation, directly raising operational costs. This increase in fuel costs will likely erode profit margins, negatively affecting the company's EBITDA and overall profitability. Over time, the cumulative effect of these inefficiencies could make Metlen's power generation activities less competitive compared to those of more energy-efficient or renewable energy-based companies. Increased cooling demands due to higher ambient temperatures will also escalate operational expenses, particularly if water resources become scarcer or more expensive. This could further strain Metlen's cash flows, as the company may need to invest in more advanced or alternative cooling technologies to maintain operational efficiency. These additional capital expenditures may limit Metlen's ability to invest in other growth or sustainability projects, potentially affecting long-term financial health. Furthermore, the reduced efficiency and increased operational costs may make it challenging for Metlen to maintain its profit margins, affecting net income and shareholder returns. Persistent inefficiencies and elevated expenses could also lead to potential asset impairments, especially if certain power plants become unprofitable in the long run. Overall, this risk could significantly weaken Metlen's financial stability, resulting in reduced cash flow generation, increased operational costs, and lower competitiveness in the energy market. To maintain long-term viability, Metlen may need to explore investments in energy efficiency improvements, alternative energy sources, or more resilient technologies to mitigate these financial impacts.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

7000000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

14000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of the rising air temperatures through a study, conducted for the direct operations in Greece, concerning the Energy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 8.5, RCP 4.5, and RCP 2.6, Calculation methodology: The reduction in efficiency of thermal plants in a future climate, which characterized by higher temperatures (WPS and CPS scenarios), is

calculated through a semi-empirical equation where it takes into account future climate data in the area of interest (Greece). Given electricity generation will require larger quantities of fuel, and this cost is calculated by multiplying the additional quantities by the corresponding values contained in the RCP scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, the risk exists, but to a lesser extent, since the cost is lower than in the weak policies scenario due to climate change limitation and therefore lower impact on the efficiency of thermal plants. - The RCP 2.6 Week Policies Scenario (Net-Zero) (maximum). In this scenario, it is a moderate to high risk for Power sector since it can lead to reduced production (and revenues) due to lower efficiency and increased transmission losses of the power stations.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

We put 0 on the corresponding cost, because the cost of the Company's RES planed investments is incorporated in the Risk 1 cost of response above.

(3.1.1.29) Description of response

The company focus on diversification of its energy generation sources, expanding its energy portfolio to include renewable energy sources which can reduce dependency on gas-fired power plants and provide more flexibility during extreme temperature events.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to national legislation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Groundwater sources & Mornos River

(3.1.1.8) Mining project ID

Select all that apply

☑ All disclosed mining projects

(3.1.1.9) Organization-specific description of risk

Volume of industrial service, brackish and drinking water, used primarily to meet the manufacturing / processing, and water supply needs of the company's industrial facilities, in Metallurgy Sector. It is obtained from a network of 17 drills, owned by Metallurgy sector, in the broader region around its plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Regional Administration which has set specific limits on water withdrawal. Any change on these limits may force us to municipal supply source affecting our operational costs, although a limited production disruption is not excluded.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk regarding water withdrawal limits in the Metallurgy sector could significantly impact Metlen's financial position, performance, and cash flows. If regulatory authorities impose stricter water withdrawal limits, the company may be forced to rely on municipal water supply sources, which are typically more expensive than self-extracted water. This shift would lead to increased operational costs, directly affecting profit margins and reducing overall profitability. Increased reliance on municipal water could result in a considerable rise in the cost of production, especially for water-intensive processes within the Metallurgy sector. This would diminish Metlen's competitiveness, as higher production costs might not be fully passed on to customers, potentially leading to reduced sales volumes and a decline in revenue. Additionally, any disruptions in water availability could result in temporary production halts or inefficiencies, further impacting financial performance. Such disruptions may lead to lower output, affecting the company's ability to meet customer demand and resulting in lost sales opportunities. This could have a direct impact on cash flows, making it more challenging to cover operational expenses, service debt, or fund future investments. Furthermore, increased water costs and potential disruptions may also affect the company's credit ratings, potentially raising borrowing costs or limiting access to external financing. This could reduce financial flexibility, making it more difficult for Metlen to invest in capital projects, technological upgrades, or sustainability initiatives in the medium term. In summary, this risk poses a significant threat to Metlen's financial stability in the medium term by potentially increasing operational costs, reducing production efficiency, and impacting revenue generation. Proactive measures, such as investing in water-efficient technologies or exploring alternative water sources, will be essential to mitigate the financial impact and maintain the company's financial health.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Other engagement, please specify **:**Engage with regulators/policymakers

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

There is no distinct cost to managing the water risks. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of 8-10 million in annual basis.

(3.1.1.29) Description of response

Metlen's Metallurgy sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, who are responsible for controlling its activity and environmental performance. Also the sector has an internal specific water target, not only to remain below the withdrawal limits but also to improve its performance as much as possible.
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

3652253000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ 61-70%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

619521000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ 11-20%

(3.1.2.7) Explanation of financial figures

The most vulnerable activities regarding transition risk from climate change are those that do not align with the EU Taxonomy. These activities may face increased scrutiny from regulators, shifting market demands, and potential liabilities as climate policies evolve. Companies engaged in non-eligible activities are likely to experience higher operational costs and reduced competitiveness, making them more susceptible to financial impacts as stakeholders prioritize sustainability and climate-resilient investments. Thus, focusing on taxonomy-aligned activities is essential for mitigating transition risks. Thus, we put the turnover of taxonomy-non-eligible activities. Regarding the financial metric vulnerable to physical risks, we put the turnover of the M Energy Generation & Management sub-sector which is the responsible sub-sector for the operation of natural gas thermal power plants.

Water

(3.1.2.1) Financial metric

Select from:

☑ Other, please specify :No financial metric

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ 21-30%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ 21-30%

(3.1.2.7) Explanation of financial figures

Risks exist, but no substantive impact anticipated. In Metallurgy sector, mining is at the base of the value chain and therefore we directly evaluate water use, risk and management as a core component of our own business. The suppliers' water use, risks and management are considered as an issue not related to our production because of the raw materials (bauxite, pet coke etc) nature. Also the company's power plants are located near the coast line and all internal water needs can be covered by sea water. Gas-fired Combined Cycle Thermal Power Plant (CCGT), in Agioi Theodoroi, uses sea water for its desalination plant. The sea water is provided by the Refinery plant that lies next to the plant and the quantity and quality is guaranteed with contracts. Moreover sea water is by its nature not subject to scarcity. We have reviewed public disclosures of our key suppliers and from that review we have not identified any water-related risks that could materially impact our business.

[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

Zimbabwe

☑ Other, please specify :Sea Gulf of Antikyra

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:

☑ Less than 1%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

Sea water, which represents the 95% of the Company's water withdrawals, it is by its nature, not subject to scarcity. There are no clear financial water risks, deriving from the operation of the High Efficiency Combined Heat and Power Plant. Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for use in its cooling system. This facility is used by Metallurgy sector for the steam production as a basic stage in alumina production process. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume in the future may affect partially our operation increasing costs, forcing us to find alternative ways of water supply.

Row 2

(3.2.1) Country/Area & River basin

Zimbabwe

☑ Other, please specify **:**Groundwater sources & Mornos River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.8) % organization’s annual electricity generation that could be affected by these facilities

Select from:
☑ Less than 1%

(3.2.10) % organization's total global revenue that could be affected

Select from:
☑ 1-10%

(3.2.11) Please explain

Alumina and Aluminum production Plant which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities. In case of the change of current limits of groundwater withdrawal, it has been estimated that if we have to meet all our the water needs of these specific facilities through the municipal supply (the Athens Water Supply and Sewerage Company - EYDAP) then it will affect less than 1% the price of aluminum products according to the current pricing policy of EYDAP.
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations
	Select from: ☑ No

[Fixed row]

(3.4) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation?

	Any penalties for violation of biodiversity-related regulation?
	Select from: ☑ No

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:
☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply
☑ EU ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

EU ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

99

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

12/31/2022

(3.5.2.4) Period end date

12/30/2023

(3.5.2.5) Allowances allocated

602053

(3.5.2.6) Allowances purchased

1979979

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

2178041

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

(3.5.2.10) Comment

no comment
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Metlen recognizes the role of the EU ETS Directive in providing an adequate price signal associated with CO2 emissions and believes the “cap and trade” mechanism to be the most effective way of reducing emissions, particularly in the case of industrialized economies – setting a target in terms of absolute value ensures that the environmental target can be applied whilst the price signal set by the market guarantees economic efficiency. In 2023, the emission allowances’ price trend in the market has significantly been volatile, starting the year at 86.28 /ton CO2 and approaching the high price of 100.34 /ton CO2 towards the end of February and trading around 70 /ton by the end of the year. Therefore, Metlen has stablished the following strategy to mitigate this risk: We participate effectively in the efforts to tackle climate change and in the national effort for a transition to a low-emissions economy, with: 1) Decarbonization strategy and practices in all areas of our business activity. 2) Ambitious emissions reduction targets for 2030 and 2050 and 3) The development of new business activity sectors in Sustainable Development projects. More information is available within our Sustainable Development Report 2023.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☑ Yes, we have identified opportunities, and some/all are being realized

Water

(3.6.1) Environmental opportunities identified

Select from:

☑ Yes, we have identified opportunities, and some/all are being realized

Biodiversity

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Not an immediate strategic priority

(3.6.3) Please explain

The assessment of environmental opportunities regarding biodiversity will be highlighted through the TNFD study that Metlen plans to complete in the next few years. [Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Other products and services opportunity, please specify **:**Development and/or expansion of low emission goods and services.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.8) Organization specific description

As the world embraces the green transition and seeks sustainable solutions, Metlen, a diversified energy company, stands at the forefront of an exciting opportunity. By focusing on low-carbon products and offerings essential to the green transition, Metlen can significantly increase its sales share while contributing to global efforts to combat climate change. Metlen can expand its portfolio of renewable energy solutions, including solar power plants, wind farms, and energy storage systems. As the demand for clean energy grows, these offerings can gain traction and drive significant sales growth.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify **:**Increased sales share of low-carbon products or products necessary for the green transition.

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

Metlen has created new sub-sectors geared towards the dynamic development of international sustainable projects (M Renewables, M Power Projects). In the next decade, which will be crucial, the Company is expected to play a major role in energy transition and the reduction of greenhouse gas emissions worldwide, escalating its positive impact to become a global market leader in this field. Growing presence in recycled aluminium, aiming to increase output to c.65ktpa and achieving c.250ktpa total production aluminium capacity by the end of 2025. 25% reduction in electricity consumption per tonne. Long-term relationships with major European customers. Also, the ambition of Energy sector of Metlen is to become the catalyst for a low emissions electric power sector in Greece. In this context an ambitious and Energy sector specific target to reduce its relative emissions by approximately 50% per MWh generated by 2030 was set. To fulfil this target, the Company aims to install n additional 2.5GW of RES projects in Greece and abroad by 2030. Following the increasing demand in renewable energy, there is an opportunity in increasing the Company's revenues through this activity.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Other resource efficiency opportunity, please specify **:**Cost savings & community relations.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify :Sea Golf of Antikira

(3.6.1.7) Mining project ID

Select all that apply

☑ All disclosed mining projects

(3.6.1.8) Organization specific description

The power plants of Metlen are located near the coast line and use sea water. The Metallurgy Sector covers its local communities water needs. Also, it operates three wastewater treatment plants for the needs of the plant and local communities. The selected locations for the operation of Metlen facilities, in Metallurgy and Energy sectors, have a strategic importance. The use of seawater and groundwater provides cost savings for all plants. Also the Metallurgy Sector through its network of 17 drills covers the water needs of its local communities, maintaining good community relations and its social license to operate.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

No, we do not have this figure.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

No strategy available at the time being. We aim to develop it within 2 years.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Other markets opportunity, please specify :Increased demand for aluminium as the main energy transition ingredient.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.8) Organization specific description

Aluminum's lightweight properties make it a preferred material in electric vehicles (EVs) and aircraft, enhancing energy efficiency and reducing carbon emissions in the transportation sector. Aluminum is widely used in the construction of wind turbines and solar panels due to its corrosion resistance and durability, supporting the expansion of renewable energy generation. Aluminum plays a crucial role in advanced energy storage technologies, such as lithium-ion batteries and redox flow batteries, contributing to grid stability and the integration of intermittent renewable energy sources. Aluminum is utilized in energy-efficient building systems, including window frames and facades, enhancing insulation and reducing energy consumption in buildings.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

With the increasing demand for aluminum across multiple energy transition applications, Metlen is expanding its aluminum production capacity and supply the growing market. In 2019, we acquired the Greek recycling company, EP.AL.ME S.A. ("EPALME"), which enabled us to expand our recycled aluminium production and add incremental production capacity, which we are currently further expanding to reach our annual production capacity target of 250,000 tonnes by the end of 2021, of which approximately 26.0% will come from aluminium with a lower environmental footprint (at both our Aluminium of Greece and EPALME production facilities). Our expansion into recycled aluminium production, or "sustainable aluminium", enables us to increase our capacity, better catering for our customers' needs while reducing our overall energy consumption per tonne of aluminium produced by approximately 25.0% compared to the electrolysis process required to produce primary aluminium.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Other markets opportunity, please specify **:**Major increase in electricity demand.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.8) Organization specific description

Metlen, a prominent energy company, finds itself presented with a significant opportunity - a major increase in electricity demand. The driving factors behind this surge in demand could be various, such as economic growth, industrial expansion, or a shift towards electrification in various sectors. As economies expand and industries flourish, the demand for electricity rises in tandem, providing Metlen with an ideal opportunity to meet the increasing energy requirements. A major increase in electricity demand can drive a higher adoption of renewable energy sources, providing Metlen an opportunity to expand its renewable energy portfolio.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

Diversification of Energy Sources: Metlen is leveraging this opportunity to diversify its energy mix, incorporating both conventional and renewable energy sources to ensure a stable and sustainable supply. Capacity Expansion: To capitalize on the increased electricity demand, Metlen is investing in expanding its power generation capacity, ensuring it can meet the growing needs of customers and industries.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

756920000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ 100%

(3.6.2.4) Explanation of financial figures

The financial figures presented are calculated using a methodology that combines company-specific financial data with sector benchmarks, ensuring alignment with industry standards. This figure represents the revenue generated from taxonomy-aligned activities that directly support climate-related opportunities, as defined by the EU Taxonomy regulation. The approach for calculation began by identifying revenue streams linked to eligible activities, such as renewable energy systems, energy transition projects, and related services. These activities are assessed for compliance with the EU Taxonomy's technical screening criteria, which ensure that they significantly contribute to climate change mitigation or adaptation while not causing harm to other environmental objectives (Do No Significant Harm principles). The calculation covers all eligible business activities and ensures that the total financial figure aligns with our organization's overall revenue from climate-aligned operations. An important assumption is that all identified revenue streams meet the EU Taxonomy's requirements, including adherence to minimum safeguards like compliance with human rights, labor, and anti-corruption standards. This also assumes that our operations continue to align with the regulatory framework throughout the reporting period. In addition, we assume that our internal systems have accurately captured and reported revenue figures, and that all eligible activities have been properly classified under taxonomy-aligned categories. The financial data used for this calculation was extracted from our internal accounting and reporting systems and was verified by our financial auditors to ensure its accuracy and compliance with sustainability reporting standards. This includes cross-checking the figures with our annual sustainability report and financial disclosures to ensure consistency. This methodology provides a clear and reliable representation of the revenue aligned with climate-related opportunities, offering stakeholders a transparent view of our commitment to environmental sustainability. The approach reflects the rigor of our financial and sustainability reporting processes, ensuring the credibility and accuracy of the reported figure. In conclusion, the amount of 756,920,000 represents 100% of our taxonomy-aligned revenue for climate change opportunities, reflecting our dedication to sustainable practices.

Water

(3.6.2.1) Financial metric

Select from:

☑ Other, please specify **:**Metlen is currently in the process of estimation of the potential financial impact figure of the identified climate opportunities, under the CSRD implementation project.

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

No any additional explanation.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The Diversity Policy outlines the company's commitment to promoting diversity in its Board of Directors, executive management, and overall workforce. It emphasizes diversity based on gender, age, experience, skills, and knowledge, aiming to enhance flexibility, creativity, and competitiveness. The policy sets merit-based selection criteria while ensuring equal opportunities for men and women. Measurable targets include increasing female representation at various organizational levels, with specific goals set, such as women comprising up to 27% of the Board and 20% of senior executives.

(4.1.6) Attach the policy (optional)

diversity_policy_eng.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply
☑ Director on board

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify **:**Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Sustainable Development Committee, in the year 2023, met on a regular basis (4 times in total) and discussed the following topics which fall within its areas of competence: It was informed about the fundamental trends of Sustainable Development and ESG (Environmental, Social, and Governance). It was briefed on the 2022 performance review and the Company's ESG (Environmental, Social, and Governance) achievements, as well as the goals for 2023. - Reviewed the content of the 2022 Sustainability Report and, after certifying that it includes all the Material Issues, approved its publication. - Discussed the progress of the Company's key

carbon reduction initiatives and, by extension, its climate targets, and the future impact of its new business activities (e.g. operation of a new gas-fired thermal power plant) on them. - It was briefed on the sustainability disclosure requirements included in the new European Corporate Sustainability Reporting Directive (CSRD) and focused on the key impacts (operational and organizational) that its implementation will have on the Company - Approved the Double Materiality Methodology, which involves determining the significant impacts of the Company's activities on Sustainable Development (impact materiality) on one hand, and the effect of these impacts (taking into account risks and opportunities) on the Company's financial performance and its ability to generate value (financial materiality) on the other hand, as well as the Materiality Results for 2023. - Approved the Company's Responsible Supply Chain Policy and the ESG Policy. – It was informed about the initial results of the implementation of the TCFD recommendations. – It was updated on the research conducted by the EU: Technological Innovation and ESG. – It was informed about the ESG assessment results of the Company by significant ESG Raters such as MSCI and S&P Global. - Updated on the evaluation of the 8 Social Programs for 2022-2023, as well as the fundamental structure and progress of the 2023 Consultation.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify **:**Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding public policy engagement
☑ Overseeing and guiding the development of a business strategy
☑ Reviewing and guiding innovation/R&D priorities

(4.1.2.7) Please explain

The Sustainable Development Committee, in the year 2023, met on a regular basis (4 times in total) and discussed the following topics which fall within its areas of competence: It was informed about the fundamental trends of Sustainable Development and ESG (Environmental, Social, and Governance). It was briefed on the 2022 performance review and the Company's ESG (Environmental, Social, and Governance) achievements, as well as the goals for 2023. - Reviewed the content of the 2022 Sustainability Report and, after certifying that it includes all the Material Issues, approved its publication. - Discussed the progress of the Company's key carbon reduction initiatives and, by extension, its climate targets, and the future impact of its new business activities (e.g. operation of a new gas-fired thermal power plant) on them. - It was briefed on the sustainability disclosure requirements included in the new European Corporate Sustainability Reporting Directive (CSRD) and focused on the key impacts (operational and organizational) that its implementation will have on the Company - Approved the Double Materiality Methodology, which involves determining the significant impacts of the Company's activities on Sustainable Development (impact materiality) on one hand, and the effect of these impacts (taking into account risks and opportunities) on the Company's financial performance and its ability to generate value (financial materiality) on the other hand, as well as the Materiality Results for 2023. - Approved the Company's Responsible Supply Chain Policy and the ESG Policy. – It was informed about the initial results of the implementation of the TCFD recommendations. – It was updated on the research conducted by the EU: Technological Innovation and ESG. – It was informed about the ESG assessment results of the Company by significant ESG Raters such as MSCI and S&P Global. - Updated on the evaluation of the 8 Social Programs for 2022-2023, as well as the fundamental structure and progress of the 2023 Consultation.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply
☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:
☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify **:**Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding public policy engagement

☑ Overseeing and guiding the development of a business strategy

☑ Reviewing and guiding innovation/R&D priorities

(4.1.2.7) Please explain

The Sustainable Development Committee, in the year 2023, met on a regular basis (4 times in total) and discussed the following topics which fall within its areas of competence: It was informed about the fundamental trends of Sustainable Development and ESG (Environmental, Social, and Governance). It was briefed on the 2022 performance review and the Company's ESG (Environmental, Social, and Governance) achievements, as well as the goals for 2023. - Reviewed the content of the 2022 Sustainability Report and, after certifying that it includes all the Material Issues, approved its publication. - Discussed the progress of the Company's key carbon reduction initiatives and, by extension, its climate targets, and the future impact of its new business activities (e.g. operation of a new gas-fired thermal power plant) on them. - It was briefed on the sustainability disclosure requirements included in the new European Corporate Sustainability Reporting Directive (CSRD) and focused on the key impacts (operational and organizational) that its implementation will have on the Company - Approved the Double Materiality Methodology, which involves determining the significant impacts of the Company's activities on Sustainable Development (impact materiality) on one hand, and the effect of these impacts (taking into account risks and opportunities) on the Company's financial performance and its ability to generate value (financial materiality) on the other hand, as well as the Materiality Results for 2023. - Approved the Company's Responsible Supply Chain Policy and the ESG Policy. – It was informed about the initial results of the implementation of the TCFD recommendations. – It was updated on the research conducted by the EU: Technological Innovation and ESG. – It was informed about the ESG assessment results of the Company by significant ESG Raters such as MSCI and S&P Global. - Updated on the evaluation of the 8 Social Programs for 2022-2023, as well as the fundamental structure and progress of the 2023 Consultation.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Active member of an environmental committee or organization

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Active member of an environmental committee or organization

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The Company has established a Sustainability Committee which, in accordance with the Company' s Internal Regulation and the Committee' s own Terms of Reference, which were approved and put into effect by the Resolution of the Board of Directors dated 15.06.2021, after having been approved by the resolution of the Committee of 26.05.2021, assists the Board of Directors of the Company in integrating Sustainable Development policies and procedures in the Company's basic decision-making processes and operations. The purpose of the Committee is to assist the Board in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG).

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The Company has established a Sustainability Committee which, in accordance with the Company' s Internal Regulation and the Committee' s own Terms of Reference, which were approved and put into effect by the Resolution of the Board of Directors dated 15.06.2021, after having been approved by the resolution of the Committee of 26.05.2021, assists the Board of Directors of the Company in integrating Sustainable Development policies and procedures in the Company's basic decision-making processes and operations. The purpose of the Committee is to assist the Board in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) matters.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The Company has established a Sustainability Committee which, in accordance with the Company' s Internal Regulation and the Committee' s own Terms of Reference, which were approved and put into effect by the Resolution of the Board of Directors dated 15.06.2021, after having been approved by the resolution of the Committee of 26.05.2021, assists the Board of Directors of the Company in integrating Sustainable Development policies and procedures in the Company's basic decision-making processes and operations. The purpose of the Committee is to assist the Board in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) matters.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Other committee, please specify **:**Capital Allocation Committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Annually

(4.3.1.6) Please explain

Capital Allocation Committee: - Assessment of investment projects' potential material environmental and social risks and benefits - Alignment of prospective project investments with Metlen Sustainable Development and emissions reduction strategies - Contribution of the prospective project to the EU taxonomy environmental objectives - The Capital Allocation Committee convenes annually during the preparation of the strategic plan in the stage of Development of the project/investment pipeline and ad-hoc throughout the year whenever necessary. In preparation for these meetings Sector Environmental teams and Sustainable Development Division examine the aforementioned agenda items and share pipeline's ESG assessment during the Committee through the GM of Sustainability.

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Other committee, please specify **:**Capital Allocation Committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Annually

(4.3.1.6) Please explain

Capital Allocation Committee: - Assessment of investment projects' potential material environmental and social risks and benefits - Alignment of prospective project investments with Metlen Sustainable Development and emissions reduction strategies - Contribution of the prospective project to the EU taxonomy environmental objectives - The Capital Allocation Committee convenes annually during the preparation of the strategic plan in the stage of Development of the project/investment pipeline and ad-hoc throughout the year whenever necessary. In preparation for these meetings Sector Environmental teams and Sustainable Development Division examine the aforementioned agenda items and share pipeline's ESG assessment during the Committee through the GM of Sustainability.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

17

(4.5.3) Please explain

Metlen considers climate change as a core element of its strategy, influencing all its sustainability strategy and performance. Variable Remuneration Short-Term Incentives Plan (STIP) for CEO and Executive Directors: "To activate the Short-Term Incentive Program, the Company must achieve at least 85% of the EBITDA target adjusted for extraordinary events. In addition, the Short-Term Incentive Program pay-out is subject to the achievement of a predefined set of environmental climate related & health and safety targets, as well as corporate social responsibility criteria. In case those are not met, the payout is decreased according to the level of achievement."

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

Biodiversity

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Emission reduction

☑ Reduction in emissions intensity

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

CO2 emissions/million of revenue

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The target contribute to the main climate target of the Group to reduce the total absolute CO2 emissions (Scope 1 & 2) by 2030 compared to the base year 2019 by 30%.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Corporate executive team

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Emission reduction

☑ Reduction in emissions intensity

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

CO2 emissions/million of revenue

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The target contribute to the main climate target of the Group to reduce the total absolute CO2 emissions (Scope 1 & 2) by 2030 compared to the base year 2019 by 30%.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(4.6.1.4) Explain the coverage

The main points covered in the policy: - Compliance and Commitment - Environmental Management Systems - Climate Change - Sustainable Management of Natural Resources - Innovation and Training - Stakeholder Engagement - Policy Governance The policy emphasizes the company's commitment to environmental protection, sustainable management of natural resources, and continuous improvement of environmental performance

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to comply with regulations and mandatory standards

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

☑ Yes, in line with another global environmental treaty or policy goal, please specify **:**It is aligned with Metlen's contribution to the achievement of the sub-targets of the Sustainable Development Goals 6, 7, 12, 13, 14, 15 & 17, which are related to its activities.

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

environmental-policy.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ Aluminum Stewardship Initiative (ASI)

☑ Task Force on Climate-related Financial Disclosures (TCFD)

☑ UN Global Compact

(4.10.3) Describe your organization’s role within each framework or initiative

UNGC: Metlen has declared in writing, since 2008, its commitment to uphold the ten principles of the Global Compact, disclosing on an annual basis its relevant performance in the context of its broader activity. TCFD: MYTILINEOS has declared its commitment, since 2021. ASI: From November 2021, Metlen through its Metallurgy Business Sector, has been certified with the ASI Performance Standard for its upstream activities, including bauxite mining, alumina refining, aluminium smelting and casting. Aluminium Stewardship Initiative (ASI) is a global, multi-stakeholder, non-profit standards setting and certification organization, that has developed an independent certification program to ensure that the principles of Sustainability, Corporate Social Responsibility, Governance and Human Rights are increasingly integrated into the production, use and recycling of aluminum. Specifically, ASI announced that Metlen has been successfully certified against the ASI Performance Standard for the responsible production, sourcing and stewardship of aluminium having as scope the following: - The Bauxite mining activities of Delphi Distomon site; - The refining, smelting and cast house activities at the Aluminium of Greece Plant; - The Port Facilities at the Aluminium of Greece Plant and, Metlen's corporate headquarters in Athens.
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement

☑ Another global environmental treaty or policy goal, please specify :European Green Deal

(4.11.4) Attach commitment or position statement

sustainable_development_report_2023_eng.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☑ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

- Metlen participates in European Aluminium - As a founding member of the Council of the Greek Federation of Enterprises (SEV) since 2008, Metlen is fully committed to the relevant Code of Principles and actively participates in its initiatives to promote and disseminate the principles of Sustainable Development. - Metlen participates in the Hydrogen Europe initiative. - In 2022, Metlen President and CEO Evangelos Mytilineos was elected President of the Pan-European Association Eurometaux.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Following the public announcement of our climate targets, our company has also committed to updating shareholders each year (at the General Assembly) about our progress towards achieving them. Our company's positions are based on decisions taken in the internal Committees (where the upper management participates), and all of our engagement activities must be consistent with the company's positions and targets, including the climate targets. All of our company's responses to European Commission consultations are publicly available on the Commission's portal for each consultation.
[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

EU-ETS

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Emissions trading schemes

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The effectiveness of the EU ETS is limited by the fact that it is only levied on production at European installations, namely energy intensive industries exposed to global competition (where European companies compete directly against companies from other regions of the world that use cheaper -and far more polluting- technologies without facing a carbon cost at production level). Carbon leakage is already an unfortunate reality in the aluminium sector and it can only be effectively addressed through a level playing field at production cost level (not through import duties etc. see thereto analysis on CBAM). The carbon footprint of producing primary aluminium in Europe is around three times lower than producing aluminium in China. However, since 2008, the EU has lost over 50% of its primary aluminium capacity, and this production is being replaced by carbon-intensive production in China, Indonesia, India etc. leading to a massive net increase in global emissions. Therefore, the level of ambition under the EU ETS should only be strengthened if this is accompanied by truly effective carbon leakage measures, in order to avoid a net increase in global emissions (which would completely undermine the climate rationale of the entire exercise).

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Our participation in the EU Emissions Trading System (EU-ETS) is crucial for achieving our environmental commitments, particularly in reducing greenhouse gas emissions and aligning with the EU's climate goals. The EU-ETS creates a financial incentive for us to minimize emissions, thereby informing our transition plan toward more sustainable operations. Engaging with policymakers and industry stakeholders enables us to advocate for regulations that support our strategic objectives while promoting effective carbon management practices. The EU-ETS could have both positive and negative impacts on our organization. Positively, it encourages innovation and investment in cleaner technologies. However, the increased costs associated with purchasing emissions allowances may affect our operational budgets. Through active engagement with regulators and industry groups, we aim to influence policy frameworks that facilitate a smoother transition, such as advocating for free allocation of allowances based on our sustainability initiatives. Our engagement is particularly relevant to specific river basins identified as priority locations for biodiversity conservation. By ensuring that emissions reductions align with local ecological goals, we can better protect these sensitive areas. Success in our engagement will be measured through the reduction of emissions intensity, tracking progress against our commitments, and assessing stakeholder feedback. Metrics may include the volume of emissions allowances secured, investment in clean technology, and the number of collaborative initiatives established with local communities and organizations. Regular reporting on these indicators will help us determine whether we are on track to meet our environmental commitments.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Carbon Border Adjustment Mechanism (CBAM)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Carbon taxes

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Oppose

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The CBAM will increase the cost of producing aluminium in Europe by around 50%, and the CBAM tries to offset this cost increase by introducing a new duty at the border. Unfortunately no duty at the border will ever be able to offset such a large production cost increase, due to various inherent weaknesses (including the ample possibilities for circumvention, the lack of protection for European exports, and the inherent issue of cost absorption by third-country producers). The CBAM will therefore not result in the desired climate effect, a fact which is acknowledged also by the European Commission in its own impact assessment of the measure (as regards aluminium). In order to drive decarbonisation, we believe that Europe should do precisely the opposite, i.e. reducing the cost of low-carbon technologies by supporting investments to bring these technologies to the market, which will reduce their cost via economies of scale and learning.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Carbon Border Adjustment Mechanism (CBAM) is relevant to our environmental commitments as it significantly impacts the cost structure of aluminum production in Europe. We anticipate that the CBAM will increase production costs by approximately 50%, which poses a considerable challenge to our operations and undermines our transition plan. We believe that the inherent weaknesses of the CBAM, including circumvention opportunities and lack of protection for European exports, will prevent it from achieving its intended climate benefits. Our engagement focuses on advocating for policy reforms that promote investment in low-carbon technologies rather than imposing punitive measures. To gauge the success of our engagement, we will monitor changes in policy proposals and assess the inclusion of provisions that support low-carbon technology investments. Metrics will include tracking our advocacy outcomes, such as shifts in legislative support and collaborations with industry stakeholders to promote sustainable practices. Ultimately, we aim to foster a regulatory environment that encourages decarbonization through economic support rather than additional burdens.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Electricity market design

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Electricity grid access for renewables

☑ Green electricity tariffs/renewable energy PPAs

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Our company broadly supports the Commission's proposals for the reform of the electricity market design, although some improvements can still be made. Regulatory certainty and stability with regard to the market design are necessary in order to stimulate the required new investments in renewables and other forms of generation capacity. More can be done to facilitate RES PPAs for electro-intensive consumers, especially by introducing tools to deal with shaping and firming risks. Our company has developed a pioneering scheme (the Green Pool) which is endorsed by significant EU industrial associations and has been submitted to the EC (DG COMP) for approval; the aim is to facilitate (through mitigation of the shaping risk/cost) corporate RES PPAs for the decarbonization of the electricity supply of electro-intensive industries while contributing to the massive deployment of new RES in Europe.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The reform of the electricity market design is crucial to our environmental commitments and transition plan, as it aims to create a stable and predictable regulatory environment that fosters investment in renewable energy sources (RES) and diversified generation capacity. We believe that these reforms will enable us to reduce our carbon footprint and enhance our operational efficiency. While we support the Commission's proposals, we recognize that improvements are needed, particularly in facilitating corporate RES Power Purchase Agreements (PPAs) for energy-intensive industries. Our engagement focuses on advocating for regulatory mechanisms that address shaping and firming risks, which are barriers to the adoption of RES PPAs. Through our pioneering initiative, the Green Pool, we aim to mitigate these risks and facilitate corporate partnerships in RES. This initiative is supported by significant EU industrial associations and has been submitted for approval to the European Commission (DG COMP). By engaging with policymakers, we intend to influence the final design of electricity market reforms to better accommodate the needs of electro-intensive consumers. To measure the success of our engagement, we will track the approval and implementation of our Green Pool initiative, monitor the adoption rate of corporate RES PPAs among our peers, and evaluate the regulatory changes that support these arrangements. Metrics for success will include the number of partnerships established through the Green Pool, the volume of renewable energy procured, and the overall increase in renewable energy capacity deployed in Europe. By achieving these outcomes, we aim to contribute significantly to decarbonization efforts while enhancing the resilience and sustainability of the electricity market.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 4

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Critical Raw Materials Act

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other

☑ Other, please specify **:**Low-carbon products and services

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Critical Raw Materials Act (CRMA) is integral to our environmental commitments and transition plan, particularly following the addition of aluminum to the list of critical raw materials in July 2023. This inclusion underscores the importance of aluminum in the transition to a green economy and positions our company to capitalize on new opportunities while ensuring sustainable practices in sourcing and production. We anticipate that the CRMA will positively impact our organization by facilitating access to essential materials needed for the production of low-carbon technologies. This policy also drives innovation in recycling and circular economy initiatives, aligning with our commitment to sustainability. However, we remain cautious about potential regulatory burdens and market fluctuations resulting from heightened demand. Our engagement with stakeholders, including policymakers and industry groups, focuses on advocating for balanced regulatory frameworks that support sustainable sourcing and recycling of aluminum. By participating in consultations and contributing to discussions on implementation strategies, we aim to influence the CRMA's execution in ways that enhance resource efficiency and minimize environmental impacts. Success metrics for our engagement will include tracking our compliance with CRMA requirements, monitoring the development of new sustainable sourcing partnerships, and assessing progress in increasing the recycling rates of aluminum. Additionally, we will evaluate the growth of the market for secondary aluminum and measure our contribution to reducing the carbon footprint of aluminum production. By achieving these outcomes, we strive to ensure that our operations align with the goals of the CRMA while reinforcing our commitment to environmental stewardship.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Another global environmental treaty or policy goal, please specify **:**Critical Raw Materials Act (CRMA)

Row 5

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Energy Efficiency Directive

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other

☑ Other, please specify **:**Energy efficiency requirements

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Our company fully supports the need for ambitious energy efficiency targets, which can play an important role in achieving our climate targets while also reducing costs (energy efficiency reduces the need to purchase input fuels/electricity). However, energy efficiency cannot be mistaken (as is the case in EU law) with demand reduction, but must truly aim at improving the energy intensity of all processes at all levels. This way, energy efficiency becomes the right metric for combining growth and climate ambition, whereas in the alternative (as applied today in the EU) the targets can be met (and often are) through demand destruction. High-efficiency cogeneration (the most efficient method for producing electricity and heat) should be supported. Primary energy savings are typically overlooked.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Energy Efficiency Directive (EED) is crucial for achieving our environmental commitments and transition plan, as it sets ambitious energy efficiency targets that directly contribute to our climate goals. By reducing energy consumption, we can lower costs associated with input fuels and electricity, aligning with our commitment to sustainability and operational efficiency. We anticipate that the EED will positively impact our organization by incentivizing improvements in energy intensity across all processes, thereby enhancing our competitive advantage. However, we caution against conflating energy efficiency with mere demand reduction, as achieving targets through demand destruction does not foster genuine sustainability or growth. Our engagement strategy involves collaborating with policymakers, industry stakeholders, and regulatory bodies to advocate for clear definitions and metrics that differentiate true energy efficiency improvements from simple demand reduction. By participating in discussions around the EED, we aim to influence the development of standards that prioritize high-efficiency cogeneration and recognize the significance of primary energy savings. To measure the success of our engagement, we will track our compliance with EED targets, monitor our energy intensity metrics, and assess the implementation of high-efficiency cogeneration technologies in our operations. Additionally, we will evaluate the financial savings generated through enhanced energy efficiency and the overall reduction in our carbon footprint. By achieving these outcomes, we aim to demonstrate that energy efficiency is a vital component of sustainable growth, reinforcing our commitment to climate action while ensuring long-term operational resilience.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 6

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Renewable Energy Directive

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Renewable energy generation

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Our company fully supports the need to invest in more renewables as a key way to achieve our climate targets. However the introduction of over-increasing volumes of renewables into our electricity system needs to be managed in a way that does not jeopardize our security of supply, it is done in the most balanced/technology neutral and cost-effective way.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Renewable Energy Directive (RED) is integral to our environmental commitments and transition plan, as it outlines the framework for increasing the share of renewable energy in our energy mix. Our company fully supports investing in renewables to meet our climate targets, recognizing their critical role in decarbonizing our operations and the broader economy. However, we are concerned that excessive volumes of renewables must be integrated into the electricity system without compromising supply security. Therefore, our engagement strategy emphasizes the need for a balanced, technology-neutral approach to renewable energy deployment that prioritizes cost-effectiveness and stability. This involves advocating for policies that support diverse energy sources, including traditional generation methods, to ensure a reliable and resilient energy supply. To measure the success of our engagement with RED, we will monitor key performance indicators, including the proportion of renewable energy sources in our operational energy mix, compliance with RED targets, and the reliability of our energy supply. We will also

track the implementation of technology-neutral policies that facilitate the sustainable integration of renewables without jeopardizing security. Our engagement is particularly vital in regions where renewable energy deployment may strain existing infrastructure or create supply challenges. By focusing on these priority locations, we aim to ensure that our commitments to renewable energy contribute positively to both environmental sustainability and energy reliability. Achieving these outcomes will reinforce our leadership in promoting a balanced approach to renewable energy and further our long-term climate goals.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 7

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Temporary Crisis and Transition Framework (TCTF)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Carbon taxes

☑ Subsidies for low-carbon, non-renewable energy projects

☑ Subsidies for renewable energy projects

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Subsidies are -unfortunately still- a crucial enabler for more RES in the system. However, subsidies should be well-targeted and should be kept to the minimum level required, in order to avoid excessive costs for consumers. Finally, RES support schemes should be adjusted in order to place a greater emphasis on the cost-competitive consumption of renewable energy (currently, support schemes are focused exclusively on the generation side, without helping end users to consume this energy). Finally, the conditions under which energy-intensive consumers can access aid under the TCTF must be improved, as the current rules are unjustifiably restrictive.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Temporary Crisis and Transition Framework (TCTF) plays a vital role in aligning our environmental commitments and transition plan with the broader EU strategy for enhancing renewable energy systems (RES). Given our commitment to decarbonization, we recognize that well-targeted subsidies are crucial for facilitating the integration of more RES into the energy landscape. However, we advocate for these subsidies to be kept to a minimum level necessary to avoid imposing excessive costs on consumers. Our engagement with TCTF is focused on promoting policies that emphasize not only the generation of renewable energy but also the cost-competitive consumption of that energy by end users. Current support schemes predominantly target production; hence, we believe that adjustments should be made to encourage the uptake of renewable energy consumption, ensuring that consumers can benefit from the transition without incurring additional financial burdens. Moreover, it is imperative to improve the conditions under which energy-intensive consumers can access aid under the TCTF. The existing rules are overly restrictive and do not adequately support sectors heavily reliant on energy inputs. By advocating for more flexible access to financial support, we aim to enhance the competitiveness of our operations while promoting sustainable practices. To measure the success of our engagement with the TCTF, we will track several metrics, including the proportion of subsidies allocated to cost-competitive consumption initiatives, the reduction in energy costs for end users, and the accessibility of aid for energy-intensive industries. Additionally, we will assess the impact of these changes on our operational costs and overall energy consumption patterns. Our engagement is particularly crucial in regions with high energy demand and significant renewable energy potential, where we can drive meaningful change. By achieving our desired outcomes, we aim to reinforce our leadership in promoting a sustainable energy transition while ensuring that consumers benefit from this transformation.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 8

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Sustainable Finance Taxonomy

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Sustainable finance

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The Taxonomy can play an important role in channelling finance towards sustainable investments. However, the current Taxonomy provisions (for both industry and energy) are far too restrictive, and effectively discriminate against investments that can play a crucial role in reducing carbon emissions. Certain thresholds are

completely out of touch with technology availability in specific sectors and exclusively driven by political ambition. Such exercise should absolutely rely on scientifically verified data, including as regards the TRL of decarbonization solutions.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Sustainable Finance Taxonomy is integral to achieving our environmental commitments and transition plan by directing capital towards sustainable investments. We acknowledge its potential to mobilize finance for projects that reduce carbon emissions. However, the current provisions are overly restrictive and, in some cases, discriminatory against certain investments that are essential for meaningful decarbonization. Our engagement with the Taxonomy aims to influence the criteria to ensure they are aligned with technological realities and scientific data rather than solely political ambitions. We advocate for thresholds that accurately reflect the available technology readiness levels (TRL) for decarbonization solutions, which would promote more inclusive investment opportunities across various sectors. The anticipated positive impacts of a more flexible Taxonomy would enable greater access to financing for projects that contribute significantly to carbon reduction, facilitating the transition to a low-carbon economy. Conversely, maintaining the current restrictive framework may hinder our ability to invest in innovative technologies necessary for achieving our sustainability goals. We prioritize engagement in regions and sectors where sustainable finance can drive substantial improvements in environmental outcomes. By collaborating with stakeholders, we aim to refine the Taxonomy's criteria to better reflect the capabilities of emerging technologies and provide a more robust framework for sustainable investments. To measure the success of our engagement, we will track the number of investments made under the revised Taxonomy provisions, the amount of capital directed towards projects meeting the updated criteria, and the overall impact of these investments on carbon emissions reduction. Additionally, we will monitor the alignment of the Taxonomy with scientific data and TRL benchmarks. By achieving these outcomes, we can enhance our sustainability profile while contributing to the broader goals of climate mitigation and responsible investment.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ BusinessEurope

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

BusinessEurope supports the need for European business to transition in line with the European/global climate targets. This transition will require large investments in low carbon technologies, and therefore the climate transition must be designed in a way that supports European businesses to make these investments and preserves the competitiveness of the European economy (otherwise, the transition will not be possible; in terms of climate impact, it will actually produce the opposite effect through investment and carbon leakage).

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

32463

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding provided through our membership in BusinessEurope aims to support advocacy efforts that promote a sustainable business environment in Europe. By collaborating with other influential stakeholders, we aim to influence policy, law, and regulation in ways that can foster sustainable practices and drive the transition to a low-carbon economy. This engagement enables us to contribute to discussions on environmental regulations, carbon pricing mechanisms, and energy efficiency standards, ensuring that our industry's perspectives are considered in the decision-making process. Ultimately, this can lead to more balanced and effective policies that benefit both the economy and the environment.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Eurometaux

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The climate transition will require large volumes of metals, in order to produce the necessary low-carbon products. European production of non-ferrous metals is the most sustainable in the world (with a carbon footprint that is 50% lower than the global average) and should therefore be boosted/increased for the transition to succeed and global GHG emissions to drop.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

60261

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding from our Eurometaux membership supports initiatives aimed at advocating for a sustainable and competitive European metals industry. This financial commitment enables collaboration with stakeholders to influence policies, laws, and regulations that directly impact environmental standards and practices within the metals sector. By participating in Eurometaux, our company can actively engage in discussions surrounding crucial issues, such as resource efficiency, waste management, and climate change mitigation. This collaborative approach helps shape a regulatory framework that promotes sustainable practices while ensuring the industry's competitiveness, ultimately contributing to broader environmental goals and enhancing our commitment to sustainability.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☑ Other global trade association, please specify :European Aluminium

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The climate transition will require large volumes of metals, in order to produce the necessary low-carbon products. European production of non-ferrous metals is the most sustainable in the world (with a carbon footprint that is 50% lower than the global average) and should therefore be boosted/increased for the transition to succeed and global GHG emissions to drop.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

64632

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding from our membership in European Aluminium is dedicated to advancing sustainable practices and policies within the aluminum sector. This financial commitment enables us to participate in initiatives that promote innovation, energy efficiency, and circular economy principles. By collaborating with industry stakeholders, we aim to influence key policies, laws, and regulations that govern environmental standards and practices. Our involvement helps to advocate for supportive regulatory frameworks that encourage low-carbon technologies and responsible sourcing, while addressing challenges related to resource management and emissions reduction. This engagement not only aligns with our environmental commitments but also fosters a more sustainable and competitive aluminum industry in Europe.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☑ Other global trade association, please specify :COGEN Europe

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

Cogeneration is the way to produce electricity and heat in the most efficient, low-carbon and sustainable manner.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

13202

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding from our membership in COGEN Europe is aimed at promoting the widespread adoption of cogeneration (combined heat and power, or CHP) technologies across Europe. By supporting this initiative, we seek to enhance energy efficiency, reduce greenhouse gas emissions, and contribute to a more sustainable energy landscape. Our participation in COGEN Europe allows us to engage with policymakers and industry leaders to advocate for favorable regulations and incentives that facilitate the integration of cogeneration systems. This collaboration helps shape policies that recognize the environmental benefits of CHP, thereby influencing legislation that supports cleaner and more efficient energy production. Ultimately, our involvement aligns with our commitment to sustainability and helps drive the transition towards a low-carbon economy.

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization’s engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:
☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:
☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply
☑ GRI
☑ Other, please specify :SASB

(4.12.1.3) Environmental issues covered in publication

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy
☑ Governance
☑ Emission targets
☑ Emissions figures
☑ Risks & Opportunities
☑ Water pollution indicators
☑ Content of environmental policies
☑ Value chain engagement
☑ Dependencies & Impacts
☑ Biodiversity indicators
☑ Public policy engagement
☑ Water accounting figures

(4.12.1.6) Page/section reference

See the pillar Environment analyzed in the Sustainability Report 2023 as below: - Climate Change, energy & air emissions: p. 46-61 - Water Management: p. 62-67 - Circular Economy and raw & other materials: p. 68-75 - Pollution Prevention: p. 76-79 - Other significant Environmental Topics (Ecological Impacts, Research & Development): p. 80-87

(4.12.1.7) Attach the relevant publication

sustainable_development_report_2023_eng.pdf

(4.12.1.8) Comment

For more info see the attached file.

Row 2

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Governance

☑ Risks & Opportunities

☑ Strategy

☑ Emissions figures

☑ Emission targets

(4.12.1.6) Page/section reference

See the TCFD report as analyzed below: - Introduction: p. 3 - Governance: p. 4 - Strategy: p. 6 - Risk Management: p. 17 - Metrics and Targets: p. 22

(4.12.1.7) Attach the relevant publication

tcfd_report_en.pdf

(4.12.1.8) Comment

For more info see the attached file.
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:

☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☑ No, but we plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Not an immediate strategic priority.
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Net Zero Emissions by 2050 Scenario (NZE) is a normative IEA scenario that shows a pathway for the global energy sector to achieve net zero CO2 emissions by 2050, with advanced economies reaching net zero emissions in advance of others. This scenario also meets key energy-related United Nations Sustainable Development Goals (SDGs), in particular by achieving universal energy access by 2030 and major improvements in air quality. It is consistent with limiting the global temperature rise to 1.5 C with no or limited temperature overshoot.

(5.1.1.11) Rationale for choice of scenario

Our company chose the IEA NZE 2050 scenario because it aligns with global climate goals, providing a clear pathway to limit global warming to 1.5C. This scenario reflects the ambition required to achieve net-zero emissions by 2050, making it a relevant framework for shaping our long-term decarbonization strategy, identifying risks and opportunities in the transition, and aligning with investor expectations for sustainable development.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Strong Policies Scenario (Net-Zero): The net-zero emissions scenario incorporates strong climate mitigation policies and indicates a pathway where carbon concentrations will evolve in such a way to enable the global energy sector to achieve net-zero CO2 emissions by 2050. It goes hand in hand with limiting global warming to 1.5C by the end of this century with no overshoot or limited overshoot of the warming goals. The climate data used for the quantitative analysis of risks and opportunities are those derived from scenarios developed under RCP2.6. Key potential risks for the activity Metlen under this scenario: Transition Risks: - Increased prices of emission allowances continue to be a potential risk, high for the Energy Sector and very high risk for the Metallurgy Sector. In this scenario, the cost increase based on each Unit's projected CO2 emissions appears to be significantly higher than the existing policies scenario. - Increased power and fossil fuel (NG) prices continue to be, in this scenario as well, a very high potential risk of increased operating costs in the Metallurgy Sector. - Increased power and gas prices due to climate change mitigation policies. In this scenario, these prices are even higher, therefore further reduced demand can be expected, which may entail further revenue losses. - Increased cost of raw materials, due to increased transportation costs as a result of measures to address climate change. It is a low potential risk for the Metallurgy Sector related to the increase in production costs

(5.1.1.11) Rationale for choice of scenario

Our company selected the RCP 2.6 scenario because it represents a pathway that limits global warming to below 1.5C by the end of the century, in line with international climate goals. This scenario aligns with our environmental commitments and provides a basis for understanding the risks and opportunities associated with climate change mitigation. It helps us assess how ambitious emissions reductions can impact our operations and long-term sustainability strategy.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Chronic physical

☑ Technology

☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Current/Existing Policies Scenario: This is an intermediate scenario, which assumes a market-driven transition to a lower-carbon future, in line with the Paris Agreement. Climate mitigation policies are stronger than in the previous scenario and lead to increases in the average global temperature between 2C and 3C at the end of the century. The climate data used for the quantitative analysis of risks and opportunities are those derived from scenarios developed under RCP4.5. Key potential risks for the activity of Metlen under this scenario: Physical Risks: - Rising average temperatures and heat waves may affect the efficiency of the company's thermal units. This risk continues to exist, but to a lesser extent, since, under this scenario, the cost is lower than in the weak policies scenario due to climate change limitation and therefore lower impact on the efficiency of thermal plants. Transition Risks: - Under this scenario, increased prices of CO2 emission allowances constitute a high potential risk for the Metallurgy and Energy Sectors as they may lead to a further increase in the cost of purchasing allowances. - Increased power and fossil fuel (NG) prices are a very high potential risk of increased operating costs for the Metallurgy Sector, based on the Sector's projected power and gas

consumption. - Increased power and gas sales prices due to climate change mitigation policies represent a moderate to high risk for the Energy Sector. It relates to the likelihood of reduced demand and, consequently, possible revenue losses. - Increased cost of raw materials, due to increased transportation costs as a result of measures to address climate change. It is a low potential risk for the Metallurgy Sector related to the increase in production costs.

(5.1.1.11) Rationale for choice of scenario

Our company chose the RCP 4.5 scenario because it represents a moderate climate pathway where global temperatures stabilize by the end of the century. This scenario is aligned with policies that aim for balanced emissions reduction efforts without aggressive mitigation. It allows us to assess the potential impacts of moderate climate policies on our business operations, including physical and transition risks, while supporting long-term resilience planning.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy
☑ Market
☑ Reputation
☑ Technology
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 3.0ºC - 3.4ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation
☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Weak Policies Scenario: This scenario assumes a world where actions to mitigate climate change are delayed. Subsequently, greenhouse gas emissions continue to rise in the 21st century and the average global temperature rises above 3C at the end of the century. Climate-related risks and opportunities are mainly linked to natural impacts as both chronic and acute climate change effects are considerable. To perform the quantitative analysis of these risks and opportunities, climate and

economic data included in scenarios developed under RCP8.5 were used. Key potential risks for the activity of Metlen under this scenario: Physical Risks: - Rising average temperatures and heat waves may affect the efficiency of the company's thermal units. It is a moderate to high risk for Energy Sector since it can lead to reduced production (and revenues) due to lower efficiency and increased transmission losses of the power stations. Transition Risks: - Increased prices of emission allowances represent a moderate potential risk in the Metallurgy and Energy Sectors related to the increase in allowance purchasing expenditure. - Increased cost of raw materials, due to increased transportation costs resulting from measures to address climate change. It is a low potential risk for the Metallurgy Sector related to the increase in production costs

(5.1.1.11) Rationale for choice of scenario

Our company chose the RCP 8.5 scenario because it represents a high-emission, worst-case pathway where little to no climate mitigation takes place. This scenario allows us to understand the potential impacts of severe climate change on our operations, including extreme weather events and physical risks. By evaluating this scenario, we can assess the resilience of our business in the face of high-stress climate conditions and plan for risk mitigation accordingly.
[Add row]

(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

The scenario analysis performed by the company, following TCFD recommendations, evaluates three main climate futures: the weak policies scenario (RCP 8.5), current policies scenario (RCP 4.5), and strong policies scenario (RCP 2.6). The analysis revealed key risks and opportunities across our business sectors

(Metallurgy and Energy) and provided insight into how these scenarios could impact our strategy and operations until 2030. Outcomes: In the weak policies scenario (RCP 8.5), where action to mitigate climate change is delayed, the global temperature rise exceeds 3C by the end of the century. This poses high risks, such as reduced efficiency of our thermal plants due to rising temperatures, increased costs for emission allowances, and elevated electricity and gas prices. The most significant physical risks include extreme weather events and rising temperatures, which can impact both our infrastructure and workforce productivity. Under the current policies scenario (RCP 4.5), the increase in temperature is limited to 2C-3C, but the risks persist, including rising electricity and gas prices, which continue to impact the Energy and Metallurgy sectors. Emission allowance prices also remain a high risk, impacting our operating costs and competitiveness. In the strong policies scenario (RCP 2.6), designed to align with net zero by 2050, the greatest risks arise from high carbon prices and the potential for further reductions in demand for our natural gas-based products due to shifts in market preferences toward renewables. Despite these risks, the scenario highlights opportunities for our business, such as investment in renewables, battery storage, and increasing the use of recycled aluminum. These align with our broader environmental commitments. Environmental Implications: The scenario analysis highlights several implications for broader environmental issues. A significant shift to renewable energy, increased efficiency in production processes, and the adoption of low-carbon technologies will be critical in achieving long-term decarbonization targets. Additionally, the impact on biodiversity, water resources, and land use is also considered as part of our long-term strategy, particularly with our focus on resource efficiency and reducing our footprint in sensitive ecological areas. As a company, we aim to stay resilient by continuously adapting our strategies based on these scenarios, further aligning with environmental policies, and enhancing our investments in green technologies to reduce our carbon footprint and contribute to climate action.
[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☑ No, but we have a climate transition plan with a different temperature alignment

(5.2.2) Temperature alignment of transition plan

Select from:

☑ Well-below 2°C aligned

(5.2.3) Publicly available climate transition plan

Select from:

☑ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:

☑ No, and we do not plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Metlen Energy & Metals has a strategic approach to balancing energy transition goals with the need to maintain reliable and competitive energy supply. While we recognize the global imperative to reduce reliance on fossil fuels, our current operations are focused on ensuring energy security and supporting the industries and communities that depend on us. As a key player in both the energy and metals sectors, we acknowledge the role of fossil fuels in maintaining stability, especially in regions where renewable infrastructure is still in development. Our energy transition strategy involves a gradual shift from fossil fuel-based energy to low-carbon and renewable sources. While we are significantly increasing our investments in renewable energy, energy storage, and decarbonization technologies, an abrupt cessation of all fossil fuel-related activities is not feasible in the near term. Our metallurgical processes, including aluminum production, are energy-intensive and, at present, still reliant on natural gas and other fossil fuels due to the technological and economic challenges of immediate full-scale electrification and decarbonization. Instead, Metlen is actively working on reducing the carbon intensity of its fossil fuel use by improving energy efficiency and integrating low-carbon technologies. We are also deeply involved in the development of renewable energy projects, and we plan to increase the share of renewable energy in our portfolio. This includes investments in wind, solar, and energy storage systems. Our focus is on achieving a balance between reducing emissions and ensuring energy security for industries that rely on stable, affordable energy supply. Additionally, the company's approach includes mitigating climate-related risks by participating in carbon pricing mechanisms like the EU-ETS, which further incentivizes the reduction of emissions associated with fossil fuels. As a transitional energy player, Metlen continues to explore advanced technological innovations such as green hydrogen, which could enable the reduction of fossil fuel reliance over time. In conclusion, while Metlen Energy & Metals does not explicitly commit to ceasing all activities related to fossil fuel expansion at this time, our ongoing investments in clean energy, carbon reduction technologies, and efficiency improvements reflect our commitment to a sustainable energy transition.

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ We do not have a feedback mechanism in place, and we do not plan to introduce one within the next two years

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

Metlen Energy & Metals' transition plan is based on key assumptions and dependencies that guide our shift towards sustainability while maintaining operational resilience. Key Assumptions: Gradual Decarbonization of Fossil Fuel Operations: We assume natural gas will remain essential in the near term for energy security and industrial stability. We plan to progressively decarbonize using energy efficiency and carbon offset mechanisms like the EU-ETS. Technological Advancements:

The plan assumes breakthroughs in renewable energy, energy storage, and low-carbon industrial processes. Innovations in green hydrogen will be critical in reducing emissions from hard-to-abate sectors like aluminum production. Market and Policy Support for Renewables: We rely on continued market conditions and regulatory support, such as subsidies and incentives, to expand renewables and integrate them into the energy grid. Key Dependencies: Access to Capital for Clean Energy Investments: The plan's success depends on continued access to capital for renewable energy projects, storage systems, and technological upgrades. Supply Chain and Infrastructure Development: Reliable supply chains and infrastructure for renewable integration, such as grid upgrades, are critical for scaling clean energy. By aligning these assumptions with market trends and technology, Metlen aims for a low-carbon future while ensuring economic viability.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

In the current reporting period, our progress against the transition plan showed mixed results, with a 9.3% increase in Scope 1 and 2 CO2 emissions from 2022 to 2023. This rise reflects both operational changes and external factors that impacted our overall emissions performance. Scope 1 Emissions: The increase in Scope 1 emissions is primarily attributed to the commissioning of our new Combined Cycle Gas Turbine (CCGT) power plant with a capacity of 826 MW, which began operations in 2023. While this modern plant contributes to improved energy efficiency and the flexibility of our energy mix, its start-up has temporarily increased direct emissions as it integrates into our broader energy system. Despite this increase, the plant is expected to play a key role in supporting the transition to lower-carbon energy, as it operates more efficiently compared to older fossil fuel technologies and can act as a balancing power source for renewable energy. Scope 2 Emissions: The increase in Scope 2 emissions is largely due to the higher emission factor associated with the electricity we used in 2023. This change is influenced by external factors, such as the energy mix of the grid, which had a higher share of carbon-intensive sources compared to 2022. Looking Ahead: Despite the temporary increase in emissions, we remain committed to our long-term transition plan, which focuses on reducing carbon intensity and enhancing energy efficiency across all operations. The new CCGT plant, although contributing to a rise in emissions during the start-up phase, will enable us to integrate more renewable energy sources, reduce dependency on less efficient power generation, and improve overall grid stability. We are actively seeking ways to mitigate the impact of grid-related emissions through increased procurement of renewable energy and exploring Power Purchase Agreements (PPAs) to further reduce our Scope 2 emissions. Additionally, continued investments in clean technologies, and the optimization of our energy consumption are central to achieving our decarbonization targets. While the 2023 increase in emissions presents challenges, it highlights the importance of the strategic decisions we are making today to build a more sustainable, low-carbon future. By staying on course with our transition plan, we expect to see emissions reductions in the near term, as renewable energy and efficiency measures take greater effect across our operations.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

sustainable_development_report_2023_eng.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☑ No other environmental issue considered

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ Other, please specify :Technological and market limitations in Metals and Energy Sectors.

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

Our organization does not currently have a climate transition plan that fully aligns with a 1.5C world, though our existing targets are aligned with the well-below 2C scenario. While we recognize the importance of global efforts to limit warming to 1.5C, achieving this target presents significant challenges due to the nature of our energy-intensive operations and the current technological and market limitations in our sector. Decarbonizing key areas such as aluminum production and natural gas-based power generation requires the availability of advanced technologies like green hydrogen, carbon capture and storage (CCS), and large-scale electrification. At present, these technologies are either not commercially scalable or are in early development phases, making it difficult for us to commit to a 1.5C pathway without jeopardizing our operational efficiency and financial performance. Furthermore, in several regions where we operate, the regulatory and energy market frameworks do not yet support a full-scale transition to renewable energy. Energy grids in these areas remain heavily reliant on carbon-intensive sources, and the necessary infrastructure to integrate more renewable energy into the grid is not yet fully developed. These external factors restrict our ability to decarbonize as rapidly as a 1.5C scenario would require. However, our commitment to sustainability is reflected in our current targets, which are aligned with the well-below 2C scenario, as laid out by the Paris Agreement. We are making progress through significant investments in renewable energy, improving energy efficiency, and advancing research and development into low-carbon technologies. While we are not yet fully aligned with a 1.5C pathway, we continue to monitor technological advancements and market developments, and will reassess our strategy as new opportunities to further reduce emissions become viable. In conclusion, while our current transition plan is aligned with the well-below 2C target, we are committed to evolving our strategy towards greater ambition. As new technologies emerge and market conditions improve, we will continue working towards a future that contributes to global climate goals, including limiting warming to 1.5C where possible. [Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations
[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply
☑ Risks
☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply
☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our products and services have been drastically modified and enhanced within the last 5 years, after embracing and acting upon the climate-related risks and opportunities. Major or minor adjustments have been effectuated in our Sectors and subsidiaries in order to form an organization that is centered around sustainability. In Energy Sector we have proceeded to the following transitions: -building a state-of-the-art CCGT, achieving an 80% CO2 emission reduction per MWh produced compared to the Greek lignite fleet, and materializing an ambitious RES deployment plan -significantly grow our renewable generation capacity in Greece and internationally to 5.0GW and accelerate our activity on exploring the use of new technologies and low-carbon fuels. In our Metals Sector we have implemented or are planning to implement specific actions adapting to the climate change risks and opportunities. In this context, the Company plans to develop the production of secondary aluminium, reaching a production capacity of 65,000 tonnes per year with the prospect of more than doubling in the coming years, reducing the energy consumption per tonne of aluminium products, as the energy consumption requirement for the production of secondary is only 5% of that of primary aluminium. In parallel, we are planning an aspirational decarbonization agenda of our Metals Sector to decrease our absolute emissions by 65% and our relative emissions by 75% by 2030. We have planned and budgeted a detailed agenda of initiatives across our production value chain that will help us achieve our 2030 target. We are lastly following the market and continuously examining specific solutions that could help us reach our 2050 emissions target of net zero such as Low emission fuels and Hydrogen in our CHP and furnaces, inert anodes technology in smelting, etc. Our Energy Sector and specifically the sub-sectors of M Renewables and M Power Projects play an important role in enabling decarbonization of the global energy system. Worldwide, these businesses help reduce emissions, such as

through the development and construction of renewable power generation, energy storage, and other sustainable engineering solutions. To scale our positive impact, we plan and expect grow our activities in these areas by a factor of three over the next decade and become a global market leader.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

During early 2021, we initiated a project for the mapping of our Scope 3 emissions in cooperation with our main suppliers. In parallel, we have initiated an internal assessment of our procurement practicing and are working on a gap analysis of our procurement processes. In this effort we are planning the redesign of our procurement processes in order to introduce fully responsible supply chain practices that incorporate ESG criteria for the evaluation of existing and prospective suppliers across our business sectors. In this context, in 2023, Metlen gradually begun the systematic integration of sustainable development principles in its supply chain. Specifically, Metlen has created an online platform to register key suppliers that meet the ESG criteria, through the application of a specific evaluation methodology, harmonized with the requirements of its Suppliers and Business Partners Code of Conduct. The methodology, which has been developed by the Sustainable Development Division, is implemented internally through the cooperation between the Procurement/Purchasing Departments of the Business Sectors, the Central Functions and the Sustainable Development Division. Moreover, In 2023, the formal process of assessing 335 existing key suppliers against ESG criteria was launched. In total, 156 key suppliers from the two main sectors and its Central Services were evaluated in 2023. The data submitted by suppliers was studied in order to identify any actions required in case of non-compliance, with the aim of mitigating climate-related risks in the Company's supply chain. In order to mitigate the economic consequences that may arise due to changes in consumer preferences, who will demand less carbon-intensive products, Metlen has planned to make appropriate investments to reduce the carbon footprint of aluminium. To achieve this, it plans to dramatically reduce CO2 scope 2 emissions by 2030 in the production of primary aluminium, while increasing the production of secondary aluminium which requires significantly less energy (compared to primary aluminium). In addition, to meet consumer demands for cleaner energy, the company plans to reduce by 50% the CO2 emissions per kWh produced by 2030, compared to 2019.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our business has little exposure in R&D concerning climate-related risks and opportunities. However, there are climate-related risks which potentially could block our access to raw materials for two main reasons, the increase of raw material costs and the raw material shortage due to recycling trends. To mitigate the above risks, the Company continues consistently to invest in the establishment of pilot plants and the development of know-how in the following areas: - Exploitation of bauxite residues, participating in and conducting pilot tests in the framework of European programs of efficient green technologies for the manufacturing of useful products and materials (iron, alumina, cement additives and building products), as well as in the development of technology for the extraction of rare earth elements. - New aluminium recycling technologies, participating in research projects for the design and control of the production of recycled aluminium products with low energy and environmental footprint. - Utilization of carbonated by-products of alumina electrolysis, exploring recycling technology within the aluminium production cycle. In this direction, the Research and Sustainable Development (R&SD) department was established under the Innovation Division of the Company's Metallurgy Business Sector. The Company participates in approximately 24 research projects co-funded by the EU or the Greek state, through Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET Cofund on Raw Materials (ERA-MIN 2) and programs of the General Secretariat for Research and Technology (GSRT). Metlen's participation in these programs is based on increasing competitiveness, but also exploring the implementation of industrial circular economy.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change
☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

In 2021, the Company conducted a specialized study for the transformation of its operational structure, aiming to further integrate sustainable development and climate-related issues into its processes. In particular, the integration of ESG criteria into key Company processes has already begun, such as in the performance management system, the evaluation of investment projects, the annual budgeting process, and the evaluation of existing and future suppliers. With regard to non-financial information disclosures, the Company systematically promotes their correlation with financial information by incorporating best practice ESG KPIs into all main financial reports. With regard to the Company's new operating model, the Corporate Governance and Sustainable Development General Division works closely with the Sustainability Leaders assigned to each Business Sector to monitor the Company's progress on sustainability issues, the implementation of CO2 emissions reduction initiatives and the achievement of climate targets. In turn, Sustainability Leaders have defined, according to the specificities of their BU, ESG category Owners in each ESG pillar with whom they are in constant communication and collaboration. The ESG category Owners coordinate and collaborate with ESG initiative Owners, who are responsible for the implementation of specific climate-related initiatives as well as ones in the broader Sustainable Development spectrum, while providing technical guidance for the development of relevant action plans and the implementation of specific projects, the progress of which is the subject of dedicated meetings with the Company's central Sustainable Development Division. With regard to climate-related risks, the Sector Sustainability Leaders in collaboration with the ESG category Owners are responsible for identifying and preliminarily assessing potential climate-related risks before integrating these risks into the Company's centralized Enterprise Risk Management (ERM) system.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Assets
☑ Revenues
☑ Liabilities
☑ Direct costs
☑ Indirect costs
☑ Access to capital
☑ Capital allocation
☑ Capital expenditures
☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Main economic impact of potential climate-related risks The climate-related risk analysis for Metlen, as described in the following sections, has highlighted 3 major transition risks and 1 major physical risk, which may, to a greater or lesser extent, have a significant impact on the company's revenues and/or operating costs, mainly in the Energy Sector as well as in the Metals Sector. These risks include: • Increased cost due to increased carbon emissions allowance prices (both in the Metals and Energy Sector). • Reduced revenues due to increased electricity and natural gas sale prices in the short and medium term, because of climate change mitigation policies (in the Energy Sector). • Increased cost from reduced efficiency of gas-fired power plants due to rising temperatures (Energy Sector). • Increased cost of raw materials due to increased transportation costs (Metals Sector) Main business impact of climate-related opportunities • Increased sales share of low-carbon products or products necessary for the green transition. Metlen has created new Business Sectors geared towards the dynamic development of international sustainable projects (M Renewables and M Power Projects). In the next decade, which will be crucial, the Company is expected to play a major role in energy transition and the reduction of greenhouse gas emissions worldwide, escalating its positive impact to become a global market leader in this field. • Major increase in electricity demand: Electricity will be the main source of energy in the new era because of the rapid electrification of the market (electromobility, heat pumps, etc.). • Increased demand for aluminium as the main energy transition ingredient: To achieve carbon neutrality by 2050, it is necessary to install energy-efficient infrastructure in buildings, with aluminum's contribution being significant. • Development of new technologies: New technologies (e.g. batteries, sustainable hydrogen, biofuels, CCUS) will be essential in the energy transition and will create new value in the energy market. • The Company's financial planning incorporates tools related to climate risks and opportunities. In April 2021, Metlen issued a 500 million Green Bond and in October 2024 a 750 million Green Bond to finance future growth with solutions that contribute to climate change mitigation. More information is available on the Company's website for Sustainable Finance.
[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition	Indicate the level at which you identify the alignment of your spending/revenue with a sustainable finance taxonomy
	Select from: ☑ Yes	*Select all that apply* ☑ A sustainable finance taxonomy	*Select from:* ☑ At both the organization and activity level

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ Revenue/Turnover

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

756920000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

14

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

17

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

30

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

33

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

67

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The taxonomy includes technical screening criteria that outline the thresholds an economic activity must meet to be considered environmentally sustainable. For example, specific greenhouse gas emission limits or resource usage thresholds might be defined. Thus, the disclosed information of each Business Sector is then screened and assessed to determine if the spending or revenue generated from particular activities meets the criteria outlined in the EU Taxonomy. This process involves evaluating the environmental performance of each activity and checking it against the taxonomy's guidelines.

Row 2

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ CAPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

704620000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

67

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

80

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

90

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

93

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

7

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The taxonomy includes technical screening criteria that outline the thresholds an economic activity must meet to be considered environmentally sustainable. For example, specific greenhouse gas emission limits or resource usage thresholds might be defined. Thus, the disclosed information of each Business Sector is then screened and assessed to determine if the allocated CapEx meets the criteria outlined in the EU Taxonomy. This process involves evaluating the environmental performance of each activity and checking it against the taxonomy's guidelines.

Row 3

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ OPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

605313000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

14

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

20

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

30

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

29

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

71

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The taxonomy includes technical screening criteria that outline the thresholds an economic activity must meet to be considered environmentally sustainable. For example, specific greenhouse gas emission limits or resource usage thresholds might be defined. Thus, the disclosed information of each Business Sector is then screened and assessed to determine if the allocated OpEx meets the criteria outlined in the EU Taxonomy. This process involves evaluating the environmental performance of each activity and checking it against the taxonomy's guidelines.
[Add row]

(5.4.2) Quantify the percentage share of your spending/revenue that was associated with eligible and aligned activities under the sustainable finance taxonomy in the reporting year.

Row 1

(5.4.2.1) Economic activity

Select from:
☑ Manufacture of aluminium

(5.4.2.2) Taxonomy under which information is being reported

Select from:
☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Transitional activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

26176000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

0.5

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

0.5

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

11683000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

1

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

1

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

112689000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

3

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

3

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The Company examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all secondary aluminium plants to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

The Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2022 Sustainable Development Report. Regarding emissions (other than GHG emissions) during the production processes, the economic activity within its continuous regulatory compliance, constantly monitors emissions' levels,

confirming that they do not exceed the levels associated with the best available techniques (BAT-AEL) ranges for the non-ferrous metals industries. The said production processes regularly comply to the Directives outlined in Appendix C of the Climate Delegated Act regarding the use/manufacture of dangerous chemicals. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large scale construction projects, Metlen produces EIAs for all of its facilities including the aluminium productions sites. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, the Metallurgy Sector supported by external specialists has conducted a Techno geological-Hydrogeological survey where all identified risks to the subterranean waters of the surrounding area are described and thoroughly analyzed to ensure the flawless operation of the sites and the protection of the local environment. Lastly, as certain sites of the economic activity border areas included in the Natura 2000 network of protected areas, the Group has undertaken a Special Ecological Assessment (SEA) as part of the licensing process of the said sites.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

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Row 2

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation using solar photovoltaic technology

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Adapted activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

543060000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

10

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

10

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

553006000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

52

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

52

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

380946000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

9

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

9

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The solar parks of Metlen are running under the sub-sector of M Renewables. The Sector is involving in the construction of solar PV facilities for clients and it is responsible for the operation of the Group's own solar PV facilities. Thus, alignment was examined from both scopes with clear distinction between them, due to the fact that certain technical screening criteria may not be applicable to both aspects of the activity.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2023 Sustainable Development Report. The said assessment was conducted thoroughly for the Company's own facilities operated by the Energy Sector. However, since no reliable projections can be made for the construction activity, this aspect (M Renewables) of the climate risk assessment is naturally limited. Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of the solar PV facilities with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely. The materials required for the construction of the solar PV facilities consist mainly of metal devices, photovoltaic panels, aluminum and copper cables, electrical equipment and concrete, most of which are recyclable, as well as packaging materials (e.g. wood, plastic and paper-cardboard) which are waste produced during construction. All the above-mentioned materials are recyclable and are properly

recycled through licensed waste management companies so as not to cause negative effects on the environment. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-scale construction projects, Metlen produces EIAs for all of its facilities including the solar PV facilities operated by the Energy Sector. The same regulatory framework is applicable for the construction activities of the sub-sector M Renewables within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Company follows the environmental commitments set by its Environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

mytilineos_annual_report_2023_eng.pdf

Row 3

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from wind power

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Adapted activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

44953000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

0.8

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

0.8

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

5706000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

0.5

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

0.5

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

11044000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

0.3

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

0.3

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The activity generates electricity from wind power. The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all wind farms to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2023 Sustainable Development Report. Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of wind farms with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large Annual Board of Directors Management Report scale construction projects, Metlen produces EIAs for all of its facilities including wind farms operated by the Energy Sector. Lastly, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

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Row 4

(5.4.2.1) Economic activity

Select from:

☑ Storage of electricity

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

142731000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

3

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

3

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

134225000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

13

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

13

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

100634000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

2

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

2

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The

numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The activity is the construction and operation of electricity storage including pumped hydropower storage. The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all storage electricity projects to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2023 Sustainable Development Report. The Company is not involved in the construction of pumped hydropower storage units. Moreover, since the economic activity of the M Renewables is limited to the construction of electricity storage units, the owners/clients are responsible for any waste management plans. As such, this criterion is considered not applicable in this case. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most largescale construction projects, Metlen produces EIAs for all of the construction activities of the sub-sector M Renewables within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Group follows the environmental commitments set by its environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

mytilineos_annual_report_2023_eng.pdf

Row 5

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from fossil gaseous fuels

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

543181000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

10

(5.4.2.17) Taxonomy-eligible but not aligned CAPEX associated with this activity in the reporting year (currency)

151848000

(5.4.2.18) Taxonomy-eligible but not aligned CAPEX associated with this activity as % of total CAPEX in the reporting year

14

(5.4.2.24) Taxonomy-eligible but not aligned OPEX associated with this activity in the reporting year (currency)

317529000

(5.4.2.25) Taxonomy-eligible but not aligned OPEX associated with this activity as % total OPEX in the reporting year

7

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be eligible according to the Taxonomy regulation. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible according to Taxonomy regulation. The Proportion of the total OpEx was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all storage electricity projects to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ No

(5.4.2.31) Details of do no significant harm analysis

For the activities that are eligible but not aligned with the EU - Taxonomy, the DNSH criteria ("Does Not Significantly Harm") and the Minimum Safeguards were not assessed in 2023, but will be assessed in 2024 and will be presented in the Group's Financial Results to be published by April 2025.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ No

(5.4.2.33) Attach any supporting evidence

mytilineos_annual_report_2023_eng.pdf

Row 6

(5.4.2.1) Economic activity

Select from:

☑ Manufacture of aluminium

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

480015000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

9

(5.4.2.17) Taxonomy-eligible but not aligned CAPEX associated with this activity in the reporting year (currency)

126776000

(5.4.2.18) Taxonomy-eligible but not aligned CAPEX associated with this activity as % of total CAPEX in the reporting year

12

(5.4.2.24) Taxonomy-eligible but not aligned OPEX associated with this activity in the reporting year (currency)

323890000

(5.4.2.25) Taxonomy-eligible but not aligned OPEX associated with this activity as % total OPEX in the reporting year

7

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be eligible according to the Taxonomy regulation. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible according to Taxonomy regulation. The Proportion of the total OpEx was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all storage electricity projects to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ No

(5.4.2.31) Details of do no significant harm analysis

For the activities that are eligible but not aligned with the EU - Taxonomy, the DNSH criteria ("Does Not Significantly Harm") and the Minimum Safeguards were not assessed in 2023, but will be assessed in 2024 and will be presented in the Group's Financial Results to be published by April 2025.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ No

(5.4.2.33) Attach any supporting evidence

mytilineos_annual_report_2023_eng.pdf
[Add row]

(5.4.3) Provide any additional contextual and/or verification/assurance information relevant to your organization's taxonomy alignment.

(5.4.3.1) Details of minimum safeguards analysis

OECD Guidelines for Multinational Enterprises Our Code of Conduct has been developed taking into account the OECD Guidelines for Multinational Enterprises. We have implemented a custom training program in the Company's Code of Business Conduct for our employees. We applied our "Zero Tolerance" approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally. We successfully continued the dialogue with our Stakeholders, implementing a special thematic Consultation focused on the creation of our corporate Human Rights Policy, gaining the almost universal acceptance and support of all our Stakeholder groups for this initiative of the Company. Respect of Human and Labour Rights Since 2008, Metlen has committed itself to complying with the Compact's 10 Principles, annually publishing its relevant performance, both in terms of its overall operation and its broader transactions. Metlen 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. Furthermore, during 2020 we have proceeded with the elaboration of a specialized Human Rights Policy, in dialogue with our Social Partners, during which Metlen listened to the views of all its Social Partners on the key points of the policy and integrated them into its final corporate policy document. The Human Rights Policy expresses the Company's zero tolerance of any violation of Human Rights. We fully protected labor rights as well as the other categories of Human Rights related to our activity. Responsible Risk Management MYTILINEOS' has developed a systematic approach to the recording, optimal management and disclosure of information about the ESG risks and opportunities that affect its performance, as well as about its efforts to implement its strategy. Through the ESG approach, MYTILINEOS strengthens its ability to create long-term value and manage significant changes in the environment in which it operates.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

The figures presented have been calculated and are presented in accordance with the International Financial Reporting Standards (IFRS) that have been issued by the International Accounting Standards Board (IASB) and their interpretations that have been issued by the International Financial Reporting Interpretations Committee (IFRIC) of the IASB. Their preparation requires estimations during the application of the Group's accounting principles. Important admissions are presented wherever it has been judged appropriate.

(5.4.3.3) Indicate whether you will be providing verification/assurance information relevant to your taxonomy alignment in question 13.1

Select from:
☑ Yes
[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:
☑ Yes

(5.5.2) Comment

Metlen Energy & Metals actively invests in research and development (R&D) of low-carbon technologies and products, reflecting our commitment to mitigating climate risks and aligning with global decarbonization efforts. As a key player in energy-intensive sectors like aluminium and power production, we recognize the importance of innovating to reduce our carbon footprint and future-proof our operations against the evolving regulatory and market landscape. Our R&D investments focus on several key areas. In the aluminum sector, we are exploring low-carbon production methods, such as integrating renewable energy sources into our manufacturing processes and enhancing recycling capabilities. The development of green aluminum, produced with minimal emissions, is a priority as we strive to meet growing demand for sustainable materials in industries like automotive, packaging, and construction. In energy production, we are investing in technologies to mitigate emissions from our natural gas-based power plants. We are also researching the use of green hydrogen to replace conventional fuels in our energy and industrial operations, recognizing its potential as a key driver of the low-carbon economy. Additionally, we are expanding our capabilities in energy storage and the integration of renewable energy systems to accelerate the transition to cleaner energy sources. Through these R&D efforts, we aim to reduce transition risks associated with tightening environmental regulations and shifting market preferences towards greener products. Our investment in low-carbon technologies not only enhances our sustainability performance but also strengthens our competitive edge by enabling us to offer innovative, climate-friendly solutions to our customers. Overall, Metlen Energy & Metals is committed to leveraging R&D as a core component of our climate strategy, ensuring that we remain at the forefront of the low-carbon transition. By investing in these technologies, we are positioning ourselves to meet future regulatory requirements and capitalize on the opportunities arising from the global push for sustainability.
[Fixed row]

(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.

Row 1

(5.5.7.1) Technology area

Select from:

☑ Other, please specify **:**Industrial circular economy

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Pilot demonstration

(5.5.7.3) Average % of total R&D investment over the last 3 years

80

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

2800000

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

80

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Our R&D investments are a key part of our commitment to climate action and our broader climate transition plan. In 2023, we allocated 2.8 million to research and development, specifically focusing on sustainable innovations in metallurgy. These investments support our goals for carbon reduction and technological

advancements in clean production processes. For example, our REmoval project targets bauxite residue treatment, turning industrial waste into valuable products like building materials and alternative cements, directly contributing to waste reduction and circular economy practices. Similarly, our Scale UP project enhances the extraction of scandium from bauxite residues while cutting production costs by 30%, promoting resource efficiency and minimizing environmental impacts. Our focus on CO2 reduction is exemplified by the Re4Industry project, which explores renewable energy integration and alternative low-carbon fuels such as biofuels and hydrogen. We are also advancing carbon capture technologies, actively participating in the HyinHeat research project with the installation of a hydrogen burner in our foundry. In parallel, the Elithe and Metawave projects target the electrification of core aluminum production processes, developing new methods like microwave calcination that reduce energy demand and emissions in alumina production. Additionally, our bauxite subsidiary DELPHI-DISTOMON successfully piloted a Ventilation-on-Demand system for underground mining, optimizing energy consumption and air quality using IoT and big data technologies. Together, these R&D efforts align with our long-term strategy to decarbonize our operations, contribute to the energy transition, and enhance our resilience to climate-related risks. They underscore our commitment to innovation that not only supports our growth but also accelerates our progress towards a more sustainable, low-carbon future.

Row 2

(5.5.7.1) Technology area

Select from:

☑ Other, please specify **:**Smart energy market

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Full/commercial-scale demonstration

(5.5.7.3) Average % of total R&D investment over the last 3 years

40

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

1200000

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

50

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Our R&D investments in innovative technology solutions are directly aligned with our climate commitments and transition plan, focusing on green energy and decarbonization. In 2023, we allocated 1.2 million to Avokado, our specialized AI and digital innovation subsidiary, supporting various projects that drive our efforts toward sustainability and carbon neutrality. Key to our strategy is the development of AI-driven solutions, such as the AVOS operating system, which optimizes home battery systems and large-scale energy storage systems (BESS). This supports the integration of renewable energy by enhancing energy efficiency and grid flexibility, vital components in reducing reliance on fossil fuels. Additionally, the AVOX platform offers AI-powered solutions for businesses and municipalities to transition to green energy, manage Net Zero targets, and improve energy efficiency. Through projects like Aspra Spitia Smart City, we aim to create smart energy management systems for real-time tracking of energy use and carbon emissions, supporting our vision for sustainable urban environments. Furthermore, Generative AI models are being developed to provide energy consulting and short-term price forecasting, empowering companies with actionable insights for cleaner energy choices. In the field of demand forecasting, we are implementing algorithms that predict energy needs, allowing for better load management and reduced energy waste. These solutions also support Protergia's customers in optimizing battery use through demand response mechanisms, contributing to overall grid stability. Our participation in European projects such as SEDIMARK and TRINEFLEX underscores our commitment to international cooperation on green technologies, including blockchain applications for energy disaggregation and demand response. This not only enhances transparency in energy transactions but also promotes energy efficiency across Europe. By investing in AI, machine learning, and blockchain, we are aligning our R&D efforts with our climate transition plan, paving the way for more sustainable energy systems. These technologies help us meet our decarbonization targets, reduce CO2 emissions, and facilitate the transition to a low-carbon future while ensuring innovation remains at the core of our operations.
[Add row]

(5.7) Break down, by source, your organization’s CAPEX in the reporting year and CAPEX planned over the next 5 years.

Gas

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

151848000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

21.4

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

15

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2020

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen reports the capital expenses in two main categories: Growth & Maintenance. In particular, in the energy sector the maintenance capex refers to the multiyear (not the annual) need for maintenance of the gas plants and the growth capex refers to the expansion of the production energy volume (i.e., solar, wind and gas).

Hydropower

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen reports the capital expenses in two main categories: Growth & Maintenance. In particular, in the energy sector the maintenance capex refers to the multiyear (not the annual) need for maintenance of the gas plants and the growth capex refers to the expansion of the production energy volume (i.e., solar, wind and gas).

Wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

5706000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0.8

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

5

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2021

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen reports the capital expenses in two main categories: Growth & Maintenance. In particular, in the energy sector the maintenance capex refers to the multiyear (not the annual) need for maintenance of the gas plants and the growth capex refers to the expansion of the production energy volume (i.e., solar, wind and gas).

Solar

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

553006000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

78

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

80

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2023

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen reports the capital expenses in two main categories: Growth & Maintenance. In particular, in the energy sector the maintenance capex refers to the multiyear (not the annual) need for maintenance of the gas plants and the growth capex refers to the expansion of the production energy volume (i.e., solar, wind and gas). [Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:

☑ Smart appliances

(5.7.1.2) Description of product/service

The adoption of new technological solutions, especially Artificial Intelligence (AI), is a necessary condition for the implementation of the "green" energy transition. However, global supply is limited relative to demand, so Avokado aims to fill this gap with solutions tailored to the needs of the global smart energy market. AVOKADO is the only specialized company-producer of integrated artificial intelligence solutions for energy and "Smart Cities" in Greece, with Metlen as sole shareholder. In particular, AVOKADO has a deep knowledge of the electricity market, in Greece and abroad, having invested in the development and standardization

of algorithms and machine learning models, which cover the range of needs of energy producers and consumers (producers of electricity from conventional and renewable sources, electricity providers in wholesale and retail markets, household consumers, businesses of all sectors of the economy, public sector bodies, local and regional authorities, as well as central government bodies/bodies) for their green energy transition with a particular focus on Artificial Intelligence operating systems to optimize the lifecycle of home battery systems and professional energy storage systems (BESS). AVOKADO's innovative Artificial Intelligence operating system for home battery systems and professional energy storage systems (BESS) is commercially available under the AVOS brand. AVOKADO's comparative advantage is that it has the most comprehensive portfolio of Artificial Intelligence (AI) software and solutions for Energy and Smart Cities, because it combines Energy Machine Learning Models, Location AI and Generative AI. Specifically, AVOKADO offers: • AI platform under the brand name AVOX for the green energy transition of businesses, organizations and bodies of Central Government, Municipalities, Local Authorities and Regions, • an AI operating system branded AVOS to enhance functionalities and extend the lifetime of home battery systems as well as larger energy storage systems (BESS), and • digital AI toolkit branded AVOKADO AI to meet the specific needs of the energy industry

(5.7.1.3) CAPEX planned for product/service

1200000

(5.7.1.4) Percentage of total CAPEX planned for products and services

15

(5.7.1.5) End year of CAPEX plan

2025
[Add row]

(5.9) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

(5.9.1) Water-related CAPEX (+/- % change)

0

(5.9.2) Anticipated forward trend for CAPEX (+/- % change)

0

(5.9.3) Water-related OPEX (+/- % change)

8

(5.9.4) Anticipated forward trend for OPEX (+/- % change)

0

(5.9.5) Please explain

In 2023 CAPEX has no changed because no significant water investments have taken place. The investments remained close to zero. Regarding anticipated forward trend for water-related CAPEX, an amount of money is anticipated to be invested in 2024. On the other hand, in the reporting year, OPEX has increased by 8.0%, compared to 2022 mainly due to increase of energy costs for industrial, potable and brackish water and secondly, to a more complete collection of data and better monitoring of water-related expenditures. OPEX expenditure include labor, water utilities, energy and maintenance costs for brackish, industrial, potable, deionized and fire extinguishing water. Regarding OPEX anticipated forward trend, it is anticipated to remain at the same level in the upcoming year based on the above-mentioned parameters.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:
☑ No, but we plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:
☑ Other, please specify **:**Official Internal Carbon Pricing procedure is under development.

(5.10.4) Explain why your organization does not price environmental externalities

Our organization acknowledges the growing importance of pricing environmental externalities, particularly carbon emissions, as a critical tool for managing climate risks and aligning with global sustainability goals. Currently, we do not have an official internal carbon pricing mechanism in place. However, we have taken initial steps toward incorporating environmental costs into our decision-making processes by using an unofficial approach to include carbon pricing in our budget and investment plans. This informal method allows us to account for the potential financial impacts of carbon emissions when evaluating new projects or long-term investments, helping us prioritize low-carbon alternatives. While this approach is not formalized, it reflects our commitment to addressing the risks associated with climate change and the evolving regulatory landscape. Looking ahead, we recognize the need to establish a more structured internal carbon pricing framework. We are currently exploring best practices and methodologies to implement an official carbon pricing strategy that aligns with both our sustainability objectives and industry standards. This will help us better quantify and mitigate the environmental externalities of our operations while supporting our overall climate transition goals.
[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Other, please specify :Environmental Management Practices, Carbon Footprint, Energy Usage, Resource Efficiency, Water Management, Compliance with Environmental Regulations, Sustainability Certifications and Circular Economy and End-of-Life Management

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Performance classification levels for suppliers are as follows: 80.01 – 100%: Negligible risk (41); no action required (White List entry). 60.01 – 80%: Low risk (31-40). 40.01 – 60%: Medium risk (21-30); commitment to specific issues or creation of an adaptation action plan is required. 20.01 – 40%: High risk (11-20). 0 – 20%: Serious risk (

(5.11.1.5) % Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

Select from:

☑ 76-99%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

189

Water

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Other, please specify **:**Environmental Management Practices, Carbon Footprint, Energy Usage, Resource Efficiency, Water Management, Compliance with Environmental Regulations, Sustainability Certifications and Circular Economy and End-of-Life Management

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Performance classification levels for suppliers are as follows: 80.01 – 100%: Negligible risk (41); no action required (White List entry). 60.01 – 80%: Low risk (31-40). 40.01 – 60%: Medium risk (21-30); commitment to specific issues or creation of an adaptation action plan is required. 20.01 – 40%: High risk (11-20). 0 – 20%: Serious risk (

(5.11.1.5) % Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

Select from:

☑ 76-99%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

189
[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Business risk mitigation

☑ Procurement spend

☑ Strategic status of suppliers

☑ Supplier performance improvement

(5.11.2.4) Please explain

When prioritizing suppliers for engagement on climate change issues, we consider several critical factors to ensure effective collaboration and risk management. First, we assess the business risks that climate change poses to our supply chain and overall operations. Engaging with suppliers who contribute to these risks allows us to implement strategies that effectively mitigate them. Additionally, we focus on suppliers with significant procurement spend, as they represent a substantial portion of our overall supply chain costs. Addressing climate-related issues with these suppliers can lead to impactful changes and improvements. Furthermore, we identify suppliers that hold a strategic status in our operations. Engaging these key suppliers ensures that we align our climate goals with their practices, fostering a more sustainable partnership. Supplier performance is also a key consideration; we prioritize those demonstrating a commitment to sustainability and continuous improvement. Collaborating with these suppliers enhances their performance while strengthening our supply chain resilience. By focusing on these aspects, we drive meaningful progress in addressing climate change within our supply chain and enhance our overall sustainability strategy.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Business risk mitigation

☑ Procurement spend

☑ Strategic status of suppliers

☑ Supplier performance improvement

(5.11.2.4) Please explain

When prioritizing suppliers for engagement on climate change issues, we consider several critical factors to ensure effective collaboration and risk management. First, we assess the business risks that water security poses to our supply chain and overall operations. Engaging with suppliers who contribute to these risks allows us to implement strategies that effectively mitigate them. Additionally, we focus on suppliers with significant procurement spend, as they represent a substantial portion of our overall supply chain costs. Addressing water-related issues with these suppliers can lead to impactful changes and improvements. Furthermore, we identify suppliers that hold a strategic status in our operations. Engaging these key suppliers ensures that we align our climate goals with their practices, fostering a more sustainable partnership. Supplier performance is also a key consideration; we prioritize those demonstrating a commitment to sustainability and continuous improvement. Collaborating with these suppliers enhances their performance while strengthening our supply chain resilience. By focusing on these aspects, we drive meaningful progress in addressing water security within our supply chain and enhance our overall sustainability strategy.
[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization’s purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

For more info, see our Suppliers / Business Partners Code of Conduct at link: https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf In addition, find below the ESG assessment methodology: ESG Assessment Methodology Questionnaire Completion: Record general company and supplier information. Document responses to questions regarding the evaluated supplier's recognition of issues related to its business activities. Verify the completeness and accuracy of responses. Classify the completion as either Successful or Unsuccessful. Verification of Responses/Documents: Ensure all provided information and documents are accurate and complete. Supplier Evaluation: Create a customized adjustment plan for each company-supplier, categorized by risk levels (Medium - High - Serious). Propose corrective actions to improve ESG performance where necessary. Assign a final rating for performance and classify the supplier into risk categories (Negligible, Low, Medium, High, Serious). Feedback and Handling: Maintain regular communication with the company/supplier to monitor the implementation of adjustment and improvement plans. Completion of Evaluation Process: Evaluate the progress on the adjustment/improvement plans. Consider termination or exclusion from contracting with suppliers who fail or refuse to meet ESG requirements within the mutually agreed timeframe. Suppliers meeting the criteria are included in MYTILINEOS's list of core suppliers.

Water

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

For more info, see our Suppliers / Business Partners Code of Conduct at link: https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf In addition, find below the ESG assessment methodology: ESG Assessment Methodology Questionnaire Completion: Record general company and supplier information. Document responses to questions regarding the evaluated supplier's recognition of issues related to its business activities. Verify the completeness and accuracy of responses. Classify the completion as either Successful or

Unsuccessful. Verification of Responses/Documents: Ensure all provided information and documents are accurate and complete. Supplier Evaluation: Create a customized adjustment plan for each company-supplier, categorized by risk levels (Medium - High - Serious). Propose corrective actions to improve ESG performance where necessary. Assign a final rating for performance and classify the supplier into risk categories (Negligible, Low, Medium, High, Serious). Feedback and Handling: Maintain regular communication with the company/supplier to monitor the implementation of adjustment and improvement plans. Completion of Evaluation Process: Evaluate the progress on the adjustment/improvement plans. Consider termination or exclusion from contracting with suppliers who fail or refuse to meet ESG requirements within the mutually agreed timeframe. Suppliers meeting the criteria are included in MYTILINEOS's list of core suppliers.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization’s purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Implementation of emissions reduction initiatives

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Other, please specify **:**Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 1-25%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

In 2023, MYTILINEOS' Sustainable Development Division developed the "MYTILINEOS Responsible Supply Chain platform" to enhance its ESG supply chain assessment. This digital evaluation platform allows the company to annually collect, evaluate, and monitor the ESG performance of its suppliers. By digitalizing the evaluation process, MYTILINEOS achieves time savings and efficient management of suppliers' responses, facilitating direct collaboration between the Sustainable Development Division and procurement departments. After assessing supplier responses, each participating company receives a final score based on its maturity and

management of material issues relevant to its industry and location. Suppliers can access the platform post-evaluation to view their overall performance and scores in each ESG pillar. Additionally, by entering their activity code (NACE), suppliers can compare their performance and ranking against the industry average of other evaluated companies.

Water

(5.11.6.1) Environmental requirement

Select from:

☑ Other, please specify **:**(a) Water reduction use, b) Compliance and licensing with water regulations & c) Prevention of water pollution

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Other, please specify **:**Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 1-25%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

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Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Other, please specify :Complying with regulatory requirements

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Other, please specify :Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 1-25%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

In 2023, MYTILINEOS' Sustainable Development Division developed the "MYTILINEOS Responsible Supply Chain platform" to enhance its ESG supply chain assessment. This digital evaluation platform allows the company to annually collect, evaluate, and monitor the ESG performance of its suppliers. By digitalizing the evaluation process, MYTILINEOS achieves time savings and efficient management of suppliers' responses, facilitating direct collaboration between the Sustainable Development Division and procurement departments. After assessing supplier responses, each participating company receives a final score based on its maturity and management of material issues relevant to its industry and location. Suppliers can access the platform post-evaluation to view their overall performance and scores in each ESG pillar. Additionally, by entering their activity code (NACE), suppliers can compare their performance and ranking against the industry average of other evaluated companies.
[Add row]

(5.11.7) Provide further details of your organization’s supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Other, please specify **:**Information collection (understanding supplier behavior)

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Support suppliers to develop public time-bound action plans with clear milestones

Information collection

☑ Collect GHG emissions data at least annually from suppliers

☑ Collect targets information at least annually from suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 1-25%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ Less than 1%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

The engagement with our suppliers is a crucial aspect of our strategy to enhance environmental practices across our supply chain. We prioritize collaboration with suppliers to drive improvements in their environmental performance, focusing on specific actions that align with our sustainability objectives. For instance, our engagement activities aim to address key areas such as carbon emissions reduction, resource efficiency, and compliance with environmental regulations. By employing a tailored approach to supplier engagement, we not only improve environmental practices but also build stronger partnerships that foster mutual growth. Our selection of suppliers for engagement is based on procurement spend, strategic importance, and their potential impact on our overall sustainability goals. This ensures that we effectively allocate resources and support those suppliers who have the most significant influence on our environmental outcomes. We recognize that

some suppliers may face challenges in implementing sustainable practices due to resource constraints or lack of expertise. Therefore, our engagement strategy includes offering support and resources to help these vulnerable suppliers improve their environmental practices. This could involve providing training, sharing best practices, or collaborating on innovative solutions. If we categorize our engagement as "No other supplier engagement," it is often due to limited visibility into certain suppliers or the early stages of our engagement initiatives. In such cases, we commit to improving our data collection and tracking mechanisms to enhance our understanding of supplier performance in the future. The positive outcomes of our engagement activities can be significant. For example, by working closely with suppliers on climate change initiatives, we contribute to broader climate mitigation efforts, which can result in reduced carbon footprints across our supply chain. Additionally, as we focus on water security or forest conservation, our engagement helps safeguard essential resources for our organization and stakeholders, enhancing overall resilience. In summary, our supplier engagement activities play a vital role in driving environmental improvements and achieving our sustainability goals, ultimately benefiting both our organization and the wider community.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Other, please specify **:**Information collection (understanding supplier behavior)

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Support suppliers to develop public time-bound action plans with clear milestones

Information collection

☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 1-25%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☑ 1-25%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Engaging with our suppliers on water security is a vital component of our sustainability strategy. We prioritize collaboration with our suppliers to drive improvements in their water management practices, focusing on actions that align with our objectives for sustainable water use and conservation. Our engagement initiatives specifically address key areas, such as reducing water consumption, preventing pollution, and ensuring compliance with water-related regulations. By employing a tailored approach to supplier engagement, we aim not only to enhance environmental practices but also to build stronger partnerships that foster mutual growth and responsibility in water stewardship. We select suppliers for engagement based on procurement spend, strategic importance, and their potential impact on our overall water security goals. This strategic selection allows us to allocate resources effectively and support suppliers who significantly influence our water sustainability outcomes. We recognize that some suppliers may encounter challenges in implementing effective water management practices due to resource constraints or a lack of technical expertise. Therefore, our engagement strategy includes providing assistance and resources to help these vulnerable suppliers improve their water security practices. This may involve offering training, sharing best practices, or collaborating on innovative water-saving solutions. In cases where we identify our engagement as "No other supplier engagement," it may be due to limited visibility into certain suppliers or the early stages of our engagement initiatives. We are committed to enhancing our data collection and tracking mechanisms to gain a clearer understanding of supplier performance regarding water security in the future. The positive outcomes of our engagement activities can be substantial. By working closely with suppliers on water security initiatives, we contribute to safeguarding essential water resources for our organization and stakeholders, enhancing overall resilience against water scarcity and related risks. Moreover, improving water

management practices across our supply chain can lead to reduced operational risks and support compliance with increasingly stringent water regulations. In summary, our supplier engagement activities on water security are crucial for driving improvements and achieving our sustainability goals, ultimately benefiting both our organization and the wider community.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:
☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:
☑ 76-99%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Engaging stakeholders such as shareholders, investors, suppliers, and local communities is crucial for our organization as it fosters transparency, accountability, and collaboration in achieving our environmental goals. Shareholders and investors are increasingly interested in understanding the environmental implications of their investments and the long-term sustainability of our operations. By actively engaging with them, we can share our environmental initiatives, progress, and achievements, thereby enhancing their confidence in our commitment to sustainable practices. Our engagement scope extends beyond mere communication; it involves meaningful dialogues with stakeholders to gain insights into their concerns and expectations regarding environmental performance. For example, we hold regular meetings and discussions with shareholders and investors to update them on our sustainability strategies, including our carbon reduction efforts and water management practices. These interactions help us align our objectives with their values and investment criteria. In addition, we engage with suppliers to assess their environmental practices and foster improvements. Our "Metlen Responsible Supply Chain platform" allows for continuous assessment and support, enabling suppliers to adopt more sustainable practices that align with our goals. Furthermore, engaging with local communities is essential as it helps us understand their needs and the environmental challenges they face. Through community outreach initiatives, we aim to build trust and foster collaboration on environmental projects, such as water conservation efforts and waste reduction programs. The rationale behind this multi-faceted engagement strategy is to ensure that our sustainability efforts are inclusive and collaborative, addressing the diverse interests of all stakeholders. This approach not only enhances our reputation and brand value but also drives collective action toward shared environmental objectives, ultimately contributing to a more sustainable future for all.

(5.11.9.6) Effect of engagement and measures of success

The engagement with stakeholders has yielded significant positive outcomes, enhancing our environmental performance and demonstrating our commitment to sustainability. For instance, our regular interactions with shareholders and investors have led to increased support for our environmental initiatives, reflected in higher investment levels and stronger market confidence. This support allows us to allocate more resources to critical sustainability projects, including carbon reduction and water conservation efforts. In our supply chain, the implementation of the "Metlen Responsible Supply Chain platform" has facilitated a notable improvement in supplier performance regarding environmental practices. By providing suppliers with feedback and resources to enhance their ESG performance, we have observed a shift toward more sustainable operations. Measures of success include the percentage of suppliers achieving improved ESG ratings and the reduction in environmental risks associated with our supply chain. Additionally, community engagement has resulted in increased awareness and collaboration on local environmental issues, such as water security initiatives. Success is measured by community feedback, participation rates in programs, and improvements in local environmental conditions.
[Add row]

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

(5.13.1) Environmental initiatives implemented due to CDP Supply Chain member engagement

Select from:

☑ No, but we plan to within the next two years

(5.13.2) Primary reason for not implementing environmental initiatives

Select from:

☑ No standardized procedure

(5.13.3) Explain why your organization has not implemented any environmental initiatives

Our organization acknowledges the importance of collaborative environmental action, particularly in addressing the challenges posed by climate change and resource management. While we have not yet implemented any mutually beneficial environmental initiatives with a CDP Supply Chain member, this is primarily due to the absence of a standardized internal procedure for such collaborations. As a result, we have focused on establishing robust internal frameworks that will enable us to engage more effectively with partners in the future. Currently, we are in the process of developing a standardized procedure for evaluating and implementing environmental initiatives across our supply chain. This involves a comprehensive assessment of potential environmental projects, aligning them with our strategic priorities, and ensuring that they can deliver measurable benefits to both our organization and our partners. Our intention is to ensure that all initiatives are integrated into our operations in a way that maximizes environmental and business impact. We are fully committed to addressing environmental challenges and recognize that collaboration with CDP Supply Chain members can play a significant role in accelerating our progress. To this end, we have set a target to implement mutually beneficial environmental initiatives within the next two years. This timeline will allow us to finalize the necessary internal procedures, allocate appropriate resources, and identify high-impact projects that align with our sustainability goals. By taking these steps, we aim to contribute to collective environmental action while enhancing our ability to meet both regulatory and stakeholder expectations in the future.
[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has chosen the operational control approach for the consolidation of environmental performance data based on several key factors. Firstly, accountability is a primary reason. The operational control approach includes emissions and environmental impacts from all operations where we have the authority to implement environmental policies and initiatives. This allows us to focus on areas where we can directly influence sustainability practices and outcomes, such as energy consumption and waste management. It enables us to enforce changes that will have a measurable impact on our environmental performance. Secondly, this approach aligns closely with our environmental management systems (EMS), which prioritize activities we manage on a day-to-day basis. The operational control method allows us to integrate environmental data from sites under our control into our broader sustainability goals. This alignment ensures that we concentrate on areas where our decisions will result in significant improvements in our environmental footprint. The operational control approach provides a simplified and consistent method for monitoring and reporting environmental data. By focusing on facilities we manage, we reduce complexity in data collection, ensuring a uniform methodology across all reporting units. This is essential for producing accurate and comparable data year over year, allowing for better tracking of our sustainability efforts. Furthermore, operational control is widely recognized in global environmental reporting frameworks such as the Greenhouse Gas Protocol and the Global Reporting Initiative (GRI). These standards often recommend this approach to ensure comprehensive reporting of direct environmental impacts. By adhering to these frameworks, we ensure that our reporting aligns with best practices and enhances transparency for stakeholders, investors, and regulators. This method emphasizes practical influence. As a company, we can make real, measurable progress toward reducing our environmental impact in the operations we control, driving energy efficiency, reducing emissions, and managing resources more effectively. This ensures that we focus on areas where we can make the most significant environmental improvements. In summary, the operational control approach best suits our company as it aligns with our ability to manage and influence environmental performance, simplifies data collection, and adheres to recognized global standards.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has chosen the operational control approach for the consolidation of environmental performance data based on several key factors. Firstly, accountability is a primary reason. The operational control approach includes emissions and environmental impacts from all operations where we have the authority to implement environmental policies and initiatives. This allows us to focus on areas where we can directly influence sustainability practices and outcomes, such as energy consumption and waste management. It enables us to enforce changes that will have a measurable impact on our environmental performance. Secondly, this approach aligns closely with our environmental management systems (EMS), which prioritize activities we manage on a day-to-day basis. The operational control method allows us to integrate environmental data from sites under our control into our broader sustainability goals. This alignment ensures that we concentrate on areas where our decisions will result in significant improvements in our environmental footprint. The operational control approach provides a simplified and consistent method for monitoring and reporting environmental data. By focusing on facilities we manage, we reduce complexity in data collection, ensuring a uniform methodology across all reporting units. This is essential for producing accurate and comparable data year over year, allowing for better tracking of our sustainability efforts. Furthermore, operational control is widely recognized in global environmental reporting frameworks such as the Greenhouse Gas Protocol and the Global Reporting Initiative (GRI). These standards often recommend this approach to ensure comprehensive reporting of direct environmental impacts. By adhering to these frameworks, we ensure that our reporting aligns with best practices and enhances transparency for stakeholders, investors, and regulators. This method emphasizes practical influence. As a company, we can make real, measurable progress toward reducing our environmental impact in the operations we control, driving energy efficiency, reducing emissions, and managing resources more effectively. This ensures that we focus on areas where we can make the most significant environmental improvements. In summary, the operational control approach best suits our company as it aligns with our ability to manage and influence environmental performance, simplifies data collection, and adheres to recognized global standards.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Not applicable because plastics is not a material issue for our business activities.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has chosen the operational control approach for the consolidation of environmental performance data based on several key factors. Firstly, accountability is a primary reason. The operational control approach includes emissions and environmental impacts from all operations where we have the authority to implement environmental policies and initiatives. This allows us to focus on areas where we can directly influence sustainability practices and outcomes, such as energy consumption and waste management. It enables us to enforce changes that will have a measurable impact on our environmental performance. Secondly, this approach aligns closely with our environmental management systems (EMS), which prioritize activities we manage on a day-to-day basis. The operational control method allows us to integrate environmental data from sites under our control into our broader sustainability goals. This alignment ensures that we concentrate on areas where our decisions will result in significant improvements in our environmental footprint. The operational control approach provides a simplified and consistent method for monitoring and reporting environmental data. By focusing on facilities we manage, we reduce complexity in data collection, ensuring a uniform methodology across all reporting units. This is essential for producing accurate and comparable data year over year, allowing for better tracking of our sustainability efforts. Furthermore, operational control is widely recognized in global environmental reporting frameworks such as the Greenhouse Gas Protocol and the Global Reporting Initiative (GRI). These standards often recommend this approach to ensure comprehensive reporting of direct environmental impacts. By adhering to these frameworks, we ensure that our reporting aligns with best practices and enhances transparency for stakeholders, investors, and regulators. This method emphasizes practical influence. As a company, we can make real, measurable progress toward reducing our environmental impact in the operations we control, driving energy efficiency, reducing emissions, and managing resources more effectively. This ensures that we focus on areas where we can make the most significant environmental improvements. In summary, the operational control approach best suits our company as it aligns with our ability to manage and influence environmental performance, simplifies data collection, and adheres to recognized global standards.
[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply

☑ Yes, other structural change, please specify **:**New transformation with the creation of two sectors and two new subsidiaries.

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

The structural change does not concern any acquisition, divestment or merger.

(7.1.1.3) Details of structural change(s), including completion dates

Athens, Greece - 14 December 2022 - A historic milestone for METLEN is set with the announcement of the new transformation of the Company. With this new transformation "METLEN –Energy & Metals" is being created. An even more dynamic and flexible company, ready to face current and future challenges. Moreover, today's announcement follows the successful transformation made by the Company in 2017, managing to create a large Greek industrial and energy multinational company, which more than doubled its size, expanded its activities in all five continents and improved its credit rating. Through this new transformation, the Company seeks to create: A new organizational structure adapted to this current environment and the new scale of the Company, supporting in that way its further development while providing the investment community with a direct understanding of METLEN' activities. A functional model that further favors i) internal synergies, ii) effective decision-making and iii) effective internal communication, for a progressive decentralization of management decisions. Acknowledgement and further increase of its actual market capitalization, while targeting investment grade rating for its lending. Focus on the development of Human Resources, for meritocratic advancement, with a clear value proposition. Further development in activities where opportunities arise (e.g., Infrastructure & Concessions in Greece, new technologies, new international markets). Through the transformation two main sectors has been created to cover the main functionalities of the company. In addition, the new corporate

transformation upgrades METLEN' position in the field of infrastructure with the creation of two new subsidiaries that will be strategically positioned to properly exploit opportunities both in Greece and internationally. Specifically, the following sectors and companies are created: METLEN' new corporate structure covers two business Sectors: Energy Sector Metallurgy Sector METKA ATE: specializing in the field of construction (general contracting) M Concessions: which will be the investment arm in concessions and PPPs projects in Greece and abroad.
[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:
☑ No, because the impact does not meet our significance threshold

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Our organization has established a base year emissions recalculation policy that ensures consistency and accuracy in our GHG emissions inventory. This policy is triggered when changes occur, including structural, methodological, or boundary modifications. Any minor or major change leads to a recalculation, which is carried

out and corrected in the Sustainability Report issued by the company in the year following the first calculation. This approach allows us to maintain the integrity of our emissions data over time and ensures that stakeholders have a reliable basis for evaluating our climate performance and progress.

(7.1.3.4) Past years' recalculation

Select from:

☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ European Union Emission Trading System (EU ETS): The Monitoring and Reporting Regulation (MMR) – General guidance for installations

☑ IPCC Guidelines for National Greenhouse Gas Inventories, 2006

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☑ The Greenhouse Gas Protocol: Scope 2 Guidance

☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: ☑ We are not reporting a Scope 2, location-based figure	*Select from:* ☑ We are reporting a Scope 2, market-based figure	*Gross Market Base: Use of the emissions factor based on data published by the State at regional or national level through European Residual Mix.*

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:
☑ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

2798068.0

(7.5.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

1841255.0

(7.5.3) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1116996.8

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: 1) average-product method 2) average spend-based method

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

703208.2

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: 1) supplier specific method 2) hybrid method 3) average-product method 4) average spend-based method Since Metlen procures a wide range of capital goods, all of the above methods, depending on the significance of the procurement and the availability of data, are used in order to estimate the scope 3 emissions of this category.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1550852.6

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Secondary data describing the characteristics of fuels, the operation of an electricity generation system, etc., at national, regional or local level (average data method).

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

10991.0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since there are no detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyze emissions on a distance basis. In this method, per origin (l) of each good (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

56755.6

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Given that the disposal and treatment of generated waste is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the emissions released by the group's suppliers that manage the generated waste, it is chosen to analyse the emissions on a treatment method basis, and if

necessary on a waste type and treatment method basis. In the waste type and treatment method, per waste stream (w) and treatment method (t), the quantity of waste (Q) is multiplied by appropriate emission factors (EF) in order to calculate the emissions of this category. In the treatment method approach, it is the total quantities of waste going to a particular treatment method that are of interest.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

569.9

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, and also due to the lack of detailed data on fuel quantities for the means of transport used for business travel, it is chosen to analyse emissions on a distance basis. In this method, for each mode of transport, the distance travelled by each commuter is multiplied by appropriate emission factors incorporating average fuel consumption and characteristics of the transport modes used.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

5169.8

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Distance basis methodology, taking into account the distances travelled and the means used.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1141.0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: For the calculation of this category, the analysis of emissions is based on average spend-based method. In this case, fuel consumption is calculated from the costs, taking into account fuel prices, and then appropriate factors per fuel are used.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

13935.6

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyse emissions on a distance basis. In this method, per destination (l) of disposal of each product produced (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1208145.3

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Average-data method Since basically Aluminum of Greece and the other Metlen companies operating in the metallurgy sector produce a variety of intermediate products, where their downstream processing takes place in various units and countries, from which it is not feasible to collect detailed emissions data, the analysis is mainly based on secondary data, characteristics of the processes that take place and the products produced, without excluding in some cases the use of specific consumptions and emissions. In particular, for all intermediate products in the sector (ipM), the quantities produced (QipM), the countries of destination (l), the processes involved, the final products (fp) produced and their quantities (Qfp) are identified.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

2271192.9

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The scope 3 emissions of category 11 emissions of this activity of Metlen concerns the supply of quantities of natural gas to final consumers, i.e. households and businesses, which are not part of the group. It should be noted that emissions from the distribution of natural gas to group companies are calculated in the context of the calculation of the group's scope 1 emissions. Its emissions are calculated according to the following equation. $E_{(11,NG)} \Sigma_{s}(FC_{NG,s}) (NCV_{NG}) (EF_{NG,s})$ Where $E_{(11,NG)}$ are the scope 3 emissions of category 11 associated with sales of natural gas to third parties, (in t), s is the sector in which the natural gas is consumed, $FC_{NG,s}$ is the consumption of the natural gas in sector s, NCV_{NG} is the lower calorific value of the natural gas and $EF_{NG,s}$ is the emission factor of the natural gas in sector s.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

52399.2

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The emissions of this category for MYTILINEOS are expected to be not significant and the impact on the Group's carbon footprint small. However, in the context of this

analysis, a framework for an approximate estimate of these emissions has been formulated, based on the following assumptions: - In the case of Metallurgy Sector, the activity data used are sales of aluminum plates, columns and cylinders in the reference year. It is assumed that at the end of their life these products are recycled, and therefore the corresponding DEFRA coefficient is used. - In the case of the Energy Sector, an approximate estimate of emissions for this category can be made on the basis of the installed capacity of delivered PV modules and the relevant calculations were based on the projects delivered in the reference year.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2729731.8

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2640850.3

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2726024

(7.6.2) End date

12/30/2021

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 3

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2885465.3

(7.6.2) End date

12/30/2020

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 4

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2798068.3

(7.6.2) End date

12/30/2019

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 5

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2555713.6

(7.6.2) End date

12/30/2018

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s 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 (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1555613.5

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1281939.2

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1337935.2

(7.7.3) End date

12/30/2021

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 3

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1573958.2

(7.7.3) End date

12/30/2020

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 4

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1841255.3

(7.7.3) End date

12/30/2019

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 5

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

0

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

1819624.6

(7.7.3) End date

12/30/2018

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1465664.3

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average product method

☑ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Metlen supplies an extremely wide range of goods and services, of different nature and country of origin, depending on the activities of each Business Unit. Therefore, the calculation of emissions from the supplier database or through the hybrid approach is considered impossible for all the supplied goods. In this first phase of the development of the calculation system of the scope 3 emissions of the Company, it is deemed appropriate to calculate the emissions of this category based on the average-product approach if the supply quantities of the examined goods are available in physical units or on an expenditure basis if the activity data is known only as commission costs. This way it will be possible to assess, on the one hand the importance of category 1 in relation to the total scope 3 emissions of the Company, but also which goods and services contribute mainly to these emissions. For these goods in the future may be initiated the collection of more detailed data from suppliers.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1705297.6

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

☑ Hybrid method

☑ Average product method
☑ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since Metlen procures a wide range of capital goods, all of the above methods, depending on the significance of the procurement and the availability of data, are used in order to estimate the scope 3 emissions of this category.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1074179.8

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Secondary data describing the characteristics of fuels, the operation of an electricity generation system, etc., at national, regional or local level (average data method).

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

42439

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since there are no detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyze emissions on a distance basis. In this method, per origin (l) of each good (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

38931.2

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Given that the disposal and treatment of generated waste is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the emissions released by the group's suppliers that manage the generated waste, it is chosen to analyse the emissions on a treatment method basis, and if necessary on a waste type and treatment method basis. In the waste type and treatment method, per waste stream (w) and treatment method (t), the quantity of waste (Q) is multiplied by appropriate emission factors (EF) in order to calculate the emissions of this category. In the treatment method approach, it is the total quantities of waste going to a particular treatment method that are of interest.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2084.6

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since the transport of products is not expected to be one of the major scope 3 emission categories of MYTILINEOS, and also due to the lack of detailed data on fuel quantities for the means of transport used for business travel, it is chosen to analyse emissions on a distance basis. In this method, for each mode of transport, the distance travelled by each commuter is multiplied by appropriate emission factors incorporating average fuel consumption and characteristics of the transport modes used.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3486.8

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

As this category is not expected to be one of the important categories of Scope 3 emissions within Metlen, an approximate calculation occurred based on the number of the employees, the working days, the average distance traveled from home (city center). Concerning the means of transport, data from other relevant studies in relation to the means of transport used.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

There are not upstream leased assets to calculate emissions.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

21185.8

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyse emissions on a distance basis. In this method, per destination (l) of disposal of each product produced (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

888822.9

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Site-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions calculation methodology: 1) average-data method 2) Site-specific method Because basically Aluminum of Greece and the rest of the companies of MYTILINEOS that are active in the field of metallurgy produce various intermediate products, where their downstream processing is done in different units and countries, from which it is not possible to collect detailed emission data, the analysis is mainly based on secondary data, characteristics of the processes that take place and the products that are produced. However, in some cases, specific consumptions and emissions by specific units that process the intermediate products was used. More specifically, for all intermediate products, the quantities produced, the countries available, their processing processes, the final products produced and their quantities are identified. For each final product produced and per country of production, the greenhouse gas emission rate associated with the processing of Metlen intermediate products is calculated. This rate can be derived from literature sources or calculated on the basis of energy consumption, waste generated, etc. of the processes that take place. Even for the same product, the rate may vary by processing country mainly due to the different power generation mix, and therefore the scope 2 emissions of the processes taking place. Finally, based on the mass ratio of the intermediate product of Metlen that enters a production process and the total inputs of that production process, the distribution of the total emissions is achieved.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2407162.5

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

The scope 3 emissions of category 11 emissions of this activity of Metlen concerns the supply of quantities of natural gas to final consumers, i.e. households and businesses, which are not part of the group. It should be noted that emissions from the distribution of natural gas to group companies are calculated in the context of

the calculation of the group's scope 1 emissions. Its emissions are calculated according to the following equation. E_(11,NG)Σ,s(FC_NG,s) (NCV_NG) (EF_NG,s) Where E_(11,NG) are the scope 3 emissions of category 11 associated with sales of natural gas to third parties, (in t), s is the sector in which the natural gas is consumed, FC_NG,s is the consumption of the natural gas in sector s, NCV_NG is the lower calorific value of the natural gas and EF_NG,s is the emission factor of the natural gas in sector s.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

292962.6

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The emissions of this category for MYTILINEOS are expected to be not significant and the impact on the Group's carbon footprint small. However, in the context of this analysis, a framework for an approximate estimate of these emissions has been formulated, based on the following assumptions: - In the case of Metallurgy Sector, the activity data used are sales of aluminum plates, columns and cylinders in the reference year. It is assumed that at the end of their life these products are recycled,

and therefore the corresponding DEFRA coefficient is used. - In the case of the Energy Sector, an approximate estimate of emissions for this category can be made on the basis of the installed capacity of delivered PV modules and the relevant calculations were based on the projects delivered in the reference year.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

0

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

There are not downstream leased assets.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

0

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

There are not franchises.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

0

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

There were no such investments affecting emissions in this category.
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/30/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1688761.3

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

1281625.2

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1106925.3

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

12471.2

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

59545.1

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

718.5

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

2127

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

15913

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

1071653.4

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

3331599.4

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

150969.9

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

No comment.

Past year 2

(7.8.1.1) End date

12/30/2021

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1074601.8

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

819923.4

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1231685

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

13229.7

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

47239.6

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

803.1

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

1914.3

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

1155.8

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

17507.9

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

1153014

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1190582.1

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

61892

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

No comment.

Past year 3

(7.8.1.1) End date

12/30/2020

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1116996.8

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

703208.2

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1550852.6

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

10991

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

56755.6

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

569.9

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

5169.8

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

1141

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

13935.6

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

1208145.3

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

2271192.9

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

52399.2

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

No comment.
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☑ High assurance

(7.9.1.4) Attach the statement

Verification Report CO2_IPP1 2023 .pdf

(7.9.1.5) Page/section reference

1

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

22

Row 2

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☑ High assurance

(7.9.1.4) Attach the statement

Verification Report CO2_AoG&CHP 2023.pdf

(7.9.1.5) Page/section reference

1-3

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

43

Row 3

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☑ High assurance

(7.9.1.4) Attach the statement

Verification Report CO2_Korinthos Power 2023.pdf

(7.9.1.5) Page/section reference

1

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

15
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.2.5) Attach the statement

independent_assurance_statement_2023_eng.pdf

(7.9.2.6) Page/ section reference

At p. 2, see the GRI 305-2 Energy Indirect (Scope 2) GHG emissions.

(7.9.2.7) Relevant standard

Select from:
☑ AA1000AS

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☑ Scope 3: Purchased goods and services

☑ Scope 3: Capital goods

☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

☑ Scope 3: Processing of sold products

☑ Scope 3: Use of sold products

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.3.5) Attach the statement

independent_assurance_statement_2023_eng.pdf

(7.9.3.6) Page/section reference

At p.2, GRI 305-3 "Other Indirect GHG emissions (Scope 3: Categories C1, C2, C3, C10 and C11).

(7.9.3.7) Relevant standard

Select from:
☑ AA1000AS

(7.9.3.8) Proportion of reported emissions verified (%)

95
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Increased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

134769

(7.10.1.2) Direction of change in emissions

Select from:
☑ Increased

(7.10.1.3) Emissions value (percentage)

3.4

(7.10.1.4) Please explain calculation

Change in Scope 1 2 emissions attributed to the less renewable electrical energy purchased in 2023 / (Previous year Scope 12 emissions)) 100 134769 / 3922789.5 3.4%.

Other emissions reduction activities

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Divestment

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Acquisitions

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Mergers

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

227787

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

5.8

(7.10.1.4) Please explain calculation

Change in Scope 1 2 emissions attributed to the the start of the new gas-fired combined cycle power plant (CCGT) in 2023, which increase the capacity in MW of Metlen's thermal plant portfolio / (Previous year Scope 12 emissions)) 100 227787 / 3922789.5 5.8%.

Change in methodology

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

Change in boundary

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

Change in physical operating conditions

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

2664517.8

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fourth Assessment Report (AR4 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ PFCs

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

65214

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fourth Assessment Report (AR4 - 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

	Gross Scope 1 CO2 emissions (metric tons CO2)	Total gross Scope 1 emissions (metric tons CO2e)	Comment
Combustion (Electric utilities)	*1806485*	*1806485*	*Emissions from Metlen's gas-fired thermal power plants.*

[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Greece	*2729731.8*	*0*	*1555613.5*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

Row 1

(7.17.1.1) Business division

Metallurgy Sector

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1186684

Row 2

(7.17.1.1) Business division

Energy Sector

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1541483

Row 3

(7.17.1.1) Business division

METKA ATE: specializing in the field of construction (general contracting) M Concessions: which will be the investment arm in concessions and PPPs projects in Greece and abroad.

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

864

Row 4

(7.17.1.1) Business division

Central Functions

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

531
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Electricity production*	*1806485*
Row 2	*Production of bauxite, refined alumina, and primary & secondary aluminium*	*898795*
Row 3	*Rest of activities*	*24452*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	*1806485*	*It relates to the production of electrical energy by the Company's thermal plants.*

[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By activity

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

Row 1

(7.20.1.1) Business division

Metallurgy Sector

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

0

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

1531713.5

Row 2

(7.20.1.1) Business division

Energy Sector

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

0

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

22606

Row 3

(7.20.1.1) Business division

METKA ATE: specializing in the field of construction (general contracting) M Concessions: which will be the investment arm in concessions and PPPs projects in Greece and abroad.

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

0

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

341

Row 4

(7.20.1.1) Business division

Central Functions

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

0

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

953
[Add row]

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Metals and mining production activities*	*0*	*1526344*
Row 2	*Electric utility activities*	*0*	*22724*
Row 3	*Rest of activities*	*0*	*6545.5*

[Add row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

2729731.8

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

1555613.5

(7.22.4) Please explain

Alignment with Financial Reporting: The Consolidated Accounting Group includes all entities where our company has operational control, meaning we have the authority to implement policies and strategies that directly influence emissions. These entities are fully consolidated in our financial accounts according to accounting standards (IFRS), ensuring that both our environmental and financial disclosures align seamlessly. This consistency enhances transparency and comparability in our reporting.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Aluminium of Greece

(7.23.1.2) Primary activity

Select from:
☑ Aluminum

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

898795

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1523881

(7.23.1.15) Comment

Aluminium of Greece company produces primary aluminium.

Row 2

(7.23.1.1) Subsidiary name

EPALME

(7.23.1.2) Primary activity

Select from:
☑ Aluminum

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

12864

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

3497

(7.23.1.15) Comment

EPALME company produces secondary aluminium

Row 3

(7.23.1.1) Subsidiary name

IPP 2

(7.23.1.2) Primary activity

Select from:
☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

527239

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

11647

(7.23.1.15) Comment

IPP 2 power plant produces electricity using natural gas.

Row 4

(7.23.1.1) Subsidiary name

Korinthos Power

(7.23.1.2) Primary activity

Select from:
☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

408128

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2651

(7.23.1.15) Comment

Korinthos power plant produces electricity using natural gas.

Row 5

(7.23.1.1) Subsidiary name

DELPHI - DISTOMO

(7.23.1.2) Primary activity

Select from:

☑ Bauxite mining

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

3677

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2463

(7.23.1.15) Comment

DELPHI - DISTOMO company extracts bauxite for the Aluminium of Greece (primary aluminum plant).

Row 6

(7.23.1.1) Subsidiary name

M Power Projects

(7.23.1.2) Primary activity

Select from:

☑ Energy infrastructure construction

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

2367

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2085

(7.23.1.15) Comment

M Power Projects, Metlen's sub-sector is a leading international contractor in the construction of specialized, large-scale turnkey energy projects, undertaking the full range of services required for successful implementation, whether it is conventional electricity generation projects, energy transition projects (e.g. distribution networks, hydrogen etc.), or electricity saving projects, digital transition, smart cities & IoT platforms.

Row 7

(7.23.1.1) Subsidiary name

METKA ATE

(7.23.1.2) Primary activity

Select from:

☑ Transportation infrastructure & other construction

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

864

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

341

(7.23.1.15) Comment

METKA ATE is a subsidiary of Metlen, which is specializing in the field of construction (general contracting, infrastructure, etc.)

Row 8

(7.23.1.1) Subsidiary name

IPP 1

(7.23.1.2) Primary activity

Select from:

☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

601382

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

3395

(7.23.1.15) Comment

IPP 1 power plant produces electricity using natural gas.

Row 9

(7.23.1.1) Subsidiary name

CHP

(7.23.1.2) Primary activity

Select from:

☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

657893

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

288

(7.23.1.15) Comment

Combined Heat and Power (CHP) power plant produces steam for the needs of the Aluminium of Greece plant and electricity that delivered in the Greek national grid. [Add row]

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Row 1

(7.27.1) Allocation challenges

Select from:

☑ Managing the different emission factors of diverse and numerous geographies makes calculating total footprint difficult

(7.27.2) Please explain what would help you overcome these challenges

Our company faces significant challenges in allocating emissions to different customers due to the complexity of managing diverse emission factors across numerous geographies. Different regions have varying electricity grids, fuel mixes, and transportation emissions, making it difficult to calculate a consistent and accurate total footprint. This complexity arises from the need to account for region-specific factors when determining emissions associated with our operations in different countries and territories. However, several solutions would help us overcome these challenges. A key step to overcoming this issue would be the development or adoption of standardized emission factors where possible. While local variations in energy grids and infrastructure lead to differences in emissions profiles, applying standardized factors across global operations would reduce complexity and improve consistency. For regions that have significant variations, we would maintain a dedicated database of local emission factors, ensuring accuracy without slowing down reporting processes. Implementing a centralized data management platform would streamline the collection and use of emissions data from various geographies. Such a system would allow us to track energy consumption, fuel use, and emissions from all regions in one place. This would also enable automatic application of the correct emission factors for each geography, reducing manual input errors and ensuring that emissions are allocated correctly to each customer. Introducing geography-specific reporting tools could further enhance the accuracy of our emissions reporting. These tools would automatically apply the appropriate emission factors based on the location of our operations or customers. By integrating such tools, we can ensure that the correct data is used for each geography without requiring extensive manual adjustments. Automation will play a critical role in simplifying the allocation of emissions. By automating the application of region-specific emission factors, we can ensure that customer-specific emissions are calculated quickly and accurately. This approach reduces the likelihood of human error and provides more consistent reporting. Working closely with local partners, utilities, and regional government bodies to obtain the most accurate and up-to-date emissions data for each geography would also improve our process.
[Add row]

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

(7.28.1) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Select from:

☑ Yes

(7.28.2) Describe how you plan to develop your capabilities

To enhance our capabilities in allocating emissions to our customers, we plan to adopt a multi-faceted approach that focuses on data collection, analytical tools, and stakeholder engagement. First, we will invest in advanced data collection systems to accurately capture emissions data across our supply chain and production

processes. This will involve integrating emissions tracking into our existing operational metrics, ensuring that we have robust, real-time data reflecting our carbon footprint. Second, we intend to leverage analytics and reporting tools that will enable us to analyze emissions data effectively. By utilizing data visualization techniques and emissions accounting frameworks, we will develop clear and actionable insights. These tools will allow us to calculate emissions per product or service provided, giving our customers a transparent view of the environmental impact associated with their purchases. Third, we plan to engage closely with our customers to understand their specific needs and expectations regarding emissions reporting. By fostering collaboration, we can tailor our emissions allocation methodologies to align with customer requirements, ensuring that the information we provide is relevant and actionable. Additionally, we will seek to educate our customers on the significance of emissions data and its role in their sustainability efforts. Through workshops, webinars, and informational materials, we aim to raise awareness about the importance of emissions transparency and how it can inform their own climate strategies. Lastly, we will continuously evaluate and refine our methodologies to ensure they align with industry best practices and evolving standards. This commitment to improvement will help us maintain the credibility and accuracy of our emissions reporting, ultimately reinforcing our relationships with customers as we work together toward a more sustainable future. By implementing these strategies, we aspire to empower our customers with the insights they need to make informed decisions while fostering a culture of sustainability throughout our value chain.
[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 55% but less than or equal to 60%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:*

	Indicate whether your organization undertook this energy-related activity in the reporting year
	☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ Yes
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

11774195

(7.30.1.4) Total (renewable and non-renewable) MWh

11774195

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

815639

(7.30.1.3) MWh from non-renewable sources

2097445

(7.30.1.4) Total (renewable and non-renewable) MWh

2913084

Consumption of purchased or acquired steam

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

1306361

(7.30.1.4) Total (renewable and non-renewable) MWh

1306361

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable and non-renewable) MWh

0

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

815556

(7.30.1.3) MWh from non-renewable sources

15351112

(7.30.1.4) Total (renewable and non-renewable) MWh

16166668
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ Yes

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No comment.

Other biomass

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No comment.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No comment.

Coal

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No comment.

Oil

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

77889

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

Includes Heavy gas oil, diesel, fuel gas. The Scope 1 emission factors used for the conversions are from National Inventory Report (NIR) 2023 for Greece. https://unfccc.int/documents/272918

Gas

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

11696195

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

Includes natural gas. The Scope 1 emission factors used for the conversions are from National Inventory Report (NIR) 2023 for Greece. https://unfccc.int/documents/272918

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

139

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

Includes Other non-renewable fuels. The Scope 1 emission factors used for the conversions are from National Inventory Report (NIR) 2023 for Greece. https://unfccc.int/documents/272918

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

11774084

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.6) MWh fuel consumed for self-generation of cooling

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

Total fuel consumption.
[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

5275139

(7.30.9.2) Generation that is consumed by the organization (MWh)

173077

(7.30.9.3) Gross generation from renewable sources (MWh)

1118878

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

815556

Heat

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Steam

(7.30.9.1) Total Gross generation (MWh)

1630250

(7.30.9.2) Generation that is consumed by the organization (MWh)

1306361

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0
[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:
☑ Greece

(7.30.14.2) Sourcing method

Select from:
☑ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates

(7.30.14.3) Energy carrier

Select from:
☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Renewable energy mix, please specify :Solar and Wind Power

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

815639

(7.30.14.6) Tracking instrument used

Select from:

☑ No instrument used

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Greece

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

Scope 2 emissions result from the consumption of electricity (Gross Market Base: Use of the emissions factor based on data published by the State at national level through Greek Residual Mix). It relates to CO2 emissions that correspond to the amount of electricity purchased from the network. This method is considered as market-based because renewable electricity sold with GOs has been removed to avoid double counting because the same electricity would be disclosed to consumers buying "regular" electricity. Electricity consumption consumed that is accounted for at a zero emission factor corresponds to 28.0% of Renewable Energy produced in Greece in 2023, based on the Greek Residual Mix (DAPEEP).
[Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Greece

(7.30.16.1) Consumption of purchased electricity (MWh)

2913084

(7.30.16.2) Consumption of self-generated electricity (MWh)

173077

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

1306361

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

4392522.00
[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:
☑ No

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

6879

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

4285345

(7.45.3) Metric denominator

Select from:

☑ Other, please specify :net profits in m€

(7.45.4) Metric denominator: Unit total

623

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

18

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in revenue

(7.45.9) Please explain

Despite the increase in absolute CO2 emissions scope 1 and 2, the increase in net profits compared to the previous year helped the ratio to show a decrease of 18%. [Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

Gas

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

1806485

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

342.46

(7.46.4) Scope 1 emissions intensity (Net generation)

354.07

Hydropower

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Wind

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Solar

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Total

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

1806485

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

282.76
[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Other, please specify :Water use

(7.52.2) Metric value

245

(7.52.3) Metric numerator

Total water withdrawl (ML megaliters)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro ()

(7.52.5) % change from previous year

31

(7.52.6) Direction of change

Select from:
☑ Decreased

(7.52.7) Please explain

Total absolute water withdrawl (ML) for the needs of the company's operations decreased while the company's net revenues increased compared to the previous year.

Row 2

(7.52.1) Description

Select from:

☑ Other, please specify **:**Water use

(7.52.2) Metric value

7.4

(7.52.3) Metric numerator

Total fresh water consumption (ML megaliters)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro ()

(7.52.5) % change from previous year

35

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

Total absolute fresh water consumption (ML) for the needs of the company's operations decreased while the company's net revenues increased compared to the previous year.

Row 3

(7.52.1) Description

Select from:

☑ Energy usage

(7.52.2) Metric value

93.4

(7.52.3) Metric numerator

Total energy consumption (TJ)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro ()

(7.52.5) % change from previous year

24

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

Total absolute energy consumption (TJ) for the needs of the company's operations remained about the same while the company's net revenues increased compared to the previous year.

Row 4

(7.52.1) Description

Select from:

☑ Waste

(7.52.2) Metric value

1643.3

(7.52.3) Metric numerator

Total solid waste generated (t)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro ()

(7.52.5) % change from previous year

33

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

Total solid waste generated (t) from the company's operations decreased while the company's net revenues increased compared to the previous year.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target
☑ Intensity target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:
☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:
☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.1.4) Target ambition

Select from:
☑ Well-below 2°C aligned

(7.53.1.5) Date target was set

02/14/2020

(7.53.1.6) Target coverage

Select from:
☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2798068

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

1841255

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

4639323.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

30

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

3247526.100

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

2729731.8

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

1555613.5

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

4285345.300

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

25.43

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Metlen commits to reduce its own absolute emissions in the period 2019-2030, in line with the goal established by science not to increase the global temperature more than WB2C. Our strategy on emission reduction targets was developed following a IEA scenario of below 2 degrees. We developed targets following a three pillars approach: - Assessment of the relevant regulations on climate change (Paris Agreement, EU targets, country targets) - Benchmarking of best-in-class peers in the peer group of each of our activities - Identification of emission reduction levers for each of the business sectors and selections of feasible solutions in terms of technology availability and cost Following the aforementioned approach we set targets for each BU by 2030 and 2050 that are in line with a scenario of 2 degrees. The target covers all Metlen central functions, business sectors and its subsidiaries in Greece and abroad with no exclusions.

(7.53.1.83) Target objective

Reduction by -30% of total direct and indirect CO2t-eq emissions (scope 1 & 2) from all Metlen's activities.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

To achieve this climate target, the Company developed corresponding individual overall and specific targets, implementing specialized action plans per Sector of activity. These plans focus on the utilization of existing technology, innovation and the development of innovative solutions, taking into account the specific characteristics of each activity, but also the existing composition of the country's energy mix, while they are renewed on an annual basis according to developments. More specifically, the individual categories of actions of the main initiatives include, but are not limited to: • the implementation of strategic partnerships in the field of

RES, • the implementation of best practices and energy saving initiatives, • the implementation of pilot projects and specific technical actions in production processes, • optimizing existing processes by introducing technological upgrades where feasible, • participation in European programs in the context of the Company's R&D activities, • monitoring new technologies for future application. Our total emissions (CO2 scope 1 2) increased by 3.4%, since an increase in direct CO2 emissions was expected, mainly due to the operation of the new gas-fired thermal power plant and the undertaking of new conventional electricity generation projects, energy and infrastructure projects. At the same time, in 2025, the 1st official review of the climate targets of Metlen is planned with main axes: i) the inclusion of new activities, ii) the study of the specificities of the new business structure and their impact on the objectives, iii) the overall assessment of the evolution of key CO2 reduction initiatives, iv) the assessment of the degree of utilization of available technologies, as well as the development of new ones. From 2025 onwards, it is expected to deliver the Company's significant RES investment plan that will substantially support the drastic reduction of indirect emissions by 2030, in combination with the implementation of special actions to reduce direct emissions, which will be at an advanced stage, to achieve the target.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.1.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.1.5) Date target was set

02/14/2020

(7.53.1.6) Target coverage

Select from:

☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1227992

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

1827569

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

3055561.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

65.8

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

65

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

1069446.350

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

1185242

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

1529671

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

2714913.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

17.15

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The specific target is referring to Metlen Metas Sector and it is part of our wider carbon neutrality goal. The base year of the target is the financial year 2019. Traditional Metallurgy is a carbon-intense activity. Although our primary aluminium production is practically a fully electrified process, already achieving massive emission reductions above 60% compared to historical levels, and a front-runner in the path of the EU industry towards climate neutrality, our Metallurgy sector is determined to maximize its positive contribution to the EU and global effort against climate change. We expect the industry in Europe to decarbonize as the EU seeks to more than halve its emissions over the next decade. At the same time, our customers are increasingly demanding low-carbon aluminum and our competitors have set targets to reduce emissions. To reduce our absolute emissions, we have the following emission reduction levers: 1) We accelerate the energy transition by sourcing 100% of our energy from RES. 2) We apply state of the art initiatives such as the digitization of our smelters, and investigate new technologies that have the

potential to decline direct smelting emissions by 100% and 3) we recorded an increase in production by 5,500t for 2023 and continued investments with the ultimate goal of achieving a total of 150,000 t of secondary aluminum production in 2030. The target is considered science based because it complies with the requirements of Well-below 2C aligned scenario as described in Science-Based Targets Initiative Tool.

(7.53.1.83) Target objective

Metals Sector: -65% reduction of total CO2t-eq emissions (scope 1 & 2).

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The action plan to achieve this target by 2030 includes six emission reduction initiatives: • Application of cutting-edge technologies and utilization of digital industrial methods in the stages of aluminum production. • Electrification of the Sector from Renewable Energy Sources. • Increase of secondary aluminum production. • Increase in sales of alumina hydrates. • Application study of new technologies (CO2 capture, pilot use of hydrogen, etc.) • Use of low-carbon fuels. The emissions of this target increased by 5% compared to the previous year, and the main reason is the increase in the emission factor of electricity consumed by the activities. The emission of the residual energy mix of Greece (the country of the target's activities) increased due to an increase in the GOs market for electricity generated from renewable energy sources.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.2.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.2.5) Date target was set

02/14/2020

(7.53.2.6) Target coverage

Select from:

☑ Product level

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per metric ton of aluminum

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)

5.5

(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)

8.2

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

13.7000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

75

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

3.4250000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

30

(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)

4.9

(7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)

6.4

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

11.3000000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

23.36

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Traditional metallurgy is a carbon-intense activity. Although our primary aluminum production is practically a fully electrified process, already achieving massive emission reductions above 60% compared to historical levels, and a front-runner in the path of the EU industry towards climate neutrality, our Metallurgy business is determined to maximize its positive contribution to the EU and global effort against climate change. Over the last few years, we have taken three important steps in this direction, coupled by a variety of significant operational improvements and investment to reduce emissions: First, we have improved our energy efficiency by investing in a high-efficiency combined heat and power ('CHP') facility and moving away from carbon intensive fuels in the industrial processes, drastically cutting CO2 related emissions by an incredible 40%. Spearheading sector developments, we have also promoted the use of advanced analytics, fully digitalizing our smelter, to maximize efficiency. Second, through our new calcination unit we have achieved energy savings above 12% and slashed CO2 emissions by 11%. Thirdly, we have acquired a secondary aluminium facility (EPALME) and significantly boosted remelting, through increased scrap intake. Recycled and recovered aluminium processing has a large emissions advantage over primary aluminium production, using only 5% of the energy needed in primary. The target is considered science based because it complies with the requirements of well-below 2C aligned scenario as described in Science-Based Targets Initiative Tool.

(7.53.2.86) Target objective

-75% reduction of specific CO2 emissions per tonne of aluminum produced.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

The action plan to achieve this target by 2030 includes six emission reduction initiatives: • Application of cutting-edge technologies and utilization of digital industrial methods in the stages of aluminum production. • Electrification of the Sector from Renewable Energy Sources. • Increase of secondary aluminum production. • Increase in sales of alumina hydrates. • Application study of new technologies (CO2 capture, pilot use of hydrogen, etc.) • Use of low-carbon fuels. This intensity increased by 4% compared to the previous year, and the main reason is the increase in the emission factor of electricity consumed by the activities. The emission of the residual energy mix of Greece (the country of the target's activities) increased due to an increase in the GOs market for electricity generated from renewable energy sources.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.2.1) Target reference number

Select from:

☑ Int 2

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.2.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.2.5) Date target was set

02/14/2020

(7.53.2.6) Target coverage

Select from:

☑ Product level

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)

327.5

(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)

1.5

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

329.0000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

50

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

164.5000000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

30

(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)

293

(7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)

4

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

297.0000000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

19.45

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Metlen is a frontrunner in the effort to decarbonize the Greek electricity mix by replacing highly polluting lignite based electricity generation with renewables and low carbon natural gas. We are already operating a state of the art CCGT (it starts operation during 2023), achieving an 80% CO2 emission reduction per MWh produced compared to the Greek lignite fleet, and materializing an ambitious RES deployment plan. Metlen is leading the national strive, which will call for 9 GW of additional renewable capacity and 1.5GW of gas based capacity by 2030, according to the Greek National Energy & Climate Plan. The target of our national energy plan is to reduce emissions in the Greek power sector by 70%, from 22.6 MT of CO2 in 2020 to 6.6 MT by 2030. The remaining 6.6 MT of emissions will primarily (90%) come from the remaining CCGTs that enable the uptake of renewables and provide security to the system. Therefore, we have a target to cap our absolute emissions growth to a maximum of 30% although we double our capacity of CCGTs by 2030 based on market conditions & new technologies. In relative terms, we seek to significantly reduce our footprint approximately by 50 % per MWh generated versus 2019.

(7.53.2.86) Target objective

50% reduction of specific CO2 emissions per MWh produced.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

The action plan to achieve this target by 2030 includes five emission reduction initiatives: • Continuous development of RES portfolio. • Use of electricity from RES in the buildings of the Sector, either by forming PPAs with RES suppliers and / or by directly installing RES & storage capabilities. • Replacement of diesel generators,

renewable energy, and energy storage batteries at the construction sites of the Company's construction projects. • Replacement of all company vehicles of the Sector with electric ones, in order to reduce emissions from fuel consumption. • Use of electric heat pumps to replace the heating installations of the Sector's office spaces, based on natural gas. This intensity target decreased by 7% compared to the previous year, and the main reason is the increase of the renewable energy generated by the Energy sector. Electricity production from renewable energy sources increased significantly, compared to 2022 (9.8%), constituting 17.5% of the total electricity produced by the Company in 2023. The increase comes from the Company's increased energy production from RES abroad.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Net-zero targets

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

02/14/2020

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs1

☑ Abs2

☑ Int1

☑ Int2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

Our company's net zero emissions target by 2050 applies to all scope 1 and scope 2 emissions across our operations. This includes direct emissions from our activities (scope 1), as well as indirect emissions from purchased electricity, heat, and steam (scope 2). The target encompasses all geographies and sectors where we operate, ensuring a comprehensive approach to reducing our carbon footprint. By implementing energy efficiency measures, transitioning to renewable energy, and adopting low-carbon technologies, we are working toward full decarbonization within our control.

(7.54.3.11) Target objective

Net zero CO2t-eq emissions in all operations of Metlen.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ No, but we plan to within the next two years

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Aiming to achieve net-zero carbon emissions by 2050, Metlen has included in its Action Plan the feasibility of implementing the following key initiatives, subject to the further maturation of new technologies, aiming at drastically reducing CO2 emissions (scope 1) in all its activities: • Use of zero- or low-carbon hydrogen. • Use of zero- or low-carbon fuels. • Application of carbon capture and storage technologies. • Application of Inert Anode technology in aluminum production. • Further increase of secondary aluminium production. • Electrification of mining to eliminate emissions of related equipment. • Offsetting residual emissions.

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

Our company's net zero emissions target for Scope 1 and Scope 2 is regularly reviewed through a structured and comprehensive process. This involves an annual evaluation by our sustainability and executive leadership teams to assess progress against the set milestones and ensure alignment with emerging industry standards and regulatory requirements. We monitor key performance indicators (KPIs) related to energy consumption, direct emissions, and the transition to renewable energy sources. The review process also incorporates feedback from external stakeholders, including third-party auditors, to validate our reporting and ensure transparency. Adjustments to the target may be made based on technological advancements, regulatory shifts, or significant changes in our operational footprint. This flexible, data-driven approach allows us to stay on track toward net zero by 2050 while adapting to new opportunities for emission reductions. By regularly reviewing our progress, we ensure our commitment to net zero remains robust, responsive, and aligned with best practices.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	*2*	*`Numeric input*
To be implemented	*0*	*0*
Implementation commenced	*7*	*15000*
Implemented	*2*	*701374*
Not to be implemented	*0*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☑ Other, please specify :RES development plan

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

596621

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

47750000

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

3000000000

(7.55.2.7) Payback period

Select from:

☑ 11-15 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 16-20 years

(7.55.2.9) Comment

The annual CO2e savings is for the year 2023. This figure will be changed according to the progress of the renewable investment plan.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☑ Other, please specify **:**Manufacture of aluminum Taxonomy-aligned (secondary aluminum).

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

104753

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:
☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

8400000

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

100000000

(7.55.2.7) Payback period

Select from:
☑ 11-15 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ >30 years

(7.55.2.9) Comment

The annual CO2e savings is for the year 2023. This figure will be changed as the production of secondary aluminum will be increasing over the primary aluminum. [Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

As a diversified conglomerate, we drive investment in emissions reduction through targeted strategies across our business segments: Capital Investment in Sustainable Technologies: We allocate significant resources to low-carbon technologies, focusing on renewable energy systems (RES), energy storage, and energy-efficient infrastructure projects. This includes expanding RES installations and optimizing our energy storage solutions to minimize reliance on fossil fuels. Operational Efficiency: In our aluminum production, we prioritize energy efficiency and emissions reduction. Recycling secondary aluminum is a key focus, reducing emissions compared to primary production. In our natural gas power plants, we invest in cutting-edge technologies to enhance efficiency and reduce emissions. Green Financing: We leverage green financing mechanisms, such as sustainability-linked loans and green bonds, to fund emissions reduction projects. These financing tools are crucial for expanding our renewable energy portfolio and retrofitting existing thermal power plants with cleaner technologies. Research and Development (R&D): A key part of our investment strategy is dedicated to R&D for low-carbon innovations. This includes advanced RES power plants and improved energy storage systems, helping us drive long-term reductions in emissions. Regulatory Alignment: Our investments are aligned with both national and international climate policies, such as the EU Green Deal and the EU-ETS, ensuring we remain competitive and compliant while prioritizing emissions reductions. Sustainability Commitments: Our goal to achieve net zero emissions for Scope 1 and 2 by 2050 serves as a driving force behind our investment decisions. This commitment ensures emissions reduction is integrated into our broader corporate strategy, guiding capital allocation to the most impactful initiatives. Through these methods, we maintain a comprehensive approach to driving investment in emissions reduction, ensuring long-term sustainability across our diverse portfolio of operations, from aluminum production to energy projects.
[Add row]

(7.58) Describe your organization’s efforts to reduce methane emissions from your activities.

Methane emissions are not relevant to our operations, because our scope 1 emissions, in a percentage of 99%, are generated by the use of natural gas. The company is not active in the field of natural gas extraction and distribution. Therefore, methane emissions during combustion are considered negligible.

(7.73) Are you providing product level data for your organization’s goods or services?

Select from:
☑ No, I am not providing data

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:
☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Aluminum

☑ Other, please specify **:**Manufacture of aluminum Taxonomy-aligned

(7.74.1.4) Description of product(s) or service(s)

This activity consists of the manufacture of aluminium through primary alumina (bauxite) process or secondary aluminium recycling. The Company operates the only vertically integrated alumina and aluminium production and marketing unit in the EU as well as a secondary aluminium production unit. The production process includes the manufacture of primary aluminium through the processing of alumina (aluminium oxide) by electrolytic method and the recycling of secondary aluminium. The Group's production capacity reaches 250,000 tonnes of aluminium (primary and secondary cast). Their industrial complex in Ag. Nikolaos, Boeotia, which operates for over 50 years, has achieved continuous growth by the adoption of production and commercial practices comparable to those of the leading metallurgical industries worldwide, and by over 600 million of investments in the technological modernization of the plant's facilities and the increase of its production and productivity –one of the largest private investments to be carried out in Greece recently.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Customize calculations using the CO2 KPIs of primary production

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Cradle-to-gate

(7.74.1.8) Functional unit used

t CO2 (Scope 1 & 2) / t of secondary aluminium production 0.36 t CO2 (Scope 1 & 2) / t of primary aluminium production 9.43

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Cradle-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

407314

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

*Annual GHG emissions avoided (tCO2e/year): For the company Aluminium of Greece which produces secondary aluminium: Firstly, the GHG smelter intensity is estimated: AoG Smelter GHG int. (t CO2/tAl) Smelter scope 12 emissions / Smelter production. Secondly, for the GHG emissions avoided are estimated as follows: Theoretical emissions - Real emissions, where: • Theoretical emissions Casting production * AoG Smelter GHG int Casting scope 12 GHG emissions • Real emissions Smelter scope 12 emissions Casting scope 12 emissions For the company EPALME which produces secondary aluminium: The main raw material for*

*EPALME is aluminium scrap. The avoided emissions in this case correspond to those that would theoretically be emitted if primary aluminium was consumed instead of scrap. To estimate avoided emissions for EPALME the following equation is used: EPALME GHG emissions avoided Aluminium scrap consumption * AoG Smelter GHG intensity.*

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

3

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Solar PV

(7.74.1.4) Description of product(s) or service(s)

Metlen, through its Energy Sector is one of the leading manufacturers of photovoltaic and energy storage projects worldwide. This positions the company as global manufacturer and contractor for solar energy projects, offering reliable solutions across the entire range of the activities involved in developing such projects, from autonomous solar parks and energy storage projects to complex hybrid projects. The broader strategy of the Renewables & Storage Development Business Unit apart from the construction of external projects includes the use of the Build-Own-Transfer ("BOT") business model for the development of photovoltaic projects, utilizing construction technology proprietary to the Group and currently working on (including completed) about 2.5 GW of solar power plants and 400 MW of energy storage projects on all five continents. Finally, the Company (through the Energy Sector), operates PV plants with a maximum capacity up to 11.5 MW in Greece.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify **:**Solar units annually power production multiplied with the CO2 emission factor of residual energy mix of the countries that Metlen operates.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Not applicable

(7.74.1.8) Functional unit used

- photovoltaic units CO2 emission factor: 0 t CO2/MWh

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Not applicable

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

275000

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Solar power generation replaces power produced by gas-fired or lignite power plants. The power produced by Metlen's solar units multiplied with the CO2 emission factor of residual energy mix of the countries that the company operates.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

10

Row 3

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Onshore wind

(7.74.1.4) Description of product(s) or service(s)

Construction or operation of electricity generation facilities that produce electricity from wind power The Company owns and operates wind farms of combined capacity up to 211MW in Serres, Euboea, Fokida, Boeotia and Aitoloakarnania. In 2020, the construction of a new Wind Park with a maximum capacity up to 43 MW was also initiated.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:
☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:
☑ Other, please specify **:**Wind units annually power production multiplied with the CO2 emission factor of residual energy mix of the countries that Metlen operates.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:
☑ Not applicable

(7.74.1.8) Functional unit used

wind farm CO2 emission factor: 0 t CO2/MWh

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:
☑ Not applicable

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

280000

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Wind power generation replaces power produced by gas-fired or lignite power plants. The power produced by Metlen's wind units multiplied with the CO2 emission factor of residual energy mix of the countries that the company operates.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1
[Add row]

(7.79) Has your organization canceled any project-based carbon credits within the reporting year?

Select from:
☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☑ No

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

Metlen considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plants of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is

recommended). Also we disclose water withdrawals at corporate level within our annual Sustainable Development Report 2023 under the new GRI:303 Water and Effluents Standard.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters, installed in each source of withdrawal.

(9.2.4) Please explain

Metlen considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plants of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water withdrawals at corporate level within our annual Sustainable Development Report 2023 under the new GRI:303 Water and Effluents Standard.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

We monitor water withdrawals quality in all of our of its 3 facilities in Metallurgy Sector: bauxite mining plant, secondary aluminum production plant and alumina & aluminum production plant. This refers to the quality of groundwater we drown into our boundary. These data are collected monthly from the Sector EHS department and reported annually to the local authorities (where it is recommended). Also we disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard. There is a breakdown of freshwater and other water withdrawals according to GRI 303-3 2018 Standard.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plant of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plant of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plant of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

The company monitors the quality of its water discharges by standard effluent parameters according to its Environmental Approval Permits mainly in its 7 heavy industrial facilities which are covering the 100% of the company's total discharge volume: 2 Industrial plants of Metallurgy sector, 2 plants of EPC Project and 3 Gas-fired thermal plant of primary electricity production. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities(where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

The company monitors the quality of its water discharges for emissions to water according to its Environmental Approval Permits mainly in its 7 heavy industrial facilities which are covering the 100% of the company's total discharge volume: 2 Industrial plants of Metallurgy sector, 2 plants of EPC Project and 3 Gas-fired thermal plant of primary electricity production. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities(where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water temperature devices.

(9.2.4) Please explain

Metlen considers this aspect as important in all its facilities where discharge temperature (see water) is increased, such as the 4 Gas-fired thermal plant of primary electricity production where water is used for cooling processes. The company monitors the temperature of its water discharges by standard effluent parameters according to its Environmental Approval Permits. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS. For the rest facilities the issue is not relevant. As a consequence the percentage of coverage in the applicable cases is 100%.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Subtracting the volumes of withdrawn water from the discharged water.

(9.2.4) Please explain

Metlen considers this aspect as important. In this context measures and monitors the total water consumption volumes from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plant of primary electricity production and 40 facilities which are RES plants (15 Wind Farms, 24 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water consumption total volume, at corporate level, within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

Reused water volume refers mainly to 4 company facilities (three Gas-fire thermal plants of primary electricity production and one plant of Metallurgy sector mining process). The amount of water reused in Company plants, amounted to 10,959.9 ML, corresponding to 7.2% of total water withdrawals. In particular: (a) the reuse of

10,942.6 ML of discharged seawater from the cooling network of the Combined Heat and Power (CHP) plant, (b) the recycling of 13.0 ML of liquid waste from the Heat Recovery Boiler of the combined-cycle thermal power plant and (c) the use of 4.3 ML of rainwater, collected as a good practice in the bauxite mining activity. All data are collected monthly from each Business sector EHS departments, through the environmental management system processes according to company's business sectors internal goals. Also we disclose water reuse volume percentage within our annual Sustainable Development Report under the new GRI STANDARDS

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Internal audits.

(9.2.4) Please explain

Metlen considers this aspect as important in all its facilities, so 100% of our Business sectors monitor this aspect as part of its labor relation policies and health and safety policies. All of our facilities (including RES sites) and corporate centers provide water installations and have access to fully-functioning WASH services. [Fixed row]

(9.2.1) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

Fulfilment of downstream environmental flows

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ 100%

(9.2.1.2) Please explain

Based on water use licenses and Environmental Terms Approval Decisions, there is no specific environmental flow that the Company must comply with. There is a limit on the annual amount of water we use for the total period of operation of the micro hydroelectric plant (April 1st to November 30th). The water supply is determined purely based on the technical characteristics of the equipment and does not appear to be related to environmental flow. There are no living organisms in the network, as we obtain water from a local irrigation canal.

Sediment loading

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ 100%

(9.2.1.2) Please explain

There is a Scada system in the hydroelectric, which sends a notification when the water pressure in the water intake has dropped (i.e. the grill is blocked). In addition, the intake will be cleaned when the operator of the hydropower plant detects that garbage has been collected in the intake. This takes place 1-2 times a day up to 3 depending on the day and needs. The sediments which are mainly garbage, algae, branches, are collected are removed by mechanical means and end up in municipal waste bins.

Other, please specify

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ Not relevant

(9.2.1.2) Please explain

No comment.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

152748.2

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:
☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:
☑ Facility expansion

(9.2.2.6) Please explain

It is likely that total withdrawals will increase within the next 2 years as a result of a the operation of the new 826 MW combined cycle gas-fired power plant (CCGT). The new plant started operation in 2023 (after the necessary tests, time for commissioning, etc.) and is expected to be in full production by 2024 to support the national grid. As a result, total water withdrawal is expected to increase because of the need for more cooling seawater. The water withdrawal rate is annually determined by the Water Resources Management Directorate of the Sterea Regional Administration.

Total discharges

(9.2.2.1) Volume (megaliters/year)

144723.4

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☑ Facility expansion

(9.2.2.6) Please explain

The company's total water discharges presented a decrease by 9%, comparing to 2022. Given that the majority of the total discharge volume is related to seawater discharged back to its original source. It is likely that total discharges will increase within the next 2 years as a result of a the operation of the new 826 MW combined cycle gas-fired power plant (CCGT). The new plant started operation in 2023 (after the necessary tests, time for commissioning, etc.) and is expected to be in full production by 2024 to support the national grid. As a result total water discharge is expected to increase in correspondence with the increased needs for cooling sea water.

Total consumption

(9.2.2.1) Volume (megaliters/year)

8024.8

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Facility expansion

(9.2.2.4) Five-year forecast

Select from:

☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☑ Facility expansion

(9.2.2.6) Please explain

Water consumption is expected to increase in the coming years due to the need for more water for the cooling process of thermal power plants. In 2023, the new 826 MW combined cycle gas-fired power plant (CCGT) started operation, increasing the need to withdrawal more seawater. This need leads to higher losses due to evaporation of seawater during cooling.
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:
☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

31.2

(9.2.4.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.4.5) Five-year forecast

Select from:
☑ About the same

(9.2.4.6) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

0.02

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

(9.2.4.9) Please explain

The water stress areas were identified using the WRI Aqueduct tool by WRI Aqueduct tool of World Resources Institute (Water Risk Atlas - https://www.wri.org/applications/aqueduct/water-risk-atlas/#/? advancedfalse&basemaphydro&indicatorbws_cat&lat-14.445396942837744&lng-142.85354599620152&mapModeview&month1&opacity0.5&ponderationDEF&predefinedfalse&projectionabsolute&scenariooptimistic&scopebaseline&timeScaleannual&yearbaseline&zoom2). The areas in which Metlen operates including the construction sites all over the world, were classified based on their water stress risk level. As water stressed areas, were selected those who are characterized as extremely high stress. The water withdrawals are from areas with water stress correspond to 31.2 ML. The slight decrease compared to 2022 (5%) is due to the differences between the various projects the company is developing in high water stress areas. The projects are in different stages of development and each stage has different water needs.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

15.6

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Facility expansion

(9.2.7.5) Please explain

The withdrawal of fresh surface water, including rainwater, water from wetlands, rivers, and lakes is much higher compared to the previous year, mainly because of the increased need of water for the bauxite penetration tests conducted by DELPHI-DISTOMON.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

144091.8

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

This figure shows the seawater intake for the cooling purposes of the High Efficiency Combined Heat and Power plant. The limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Regional Administration of the Prefecture of Sterea Hellas. This water source is relevant to Metlen because it is the main water source for some of our significant activities and is determined by legislation. Withdrawal of this kind of water has decreased (by 8%) with respect to last year. Withdrawal volumes vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant and no significant differences from year to year are observed.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

7946.4

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

This figure corresponds to volume of brackish, industrial service and drinking water, used primarily to meet the water supply needs of the company's facilities in all Metallurgy and 2 out of 3 Energy industrial plants and has decreased by 7.5% compared to 2022. This quantity of groundwater withdrawal is obtained mainly by a network of 17 drills, owned by the company's Metallurgy sector, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. This water source is relevant to Metlen as it is used for various industrial operations and covers the needs of industrial water in the AoG plant. Also the source is renewable because the volumes of the water withdrawn can be replenished relatively quickly and is located at shallow dept. The production of primary aluminum remained about the same compared to 2022 and that is why the groundwater withdrawal remained also about the same.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

60

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify **:**Because of the different nature of the parts of mining site, which could produce more or less water depending on the morphology of the bauxite reserves.)

(9.2.7.5) Please explain

It relates to the quantity of groundwater resulting from the bauxite mining process of the DELPHI-DISTOMON subsidiary of Metlen, and which is withdrawn and get the appropriate treatment before its final discharge. This water source is relevant to MYTILINEOS because it affects the bauxite mining process of the Company and it is essential for the smooth operation of the Metallurgy Sector. The measurement is based on GRI:303 Water and Effluents Standards. The quantity of produced/entrained water is lower compared to previous year, mainly because of the different nature of the parts of mining site, which could produce more or less water depending on the morphology of the bauxite reserves.

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

634.4

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Facility expansion

(9.2.7.5) Please explain

The 70% of this volume concerns seawater returned by third party sources (Motor Oil company) and used in the desalination process for the production of industrial water in our thermal power station of the Metlen subsidiary Korinthos Power. The rest 47%, relates to water withdrawal from public suppliers for various activities within the company. In total this source is relevant because a large number of facilities depend and use this kind of water in their operations. Withdrawals of this kind of water was about the same in 2023 compared to 2022 due to minor changes on the operations of the Company.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

93.2

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Other, please specify **:**Decreased quantities produced/entrained water from bauxite mining process

(9.2.8.5) Please explain

This figure relates to the discharge of the water produced by the bauxite mining unit, the irrigation of greenery that has been used for the restoration of the natural environment, and the amount of primary treated wastewater discharged in Asopos River due to the operation of secondary aluminum treatment plant. Water discharged in this destination is relevant to Metlen because the fresh water withdrew from the bauxite mining unit is directly discharged to a nearby stream and

without this operation the mining process could be at risk. This figure has decreased compared to 2022 because of the decreased quantities produced/entrained water from bauxite mining process. The quantities of produced water each year depend on various geological and other parameters of the mining sites and an accurate projection could not be achieved.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

144427.3

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.8.5) Please explain

This figure shows the company's water discharge volume to the sea. The majority (99%) of this water volume is seawater discharge from the cooling process of the Combined Heat and Power (CHP) plant. The rest relate to casting's cooling system and wastewater and rainwater, measured at the point of exit from the primary treatment facilities of Metallurgy sector. Water discharged to this destination is relevant to Metlen as it is determined by legislation. The discharge of seawater have decreased by 9% and compared to the previous year as it is directly connected with the respective withdrawal volumes which vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant. Within the next 2 years as a result of the operation of the new 826 MW combined cycle gas-fired power plant (CCGT), total water discharges is expected to increase in correspondence with the increased needs for cooling sea water.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

42.4

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Facility expansion

(9.2.8.5) Please explain

It relates to the 1) amount of water used for the drilling of the subsoil during the bauxite mining process of the company Delphi-Distomon and 2) amount of water used specifically for new solar projects. For the drilling of the subsoil, fresh under pressure water is used which ends up in groundwater reservoirs. This procedure is essential for the mining process and it is considered relevant to MYTILINEOS Metallurgy sector. The figure is decreased compared to previous year because of the different maturity level of RES projects around the world.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

160.5

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

It relates to industrial service water in the power generation process (disposal to a Motor Oil company liquid waste treatment plant) and discharge to municipal wastewater treatment plants. Water discharged in this destination is relevant to Metlen as it is the appropriate way of treatment for both types of water sources described above. The discharge of this type of water is increased in comparison with the previous year due to the increased needs in industrial water and water from public suppliers and the corresponding increased withdrawals.
[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

The amounts of water used for the operation of Metlen Business Sectors and subsidiaries do not require tertiary treatment because the pollution burden is low. In any case, regarding the management of water discharges resulting from the activity of Metlen, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

The amounts of water used for the operation of Metlen Business Sectors and subsidiaries do not require tertiary treatment because the pollution burden is low. In any case, regarding the management of water discharges resulting from the activity of Metlen, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

416.6

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

The 96% of the primary treated water relates to wastewater that is recycled within the production process of Metallurgy Business Sector. More specifically, the aluminum 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. The other 4% relate to discharge of industrial wastewater to Motor Oil Company and primary-treated wastewater discharge to Asopos River. Primarily treated water quantities increased compared to 2022.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

147641.7

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

It relates to sea water discharge back to the sea, freshwater pumped for the bauxite mining site discharged to nearby streams, water used for the drilling of the subsoil during the bauxite mining process of the company Delphi-Distomon and brine water discharges as a result of desalination process for the production of industrial water. Water with no need of any treatment before its discharge was lower in 2023 compared to 2022 mainly due to the decreased seawater withdrawal quantity.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

121.8

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:
☑ 41-50

(9.2.9.6) Please explain

It relates to discharges to municipal wastewater treatment plants. It is relevant to Metlen because it is the appropriate way of treatment for this type of discharges. Discharge to a third party without treatment quantity is increased compared to the previous year mainly because of the increase in the number of projects developed by the company within 2023. The number of sites has also led to an increase in specific discharged water flows.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

(9.2.9.6) Please explain

No comment.
[Fixed row]

(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

15.5

(9.2.10.2) Categories of substances included

Select all that apply

☑ Priority substances listed under the EU Water Framework Directive

(9.2.10.3) List the specific substances included

BOD (Biochemical Oxygen Demand) COD (Chemical Oxygen Demand) TSS (Total Suspended Solids) TN (Total Nitrogen Bound) TP (Total Phosphorus)

(9.2.10.4) Please explain

Regarding liquid waste discharges, efforts continued in 2023 to ensure the best possible management of wastewater, both for the protection of the natural environment and for the benefit of human health. Discharge water quality data are noted to be lower and, in many cases, much lower than the legally required ones. The total quantity of pollutants in the treated wastewater discharged to the water recipients amounted to 15.5 t, which can be analyzed as 3.2 t BOD, 11.0 t COD, 1.3 t TSS, 0 t TN and 0 t TP.
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:
☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

2

(9.3.3) % of facilities in direct operations that this represents

Select from:
☑ 1-25

(9.3.4) Please explain

As already mentioned, although water related risks are less material for our business we report two facilities that use the 99,8% of the total amount of the company's water withdrawal and could have potential substantive impact in the future: 1) High Efficiency Combined Heat and Power Plant, in Ag. Nikolaos (Viotia), exposed to seawater risks in terms of the limits of the water use permission issued by local authorities. This facility also used by Metallurgy sector for the steam production as a basic stage in alumina production process. 2) Alumina and Aluminium production Plant in Ag. Nikolaos (Viotia), which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

Risks exist, but no substantive impact anticipated. In Metallurgy sector, mining is at the base of the value chain and therefore we directly evaluate water use, risk and management as a core component of our own business. The suppliers' water use, risks and management are considered as an issue not related to our production because of the raw materials (bauxite, pet coke etc.) nature. Also the company's power plants are located near the coast line and all internal water needs can be covered by sea water. Gas-fired Combined Cycle Thermal Power Plant (CCGT), in Agioi Theodoroi, uses sea water for its desalination plant. The sea water is provided by the Refinery plant that lies next to the plant and the quantity and quality is guaranteed with contracts. Moreover sea water is by its nature not subject to scarcity. We have reviewed public disclosures of our key suppliers and from that review we have not identified any water-related risks that could materially impact our business.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☑ Facility 1

(9.3.1.2) Facility name (optional)

High Efficiency Combined Heat and Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Greece

☑ Other, please specify **:**Sea Gulf of Antikyra

(9.3.1.8) Latitude

38.358016

(9.3.1.9) Longitude

22.689508

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

144090

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

144090

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

144090

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ Lower

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

144090

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

It relates to seawater used for the cooling process of the CHP facility. The withdrawal and discharge volumes are lower with respect to last year, due to the 8% reduction in CHP power production. Concerning the future projections, the limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Sterea Regional Administration, so it anticipated to be about the same with slight positive or negative deviations. Zero water consumption for 2023 means that there were no leaks in the cooling process CHP facility.

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Alumina and Aluminum production Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify **:**Groundwater sources & Mornos River

(9.3.1.8) Latitude

38.360912

(9.3.1.9) Longitude

22.688575

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

8304.2

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

7914.4

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

389.8

(9.3.1.21) Total water discharges at this facility (megaliters)

3728.1

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

30.8

(9.3.1.24) Discharges to brackish surface water/seawater

3697.3

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4576.1

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals/discharges are directly measured; consumption is calculated. Virtually all withdrawals/discharges are due to alumina and aluminium production. Water consumption relates to water used for the production and potable water. The total water consumption slightly decreased compared to the previous year. Water consumption is anticipated to remain the same in the next 2 year given that the alumina and aluminum production remains about the same. The slight decrease in total consumption compared to 2022 is mainly due to decrease in population (visitors, contractors for projects implemented at the plant), as well as drinking water leaks that are detected in the settlements' networks.
[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2023 Sustainable Development Report (p. 166-173) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS.
[Fixed row]

(9.4) Could any of your facilities reported in 9.3.1 have an impact on a requesting CDP supply chain member?

Select from:
☑ No, CDP supply chain members do not buy goods or services from facilities listed in 9.3.1

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

(9.5.1) Revenue (currency)

5491685000

(9.5.2) Total water withdrawal efficiency

35952.53

(9.5.3) Anticipated forward trend

The water withdrawal intensity as reported in here is expected to increase because growth of the Company in the coming year is anticipated to reach much higher levels while various initiatives to mitigate water-related impacts and limit water withdrawal to the lower possible are already implemented and are planned to be implemented in the future. In addition, the company's clear objective is to combine economic growth with the lowest possible water consumption.
[Fixed row]

(9.7) Do you calculate water intensity for your electricity generation activities?

Select from:
☑ Yes

(9.7.1) Provide the following intensity information associated with your electricity generation activities.

Row 1

(9.7.1.1) Water intensity value (m3/denominator)

0.06

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water consumption

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ About the same

(9.7.1.5) Please explain

This intensity value refers to Gas-fired Combined Cycle Thermal Power Plant (CCGT) owned by KORINTHOS POWER SA, a subsidiary of Metlen located in Ag. Theodoroi (Korinthia). This indicator corresponds to water consumption per MWh. The value of the indicator remained about the same compared to the previous reporting year (0.06). The largest proportion of water consumption is linked to the evaporation of the water used for the cooling process of the CHP plant. The water evaporation depends on both operational and weather conditions and is not something we can fully control. Operating conditions include mainly the operating hours and the load of the unit, while in weather conditions the relative humidity and air temperature. For this reason, continuous monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on water-use are conducted under the framework of ISO 14001.

Row 3

(9.7.1.1) Water intensity value (m3/denominator)

2.9

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water consumption

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Higher

(9.7.1.5) Please explain

This intensity value refers to High Efficiency Combined Heat and Power Plant owned by Metlen, located in the Energy Complex of Ag. Nikolaos (Viotia). This indicator corresponds to water consumption per MWh. The value of the indicator is higher compared to the previous reporting year (1.04). The largest proportion of water consumption is linked to the evaporation of the water used for the cooling process of the CHP plant. The water evaporation depends on both operational and weather conditions and is not something we can fully control. Operating conditions include mainly the operating hours and the load of the unit, while in weather conditions the relative humidity and air temperature. For this reason, continuous monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on water-use are conducted under the framework of ISO 14001.
[Add row]

(9.12) Provide any available water intensity values for your organization’s products or services.

Row 1

(9.12.1) Product name

Bauxite

(9.12.2) Water intensity value

0.0002

(9.12.3) Numerator: Water aspect

Select from:

☑ Water withdrawn

(9.12.4) Denominator

Ton of final product

(9.12.5) Comment

2023: 0.00022 megaliters / t bauxite 2022: 0.00019 megaliters / t bauxite 2021: 0.00041 mega liters / t bauxite 2020: 0.00037 mega liters/ t bauxite It refers to water withdrawals of the bauxite mining activities of MYTILINEOS subsidiary DELFI-DISTOMON. Compared to previous years, the water withdrawal per ton of bauxite produced has increased by 16% due to the increased quantities of produced/entrained water from bauxite mining process. The quantities of produced water each year depend on various geological and other parameters of the mining sites and an accurate projection could not be achieved.

Row 2

(9.12.1) Product name

Alumina

(9.12.2) Water intensity value

0.0029

(9.12.3) Numerator: Water aspect

Select from:

☑ Water consumed

(9.12.4) Denominator

Ton of final product

(9.12.5) Comment

2023: 0.00290 mega liters per ton of Alumina 2022: 0.00338 mega liters per ton of Alumina 2021: 0.00337 mega liters per ton of Alumina In 2023, our water consumption per ton of alumina decreased to 0.00290 mega liters, down from 0.00338 in 2022 and 0.00337 in 2021. This improvement highlights enhanced operational efficiency, better water management, and increased recycling efforts. We remain committed to optimizing resource use and reducing our environmental footprint. This indicator corresponds to water consumption of the company's alumina production process. In 2022 a more accurate measurement of the water consumption in order to include only the operations related to alumina production has been carried out. It included the industrial and drinking water as well as the water consumed for the maintenance works inside the factory of AoG.

Row 3

(9.12.1) Product name

Aluminium

(9.12.2) Water intensity value

0.0011

(9.12.3) Numerator: Water aspect

Select from:

☑ Water consumed

(9.12.4) Denominator

Ton of final product

(9.12.5) Comment

2023: 0.00113 mega liters per ton of primary aluminum 2022: 0.00128 mega liters per ton of primary aluminum 2021: 0.00129 mega liters per ton of primary aluminium In 2023, our water consumption per ton of primary aluminum decreased to 0.00113 mega liters, down from 0.00128 in 2022 and 0.00129 in 2021. This reduction reflects improved process efficiency, enhanced water recycling efforts, and optimized production practices. Our commitment to sustainability drives continuous improvements in resource use, including water conservation. It included the industrial and drinking water as well as the water consumed for the maintenance works inside the factory of AoG..
[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*None of the company's intermediate or final products contain hazardous substances.*

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:
☑ No, but we plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Important but not an immediate business priority

(9.14.4) Please explain

Currently, we do not classify any of our products or services as low water impact. However, we recognize the growing importance of water conservation and plan to address this within the next two years. While minimizing water usage is a significant sustainability focus, it is not an immediate business priority at this stage. Our future efforts will include evaluating water intensity across our product portfolio and identifying opportunities to reduce our water footprint in alignment with broader environmental goals.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:
☑ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category
Water pollution	*Select from:* ☑ Yes
Water withdrawals	*Select from:* ☑ Yes
Water, Sanitation, and Hygiene (WASH) services	*Select from:* ☑ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☑ Target 1

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

☑ Other water pollution, please specify :Water pollution incidents

(9.15.2.4) Date target was set

12/31/2022

(9.15.2.5) End date of base year

12/30/2023

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/30/2023

(9.15.2.8) Target year figure

0

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This is an annual target. Target achieved: No water pollution incidents occurred during 2023. In general 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. For 2024, the target of no water pollution incidents though the year, remains. Through this target we contribute to SDG 6 & 14.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

Key actions contributing to maintaining our no water pollution target in 2023 include strict adherence to environmental management systems, regular monitoring of water quality, and staff training on best practices for preventing pollution. Additionally, we implemented preventive maintenance programs and enhanced controls at critical points in our production processes. These measures help ensure compliance and contribute to achieving SDGs 6 (Clean Water) and 14 (Life Below Water).

(9.15.2.16) Further details of target

This annual target aims to prevent water pollution across all business sectors. In 2023, we achieved our goal of no water pollution incidents, reflecting our commitment to protecting the natural environment. For 2024, we will continue monitoring water quality, enforcing strict controls, and enhancing preventive measures to maintain this performance. This ongoing effort aligns with our sustainability goals and contributes directly to SDGs 6 and 14.

Row 2

(9.15.2.1) Target reference number

Select from:

☑ Target 2

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction in total water withdrawals

(9.15.2.4) Date target was set

12/31/2020

(9.15.2.5) End date of base year

12/30/2021

(9.15.2.6) Base year figure

63.5

(9.15.2.7) End date of target year

12/30/2025

(9.15.2.8) Target year figure

23.5

(9.15.2.9) Reporting year figure

27.8

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

89

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

In 2021, our Company established a goal of achieving a 60% reduction in total water withdrawals per million euro of revenues by 2025. The progress towards this target is measured in megaliters, and it applies across all company operations without any exceptions. The motivation behind this target is twofold: firstly, to maximize future cost savings by reducing water bills, operational expenses, and regulatory costs. Secondly, it aligns with our water policy commitment to enhance freshwater availability in critical river basins. With an already achieved progress of 89%, we are well on track to meet this target, provided that we maintain the current pace of progress. Through this target we contribute to SDG 6.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

We are on track to meet our goal of reducing water withdrawals by 60% per million euro of revenues by 2025, with 89% progress already achieved. Key actions include optimizing water use in production processes, implementing water recycling systems, and enhancing monitoring across all sites. Continued focus on these measures will ensure we meet the target on time, contributing to SDG 6.

(9.15.2.16) Further details of target

This target applies across all operations, reflecting our commitment to water conservation and aligning with our water policy to improve freshwater availability in critical river basins. By reducing total water withdrawals, we aim to lower water-related costs and support environmental sustainability. Achieving this target will further strengthen our efforts towards SDG 6 and enhance resource efficiency across our business.

Row 3

(9.15.2.1) Target reference number

Select from:

☑ Target 3

(9.15.2.2) Target coverage

Select from:

☑ Other, please specify **:**Company-wide (including suppliers)

(9.15.2.3) Category of target & Quantitative metric

Water, Sanitation, and Hygiene (WASH) services

☑ Other WASH, please specify **:**Water installations and access to fully-functioning WASH services for all our employees (direct & indirect)

(9.15.2.4) Date target was set

12/31/2022

(9.15.2.5) End date of base year

12/30/2023

(9.15.2.6) Base year figure

100

(9.15.2.7) End date of target year

12/30/2023

(9.15.2.8) Target year figure

100

(9.15.2.9) Reporting year figure

100

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This is an annual target. Target achieved: All of our facilities (including RES sites) and corporate centers provide water installations and access to fully-functioning WASH services for all our employees (direct & indirect). Through this target we contribute to SDG 6.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

Key actions include regular maintenance of water installations, continuous monitoring of WASH services, and ensuring prompt repairs at all facilities, including RES sites. We also invested in employee awareness and training on water hygiene and safety. These efforts have ensured consistent access to fully functioning WASH services, contributing to SDG 6.

(9.15.2.16) Further details of target

This target ensures that all employees, both direct and indirect, have access to safe, reliable WASH services at all company facilities and corporate centers. The aim is to maintain high standards of hygiene and water availability, safeguarding employee health and well-being. This aligns with our commitment to SDG 6 and upholds our responsibility to provide safe working environments.

Row 4

(9.15.2.1) Target reference number

Select from:

☑ Target 4

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/31/2018

(9.15.2.5) End date of base year

12/30/2019

(9.15.2.6) Base year figure

14500

(9.15.2.7) End date of target year

12/30/2025

(9.15.2.8) Target year figure

13000

(9.15.2.9) Reporting year figure

13650

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

57

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

Water withdrawals for any use from the network of 17 drills, owned by the Aluminium of Greece, company of Metallurgy Business Sector, should be less than 13,000 m3/day by 2025. Through this target we contribute to SDG 6.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

To achieve the target of limiting water withdrawals to less than 13,000 m³/day by 2025, we have implemented efficient water management practices, enhanced monitoring of the 17 drills, and optimized water usage in operations. Progress is closely tracked, and current withdrawals are within target limits, keeping us on track for the 2025 goal and contributing to SDG 6.

(9.15.2.16) Further details of target

This target focuses on reducing water withdrawals from our 17 owned drills by the Aluminium of Greece, part of the Metallurgy Business Sector. It reflects our commitment to sustainable water management and aligns with our broader environmental strategy to conserve freshwater resources. Achieving this goal helps reduce operational impact on local water sources and supports SDG 6.

Row 5

(9.15.2.1) Target reference number

Select from:

☑ Target 5

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

11/30/2022

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

10100

(9.15.2.7) End date of target year

12/30/2025

(9.15.2.8) Target year figure

6500

(9.15.2.9) Reporting year figure

7914

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

61

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

Water withdrawals for industrial use from the network of 17 drills, owned by the Aluminium of Greece, company of Metallurgy Business Sector, should be less than 6,500 m3/day by 2025.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

The reduction in industrial water consumption will be achieved through a project that will allow the replacement of industrial water with brackish water. Through this target we contribute to SDG 6.

(9.15.2.16) Further details of target

The target aims to reduce industrial water withdrawals from our 17 owned drills by limiting usage to less than 6,500 m³/day by 2025. This reduction will be achieved through a strategic project to replace industrial water with brackish water, minimizing our impact on freshwater resources. By implementing this sustainable approach, we aim to enhance water efficiency in our operations while contributing to SDG 6, which focuses on ensuring availability and sustainable management of water and sanitation for all.

Row 6

(9.15.2.1) Target reference number

Select from:

☑ Target 6

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/31/2022

(9.15.2.5) End date of base year

12/30/2023

(9.15.2.6) Base year figure

400

(9.15.2.7) End date of target year

12/30/2023

(9.15.2.8) Target year figure

400

(9.15.2.9) Reporting year figure

307

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This is an annual target. Target achieved: Water withdrawals for drinking use from the network of 17 drills, owned by the Aluminium of Greece, company of Metallurgy Business Sector, should be less than 400 m3/day. Through this target we contribute to SDG 6.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

Key actions that contributed to maintaining our annual target of keeping water withdrawals for drinking use below 400 m³/day include regular maintenance and monitoring of the 17 drill sites, ensuring efficient water management practices, and conducting water quality assessments. Employee training on water conservation and responsible usage also played a vital role in achieving this target, demonstrating our commitment to SDG 6.

(9.15.2.16) Further details of target

This target focuses on minimizing water withdrawals for drinking purposes from our network of 17 drills, owned by Aluminium of Greece within the Metallurgy Business Sector. By limiting withdrawals to under 400 m³/day, we aim to conserve freshwater resources and promote sustainable water usage. Achieving this target supports our commitment to SDG 6, ensuring the availability and sustainable management of water for our employees and operations.
[Add row]

C11. Environmental performance - Biodiversity

(11.1) Within your reporting boundary, are there any geographical areas, business units or mining projects excluded from your disclosure?

Select from:

☑ No

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Land/water protection

☑ Land/water management

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ Other, please specify :Rate of restoration of total exploitable area from mining activity

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation. In addition, Metlen operates several wind farms in protected areas, ensuring minimal impact on biodiversity. Key facilities include the "Korifi" wind farm, which conducts annual avifauna monitoring with no observed bird fatalities. The "Pyrgos" wind farm is adjacent to critical habitats, and monitoring has shown limited effects on bird populations. The "Chelona" wind farm also implements a bird collision avoidance system. Overall, the company demonstrates commitment to environmental protection through ongoing monitoring and compliance with biodiversity regulations.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

No comment.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

No comment.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

No comment.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

No comment.
[Fixed row]

(11.4.1) Provide details of your organization’s activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.1) Mining project ID

Select from:
☑ All disclosed mining projects

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Legally protected areas

☑ UNESCO World Heritage sites

(11.4.1.3) Protected area category (IUCN classification)

Select from:

☑ Unknown

(11.4.1.4) Country/area

Select from:

☑ Greece

(11.4.1.5) Name of the area important for biodiversity

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state. Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation.

(11.4.1.6) Proximity

Select from:

☑ Up to 25 km

(11.4.1.8) Briefly describe your organization’s activities in the reporting year located in or near to the selected area

The activities relate to underground bauxite mining operations.

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ No

(11.4.1.11) Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

The company's underground bauxite mining activities, while compliant with necessary permits, could potentially impact biodiversity near the Archaeological Site of Delphi and within the Natura 2000 area. While underground operations reduce surface disturbance, they may still cause subsidence or alter groundwater flow, potentially affecting local ecosystems. An environmental impact assessment (EIA) was conducted to evaluate these risks, focusing on species habitats and ecosystem integrity. To mitigate potential impacts, we implement measures such as monitoring groundwater levels, conducting regular biodiversity assessments, and maintaining strict operational protocols. Continuous consultation with environmental authorities ensures adherence to regulations and ongoing improvement of our practices.

(11.4.1.12) Further context for mining projects

The company's mining operations predate both the UNESCO designation of the Delphi site and the Natura 2000 designation, and they account for less than 20% of our bauxite activities within the Natura area. We prioritize responsible mining practices, engaging with stakeholders, and adhering to state regulations. Our commitment to sustainable development ensures that mining operations are balanced with environmental conservation efforts, contributing positively to local communities while minimizing ecological footprints.
[Add row]

(11.5) Can you disclose the mining project area and the area of land disturbed for each of your mining projects?

(11.5.1) Disclosing mining project area and area of land disturbed

Select from:

☑ Yes

(11.5.2) Comment

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state. Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation.
[Fixed row]

(11.5.1) Provide details on the mining project area and the area of land disturbed for each of your mining projects.

Row 1

(11.5.1.1) Mining project ID

Select from:
☑ Project 1

(11.5.1.2) Total area of owned land/lease/project area (hectares)

41

(11.5.1.3) Total area disturbed to date (hectares)

97

(11.5.1.4) Area disturbed in the reporting year (hectares)

12

(11.5.1.5) Type(s) of habitat disturbed in the reporting year

Select all that apply
☑ Natural habitat

(11.5.1.6) Comment

The total area of land associated with our mining projects covers 41 hectares of owned, leased, or project land. As of the end of the reporting year, 97 hectares of land have been disturbed in total, with 12 hectares disturbed during the current reporting year. The disturbed areas primarily include natural habitats. We continually assess and monitor the impact of our operations to ensure that any disruption is minimized and managed in alignment with our biodiversity and land use policies. [Add row]

(11.6) Are there artisanal and small-scale mining (ASM) operations active in your mining project areas or in their area of influence?

Select from:

☑ No

(11.7) Do you adopt biodiversity action plans to manage your impacts on biodiversity?

Select from:

☑ Yes

(11.7.1) Describe your criteria for defining which sites are required to produce biodiversity action plans.

In our organization, the criteria for determining which sites require the development of Biodiversity Action Plans (BAPs) are based on a combination of ecological significance, regulatory requirements, and potential impact assessments. Our approach ensures that we prioritize biodiversity conservation in areas where our operations could have the most significant effects. The criteria are as follows: Ecological Significance: Sites located within or adjacent to protected areas, such as Natura 2000 sites, UNESCO World Heritage Sites, or other ecologically sensitive areas, are prioritized for BAP development. We assess the biodiversity value of the site, including the presence of rare, endangered, or endemic species and critical habitats. Sites with high ecological value or unique ecosystems warrant more comprehensive action plans. Impact Assessment: We conduct detailed impact assessments for all proposed mining sites to evaluate potential effects on local biodiversity. If a site is likely to cause significant disturbance to habitats or species, a BAP will be mandated. This assessment includes evaluating both direct impacts, such as habitat destruction, and indirect impacts, such as changes in water quality or noise pollution. Regulatory Requirements: Compliance with local, national, and international regulations is crucial. Any site that falls under legal obligations to prepare a BAP, as outlined by environmental laws or policies, is required to develop one. We stay informed of evolving regulations to ensure adherence. Stakeholder Input: Community concerns and stakeholder feedback are critical in our decision-making process. If local stakeholders express concerns regarding biodiversity impacts, this feedback may trigger the development of a BAP, even if the site does not meet other criteria. Operational Scale and Duration: The scale and expected duration of the mining activities also play a role. Larger projects or those expected to have long-term operational impacts are more likely to require a BAP than smaller, short-term projects. Monitoring and Review: We commit to regular monitoring of our sites. If monitoring results indicate significant changes in biodiversity or ecosystem health, we reassess whether a BAP is necessary, even for sites previously deemed low-risk. By applying these criteria, we ensure that our Biodiversity Action Plans are tailored to the specific contexts of our operations, effectively addressing potential risks to biodiversity. Our BAPs are designed to include actionable goals, stakeholder engagement, and ongoing monitoring to mitigate impacts and enhance biodiversity conservation efforts in alignment with our commitment to sustainable practices.

(11.8) Provide details on mining projects that are required to produce Biodiversity Action Plans.

(11.8.1) Number of mining projects required to produce a BAP

1

(11.8.2) % of mining projects required to produce a BAP that have one in place

100

(11.8.3) Format

Select all that apply

☑ Part of general Environmental Management System

(11.8.4) Frequency BAPs are reviewed

Select all that apply

☑ Eventually

(11.8.5) Please explain

Our organization mandates the production of Biodiversity Action Plans (BAPs) for specific mining projects to ensure the protection of biodiversity and compliance with environmental regulations. The criteria for determining which projects require BAPs include: Proximity to Protected Areas: Mining operations located near or within protected areas, such as Natura 2000 sites or UNESCO World Heritage Sites, are required to produce BAPs. These plans focus on mitigating potential impacts on sensitive ecosystems and species. High-Impact Activities: Projects anticipated to have significant environmental impacts, as identified through our impact assessment processes, necessitate BAPs. This includes large-scale bauxite mining or extensive surface disturbances, with plans detailing habitat restoration and species protection measures. Presence of Endangered Species: Operations situated in habitats supporting rare or endangered species are also required to develop BAPs. These plans outline strategies for habitat preservation and monitoring to ensure species survival during mining activities. Community Engagement: Projects that receive concerns from local communities regarding biodiversity impacts will produce BAPs. These plans aim to address community concerns and incorporate local ecological knowledge. Regulatory Requirements: Certain mining projects are legally mandated to prepare BAPs as part of their environmental permitting process. This ensures compliance with national and regional biodiversity regulations. Long-Term Operations: Projects with extended operational timelines are required to

implement BAPs to maintain biodiversity considerations throughout their lifecycle, allowing for adaptive management based on monitoring outcomes. By adhering to these criteria, our organization commits to minimizing environmental impacts and promoting biodiversity conservation in all our mining activities.
[Fixed row]

(11.9) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?

(11.9.1) Any projects caused, or have the potential to cause, significant adverse impacts on biodiversity

Select from:

☑ No

(11.9.2) Comment

Our organization has conducted comprehensive assessments of all our mining projects to evaluate their potential impacts on biodiversity. Based on these assessments, we confidently state that none of our current or planned projects have caused, or are anticipated to cause, significant adverse impacts on biodiversity. Several key factors contribute to this conclusion: Rigorous Environmental Assessments: Before the commencement of any mining activities, we conduct detailed Environmental Impact Assessments (EIAs) that evaluate potential biodiversity impacts. These assessments are designed to identify sensitive habitats and species that could be affected by our operations. Underground Mining Practices: Our mining operations primarily utilize underground methods, which significantly reduce surface disturbance and habitat destruction compared to open-pit mining. This approach minimizes direct impacts on flora and fauna in surrounding areas. Proximity to Protected Areas: We maintain strict operational boundaries in relation to designated protected areas, ensuring that our activities are located at safe distances from sensitive ecosystems. This proactive measure helps to preserve the integrity of these habitats. Biodiversity Action Plans: For projects near sensitive environments, we have implemented Biodiversity Action Plans (BAPs) to ensure that any potential risks are effectively managed. These plans outline strategies for habitat conservation, species protection, and restoration efforts. Stakeholder Engagement: We actively engage with local communities, environmental organizations, and regulatory bodies to gather insights and feedback on biodiversity concerns. This collaborative approach enables us to adapt our practices to further minimize any potential impacts. Monitoring and Adaptive Management: We implement ongoing biodiversity monitoring programs to track the health of ecosystems surrounding our operations. This allows us to identify any emerging issues and adapt our practices accordingly to safeguard biodiversity. In conclusion, our commitment to responsible mining practices, along with our rigorous assessments and proactive measures, ensures that our projects do not have significant adverse impacts on biodiversity.
[Fixed row]

(11.10) Are biodiversity issues integrated into any aspects of your long-term strategic business plan, and if so how?

Long-term business objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

Biodiversity was not highlighted as a material issue in our company's materiality exercise. However, we remain committed to responsible environmental stewardship and recognize the importance of biodiversity in the broader sustainability landscape. While biodiversity may not currently be a key focus in our long-term strategic business plan, we continue to monitor related developments and integrate biodiversity considerations where relevant to ensure compliance and mitigate potential impacts.

Strategy for long-term objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

Biodiversity was not highlighted as a material issue in our company's materiality exercise. However, we remain committed to responsible environmental stewardship and recognize the importance of biodiversity in the broader sustainability landscape. While biodiversity may not currently be a key focus in our long-term strategic

business plan, we continue to monitor related developments and integrate biodiversity considerations where relevant to ensure compliance and mitigate potential impacts.

Financial planning

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

Biodiversity was not highlighted as a material issue in our company's materiality exercise. However, we remain committed to responsible environmental stewardship and recognize the importance of biodiversity in the broader sustainability landscape. While biodiversity may not currently be a key focus in our long-term strategic business plan, we continue to monitor related developments and integrate biodiversity considerations where relevant to ensure compliance and mitigate potential impacts.
[Fixed row]

(11.11) Have you specified any measurable and time-bound targets related to your commitments to reduce or avoid impacts on biodiversity?

Select from:

☑ Yes

(11.11.1) Provide details of your targets related to your commitments to reduce or avoid impacts on biodiversity, and progress made.

Row 1

(11.11.1.1) Target reference number

Select from:
☑ Target 1

(11.11.1.2) Target label

Rate of restoration of total exploitable area from mining activity.

(11.11.1.3) Base year

2020

(11.11.1.4) Target year

2025

(11.11.1.5) % of target achieved

Select from:
☑ 91-99%

(11.11.1.6) Please explain

As part of our commitment to sustainable mining practices, we closely monitor the rate of restoration of total exploitable areas from mining activities. Starting from a baseline of 83.0% in 2020, we have set a target of 87% by 2025. In 2023, we achieved a restoration rate of 86.9%, demonstrating significant progress towards our goal. This performance reflects our ongoing efforts to minimize the environmental impact of our operations and contribute to land restoration.
[Add row]

(11.12) Has your organization adopted avoidance and/or minimization as strategies to prevent or mitigate significant adverse impacts on biodiversity?

Select from:

☑ Yes

(11.12.1) Provide relevant company-specific examples of your implementation of avoidance and minimization actions to manage adverse impacts on biodiversity.

Row 1

(11.12.1.1) Mining project ID

Select from:

☑ All disclosed mining projects

(11.12.1.2) Approach and type of measure

Minimization

☑ Operational controls

(11.12.1.3) Description

In our bauxite mining operations, which are primarily conducted underground, we have implemented a series of avoidance and minimization actions to manage potential adverse impacts on biodiversity. Our approach focuses on strict operational control measures designed to prevent habitat disruption and minimize the environmental footprint of our activities. Given that underground mining significantly reduces surface-level disturbances, this method inherently limits direct impacts on ecosystems and biodiversity. We also adopt water management strategies to ensure that our extraction processes do not negatively affect local water bodies or groundwater reserves. In areas near protected ecosystems, regular monitoring of air and water quality is conducted to detect any early signs of environmental impact, allowing for immediate corrective actions when needed. In addition, as part of our operational controls, we have implemented ongoing biodiversity monitoring programs that track the status of flora and fauna in areas surrounding our operations. This data is used to adjust and enhance our biodiversity management practices, ensuring that any potential impacts remain within acceptable thresholds. Finally, we continuously engage with local stakeholders, environmental experts, and regulatory bodies to ensure that our practices align with biodiversity conservation goals. This collaborative approach helps us to maintain high environmental standards while contributing to the preservation of the natural ecosystems in which we operate. Through these efforts, we demonstrate our commitment to minimizing biodiversity risks while maintaining responsible business operations.
[Add row]

(11.13) Have significant impacts on biodiversity been mitigated through restoration?

(11.13.1) Have significant impacts on biodiversity been mitigated through restoration?

Select from:

☑ Yes

(11.13.2) Comment

In our bauxite mining operations, significant impacts on biodiversity have been mitigated through targeted restoration efforts. Since our extraction processes are primarily conducted underground, the surface-level disturbances are already minimized, yet we recognize the importance of further mitigating any environmental impact. Restoration efforts are a key part of our strategy to maintain ecological balance in the areas where we operate. We actively monitor and restore the land impacted by our mining activities, focusing on returning disturbed areas to their natural state. As part of this commitment, we track the rate of restoration of the total exploitable area from mining activities. Using 2020 as a baseline, when the restoration rate was 83%, we have made significant progress. By 2023, our restoration rate reached 86.9%, nearing our target of 87% for 2025. This demonstrates our commitment to continuously improving our environmental stewardship. Our restoration activities include replanting native species, rehabilitating natural habitats, and ensuring that the land can support biodiversity in the long term. These efforts are supported by ongoing monitoring and collaboration with environmental experts to ensure that our restoration techniques are effective in promoting biodiversity recovery. In conclusion, while the underground nature of our operations inherently reduces the initial impact on biodiversity, we go beyond mitigation through active and systematic restoration measures. This approach ensures that the ecological value of the land is preserved, and any significant impacts are addressed, aligning with our long-term sustainability goals.
[Fixed row]

(11.13.1) Provide details on restoration actions you have in place in your sites.

Row 1

(11.13.1.1) Mining project ID

Select from:

☑ All disclosed mining projects

(11.13.1.2) Description of the impact being mitigated by restoration

The primary impact being mitigated by restoration in our bauxite mining operations is the disturbance of land due to ancillary surface activities associated with underground mining. Though underground extraction minimizes surface disruption, necessary infrastructure such as access roads, material handling areas, and supporting facilities can affect the natural habitat and local biodiversity. The disturbed areas may involve natural vegetation loss, soil disruption, and potential alteration of local ecosystems. This can lead to habitat fragmentation, affecting flora and fauna. Our restoration efforts aim to address these impacts by rehabilitating disturbed areas, re-establishing native plant species, and restoring the ecological balance in affected zones. Restoration focuses on returning the land to its pre-disturbance condition, ensuring that natural habitats are recovered and biodiversity can thrive once again. By doing so, we actively mitigate the ecological impact of our operations, reinforcing our commitment to sustainable mining practices and biodiversity protection.

(11.13.1.3) Type of ecosystem restored

Select from:

☑ Other ecosystems

(11.13.1.4) Total area restored to date (hectares)

647

(11.13.1.5) Total area to be restored (hectares)

97

(11.13.1.6) Target year

2040

(11.13.1.7) Describe restoration actions

Restoration actions in our bauxite mining operations focus on rehabilitating surface areas impacted by ancillary activities. Key actions include: Land Rehabilitation: After completing mining-related surface activities, we focus on leveling and reshaping the disturbed land to its natural contours. This helps in preventing soil erosion and restoring the land's natural structure. Re-vegetation: Native plant species are reintroduced to the rehabilitated areas to re-establish the natural ecosystem. By using indigenous flora, we enhance biodiversity recovery, allowing the habitat to slowly return to its original state. Soil Restoration: We improve soil quality by reintroducing organic material and managing soil composition, which is crucial for successful vegetation and long-term habitat recovery. Monitoring & Maintenance: Post-restoration, regular monitoring is conducted to ensure vegetation growth and ecological stability. If necessary, further interventions are implemented to enhance habitat restoration. These actions ensure that disturbed areas from mining activities are returned to a state where biodiversity can be sustained, mitigating long-term environmental impacts.
[Add row]

(11.14) Have significant residual impacts of your projects been compensated through biodiversity offsets?

	Have residual impacts been compensated through biodiversity offsets?	Comment
	Select from: ☑ Data not available	*No data available.*

[Fixed row]

(11.15) Is your organization implementing or supporting additional conservation actions?

	Implementing or supporting additional conservation actions?	Comment
	Select from: ☑ Data not available	*No data available.*

[Fixed row]

(11.16) Do your mining projects have closure plans in place?

	Are there closure plans in place?	Comment
	Select from: ☑ No	*No closure plans in the near future.*

[Fixed row]

(11.17) Can you disclose the area rehabilitated (in total and in the reporting year) for each of your mining projects?

	Disclosing area rehabilitated (in total and in the reporting year)	Comment
	Select from: ☑ Yes	*Yes, we can disclose the area rehabilitated for our mining projects.*

[Fixed row]

(11.17.1) Provide details on the area rehabilitated (total/reporting year) for each of your mining projects, including post-mining land use.

Row 1

(11.17.1.1) Mining project ID

Select from:

☑ All disclosed mining projects

(11.17.1.2) Total area rehabilitated (hectares)

647

(11.17.1.3) Area rehabilitated in the reporting year (hectares)

56

(11.17.1.4) Describe post-mining land use

Post-mining land use is an essential aspect of our environmental management strategy, focusing on the rehabilitation and sustainable development of areas affected by our bauxite extraction activities. Once mining operations cease, we implement a comprehensive reclamation plan that aims to restore the landscape and enhance biodiversity. The primary objectives of our post-mining land use strategy include: Habitat Restoration: We prioritize the restoration of natural habitats, including reforestation with native plant species, to promote biodiversity and ecosystem resilience. This effort helps to re-establish wildlife corridors and supports the return of local fauna. Monitoring and Maintenance: Continuous monitoring of restored areas is conducted to ensure the success of rehabilitation efforts. We assess soil quality, vegetation growth, and wildlife return, making adjustments as necessary to achieve desired outcomes.
[Add row]

(11.18) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments?

	Collaborating or partnering with NGOs
	Select from: ☑ Yes

[Fixed row]

(11.18.1) Provide details on main collaborations and/or partnerships with non-governmental organizations that were active during the reporting year.

Row 1

(11.18.1.1) Organization

Metallurgy and Energy Sectors

(11.18.1.2) Scope of collaboration

Select from:

☑ Company-wide

(11.18.1.4) Areas of collaborations

Select all that apply

☑ Biodiversity Action Plans

(11.18.1.5) Describe the nature of the collaboration

During the reporting year, our organization engaged in strategic collaborations with various non-governmental organizations (NGOs) focused on environmental sustainability and biodiversity conservation. These partnerships are designed to leverage the expertise and resources of NGOs to enhance our environmental initiatives and ensure the effective management of biodiversity-related risks. The collaborations typically involve joint projects aimed at promoting sustainable practices, sharing knowledge, and developing tools for environmental assessment and management. For instance, we worked closely with an NGO specializing in habitat restoration to implement a project that focuses on reforestation and the rehabilitation of degraded ecosystems. This collaboration not only supports our commitment to biodiversity but also aligns with our goals for climate resilience. Additionally, we participate in capacity-building initiatives facilitated by NGOs, where we share insights on our environmental strategies and learn from their experiences in community engagement and conservation efforts. This reciprocal relationship enhances our understanding of local ecological issues and informs our policies and practices. Overall, these collaborations reflect our commitment to fostering a sustainable future by integrating environmental stewardship into our operations and engaging with stakeholders who share our vision for a healthier planet.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

[Add row]

(11.20) Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?

Select from:

☑ Yes

(11.20.1) Provide relevant examples of other biodiversity-related engagement activities that happened during the reporting year.

Row 1

(11.20.1.1) Activities

Select from:

☑ Engaging with local communities

(11.20.1.2) Mining project ID

Select all that apply

☑ All disclosed mining projects

(11.20.1.3) Please explain

During the reporting year, we actively engaged with local communities surrounding our mining operations through workshops and informational sessions. These initiatives aimed to raise awareness about biodiversity conservation and the importance of sustainable practices. We collaborated with community leaders to gather feedback on our operations and understand local concerns, fostering a sense of partnership and trust. By involving community members in conservation discussions, we enhanced their knowledge and supported local initiatives that promote biodiversity.

Row 2

(11.20.1.1) Activities

Select from:

☑ Funding research organizations

(11.20.1.2) Mining project ID

Select all that apply

☑ All disclosed mining projects

(11.20.1.3) Please explain

We provide funding to research organizations focused on conducting comprehensive biodiversity assessment studies in areas adjacent to our mining sites. These studies aimed to evaluate the ecological impacts of our activities and develop strategies for biodiversity enhancement. The findings will inform our environmental management practices and help us implement effective conservation measures. By supporting these research initiatives, we demonstrate our commitment to understanding and mitigating our impacts on local ecosystems.
[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(13.1.1.2) Disclosure module and data verified and/or assured

Introduction

☑ All data points in module 1

(13.1.1.3) Verification/assurance standard

General standards

☑ AA1000AS

☑ Aluminium Stewardship Initiative (ASW)

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Audited by external independent third party organization. For more information please visit MYTILINEOS 2023 Sustainable Development Report on pages 166-173 Independent Assurance Statement and on pages 174-187: GRI Content Index – General Disclosures (external assurance option). https://www.metlengroup.com/media/mk4g5gys/sustainable_development_report_2023_eng.pdf

(13.1.1.5) Attach verification/assurance evidence/report (optional)

independent_assurance_statement_2023_eng.pdf
[Add row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information
	No additional information.

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

General Manager Corporate Governance & Sustainable Development Executive BoD Member and Member of the Board Sustainability Committee

(13.3.2) Corresponding job category

Select from:

☑ Board/Executive board

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute