

Sustainable Development Report

2018



MYTILINEOS

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2018 proved an active year in the field of Corporate Social Responsibility, both within our country and abroad, where highlighted issues pertaining to Sustainable Development, globalisation, defending human rights and natural disasters that keep emerging even more frequently.

Some of these issues will continue to be part of 2019 scope as well, while issues such as: continuous adjustment of enterprises to Global Sustainable Development Goals, based on which there has been a radical change to the Social Agenda, actual adaptation to Climate Change and the Circular Economy, developing responsible suppliers, creating viable "smart" cities and communities that promote better services to citizens through the exploitation of new technologies, better use of resources and less impact on the environment, legislation for non-financial reporting and sustainable funding promoted by the European Commission, set new priorities as regards the operation of today's responsible enterprises.

At MYTILINEOS, our commitment to Sustainable Development is first of all a process of continuous learning and self-improvement that enhances our competitiveness, renews and strengthens our "social license" to operate, setting the path for creating value for all our Social Partners' groups. At the same time, it is directly linked to our business operations, determining the way we choose to carry on towards achieving our goals at a steady pace each time, guided always by our vision, mission and values. We view the aforementioned present and future developments as a challenge and at the same time as an opportunity, because we are able, by combining our adaptation to increased legislative requirements with the implementation of good practices and actions, to take advantage of the opportunities offered by the path towards achieving Global Sustainable Development Goals. As a result, our strategic priorities in the field of Corporate Social Responsibility up to 2025 relate to:

- our continuous effort to ensure a healthy and safe work environment,
- developing, managing and maintaining dedicated employees, with practices that promote equal opportunities and respect for human rights,
- stabilising and reducing our environmental footprint,

- promoting the principles of C.S.R. and Sustainable Development to our key suppliers and partners,
- implementing and supporting selected actions of high social value that enhance the harmony in our coexistence with local communities and society in general.

Our commitment to operate responsibly is reflected both in renewing our participation to the UN Global Compact, committed to its principles, and in our growing integration in international ESG & CSR indexes that rate the performance of companies implementing effective practices in relation to environment, society and corporate governance.

As regards our Environmental Performance in 2018, we have completed the review of environmental management systems in all our Business Sectors according to the new standards as defined by ISO14001/2015. We have kept our power plants productive on the high-efficiency curve by using natural gas in the best possible way. Total CO₂ emissions remained stable, slightly decreased compared to emissions average over the past 5 years, while key energy intensities per product have been further improved. In the field of waste management, the quantity collected, recycled or reused in various ways has been increased by 98%, or 80,706 additional tonnes, compared to the respective quantity for 2017.

With a view to innovation in bauxite residue management, we carried on with our research effort by participating in the Metallurgy Sector, in SCALE program, aiming at the extraction of Rare Earths from bauxite residues, as well as in ENSUREAL, SIDEREWIN and RemovAL programs that study the development of new methods of alumina production from alternative sources, such as poorer bauxite deposits and bauxite residues, as well as different technologies for the exploitation of bauxite residues, such as an alternative source of iron recovery.



Our commitment to Sustainable Development is first of all a process of continuous learning and self-improvement

In addition, for the 3rd consecutive year, we voluntarily participated in the Global Water Resources Initiative, CDP Water Security. Although the results from the 2018 evaluation have been a step-down for us (Management Level) compared to our 2017 performance (Leadership Level), mainly due to the upgrade of evaluation with more and more demanding issues, MYTILINEOS's performance continued to be above global and European average in Metallurgy Sector (Awareness Level).

As regards our Social Performance, we continued to inform our employees in a timely and continuous manner about forming the new corporate culture, aiming at the commitment of Management and employees to common values and behaviours in the context of transforming the company. Our creative coexistence with local communities carried on with undiminished interest. Apart from the local initiatives that we implemented, the common objectives of our social policy still include contributing to the development of our local communities' infrastructure, supporting quality education and youth employment, mitigating poverty and food insecurity and promoting health.

In the field of Health & Safety, no fatalities or incidents of occupational diseases were noted in our directly and indirectly employed personnel as a whole. However, despite the constant efforts and the procedures we follow to prevent and minimise accidents, 2018 has been a year of challenges for all of our company's activities, which resulted in exceeding the year's objectives. An increase in the accident frequency rate has been reported for our directly employed personnel from 0.15 to 0.25 accidents per 200,000 working hours, while the corresponding accident severity index (lost working days) has been significantly decreased by 65% compared to 2017. A relevant trend was also recorded for indirectly employed personnel, where the accident frequency index increased from 0.19 to 0.27 accidents per 200,000 working hours. Being aware that maintaining and further developing the accident prevention culture in all of our activities requires a sustained effort as regards learning and improving, we carried forth with our information campaign on key issues in the Metallurgy Sector, particularly by recording and making use of the results from cases of near accidents, as well as running relevant training sessions, particularly extensive ones in 2018 with the implementation of more than 46,000 training hours covering almost 1,000 direct and more than 5,000 indirect employees.

In a wider social context, we created 45 new job positions, raising the total number to more than 700 over the past 9 years. We continued supporting local economy and employment by making the selection of local suppliers our priority and by obtaining a large number of employees from our local communities.

At the same time, the value of the three-year program for the implementation of our social policy "IN PRACTICE" (2016-2019) exceeded 5.8 million euros. In 2018, we increased our social investments by 20.3% compared to 2017, implementing actions in social areas that support the Global Sustainable Development Goals (SDGs) and the respective national priorities.

In this context, we were particularly pleased with the results from the completion of the 3-year social, pilot program "I'M IN" dealing with school drop-out rates, with a measured social value of 768,000 € according to the International Return On Investment methodology (SROI). Through this initiative, 56 pupils from vulnerable social groups not only remained in school but successfully completed basic education and continued their course in high school, which was also the main goal of the program.

In addition, the results from the report of our first year of participating in the G.E.F.Y.R.A. program, which is directly linked to the European Youth Pact and aims to create quality "preparation for employment" positions, have been satisfactory. We have developed 6 new partnerships with higher education institutions; we have continued to implement the successful 12month - paid internship "ENGINEERS IN PRACTICE" program that greatly supports new engineers in procuring an employment position by enhancing their skills, if they are outside the labour market, while a total of 81 new quality vocational training positions, internships and apprenticeships were created.

At the same time, we designed and launched the implementation of the "#skills4engineers" program, where 25 young unemployed graduates from Engineering Schools and Technological Institutes were offered a specialised program for the development and support of professional skills aiming to rapidly cover any gaps in soft & hard skills and to interconnect them directly to the labour market.

The results from selected Corporate Social Responsibility actions that are extensively analysed in this report and already benefit thousands of children in the fields of education, health, new technologies and youth entrepreneurship, are also worth noting.

During 2018, we undertook for the first time the evaluation of 146 of our key suppliers, as regards the impact of their operations in Sustainable Development. The institution of Consultation with our Social Partners at local level also pointed along the same lines, where the Metallurgy Sector held the 4th consecutive thematic consultation (and 9th in total) on "Developing a Responsible Supply Chain". The key objectives of this open dialogue involving key sectoral suppliers were both to highlight the important role of the supply chain in Sustainable Development and to explore ways of partnership in order to achieve mutually beneficial objectives.

Corporate Governance issues have been under our spotlight. In this context, the company adopted the United Kingdom Corporate Governance Code - 2018, reflecting its new strategy, based on the highest standards of entrepreneurship and best practices. We were very pleased to note that our Corporate Governance has been considerably strengthened over the past year, fulfilling our commitment to a comprehensive review of the overall framework, by forming an Executive Committee to deal with the day-to-day operation and management of the company, by reorganising the Board of Directors through the selection of new members based on diversity criteria and aiming to express different perspectives on both experience, skills and knowledge, enhancing the formal and substantial independence of the Board and its committees as well as upgrading the Committee of Corporate Social Responsibility.

Finally, recognising how important the broad impact of our operations is for national economy and employment and in order to inform our Stakeholders about the overall perception of the financial and social value that we create on a daily basis, we proceeded to the first study of our socio-economic impact in Greece. Therefore, in cooperation with the department of Climate Change and Sustainable Development services of the EY company, we recorded our broad contribution to the country (2017 data), which in basic numbers is equivalent to creating a value added of € 1.06 billion equal

to 0.6 % of total GDP, supporting a total of 13,598 jobs (direct and indirect), representing 0.4% of total employment, as well as our total tax contribution of € 244 million, which corresponds to 0.3% of the state's total tax revenue.

In a national and international environment full of social and economical challenges, our main concern is to remain a healthy and sustainable business that will be able to create added value for everyone, contributing to a better future for our country! **[GRI 102-14]**

Evangelos G. Mytilineos
Chairman and Managing Director





Corporate Profile & Global Presence

MYTILINEOS S.A. [GRI 102-1] - [GRI 102-2] - [GRI 102-5] is one of the top industrial companies in the country, in Metallurgy, EPC & Infrastructure Projects and Electric Power & Natural Gas Trading sectors. The company was established in Greece in 1990 and has been listed in Athens Exchange since 1995. Its manifold business activity constitutes a driving force for the Greek economy, with a praiseworthy presence internationally. As a responsible industrial company, it seeks to apply the Corporate Social Responsibility and Sustainable Development principles across the range of its main activity, besides its key objective being the preservation of a leading position in all sectors of its business activity through continuing re-investment. At the end of 2018, the consolidated turnover of MYTILINEOS was €1,526.5 m (2017: €1,526.7)

Vision

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

Mission

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

Corporate Values

[GRI 102-16]

Effectiveness with Safety as a priority

We remain steadfast to the attainment of our targets, always safeguarding safety at work.

Ceaseless effort for Competitiveness by our People.

Our effort to be competitive continues unabated and is based on our people’s know-how, skills and devotion as well as the ongoing modernization - oriented investments.

Respect and important role for every Employee

We respect employees, help them develop their abilities, communicate with them, provide them with opportunities to gain experience and empower them in their role in all jobs across the organisation.

Two success factors:

Teamwork and Excellence

With teamwork, we achieve results that initially seemed impossible. We acknowledge excellence at individual level and bring it into effective action.

Continuous improvement by all to everything we do.

Continuous progress is an integral part of our role, along with the execution of our daily work. Every employee knows his/her job well, generate ideas to improve it and get recognition when such ideas are implemented.

Business Activity Sectors

[GRI 102-2] - [GRI 102-6]

Metallurgy Sector

MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminum in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries. It is one of the healthiest growing industrial enterprises in Greece and in cooperation with its subsidiary DELPHI-DISTOMON exhibits a robust international activity, which renders the company a driving force for the Greek economy and society.

EPC & Infrastructure Projects Sector

MYTILINEOS operates in the construction of broad scale projects, covering the wide spectrum of Engineering-Procurement-Construction and the industrial production of high-level know-how, with presence in the Energy & Infrastructure sectors. In the energy sector, the company focuses on the international markets, with ongoing projects in Europe, Middle East and Africa and is specialized in the construction of turn-key power plants that utilise the full

range of thermal power generation technologies, as well as of hydro and solar power large-scale plants. With more than 50 years of experience and with the necessary resources for the implementation of complex energy projects, MYTILINEOS is a reliable associate of electricity companies, industrial customers and local communities around the world.

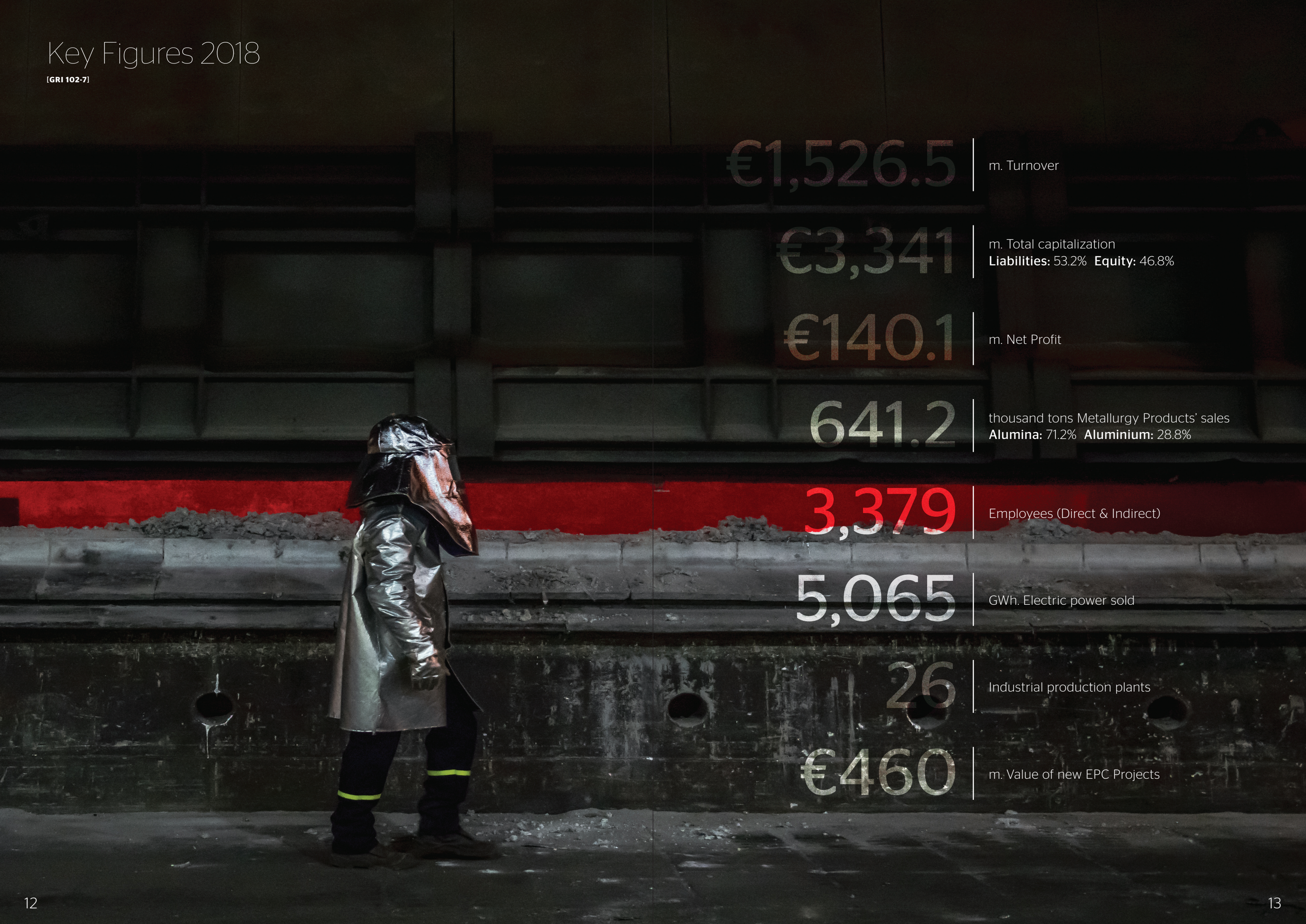
Electric Power & Natural Gas Trading Sector

MYTILINEOS has a wide range of activities in the sector of energy, extending from the construction of gas-fired thermal power generation plants and Renewable Energy Sources (RES) plants, to power and natural gas supply. It is the largest private electric power producer in Greece with an energy portfolio of 1,200MW thermal production capacity and 200 MW Renewable Energy Sources capacity; it produces more than 10% of electricity production in Greece. In addition, it provides modern, reliable services and combined packages of electricity and natural gas to almost 130,000 active customers across the country (businesses & households).



Key Figures 2018

[GRI 102-7]



€1,526.5

m. Turnover

€3,341

m. Total capitalization
Liabilities: 53.2% **Equity:** 46.8%

€140.1

m. Net Profit

641.2

thousand tons Metallurgy Products' sales
Alumina: 71.2% **Aluminium:** 28.8%

3,379

Employees (Direct & Indirect)

5,065

GWh. Electric power sold

26

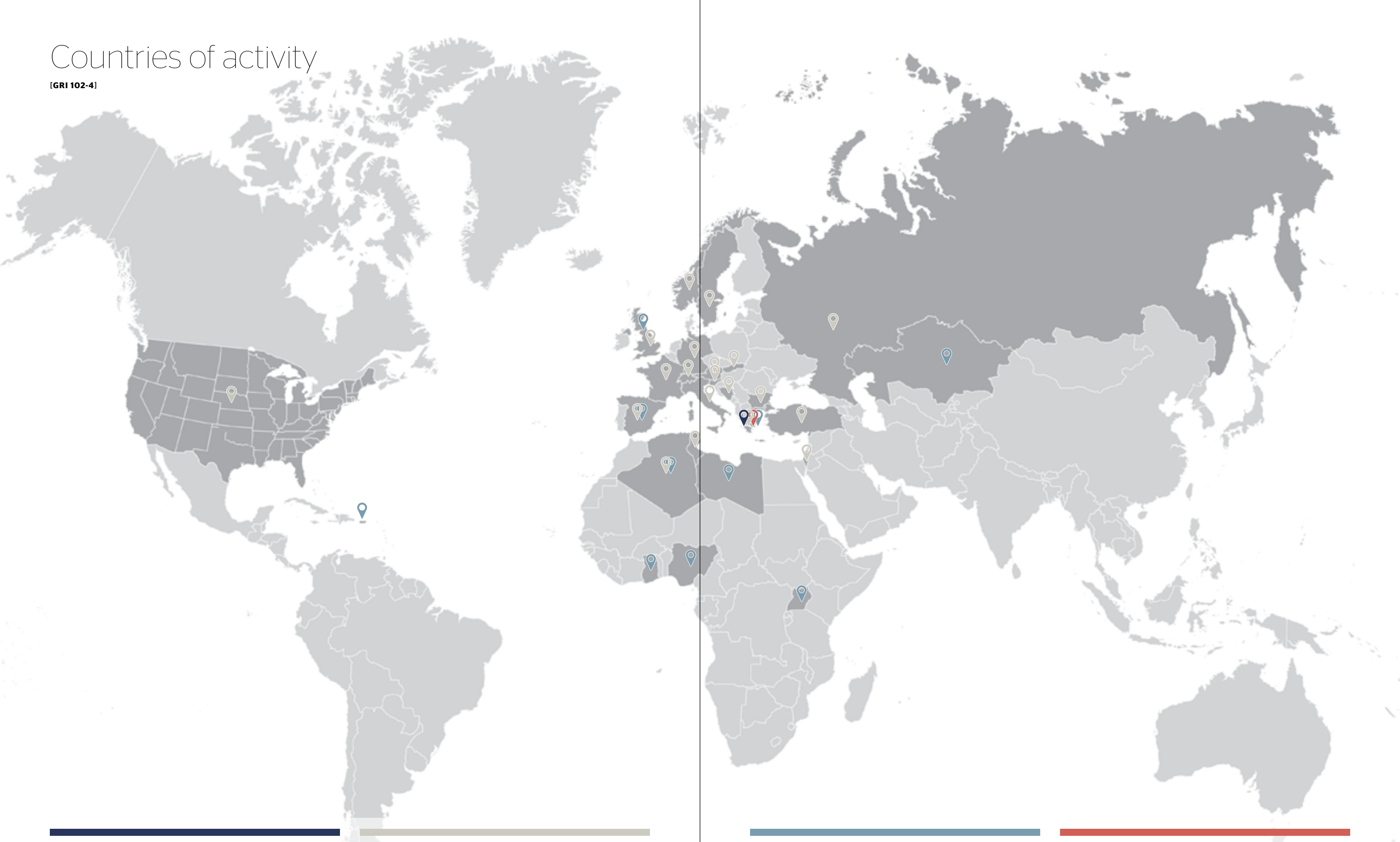
Industrial production plants

€460

m. Value of new EPC Projects

Countries of activity

[GRI 102-4]



MYTILINEOS [GRI 102-3]
Headquarters: 8 Artemidos Str Maroussi GR-15125 Athens
Industrial production plants
Greece

Metallurgy Sector
Countries where aluminium products are exported
England, Austria, Algeria, Bosnia-Herzegovina, Bulgaria,
France, Germany, Switzerland, Greece, United States of
America, Spain, Israel, Italy, Norway, Russia, Slovakia,
Slovenia, Sweden, Turkey, Tunisia

EPC & Infrastructure Projects Sector
Countries where large-scale energy and infrastructure
projects are in progress or in the design stage
Algeria, Ghana, Greece (infrastructure), United Kingdom,
Spain, Kazakhstan, Libya, Nigeria, Uganda, Puerto Rico

**Electric Power &
Natural Gas Trading Sector**
Production and Supply of Electric Power -
Natural Gas Trading
Greece

Strategic priorities

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

Metallurgy Sector

- Ongoing productivity and performance improvement to keep the company's place within the first quadrant of the global cost curve.
- Acquisition of know-how and expansion into the aluminium scrap recycling activity by acquiring the company EPALME SA.
- The basic technical study for the new Alumina plant with a production capacity of 1m. tons annually, is under completion.

Integrated Projects & Infrastructure Sector

- Focus on undertaking integrated energy projects of wide scale in natural gas and solar energy sectors.
- Expansion into existing and new developing markets.
- Probing into new opportunities when undertaking large infrastructure projects in developing countries.

Electric Power & Natural Gas Trading Sector

- Largest, independent electric power producer in Greece.
- Reduction of carbon footprint by means of further investment in the sector of Renewable Energy Sources.
- Implementation of a new investment related to the establishment of a gas-fired, electric power generation plant of combined cycle, of 665MW power, currently in the process of licensing to replace the lignite plants.
- Top-notch private supplier to the electric power retail market.

Similarly, the company's dynamic business development is inextricably linked with the Corporate Social Responsibility and Sustainable Development principles. For MYTILINEOS, Sustainable Development is synonym to pursuing business excellence with dedication to the corporate vision and with

respect for the wider society and the natural environment, while the development of significant synergies, in this direction, is vital for the achievement of the company's goals, in alignment with its corporate values.

The company's strategic partnerships in this context, at national and international level, are listed below.

[GRI 102-12] - [GRI 102-13]



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



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



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



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



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



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



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



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



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

Supply chain

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

MYTILINEOS develops long-term partnerships with a significant number of suppliers. The object and the type of the required supply will determine the priority to be placed on local suppliers¹, based on their economic, qualitative and time-related solvency, the cost of products or their services and their ability to ensure the required quality to cover the procurement needs, in line with predetermined specifications, set by the company's Business Activity Sectors. This benefits communities contributing both to the preservation of jobs and to income generation at local level.

At the end of 2018, MYTILINEOS supply chain numbered more than 7,000 suppliers and associates. The total company's expenditure to its supply chain amounted to € 1.2 billion, while the cost ratio to domestic / local suppliers reached the 70%, thus contributing to the increase of positive local economic effects from the company's activity. **[GRI 204-1]**

During 2018, there were no significant changes in MYTILINEOS supply chain structure, in terms of location or the company's supplier selection or suspension processes. However, one key change in MYTILINEOS relationship with its main suppliers was the implementation of the 1st official self-assessment concerning to the environmental and social impacts resulting from their activity. This fact will enable the company to evaluate and plan any corrective actions needed in the framework of its strategic line for the development of a responsible supply chain. **[GRI 102-10]** The main objective of the company, by 2025, is to integrate sustainable development requirements into the process of selecting its key suppliers as well as to commit existing ones to responsible practices aiming to developing partnerships for better understanding of impacts and for mutual harmonization of goals and expectations.

Basic Description Of MYTILINEOS Supply Chain [GRI 102-9]

Basic business activities requiring services or products from the supply chain	<ul style="list-style-type: none">• Production & Maintenance of alumina chemical industry and of primary aluminium metal-lurgy.• Plant production for the purchase of raw or other materials.• Construction for the purchase of equipment for EPC projects implementation• Logistics regarding the methods and time of products' delivery to different countries.• Operation and Maintenance of Energy Centers (thermal power stations)• Development, construction and maintenance of Renewable Energy Sources projects (wind farms, solar parks, hydroelectric projects)• Retail activity• Studies-Investments.• Administrative, Financial, Legal and other services
Basic categories of suppliers	<ul style="list-style-type: none">• Power and other raw materials producers & suppliers• Subcontractors• Manufacturers• Distributors / Forwarders• Suppliers of spare parts/materials• Wholesalers• Suppliers of consultancy services & studies

Supply Chain Data	2018
Total number of suppliers	7,283
Geographical percentage distribution	Greece: 81.66% Abroad: 18.34%
Total expenditure	€1,206,607,399
Geographical percentage distribution	Greece: 69.87% Abroad: 30.13%

¹ The term 'local suppliers', refers to providers of materials, products or services, industrial and non-industrial, located in Greece.



How we create value

A key element of the company's business model is the way it creates and allocate value. From the approach of markets, the development and maintenance of customer relationships, the supply of raw materials, the production, the promotion, the sale to the end of the products life cycle and the raising of funds, MYTILINEOS creates an important value chain with strong social and economic impact. Across all its sectors, MYTILINEOS supports income, tax revenues and jobs and respectively the same applies for its suppliers and associates in their own value chain. This way, a multiple positive footprint is generated, beyond the company, affecting domestic employment and relevant sectors of economy.

Fully aware of its role in the country's economy, MYTILINEOS has implemented significant investments over the last years, showing its commitment to Sustainable Development having embedded the employment, the environmental protection and the social contribution to its business model. This fact is reflected on the company's core activity by creating value with:

- the production of primary cast Aluminium products, one of the most environment-friendly metals, thus ensuring a safe work environment and the application of responsible and sustainable practices in the mining process;
- the construction of turn-key power plants with the minimum possible environmental footprint, in countries with

substantial needs in energy infrastructure, thus helping ensure access to energy for thousands of people;

- the generation and supply of electric power from natural gas-driven plants operating at the highest possible efficiency rates and from Renewable Energy Sources plants offering specialized energy saving services to all customers.

In order to achieve all the above, the use of basic resources such as **financial, industrial, human, physical and social** is required, as well as the inclusion of their interrelation in decision-making process which affects the company's ability to generate value on an annual basis.

In 2018, the company's investments stood at €84 million, while €17,3 million was spent for the improvement of the company's environmental footprint. The economic value generated and distributed, per key stakeholder group, was as follows:

- €81.0 million for remuneration and benefits to employees.
- €843.0 million to domestic/local suppliers.
- €71.2 million for tax payments.
- €76.7 million to capital providers.
- €2.3 million for social investments.

Financial value table [GRI 201-1]	2017	2018
Generated value		
Turnover (€)	1,526,720,983.8	1,526,514,352.9
Distributed value		
Operating cost (€)	1,204,796,213.2	1,229,255,481.6
Salaries and benefits of employees (€)	72,808,441.0	81,033,170.7
Income tax payments & other taxes (€)	57,430,814.2	71,250,824.0
Payments to capital providers (€)*	36,992,429.2	76,701,562.2
Investments at community level (€)	2,018,275.3	2,296,020.0
Total (€)	1,374,046,172.9	1,460,537,058.5
% of the distributed economic value	90.0%	95.7%
% of the economic value preserved	10.0%	4.3%

An illustration of MYTILINEOS Business Model and value creation process is presented below. For the better understanding of the company's generated value, in terms of

key performance indicators, you are advised to visit the following address: <http://scorecard.mytilineos.gr/>

*Shareholders' dividends, interest payments to creditors; this includes interest in all forms of debt as well as retrospective dividend dues to privileged shareholders.

Business model & Value creation process

Inputs

Effective use of resources

Financial Capital

- Cash flows from operating activities and investments
- Total Equity
- Loans

Industrial Capital

Industrial production & Renewable Energy Sources (RES) plants

Human Capital

- Number of employees (direct & indirect)
- Employees abilities and capabilities

Natural Capital

- Raw materials
- Other materials
- Air
- Water
- Land use

Social capital

- Social investments
- Social license to operate
- Disclosure Policy
- MYTILINEOS's Reputation

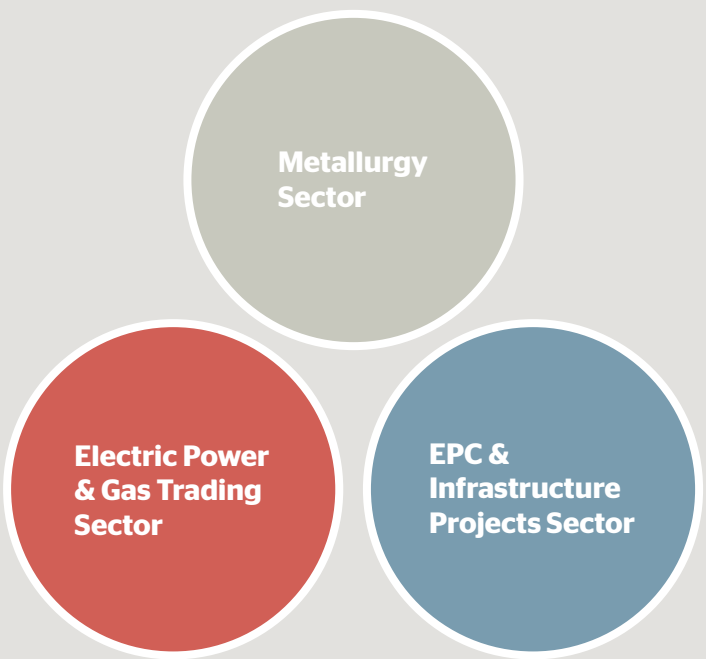
Business Activities & Procedures

Vision - Mission - Corporate Values

Corporate Governance, Code of Business Conduct, Policies

- Strategy & Resources allocation
- Financial & Non-Financial risks & opportunities
- Stakeholder Dialogue

MYTILINEOS' Activity Sectors



Central Services

- human resources management
- legal & regulatory
- finance & treasury
- mergers & acquisitions
- corporate communication & marketing

Support Services

- occupational health & safety
- environmental management system
- supply chain management
- corporate social responsibility
- quality standards & policy
- sales systems & customer management
- research & development

Outcomes

Value Creation on Sustainable Development Issues



Financial Value Creation

- Financial ratios of return ROCE, ROE & EVA
- Net Profit
- Financing capability and development of operations
- Dividends distribution to shareholders
- Payouts to capital providers
- Logistics expenditures



Products & Services

- Total exports
- Aluminium product Sales
- EPC Projects backlog
- Energy produced from Renewable Energy Resources
- Retail Energy market share



Development of Human Capital

- Healthy & Safe working environment
- Low turnover ratio of specialized employees
- Stable workplace environment
- Productivity improvement
- Effective management
- Skills development
- Women in positions of responsibility



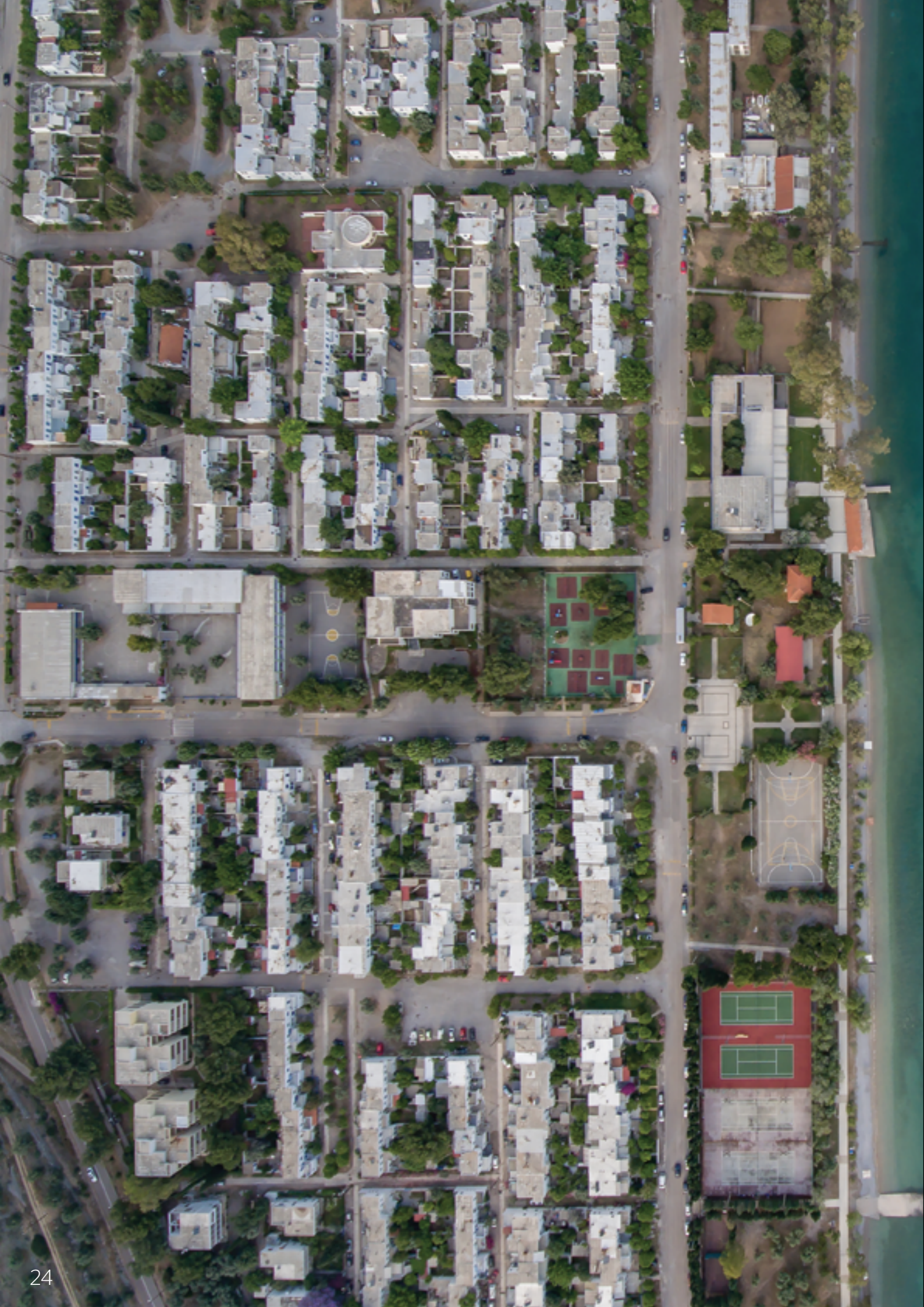
Respect of Natural Environment

- Fully compliance with environmental rules & regulations
- Stabilization of air emissions
- Responsible management of water resources
- Waste recycling
- Mining sites rehabilitation



Social Contribution

- Job creation & local employment growth
- Cooperation with local communities and regional administration
- Support of local communities infrastructure
- Taxes payments
- Support of local suppliers
- Responsible operations respecting employment and local communities rights



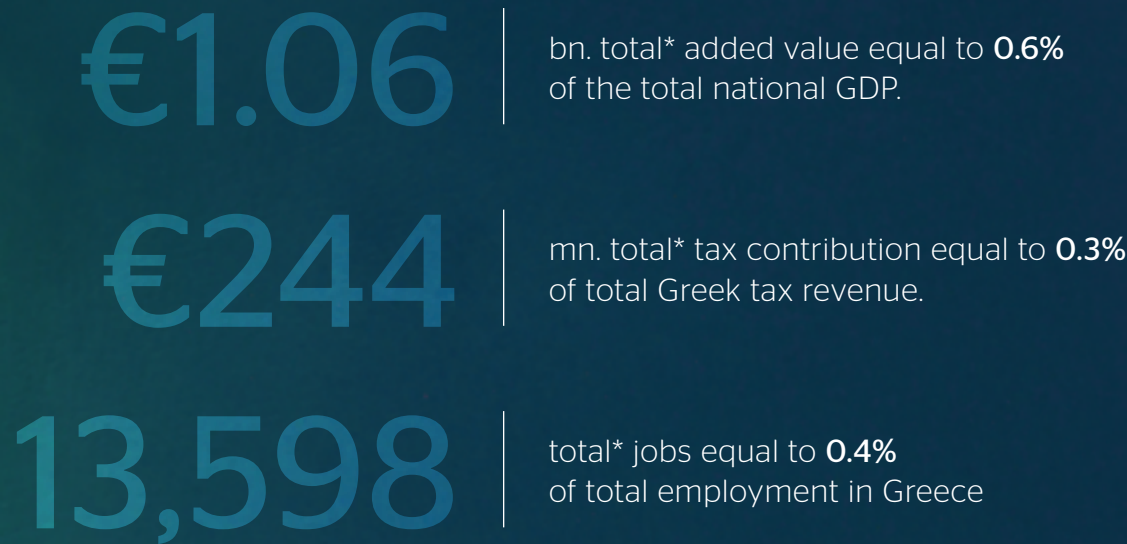
MYTILINEOS socio-economic impact in Greece

MYTILINEOS assesses its socioeconomic impact, aiming to inform all its Social Partners about how it generates benefits, not only for itself but also for its entire value chain over the last thirty years. Within this context, the Climate Change and Sustainable Development Department of EY carried out a study, from May 2018 to September 2018, on the company's socioeconomic impact for the reference period of 1 January 2017 to 31 December 2017. The study identifies and illustrates the overall MYTILINEOS contribution to Greece, acknowledging

the importance of value creation for the national economy and employment, contributing at the same time to the attainment of the UN Sustainable Development Goals. Adopting the internationally established model of "inputs and outputs", the study analyzes the social and economic footprint of all MYTILINEOS Business Units (Metallurgy, Electric Power and EPC) in Greece which extends from the procurement of raw materials and production to the final disposal and end-of-life of products.

MYTILINEOS Socio-economic impact in Greece (2017)

MYTILINEOS contribution to Greek Economy and employment



contributing, at the same time, to Global Sustainable Development Goals attained



The study is available on the company's website at:
www.mytilneos.gr/Uploads/ETHSIA_DELTIA/csr_reports/MYTILINEOS_Socioeconomic_impact_2017_Final_gr.pdf

*It includes direct, indirect & induced impact

Our approach to Sustainable Development

Corporate Social Responsibility (CSR) is a multi-faceted and complex practice for MYTILINEOS, mainly characterized by the company's conscious self-commitment to responsible entrepreneurship and continuous improvement.

Moreover, it is directly related to the business operations, as it defines the way the company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values.

Through CSR, MYTILINEOS expresses its continuous commitment to attaining Sustainable Development. The company perceives CSR as a fundamental factor that contributes to social and environmental risks prevention, as well as the prevention of risks related to its human resources management and the company's presence in the market, contributing to the development of a climate of trust, where the company can carry out business and innovate, creating value for all

its social partner groups. CSR at MYTILINEOS is a practice with significant human, environmental and social aspects going beyond legislative compliance (Law 4403/2016). It is an ongoing self-improvement and incessant learning process aimed at increasing the company's positive impact on the greater society, in combination with the range and nature of its economic activity, while also serving as a key mechanism for renewing its "social" license to operate, improving its competitiveness at national and international levels.

In addition, MYTILINEOS, in the framework of its participation in the UN Global Compact, has aligned its policy with the new Global Sustainable Development Goals. Those targets are utilized by the company as a common basis for dialogue and cooperation with the main groups of its social partners, while determining the company's key priorities for the upcoming years (2025).

Awards & Distinctions

In 2018, MYTILINEOS was granted the following awards & distinctions:

Hellenic Responsible Business Awards 2018: High distinctions were granted to MYTILINEOS Corporate Social Responsibility and Sustainable Development initiatives, showcasing the high level of actions and their immediate impact on society:

- **GOLD Award:** for the microsite '**Integrated Value Creation SCORECARD**', in the category of "Mobilization & Commitment of Interested Parties / Better printed or electronic edition"
- **GOLD Award:** for the measurement of a **Social value index of the Program "ENGINEERS IN ACTION"**, with the international methodology Social Return on Investment, in the section of "Investment Model Strengthening of Employment".
- **SILVER Award:** for the 2nd cycle of the **program "I AM IN" on combating school dropout**, in cooperation with the Association 'Together for the Child' in the section of "Excellence in Cooperation/Enterprise-NGO Cooperation".

Health & Safety Awards 2018: MYTILINEOS Metallurgy Sector was granted two high distinctions for the actions that promote Health & Safety at the Workplace:

- **GOLD Award:** For the action of "**Mobile Emergency Response Unit**". An integrated system for emergencies,

staffed by well trained personnel.

- **GOLD Award:** For the initiative '**Safety Missions**', a well-established practice whereby every employee is exclusively involved in safety issues for a fixed period, whether these are general safety issues or related to his/her object.

BRAVO Sustainability Dialogue & Awards 2018: In the context of BRAVO institution, MYTILINEOS obtained two new distinctions for one more year:

- **BRAVO GOVERNANCE pillar:** MYTILINEOS was awarded for the microsite '**Integrated Value Creation SCORECARD**' for promoting transparency and accountability.
- **BRAVO SOCIETY pillar:** In the section of the development of Health & Safety programs, MYTILINEOS (Metallurgy Sector) earned an award for the initiative titled "**Mobile Emergency Response Unit**".

ASSOCIATION TOGETHER FOR THE CHILD: Honorary Distinction to MYTILINEOS for its long-standing support to the Association's work and mission.

Targets 2025	Ways of implementation	Status 2017	Status 2018
Ensuring a work accidents free environment SDG 3, SDG 8, SDG 17	Maintaining the already successful practices of strengthening the internal culture of Health & Safety at Workplace.	1	2
	Greater emphasis on the training of contractors.	1	3
	Adjustment to the new international standard ISO 45001	●	●
	Exchange of views and best practices through consultation with specialized bodies and consultants in Health & Safety issues.	1	2
Developing, managing and retaining dedicated employees with practices that promote equal opportunities and respect for human rights. SDG 5, SDG 8, SDG 10, SDG 17	Improvement of all work practices in the context of the company's transformation completion - Integrated corporate culture.	1	3
	Carry out an employee satisfaction survey and take advantage of results.	●	●
	Information to employees on CSR issues.	1	2
	Employees' training in the Professional Code of Ethics.	●	●
	Development of corporate volunteerism.	●	●
Continuous improvement of environmental footprint. SDG 6, SDG 7, SDG 12, SDG 13, SDG 15, SDG 17	Use more environmentally friendly fossil fuels (where feasible).	1	2
	Increase of waste recycling-reuse.	1	2
	Reduction of air emissions.	1	2
	Continued participation in bauxite residues utilization programs.	1	3
	Adoption of environmentally cleaner innovative technologies & industrial methods.	1	3
Development of a responsible supply chain (key suppliers) SDG 8, SDG 12, SDG 17	Informing MYTILINEOS key suppliers about the company's Code of Conduct for Suppliers and Business Partners.	1	2
	Assessment of the environmental and social impacts of the activity of the company's key suppliers.	●	2
	Inclusion of social and environmental criteria in the purchasing procedure.	●	●
Supporting selected actions of high social value that strengthen the balanced of co-existence with the local communities and the broader society. SDG 1, SDG 2, SDG 3, SDG 4, SDG 11, SDG 16, SDG 17	Implementation of MYTILINEOS social investments in line with the Global Sustainable Development Goals.	●	3
	Emphasis on the support of local community-oriented infrastructure and services projects.	1	3
	Initiatives in the framework of our commitment to G.E.F.Y.R.A program (European Pact for Youth) to boost the employability of young people.	●	2

- New practices in the context of the specific targets whose implementation has not yet begun.
- 2

Corporate practices already applied or started to be applied in 2018.
- 1

Existing company's practices which incorporated, in 2017, within the specific set of targets.
- 3

Practices with the highest priority involving greater effort in their implementation.

Materiality Process

The process of identifying, understanding and evaluating sustainability issues is an important practice for MYTILINEOS' operations. This procedure, in line with the expectations of its social partners, enables the company to improve its strategy, objectives and social and environmental initiatives, aiming to operate responsibly in all aspects of its business, locally, nationally and internationally. The results of the Materiality process compose the main content of MYTILINEOS annual Sustainable Development Report, including those issues that can reasonably be material reflecting its economic, environmental and social impacts and influence the decisions of its Social Partners.

Furthermore, the company's Consultation process with its Social Partners groups lies at the core of MYTILINEOS' Corporate Social Responsibility policy, as it improves the understanding of the impacts of the company's activities, while also providing valuable new data as feedback to the Materiality process.

The Materiality process is implemented **within the company**, on an annual basis through the process of internal prioritization of the identified issues and **outside the company**, where a survey, through a structured questionnaire, is conducted every two years addressed to the key Social Partners groups. **[GRI 102-46]**

Illustration of the MYTILINEOS Materiality Process **[GRI 102-11]**

Identification

The Identification stage of Sustainable Development issues includes workshops between the central CSR service and the company's CSR teams per Business Unit, during which the basic overview of the competitive environment in terms of sustainability is carried out as well as the study of the relevant internal & external sources, as presented below. Also, a key part of these stage, is the incorporation of the company's Social Partners certain expectations emerging during the implementation of the annual Consultation process at a local level.

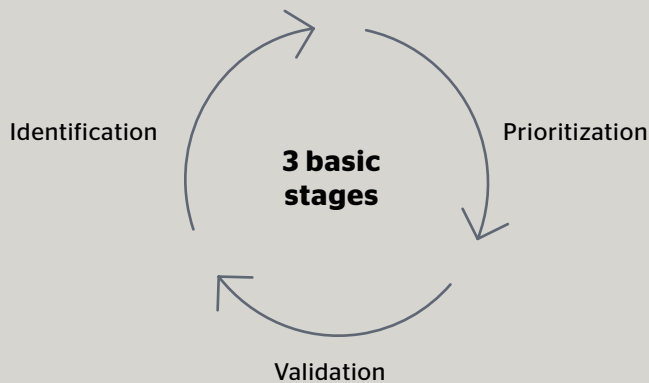
in decisions they made in the context of their cooperation with the company.

Validation

Material issues are validated by the General Managers of the MYTILINEOS Business Units, while the final approval for their disclosure is granted by the company's CSR Committee.

Prioritization

The Prioritization stage is implemented by the completion of a specific evaluation form (5-tier scale) for each identified issue, considering the impact to Sustainable Development. This process is supported by internal meetings between company's executives, supervisors, CSR teams and the central CSR service. Also, a separate survey is conducted, every two years, by sending an evaluation questionnaire (with also a 5-tier scale) to the MYTILINEOS's Stakeholder groups, to assess the importance of the identified issues



Internal sources

- Stakeholder annual Consultation process results (local level)
- Findings of the Stakeholders survey on the company's identified sustainable development issues (on a biannual basis)
- Approval Licenses of Environmental Terms for each Activity Sector
- Corporate Social Responsibility strategic lines, targets & KPIs
- Corporate vision, mission, values and Code of Conduct
- Overview of issues of the company's Executive Committee meetings

External sources

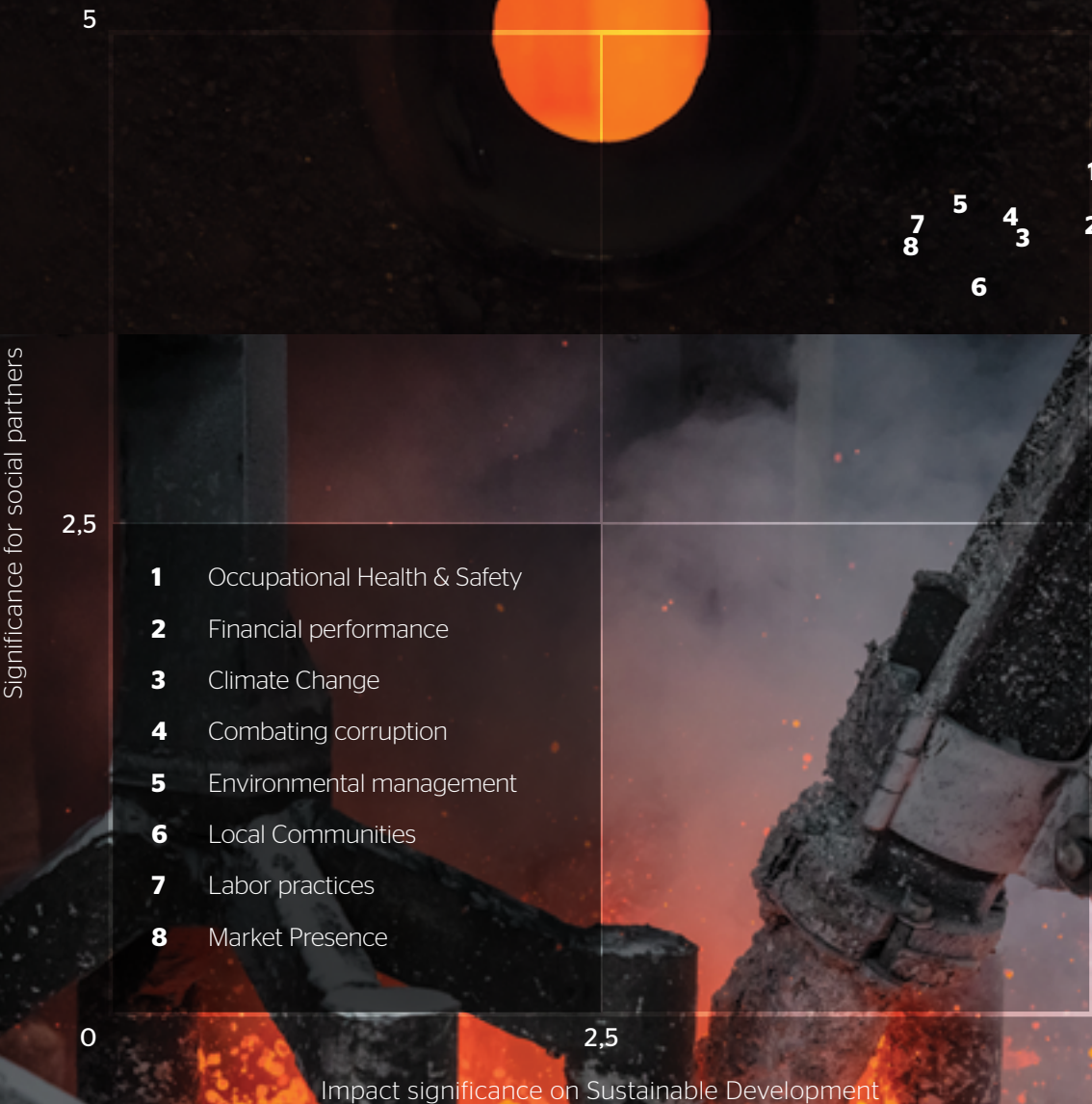
- GRI Standards
- UN Sustainable Development Goals (National priorities)
- United Nations Global Compact Principles
- CDP - Water Security
- Legislative framework (L. 4403/2016)
- ESG Investment Indexes
- Sustainable Development Principles of Greek Mining Enterprises Association and of SEV Sustainable Development Council
- Principles of Greek Sustainability Code

In 2018, MYTILINEOS implemented the internal review process of Material issues. The issues were addressed both in terms of the extent to which they affect the company's ability to meet its business objectives as well as their impact on Sustainable Development (17 Global Goals - Agenda 2030), resulting the readjustment of the boundaries of issues related to the previous reporting period. **[GRI 102-49]** In addition, the issues were combined with the significance attached thereto by the company's key stakeholder groups, maintaining the re-

sults of the relevant survey of 2017 conducted in 1,085 persons with a 40% response rate. The synthesis of the findings of the above process is shown in the Materiality Matrix graph below.

In conclusion, for 2018, the Materiality issues remain the same to those in the previous year. Nevertheless, this year's process highlighted the climate change and local communities' issues, as a result of assessing the significance of their impacts on Sustainable Development.

Table of Material Issues 2018 **[GRI 102-47]**



A summary of Material issues follows below, determining the boundaries of their impact as well as the Sustainable Development Goals where to they contribute.

Summary of Material issues 2018

[GRI 102-46] - [GRI 103-1b]

Occupational Health & Safety

What's in this issue?

Management approach, direct and indirect employees performance indicators, description of accidents & corrective measures taken.

- **0.25** accidents per 200,000 working hours (direct employees)
- Zero number of fatalities & occupational diseases

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- Independent contractors cooperating with the company's Metallurgy & EPC & Infrastructure Projects sectors.
- Main suppliers of the Metallurgy and Electric Power sectors.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Financial Performance

What's in this issue?

Management approach, financial performance, table of economic value & company's outlook for 2019.

- Turnover **€1.52 bn.**
- Net profit **€140.1 mn.**

Who causes the impact?

- MYTILINEOS Business Activity Sectors.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Anti - Corruption

What's in this issue?

Management approach, report of compliance with the laws and the relevant regulatory provisions, Code of Conduct.

- **0** incidents of corruption or bribery
- Zero political contributions

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- Key Suppliers of the EPC & Infrastructure Projects Sector operating in high risk countries.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Environmental management

What's in this issue?

Management approach, management of materials & raw materials, solid & liquid waste management, water withdrawals and consumption, biodiversity & environmental rehabilitation, report of compliance with the environmental legislation.

- **€17.3m** was invested for the protection of the natural environment

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- DELPHI-DISTOMON subsidiary (mining activity).
- Key suppliers of the Metallurgy and Electric Power Sectors.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Labor practices

What's in this issue?

Management approach, employment, working conditions, training & employees' evaluation, Human rights and Equal opportunities.

- Direct employment increase by **3.2%**
- Female participation in employment stood at **17.4%**

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- Key suppliers of the EPC & Infrastructure Projects Sector.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Climate Change

What's in this issue?

Management approach, Energy (consumption & power generation, energy intensities per produced product) & air emissions (direct & indirect CO₂ emissions, specific emissions per product produced).

- **2.2%** reduction in direct CO₂ emissions (scope 1)

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- Key suppliers of the Metallurgy and Electric Power Sectors.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Local Communities

What's in this issue?

Management approach, Stakeholders Consultation process, social policy outcomes and compliance with the law.

- **€2.3m** was invested to implement the company's social policy

Who causes the impact?

- MYTILINEOS Business Activity Sectors.
- Volunteer & Non-Governmental Organizations (in terms of cooperation for social initiatives implementation).

Impact on Sustainable Development

(Global Sustainable Development Goals)



Market Presence

What's in this issue?

Management approach, quality and safety of products, protection of customers' privacy, supply chain, responsible communication & marketing.

- Total expenditure of **€843 m** to domestic suppliers

Who causes the impact?

- MYTILINEOS Business Activity Sectors.

Impact on Sustainable Development

(Global Sustainable Development Goals)



Financial performance and 2019 outlook

Financial performance [GRI 103-3a-ii]

MYTILINEOS, in 2018, managed to maintain its financial performance at very high levels, relying primarily on the excellent performance of the Metallurgy Sector, which for a second consecutive year posted record-high operating profitability, despite the highly volatile environment which negatively impacted most aluminium producers globally.

The turnover remained unchanged at €1,526.5 million from €1,526.7 million in the previous year. Correspondingly, EBITDA amounted to €283.6 million compared to €306.0 million in 2017. On an adjusted basis Earnings before interest, taxes and depreciation (EBITDA) amounted to €290.0 million compared to €298.9 million in 2017, recording a decrease of 3.0% attributable mainly to the weak performance of the Electric Power & Gas Trading Sector in the first semester of 2018, as well as to some delays in the execution of signed contracts of the EPC & Infrastructure Projects Sector.

Net earnings after tax and minority interests amounted to €141.2 million compared to €154.6 million in 2017. On an adjusted basis, Net earnings after tax and minority interests were down 1.1%.

Moreover, MYTILINEOS posted particularly strong financial flows that resulted in the decrease of net borrowing to the lowest level over the last years, with the ratio net debt to Earnings Before Interest, Taxes, Depreciation and Amortization (EBITDA) standing at 1.38 from 1.90 at the end of 2017. It should be underscored that this reduction was attained after the dividend payment amounting to €45.7 million. For the profits of the financial year 2017, the suggested dividend for the profits of the financial year 2018 amounts to €51.4 million, namely €0.36 per share, from €0.32 in the previous year.

Outlook for 2019 [GRI 102-6]

In the Metallurgy Sector, the growth rate of global aluminium demand is expected to remain strong, thus helping support aluminium and alumina's prices. The Alumina Price Index (API) is expected to remain high for the remainder of the year, as the recommencement of the production of the factory ALUNORTE in Brazil is not expected to occur. Accordingly,

final products' premia (billetes - plates) remain increased. Raw materials' prices experience a downward trend which is expected to strengthen in the future and improve production cost and financial results respectively.

For the EPC & Infrastructure Projects Sector, 2019 is expected to be a year of significant recovery, development and new opportunities. The Group is oriented towards the development of its activities in demanding countries, with its status and know-how giving it a special place in the global market. If there are investment opportunities, the Group shall utilize its significant financing capabilities to create bigger added value for its clients and shareholders. Based on this strategy, the EPC Sector will focus on a timely execution of the existing contracts and the undertaking of new projects and investments in targeted markets. It will continue to implement its plan for expansion and development of its presence in the markets of Asia and Africa. At the same time, it will seek photovoltaic construction and power storage projects through its subsidiary METKA EGN. Finally, the EPC & Infrastructure Projects Sector intends to expand in the development, construction and sale of photovoltaic parks worldwide.

Despite the relative progress achieved in the previous years, the energy market remains in a transitory state and serious regulative changes should be put under way in order to achieve the goals placed for enhancing competition and effectively open the market. In 2019, the Electric Power & Natural Gas Sector financial results are expected to be strengthened due to:

- the decrease of the natural gas price due to excessive LNG supply, where MYTILINEOS has a significant advantage compared to its competitors
- the increased availability of the thermal power stations, since programmed maintenance will be low,
- the increased installed power of the Renewable Energy Sources, through the operation of 3 new Wind Parks with a total power of 34,45 MW
- the expansion of the activity of electric power trading to additional countries.



Stakeholders Engagement

[GRI 102-11]

By virtue of its multifaceted business activity, MYTILINEOS interacts with a broad range of social groups. These different groups are recorded, ranked and characterized as “key Stakeholder groups” for the company, on the basis of specific criteria and in correlation with:

- the position they hold under its sphere of influence,
- the degree of significance and relativity attributed to or existing in its activities and
- the way in which they affect its ability to fulfill its vision and mission.

MYTILINEOS synergies with its Stakeholders are shaped in the context of the company's contribution to the Sustainable Development Goal 17 that seeks to strengthen partnerships to support and achieve the ambitious targets of the 2030 Agenda without exclusions, built on a common vision, principles and values.

MYTILINEOS promotes regular communication with its Stakeholder groups; the frequency of such communication stems from the type of relationship built with each group, aiming to understand their expectations and respond promptly to matters concerning them, preserving and strengthening at the same time its “social license to operate”.

Ways of communication & cooperation between MYTILINEOS and social partners’ groups

Key Stakeholder groups [GRI 102-40]

Long standing ways of engagement & collaboration [GRI 102-43]		Issues that came up [GRI 102-44]	
Employees			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**• Annually instituted evaluation process of employees' performance and skills.• Open, daily communication via the HR-Business Partner role.• Policies disclosure, whenever required.• Regular and extraordinary meetings between management and employees (annual institution of hierarchy conferences, annual meetings between the Management and employees in groups of 25 people)• Annual Sustainable Development Report.		<ul style="list-style-type: none">• Occupational Health & Safety• Working conditions• Training & skills development• Reward/Recognition• Development of an internal Communication and information system• Cooperation with educational institutions concerning research and technological development matters	
Investing community (Shareholders-Investors-Financial analysts)			
<ul style="list-style-type: none">• Extraordinary and regular shareholders meetings on annual basis.• Annual presentations of financial results (press Releases, teleconferences, Internet).• Materiality process**.• Disclosure of any business developments (press Releases, Internet).• Annual meetings with financial analysts.• Daily communication through MYTILINEOS Investor Relations Directorate.• Annual Financial and Sustainable Development Report.		<ul style="list-style-type: none">• New investments (Sectors, Financing, decision making process)• Corporate Governance• Dividends• Environmental issues related to aluminium and bauxite residues treatment.• Natural Gas supply sources• Problems encountered in difficult countries the company operates though the EPC & Infrastructure Projects Sector (e.g. Corruption)• Establishing of diversity policy.• Personnel training in CSR and crisis management issues.	
Associates & Suppliers			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Regular (even daily) communication through the company's purchasing departments per Business Activity Sector.• Social and environmental impact assessment every 3 years.		<ul style="list-style-type: none">• As mentioned in the section 'Consultation process 2018':• Support of local suppliers.• Supply chain evaluation in environmental, labor and social issues.• Information on the progress of submitted quotes.	
Customers			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Daily communication through the company's Commercial Directorates.• Cooperation in the context of the annual customer satisfaction surveys.		<ul style="list-style-type: none">• Emphasis on the subject of mutual trust between customers and the company.• Offer of reliable services at affordable prices.• Information on the company's development plans.• Greater communication and participation of consumers in decisions that will affect them in the future.• Delivery of orders on exact dates and development of a larger range of Metallurgy sector products.	
Local Government (local communities)			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Regular and extraordinary communication ('open door' policy, meetings, participation in local events or consultations, whenever deemed necessary).• Annual communication in the context of MYTILINEOS social policy implementation.• Annual Sustainable Development Report.		<ul style="list-style-type: none">• Support to local infrastructure and local cultural and sports activities.• Boosting of local employment.• The company's environmental footprint.	

Long standing ways of engagement & collaboration [GRI 102-43]		Issues that came up [GRI 102-44]	
Business Bodies			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Communication on annual basis (provision of data and information, meetings, participation in consultations).• Participation in events whenever deemed necessary.		<ul style="list-style-type: none">• External verification of the Sustainable Development Report.	
Regulatory & Sustainable Development Bodies			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Regular and extraordinary communication (provision of data and information through questionnaires, meetings, participation in consultations, whenever requested).• Participation in events by bodies on annual basis.		<ul style="list-style-type: none">• Legislative compliance• Cooperation in the context of the Sustainable Development Goals.	
Academic community			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Forms of cooperation on annual basis in the framework of research programs' implementation and application of the company's social policy.		<ul style="list-style-type: none">• Development of partnerships (scholarships, in-service training positions)	
Press representatives			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Direct daily communication through MYTILINEOS Communication department• Disclosure of any business developments (press Releases, Internet).• Arrange debriefing meetings with Greek and foreign journalists on annual basis.• Annual Sustainable Development Report.		<ul style="list-style-type: none">• The progress of the new Natural Gas electric power plant in Agios Nikolaos, Viotia.• MYTILINEOS moves regarding the market opening in the Electricity sector (e.g. participation in the PPC tender).• The company's financial figures.• New investments or acquisitions• The company's environmental footprint and CSR actions.• Innovation, pioneering role in private economy, outward openness, broader institutional interventions.• More openness.• Presentation of CSR program at the end of each year to the media representatives.• Higher publicity at local level of the company's CSR related activities.	
Volunteer Associations			
<ul style="list-style-type: none">• Annual Consultation Stakeholder process*.• Materiality process**.• Electronic platform for submitting social requests, available throughout the year.• Meetings with NGO representatives, whenever deemed necessary, as a result of their requests' evaluation.• Annual Sustainable Development Report.		<ul style="list-style-type: none">• Development of synergies to support actions around MYTILINEOS social policy strategic lines.• Responsible production highlights the positive impact on society.• Importance of transparency and accountability• Aspra Spitia residential area issues such as cleanness and care of shared spaces.	

Here is the description and the results of the official 2018 Stakeholder Consultation Process as well as MYTILINEOS ‘response to the Stakeholders main expectations during the 2017 Consultation.

* The group’s participation in this specific way of engagement depends on the Consultation’s subject.
** Participation in the materiality Stakeholders’ survey carried out every two years.

The institution of Stakeholders Consultation process

[GRI 102-43]

The Stakeholders Consultation process expresses the longstanding principle of MYTILINEOS to engage with its Stakeholders through a systematic and sincere dialogue. This practice, as a corporate institution, has been carried out consistently on annual basis since 2010 and is subject to self-assessment and self-improvement procedures. The initiative’s main target is to understand and respond to the expectations of employees, customers, suppliers, local communities, organizations and businesses and all other social groups with which MYTILINEOS communicates, cooperates and interacts in the framework of its business activity.

Stakeholders consultation constitutes a two-way, systematic and objective practice governed by specific principles and is designed through the application of a circular 5-stage process, being repeated after each cycle of completion aimed at any improvements whenever required.

The stages of this procedure are the following:

- The systematic revision (every 2-3 years) of social partners’ groups on specific criteria (AA1000 SES).

- The understanding of business case and the individual incentives of the company’s Business Activity Sectors for dialogue implementation.
- The Consultation’s subject matter and structure design.
- The implementation of the dialogue and the Stakeholders’ feedback process.
- The results evaluation, the response to Stakeholdres’ basic expectations and the maintenance of dialogue.

During 2018, the revision procedure of determining MYTILINEOS key Stakeholders’ groups was implemented, per Business Activity Sector. All the company’s CSR teams participated in the process, submitting their evaluation using the 5 identification criteria (Dependency, Responsibility, Tension, Influence and

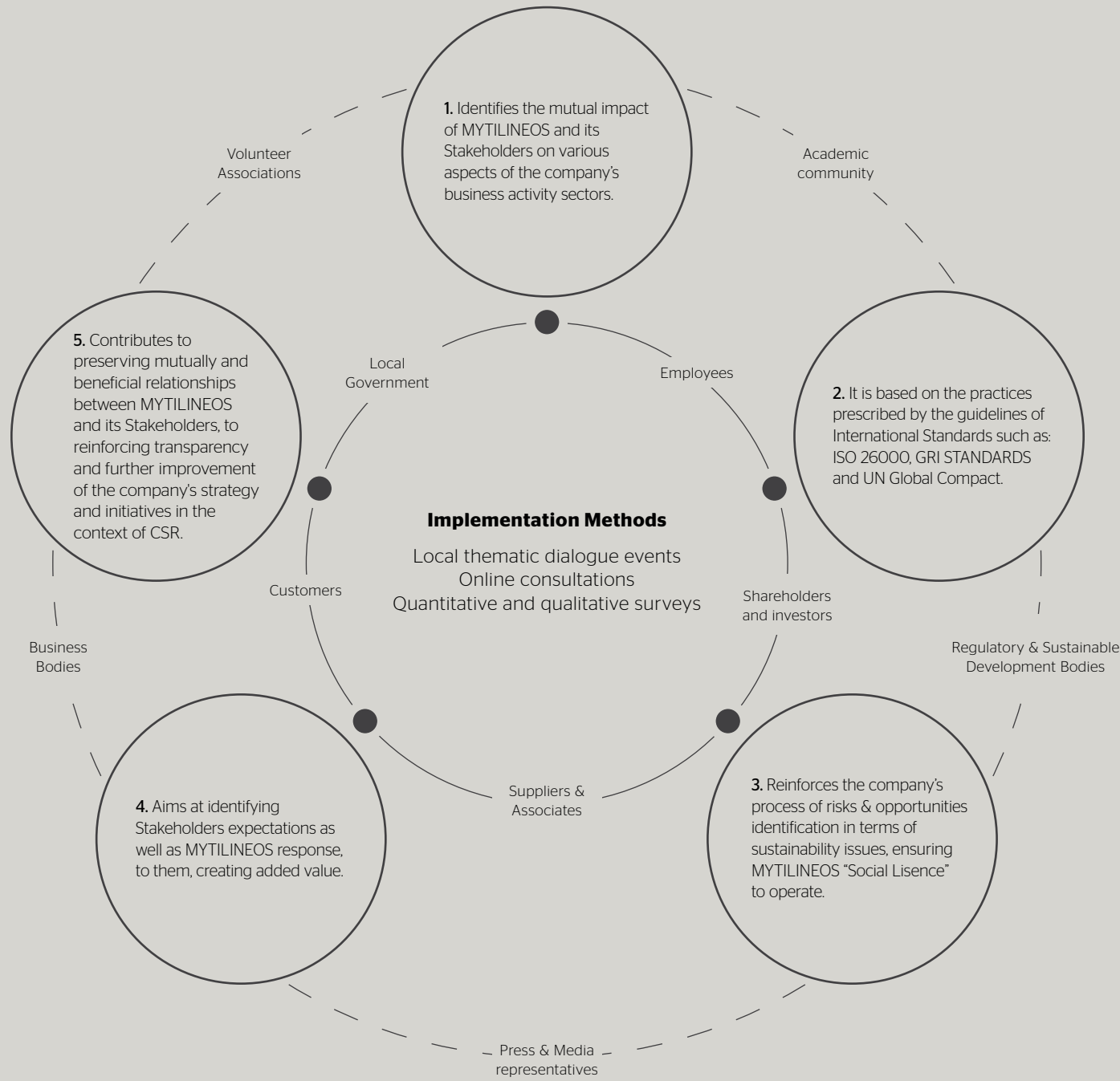
Diverse perspectives) of the AA1000 Stakeholder Engagement international standard. Those criteria drove to the classification of the Stakeholder’ groups in the following three main categories. [GRI 102-42]

	Metallurgy Sector	Electric Power & Natural Gas Sector	EPC & Infrastructure Projects Sector
Category A: OStakeholder’ groups that affect and are significantly affected by the company’s Business Activity Sector.	<ul style="list-style-type: none"> • Employees • Customers • Local community/local gov-ernment, • Suppliers 	<ul style="list-style-type: none"> • Employees • Customers • Local community/local gov-ernment, • Suppliers • Regulatory bodies 	<ul style="list-style-type: none"> • Employees • Customers • Suppliers • Local community/local gov-ernment
Category B: Stakeholder’ groups affecting the operation of the compa-ny’s Business Activity Sector but the respective influence on those groups is more limited.	<ul style="list-style-type: none"> • Regulatory bodies • Press representatives • Academic community 	<ul style="list-style-type: none"> • Press representatives • Business Bodies • Sustainable Development Bodies 	<ul style="list-style-type: none"> • Business Bodies • Regulatory & Sustainable Development Bodies
Category C: Stakeholder’ groups with limited influence from and to the company’s Business Activity Sector.	<ul style="list-style-type: none"> • Business Bodies • Sustainable Development Bodies • Non-Governmental Organi-zations 	<ul style="list-style-type: none"> • Non-Governmental Organi-zations • Academic community 	<ul style="list-style-type: none"> • Press representatives • Non-Governmental Organi-zations • Academic community

Note: The group of shareholders/investors is not included in the above table since its supervision, as a key group, is carried out centrally by MYTILINEOS General Directorate for Investor Relations and Corporate Governance.

MYTILINEOS Stakeholder Consultation Process

[GRI 102-43]



The efficiency and transparency of this process is ensured through the MYTILINEOS’ CSR governance system, whereby the individual CSR teams record and evaluate all Stakeholders proposals, ideas and concerns about sustainability issues. Subsequently, the most important issues are referred to the

General Directorates in each Business Activity Sector in order to make respond decisions as well as decisions allowing, where feasible, their integration in the corporate strategy. [GRI 102-21]

Thematic Consultation 2018

MYTILINEOS has followed and will continue following the Open Dialogue policy, setting the conditions for establishing partnerships with its key Stakeholders. In this context, the company's Metallurgy Sector carried out its 4th Stakeholder thematic consultation, 9th in a row, titled **'Developing a Responsible Supply Chain'**.

MYTILINEOS considers that disseminating its ethical principles alongside its commitment to Sustainable Development, that underpinned its evolution to this day, across all stages of its value chain and primarily in supply chain, constitutes an important element of its responsible business behavior.

The company acknowledges that its supply chain affects the fulfillment of its social and environmental targets. An increased level of information and transparency on behalf of suppliers may possibly lead to improved productivity, fewer work-related injuries and occupational diseases, a more incentivized labor force, higher quality of products and services, reduced negative environmental impact and higher competitiveness.

In this respect, MYTILINEOS, having aligned its strategic priorities with UN Sustainable Development Goals, aims at a range of initiatives to create a more responsible supply chain across all its sectors, beyond the lawful compliance, by 2025.

The kickoff of the implementation of these initiatives was inaugurated with the 2018 thematic Consultation implemented by the company's Metallurgy Sector titled: **"Developing a Responsible supply chain»**. The key objectives of this open dialogue, in which 50 main suppliers across all professional categories were participated, were the following:

- to inform suppliers on the latest developments regarding the company's growth and the overall purchase policy,
- to showcase the important role of the supply chain in Sustainable Development and
- to investigate ways of synergies for the attainment of mutual benefit objectives.

Mr. Dimitris Stefanidis, General Manager of MYTILINEOS Metallurgy sector stressed in his speech that the Consultation aims to contribute substantially to the company's suppliers in the continued and responsible effort to promote and push forward Responsible Entrepreneurship related issues, while Corporate Social Responsibility can no longer be disregarded, besides its compliance with the established rules and the practices governing the international standards followed.

The Consultation started with an overview of the Metallurgy Sector development in combination with the significant environmental friendly business investments that have been

implemented, rendering MYTILINEOS one of the largest alumina and aluminium producer in SE Europe and the only vertically integrated plant for the production of bauxite, alumina and aluminium in the European Union.

Then, the Metallurgy Sector's procurement policy, rules and procedures were thoroughly analyzed. Emphasis was given to the ensuring equal opportunities, integrity and respect in the supply chain management, highlighting the continuation of Metallurgy sector policy for long term and reliable forms of cooperation, on a win-win basis.

The first part was completed by showcasing the importance and therefore the necessity of Suppliers' Code of Conduct in modern enterprises, presenting the respective Code of MYTILINEOS as example. Then, reported the benefits of the suppliers self-evaluation process in social, labor and environmental issues and how this process enhances their competitive advantage, while discussed the relationship between the supply chain and the national and international sustainable development trends es such as: the UN Sustainable Development Goals, the transposition of the European directive of non-financial data disclosure in the Greek law, the national strategy on circular economy and the new GRI Standards.

The second part of the Consultation was totally dedicated to the active participation of the company's suppliers and started with the distribution of suppliers in eight (8) working groups with the task to discuss, analyze and finally submit their views on two specific subjects/questions raised by MYTILINEOS: a) how they perceive their self-assessment in social, environmental and labor issues and b) highlighting areas where there is room for improvement in cooperation with MYTILINEOS Metallurgy sector on the basis of mutual benefit.

In conclusion, the Consultation highlighted the difficulties involved in sensitizing the supply chain in Sustainable Development issues, either due to the size of companies, or due to their limited exposure to external challenges and due to the lack of appropriate resources. However, an optimistic conclusion was reached since all suppliers agreed that their self-evaluation in social, environmental and labor issues constitutes more of an opportunity rather than a threat, because it will highlight the areas of their activity in need of improvement, help improve quality of products and services and strengthen the openness and development of their competitiveness.



In detail, suppliers responded to the two questions raised in the following way:

Question 1o: ‘Self-evaluation of suppliers in environmental, labor and social issues. Threat or Opportunity?’

All participants agreed that their self-evaluation in social, environmental and labor issues is more of an opportunity rather than a threat for the following six key reasons:

- Involvement with something new that they had not perceived to this day with legal dimensions.
- Highlight the areas of their activity in need of improvement.
- Strengthen the openness and development of their competitiveness.
- Improve the quality of their services.
- Possibility to develop sustainable partnerships.
- Reinforce self-knowledge and self-improvement.
- More training in Health & Safety issues (contractors)

Also, emphasis was placed in the area of transportation services, where until today only the price of the service is considered as the key criterion for the cooperation and not the environmental performance/initiatives of the companies (e.g. vehicles with engines EURO5-6).

- Some parameters have been mentioned that could be considered as inhibitory factors mainly as regards the self-assessment results and the need to match them with the company’s Suppliers’ Code of Conduct, such as: the lack of preparation and the cost presupposed both by the need for cooperation with an external consultant and the certifications acquisition procedure (e.g. ISO 14001, OHSAS 18001). The topic of unfair competition was also discussed in relation to foreign suppliers mainly in developing countries that do not impose such criteria.

Question 2o : ‘In which sectors of your cooperation with MYTILINEOS METALLURGY Sector do you see margins of cooperation improvement based on mutual benefit?’

The participants focused on the following topics: **[GRI 102-44]**

- Markets should be characterized by a higher Greek penetration. Request to mutually push forward needs and possibilities.
- Prospect for joint efforts to find innovative solutions with participation in applied research programs that are known to suppliers. Creation of a communication channel for this purpose and for establishing partnerships.
- As regards procurement requests in the purchases department, it should be able to jointly draft the technical specifications (mainly in cooperation with multinational companies with experience and universal knowledge).

- Request to improve the technical descriptions and the planning of works requested by the company, for better personnel time management.
- Better provision and information to suppliers for the company’s annual needs/contracts in terms of parts.
- The need of the existence of approved materials’ suppliers list and the possibility to have automated electronic bids for materials. In addition, it was suggested separating the companies offering materials from those providing services.
- It was proposed to take into consideration the concerns regarding a tactic followed by the Metallurgy Sector seeking the best possible quality at the most economical possible price, a situation that constrains certain suppliers.
- As regards the testing of new products (from the beginning up to the application), the need to improve the response time of the company’s departments (users) to the suppliers recommending them was expressed, alongside the need to have continuing cooperation in the areas requiring improvement. There are cases of submitted proposals with no response, although the supplier has invested money and resources. In these cases, a better and quicker communication is required with well documented answers.
- A proposal for interaction between the company and suppliers owning an SAP regarding timely information on stock quantities of the company.
- More support to contractors, by the company, in Health & Safety issues (training and prevention).
- Repetition of 2-monthly meetings between the company and contractors for improvement possibilities.
- A systematic feed-back has been requested after an order has been given, regarding the reason why one of the participants is not selected.

The Consultation was completed with the presentation of results by the participants working groups representatives and with clarifications given by the company’s representatives. Overall, the suppliers’ proposals and interventions were recorded aiming at their thorough evaluation for their optimal incorporation in the existing practices of MYTILINEOS Metallurgy sector.

Finally, MYTILINEOS proceeded to the consultation’s assessment by sending a satisfaction questionnaire with a 5-tier scale (1 low to 5 high) to all participants. The Consultation was evaluated at three levels: a) Overall image, b) Planning & c) Event organisation. Several individual variables were used in each category and respondents were also able to make comments and suggest improvements. The percentage of Suppliers who responded to the evaluation reached the 70%, while 10 comments/suggestions for future improvement were submitted. Moreover, the consultation process was characterized, by the participants, as exceptionally useful and positive.

4.42^{/5}

Overall image

4.30^{/5}

Planning

4.61^{/5}

Event organisation

Response to Stakeholders’ requests

Key issues & expectations raised by MYTILINEOS Metallurgy sector stakeholders who participated in the thematic Consultation 2017 titled: “Translating Entrepreneurship to value for society”.

Response [GRI 102-44]

1. Cooperation with the academic community: Closer cooperation between MYTILINEOS Metallurgy Sector with the Technical Educational Institute (TEI) of Sterea Hellas.	In the framework of internship and the preparation for employment, MYTILINEOS Metallurgy sector cooperates with both Technical Educational Institutes (Mainland Greece and Athens), focusing mainly on students in the broader region and on employees’ children who meet all required prerequisites. In 2018, 6 TEI students were employed for internship training.
2. Investment in skills development: Contribution of MYTILINEOS Metallurgy sector to the Vocational Upper Secondary school apprenticeship and particularly in the specialties of electrical engineers and of vehicles’ department & b) Continuation of the program ‘ENGINEERS IN ACTION’.	a) In 2018, MYTILINEOS Metallurgy sector officially launched its cooperation with the Vocational Upper-Secondary School of Livadia (EPAL). In detail, two electricity technicians started their in-service training, in the context of their post upper-secondary school education, at the Aluminium plant (on a weekly basis, 4 days of work at the plant and one day at the Vocational Upper-Secondary School (EPAL) laboratories. b) The program ‘ENGINEERS IN PRACTICE’ is implemented for 3rd consecutive year, at the Aluminium plant; a 4th cycle is set to be realized in 2019.
3. Development local infrastructure: a) MYTILINEOS Metallurgy sector takes over actions to renew the model residential area of Aspra Spitia & b) Bigger investments in local infrastructure and other local-community projects.	In 2018, MYTILINEOS Metallurgy sector launched the program for the renewal of Aspra Spitia residential area, including projects for maintenance, renovation and new facilities, (tennis courts, a new sheltered gym, various buildings for associations & clubs, shared-use rooms etc.) set to continue also in 2019.
4. Cooperation with the Local Government: MYTILINEOS Metallurgy sector contributed further to Livadia Municipality’s social work program, where the company offers specific materials.	MYTILINEOS Metallurgy sector furthered its cooperation with Livadia Municipality for 2nd consecutive year in the context of the community service program, offering know-how, materials and economic support standing at 100,000€, a more than two-fold increase compared to the respective amount of 40,000€ in 2017.
5. Boosting local tourism development: A proposal to draw up a joint tourism promotion plan in cooperation with the municipalities neighboring the Aluminium plant. This plan shall be financed by MYTILINEOS Metallurgy sector Corporate Social Responsibility Program.	Following an evaluation by the CSR team of MYTILINEOS Metallurgy sector, in cooperation with the company’s central department for Corporate Social Responsibility, it was ascertained that this proposal is not included in MYTILINEOS social policy strategic priorities.
6. Education: a) Proposal to establish a Scholarships program by MYTILINEOS, based on socioeconomic criteria & b) Offer of technological equipment to schools with material needs.	a) MYTILINEOS participates in the Scholarship Program of Piraeus University. This program aims to upgrade the studies and showcase excellence for a better future for young people and particularly for those coming from economically weak families and to give them an equal opportunity of accessing the best possible education. b) The company acknowledges that qualitative education is a fundamental factor of sustainable development. Therefore, throughout 2018 also, the company continued implementing a set of initiatives of high social value in this sector. For further information, please refer to the respective section in this report (page 100).
7. Development of corporate volunteerism & social contribution of the company’s employees.	MYTILINEOS aims to develop a centralized corporate volunteerism program whose design has been included within the company’s Corporate Social Responsibility Action Plan for 2019.

MYTILINEOS response to the following requests was not available for publication in the 2017 Sustainable Development Report because their assessment had not been completed, due to the priority given to the company’s transformation procedures.

Key issues & expectations of the Electric Power & Natural Gas Trading Sector Stakeholders as recorded in the context of online thematic Consultation 2016 titled: 'Social Impact and Performance'		Response [GRI 102-44]
Employees related issues.		
Development of corporate volunteerism.	The first development stage of corporate volunteerism lies within the context of CSR Action Plan 2019 and will be implemented in cooperation with the General Directorate of Human Resources.	
Actions addressed to employees' families with long-term unemployed or health problems	These suggested actions are not included in the company's 2019 CSR Action plan.	
Support to employees' children with excellent performance (scholarships in universities abroad).		
Training in natural environment protection issues.	Under the ISO 14001-2015 Management System, the company already implements this practice. Training is recorded by the Safety Technicians.	
Incentives for submitting proposals and innovative ideas.	The company does not plan to implement this action in the next 2-3 years.	
Personnel training & education in the evolving technology.	The company's annual training program is implemented by the General Directorate of Human Resources with a diverse agenda including issues pertaining to new technological developments; pushing forward those issues is conditional on each employee's position needs.	
Suppliers related issues		
Supply chain evaluation based on the company's Suppliers' Code of Conduct.	This action was implemented within 2018.	
Information to suppliers on the evaluation's results in the context of the company's Quality Management System.	The company does not plan to implement this action in the next 2-3 years.	
Inclusion of sustainability criteria in the suppliers' selection procedure.	Considering the company's objective to promote responsible entrepreneurship to its main suppliers by 2025, this proposal is included in the basic actions the company will implement to this direction in the upcoming years.	
Customers related issues		
Customers awareness on the CSR actions the company implements, aiming to involve themselves in them.	This action has been planned for 2019.	

Environmental Performance

Our commitment to environmental protection is our second nature



Total Bauxite Consumption

2018 1.87

2017 1.85
million tones



Total Natural Gas consumption

2018 1,031.4

2017 1,063.3
million Nm³



Total energy consumption

2018 49,535

2017 53,015
TJ



Emissions
(Scope 1 & Scope 2)

2018 4.37

2017 4.93
million tCO₂ eq



Other emissions
(NOx & SOx)

2018 2.0

2017 2.0
thousand tonnes



Recycling / reuse of waste

2018 162.7

2017 82.0
thousand tonnes



Water consumption from public water utilities

2018 99.8

2017 29.4
thousand m³



Total water consumption

2018 5.7

2017 5.8
million m³



CDP WATER
(International Sustainable Development initiative for Water Resources Management)

2018 LEVEL B - Management

2017 LEVEL A - Leadership



Environmental expenditures

2018 17.3

2017 9.0
million €



Restoration of the natural environment

2018 81.1%

2017 80.4%
% of total land area that has been restored



Certified Environmental Management system

2018 ISO-14001 2015

2017 ISO-14001 2015

Material issues
Issue 3
Environmental Management

Issue 4
Climate Change

Alignment with the UN Global Compact Principles

Principle 7, Principle 8, Principle 9

Alignment with the UN Sustainable Development Goals



Environmental management & Climate Change

Disclosure Management approach [GRI 102-11] - [GRI 102-15]

The purpose of this disclosure is to provide specific information and data to all social groups and persons that affect, and are affected by MYTILINEOS' operation, so that they can understand how the company balances the unavoidable impacts of its business activity on the environment.

This management approach expresses the company's commitment to systematically invest in the most advanced Best Available Techniques (BATs) of environmental management, in research programs for waste management and utilisation, in the technological equipment renewal in its production process and in the culture of its people, aiming at improving performance minimizing its environmental footprint. [GRI 103-2b]

Relevance of the material issues [GRI 103-1a]

The major environmental challenges that MYTILINEOS is facing in pursuing its business activity are: (1) the rational management of the reserves of natural resources, (2) the energy consumption and the control of emissions, (3) the management of waste, with emphasis on the utilisation of bauxite residues, (4) the control of air quality, and (5) the restoration of the natural landscape in exploitable land areas affected by the bauxite mining process and the development of RES plants.

Climate change is one of the major challenges globally. MYTILINEOS acknowledges the importance of energy consumption and the carbon dioxide (CO₂) emissions, and energy consumption, as well as of their impacts on its operational efficiency and overall on sustainable development. Across its business activity sectors with high energy intensity, the company monitors monthly the air emissions and, by promptly taking corrective actions, ensures that such emissions are compatible with the legislatively allocated ones and are kept at the lowest possible level.

Rigorous compliance with the environmental legislation in force constitutes a key concern across all MYTILINEOS activities. Both compliance with the applicable national and EU environmental requirements and the commitments taken on voluntary basis, contribute to constantly improving the environmental footprint. The main objective is company's production processes, services and products to have the lowest possible environmental impact.

Boundaries of the material issues [GRI 103-1b]

MYTILINEOS environmental impacts are identified in the biotic and abiotic natural systems (soil, waters and ecosystems) in terms of the boundaries of its Business Activity Sectors and its subsidiaries; in the air quality as well as in its broader contribution to air emissions at national level.

The company contributes directly to the above effects, however its key suppliers, through the use of non-renewable basic raw materials in their production processes have an indirect impact the same as its customers by processing and using the company's products.

Major risks and relevant risk control practices [GRI 103-2a]

Given the environmental impacts, MYTILINEOS acknowledges the following major risks, which may affect its business goals and against which it has been carrying out, for a number of years, appropriately selected investments in order to significantly reduce the likelihood of their occurrence.

Major risks

The gradual reduction of the available bauxite residue disposal areas is a key environmental risk of MYTILINEOS Metallurgy Sector with possible negative effects on the company's financial performance.

Deviations from the legislation in force or from amendments thereto related to environmental issues or to Climate Change.

Further increase of the cost of CO₂ emission allowances as may be formed by the future EU policy on energy and climate.

Possible downgrading of groundwater and surface water quality and possible soil pollution. Refers to a potential impact of limited extent within the boundaries of the Metallurgy Sector, given the great distance from organised settlements and other economic activities.

Risk control practices

The company continues to invest consistently in research on the bauxite residues utilisation by participating in European programs of efficient green technologies for the production of useful products and materials as well as the development of rare earths elements extraction technologies.

MYTILINEOS is systematically following the relevant developments in the legislation and takes preventive measures in order to minimise any potential adverse effects. The company might be obliged to undertake significant investments in the future, as a result of the requirement for compliance with the new, amended legislation and the new regulations. For all its existing plants, the company was granted licenses for greenhouse gas emissions, as foreseen by law, and has developed and applied in the required tools for monitoring emissions and submitting reports.

The company's main objective is to avoid any incident involving a downgrading of the environment. The relevant prevention measures comprise strict adherence to the Environmental Terms for the Metallurgy Sector, compliance with the measures provided for in the Safety Study (SEVESO III - implementation of Joint Ministerial Decision 172058/2016), and detailed knowledge of the Emergency Response Plans (ERPs) accompanied by relevant drills. The quality of waters and soils is monitored systematically.

Management of the Material issues [GRI 103-2a]

Environmental responsibility is a key element of the Code of Business Conduct, the corporate principles and the Suppliers and Business Partners Code of Conduct of MYTILINEOS. It also ranks at the top of the company's Consultation agenda with the main Stakeholders' groups.

All the company's Business Sectors apply an ISO 14001/2015 certified Environmental Management System, supported by specific environmental policies per activity sector. (Metallurgy Sector Environmental Policy -EPC & Infrastructure Projects Sector Environmental Policy - Electric Power Sector Environmental Policy) [GRI 103-2c-i]

The setting of environmental targets for each Business Sector, the implementation of the company's measures and principles regarding the protection of the environment, the adherence to the requirements of the laws as a minimum commitment, the continuous assessment and monitoring of all environmental parameters, the cultivation of the employees' environmental awareness and the harmonious collaboration with the local communities, are key components of MYTILINEOS' environmental management.

To tackle climate change, the company invests systematically both in the improvement of production processes, with

new technology installations and in the Renewable Energy Sources (RES). In parallel, the systematic application of Best Available Techniques (BATs) in the production process and in the waste management, in tandem with the use of more environment-friendly fossil fuels (primarily natural gas), as the first transitional measure, to improve energy efficiency and to reduce CO₂ emissions, are significant factors that contribute to the company's business growth and drive its commitment to the protection of the environment and to ensuring the sustainable management of natural resources.

The industrial plants of Metallurgy and Electricity sectors participate in the Emissions Trading System (EU ETS); based on this system, since 2013, all procedures for calculating and verifying the gas emissions have been followed, in accordance with the regulations of the third trading period EU ETS 2013-2020, whereby the compliance cost is higher due to the allocation of a smaller number of entitlements, compared to actual emissions.

In each Business Sector, EHS supervisors take steps to ensure correct environmental operations in all industrial plants. [GRI 103-2c-iv]

Adherence to the agreements and commitments that the Company has undertaken over and above its statutory obligations.

Assessment of the impacts of the company's activities on the environment, identification and assessment of potential risks, adoption of the necessary preventive measures, conduct of regular inspections and drills in order to confirm their implementation and evaluate their efficiency.

Control and continuous reduction of solid, liquid and gas waste.

Improvement of the management of residues by promoting recycling, reuse or utilisation processes.

Control of the consumption of raw materials and energy.

Prevention of any identified pollution risk

To be ready and respond to emergency environmental incidents and to remedy any deviation implementing corrective plans.



MYTILINEOS Measures and Principles for the Environmental Protection

Study, maintenance and evolution of appropriate prevention and suppression means, especially in cases where installations are modified.

Correction of all deviations identified, by introducing and implementing improvement / restoration plans and preventive action plans.

Personnel training and briefing, in a manner adapted to the duties and needs of each employee.

Encouraging associates (contractors, suppliers, clients) to respect the same environmental and industrial safety standards.

Organisation of regular internal and external inspections to assess the performance of the Environmental Management System, the achievement of the targets set and the application of regulations and principles.

Targets of the Material issues [GRI 103-2c-iii]

The primary objective of MYTILINEOS is to stabilize and to mitigate the negative impacts of its production activities and to participate in national and in international sustainable development initiatives that can lead to overall improvements in its environmental footprint.

In the Metallurgy sector, besides the protection of the natural environment by controlling the environmental impact/risks, the main priorities are, to continue the implementation of specific continuous improvement projects aimed at stabilising and reducing emissions, to utilise in the production stages digital industrial techniques that can help conserve energy, and to invest in partnerships with Universities and scientific organisations for the development of new technologies for the utilisation of bauxite residues.

The continuing performance improvement through the application of institutionalized principles and environmental measures combined with the implementation of environmental protection programs, constitute the key targets of the Elec-

tric Power & Natural Gas Trading sector. Given the activity of MYTILINEOS' power plants, it is not possible to conserve primary energy in any way other than by utilising it in the best possible way, using the best available techniques. In this respect, the company's objective is to maintain the productivity of its gas-fired thermal power plants within the high efficiency end of the output curve and to ensure their reliability and availability throughout the year.

In the company's EPC & Infrastructure Projects sector, the priority is to apply a system of procedures, practices & methods of environmental management for pollution prevention, recording and evaluation of possible risks, taking the necessary preventive measures and carrying out regular controls at projects' execution premises. Moreover, another priority is the continued training for strengthening the environmental culture of employees and for improving the environmental footprint with responsible use of energy, water & other natural resources by means of an annual validation by an independent body, pursuant to the international standard ISO 14064-1.

Specific Environmental Targets	Targets 2018	Performance 2018	Targets 2019
Fluorine emissions (kg/t Al) ¹	1.5	1.41	<1.50
Carbon tetrafluoride emissions (kg CF ₄ / tAl) ²	0.05	0.06	<0.05
Solid waste sorting ratio ³	>90%	91.2%	>90%
Generation of unclassified basin waste (kg/basin ABeq) ⁴	<20	32.7	<20
Final waste disposal for the alumina production line (kg/t) ⁵	<4.7	4	<4.7
Final disposal or recovery of waste to third parties (t) ⁶	n/a	9,307	>6,000
Disposal of bauxite residues (t) ⁷	150,000	85,124	>90,000
Disposal of sterile decalcification (t) ⁸	60,000	48,874	>40,000
Total water withdrawal (industrial use & drinking, m ³ /day) ⁹	12,950	13,234	<12,950

1 & 2 Specific targets of the Metallurgy Sector that contribute to the reduction of air emissions.
3, 4, 5, 6, 7, 8 & 9 Specific targets of the Metallurgy Sector that contribute to the reduction of solid waste.
9 Specific target of the Metallurgy Sector that contributes to the conservation of natural resources

Performance in 2018 [GRI 103-3a-ii]

More than €17.3 m were invested in 2017 for MYTILINEOS environmental policy implementation. In particular, for waste disposal, air emissions management and environmental remediation, an amount of €15,492.074 was spent, while for environmental prevention & management €1,847.340 were spent.

The environmental performance described in each category below is calculated on the basis of consolidated results from the industrial production plants of the Business Activity Sectors and of MYTILINEOS associated subsidiaries. The results are adjusted in accordance with the definitions of the international GRI Standards. The year 2017 is used as a reference year, the first one during which MYTILINEOS published the relevant consolidated information after its transformation.

Environmental Compliance

Compliance with the environmental legislation is a core element of MYTILINEOS' business activity and a major issue of equal importance with the other issues that the Company is managing in the context of its continuous and responsible development. This view, which is the key component of the company's environmental policy, 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 undertaken by its Business Sectors. To this end, the strict adherence to the applicable laws, the implementation of a regular environmental legislation review and update process and the application of the environmental rules and regulations pertaining to MYTILINEOS' activity during 2018, have resulted in the absence of any incidents involving a deterioration in the quality of the environment.

Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the company's operational units, is a process conducted internally, on a regular basis and by specialised personnel in each Business Sector, as well as annually, by a recognised independent organisation that undertakes to audit and certify the environmental management system in place. According to the results of the recent relevant audit for 2018, no deviations from the current environmental licenses were observed, which would necessitate the planning of investments for their rectification, while no cases of non-compliance with environmental rules and regulations were recorded. [GRI 307-1]



Emissions

The Metallurgy and Electricity & Gas Trading Sectors generate 99% of the company's total direct and indirect carbon dioxide (CO₂) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from power generation (consumption of natural gas), while indirect (Scope 2) emissions correspond to the consumption of electricity.

Air emissions (tnCO ₂ eq) ¹		2018
Direct greenhouse gas emissions (Scope 1) [GRI 305-1]		2,555,713.6
Fuels (CO ₂ :100%)		2,162,139.5
Processes (CO ₂ :75% - PFCs: 25%)		388,437.4
Transports (CO ₂ :100%)		5,136.7
Indirect greenhouse gas emissions (Scope 2) ² [GRI 305-2]		1,819,624.6
Electricity (CO ₂ :100%)		
Total		4,375,338.2
Indirect greenhouse gas emissions (Scope 3) ³ [GRI 305-3]		2,577.2
Products' transport (CO ₂ :100%)		1,449.5
Business travels (CO ₂ :100%)		675.0
Employee commuting (CO ₂ :100%)		452.7
Other important emissions [GRI 305-7]		2,370.6
SOx (tons. /year)		680.0
NOx (tons. /year)		1,342.3
CF ₄ (tons. /year)		11.2
C ₂ F ₆ (tons. /year)		1.3
Fluorine (tons. /year)		261.5
Particles (tons. /year)		74.2

1 The year 2018 is fixed as new base year for this factor due to the application of the national emissions factor gCO₂/kWh (source: Eurostat Electricity conversion data for Greece). This factor was applied for the first time in all company's Business Activity Sectors, in 2018, for reasons of harmonization after the corporate transformation in 2017. [GRI 103-3a-iii]

2 Gross Location Base: Use of the emissions factor based on data published by the State at regional or national level). In addition, due to shortage of other

data for the calculation of market-based emissions, the average emissions factor was used of the total electricity generation in the country.

3 The quantity of pollutants emissions Scope 3 is partly covered. In detail, data comes from the EPC & Infrastructure Projects Sector, excluding the category of employees' displacement wherein the performance of the Electric Power sector is included.

In 2018 all direct and indirect CO₂ emissions of the company remained on average at the level of the respective emissions in the five-year period 2013-2017 (4,4 m tons) posting a slight improvement by 1% deriving mainly from the decreased natural gas consumption in the Electric Power sector. With regard to the other secondary air emissions, such as the nitrogen oxides (NOx) and sulfur oxides (SOx), limit reductions were recorded by 1.1% and 2.2% respectively, since 2017.

However, the Metallurgy sector posted an increase by 20% in carbon tetrafluoride (CF₄) emissions, at the stage of alumina electrolysis during aluminium production; as a result, the average of the last five years in total perfluorocarbons (PFCs) emissions was exceeded, as illustrated in the following table. For 2019, the company intends to bring emissions back to

2017 levels and for this reason, specific targets have been set and actions have been planned, e.g. to mitigate the increase during the electrolysis procedure aiming at decreasing and at stabilizing at low levels those emissions.

In electricity production, the company focuses on preserving the operation of thermal power generation plants to the highest performance level in Greece, with optimal natural gas use as primary fuel. It is a fossil fuel with the lowest content in coal compared to other fossil fuels, without releasing SO₂ and particles, with the lowest NOx emissions (mainly NO₂) in exhaust gases compared to the limits allowed by the legislation in force, and low production of CO₂ (by 70%) compared to the lignite plants.

Specific air emissions [GRI 305-4]	2017	2018	Change
t CO ₂ (scope 1+2) / t of bauxite production	0.018	0.019	↑
t CO ₂ (scope 1+2) / t of hydrated alumina produced	0.70	0.65	↓
t CO ₂ (scope 1+2) / t of aluminium produced	12.0	13.4	↑
Fluorine emissions (t/y)	254.7	261.5	↑
PFC emissions * (t CO ₂ /y)	82,185.1	98,913.0	↑
Particulates (t/y)	69.9	74.2	↑
Specific CO ₂ emissions (t CO ₂ (scope 1+2) / TJ electric power generated)	95.4	97.4	↑

* Perfluorocarbons-PFCs (CF₄ & C₂F₆), are gases that contribute significantly to global warming: 1 tonnes of CF₄ is equivalent to 7,390 tonnes of CO₂, while 1 tonne of C₂F₆ is equivalent to 12,200 tonnes of CO₂



Energy

The total energy consumption from MYTILINEOS activity in 2018 posted a small decline compared to 2017. This performance mainly stemmed from the decreased electricity generation and the corresponding operation hours of the company's thermal plants, due to the reduced demand, of the Greek wholesale electricity market in 1Q of the year. In particular, as presented in the following table, the energy consumption from conventional energy sources such as

the natural gas dropped by 6.5%, while the total electricity consumption posted a small increase by 1.4% compared to the respective quantity in the previous year. In terms of the exported energy quantity, although the year 2018 was a year of extended scheduled maintenance for the thermal power plant of St. Nikolaos, the thermal plants and the RES projects in progress of MYTILINEOS covered 10% of the domestic demand in electricity in the interconnected system.

Total energy consumption (Tj)* [GRI 302-1]	2017**	2018
Energy consumption (Non Renewable sources)	42,423.6	38,804.3
Natural Gas (Tj)	42,066.3	38,421.8
Mazout (Tj)	304.8	260.7
Gas-pil (Tj)	45.3	115.2
Heating-oil (Tj)	6.4	4.4
Gasoline (Tj)	0.8	2.2
Energy purchased for consumption	10,257.3	10,400.5
Produced energy quantity	18,897.0	18,565.9
IPP (Tj) ₁	13,807.8	13,533.2
CHP (Tj) ₂	4,185.0	4,153.6
RES (Tj) ₃	904.2	878.2
Exported energy quantity (sale)	18,562.3	18,235.1
IPP (Tj) ₁	13,473.1	13,203.3
CHP (Tj) ₂	4,185.0	4,153.6
RES (Tj) ₃	904.2	878.2
Total	53,015.6	49,535.6

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

** The amount of energy produced in 2017 was corrected, resulting in the corresponding redefinition of the total consumption of the same year. [GRI 102-48]

1: IPP (Therman plants)
2: CHP (Cogeneration heat and power plant)
3: RES (Renewable Energy Sources)

At efficiency level, improvements were made, for one more year, in the Metallurgy sector production process, regarding specific consumptions per ton of alumina and aluminium production respectively. These decreases are due to the continuing efforts of improvement and the investments in new technologies that were carried out by the company over the last years; it is also due to the controls on work quality, on the optimization of parameters and the personnel sensitization, to the extent it is involved, through special operations plans. In line with MYTILINEOS policy, these efforts will continue in

the future to identify the sectors that can be operationally improved in order to optimally utilize the available technologies and practices. We indicatively mention the monitoring of the energy consumption level for the production of liquid metal and the comparison with the best performance in each case and the identification of the optimum energy consumption level (electrical & thermal) both for the production of aluminium alloys in the foundry and for the production of anodes (electrical & thermal) with a gradual attainment design in both cases.

Energy intensity figures [GRI 302-3]	2017	2018	Change
Specific consumption in Bauxite production (Gj /t of bauxite produced) ¹	0.1	0.1	-
Specific consumption in alumina production (Gj/t of alumina produced) ²	10.1	9.8	↓
Specific consumption in aluminium production (Gj/t of aluminium produced) ²	50.9	49.7	↓
Specific product consumption (Tj /Tj of electric power generated) ³	1.9	1.8	↓

1 Mixed consumption of fuels & electricity.
2 Mixed consumption of natural gas & electricity.
3 Mixed consumption of natural gas & electricity.

Finally, in 2018, by virtue of decision no. 744/2018 by the Greek Regulatory Authority for Energy (RAE), MYTILINEOS was granted an electricity generation license from a gas-fired combined cycle plant of 665MW capacity, in Saint Nikolaos in the Municipality of Distomo-Arachova-Antikyra, in the Regional Unit of Viotia. The new cutting-edge technology plant will have more than 63% thermal efficiency thus becoming the most efficient combined cycle plant in Europe. With the creation of the new

plant, MYTILINEOS will increase its installed capacity to more than 2,000MW, (natural gas and RES plants), while significantly contributing to Greece's commitment to transition towards 'cleaner' energy sources. In addition, in August 2018, the new wind farm of 48MW capacity was set in operation, thus raising the company's production capacity from Renewable Energy Sources plants to 175MW; the construction of 3 additional wind farms of 34.45 MW total capacity has also been launched.

SDGs:

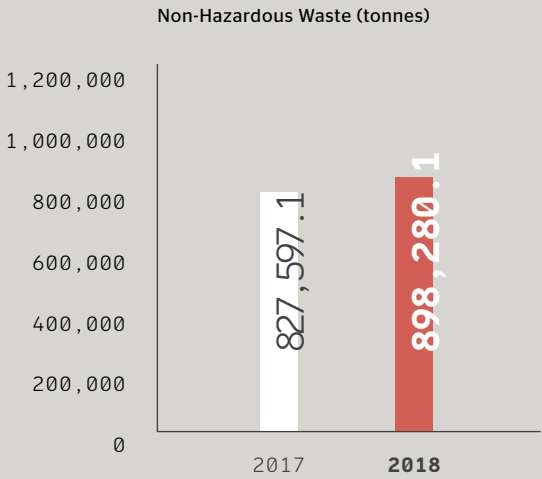


Waste Management

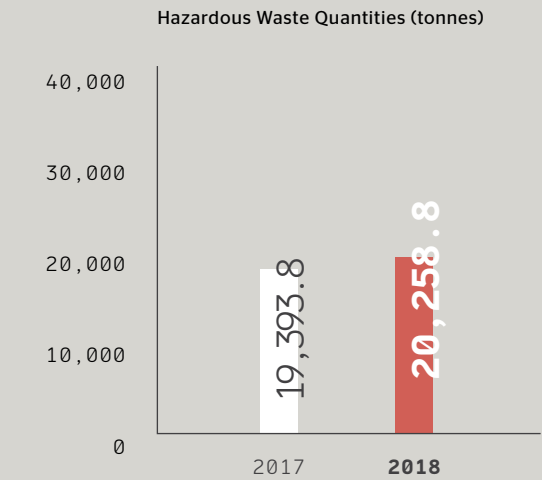
As part of its environmental policy, MYTILINEOS ensures the systematic collection and utilisation of waste, by implementing management and disposal practices on a large scale. The waste resulting from the aluminium production (bauxite residues) represent the largest part of the company's total volume of solid waste. The improvement in this particular field depends on the utilisation of this type of waste which, until their final disposal, are accumulated in a specific designated area which, for the purposes of measuring MYTILINEOS' environmental footprint, is considered as a Controlled Landfill for Non-Hazardous Waste operating in accordance with the Sterea Regional Administration and the Viotia Prefectural Administration licensing acts.

In 2018, the company posted an increase in the total waste quantity (hazardous and non hazardous) by 8.4%. Versus this,

the quantity of waste that was collected, reused in various ways or recycled by the company's activity sectors reached 17.7% of total waste (including bauxite residues), posting a significant increase by 98%, namely 80,706 additional tons, compared to the respective quantity in 2017. Almost 97% of this quantity regarded sterile and residues of bauxite, while the remaining 3% included ash, aluminium, industrial waste and materials that are collected and include metals scrap (e.g. iron and steel), batteries of vehicles, tyres, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, batteries of vehicles, lamps and consumables of printers and photocopy machines. Where feasible, the materials to be recycled are utilised inside the company's facilities, while where waste cannot be recycled or utilised internally, this is done through collective waste management systems or licensed waste contractors.



Non-hazardous waste (tonnes) [GRI 306-2]	2018
Controlled Landfill (Accumulation area for Bauxite Residues)	707,553.3
Controlled Landfill	3,056.3
Recycling / Reuse within and at third party facilities	159,118.1
Storage for recovery	25,106.1
Storage in third-party facilities	3,444.6
Exchange	1.7
Total	898,280.1



Hazardous waste (tonnes) [GRI 306-2]	2018
Controlled Landfill for hazardous waste	16,339.9
Recycling / Recovery/Reuse within and at third party facilities	3,613.9
Storage for recovery	277.4
Incineration	11.3
Storage in third-party facilities	9.8
Exchange	6.4
Total	20,258.8

In the context of the circular economy, company's Metallurgy & Mining Sector has set itself the objective of developing technologies that will make possible the holistic utilisation of bauxite residues, through its participation in national and European research programmes.



During 2018, continued the research project SCALE (Production of Scandium compounds and Scandium Aluminum alloys from European resources continued - Duration: December 2016-November 2020). which aims to obtain Rare Earths and, in particular, Scandium (Sc) compounds and Scandium-Aluminium alloys from residues of the European metallurgical industry, such as Bauxite Residues. This program is coordinated by the MYTILINEOS Metallurgy Sector; while participates the National Technical University along with 19 partners from 9 different European countries. At Metallurgy Business Sector facilities, the construction of a pilot plant has already started for the extraction of bauxite residues in an acidic environment for the production of Sc concentrate to be further utilized in a pilot plant of another partner.

Scandium is a metal, classified as a rare-earth element; its global production does not exceed 15 tons (mainly from industrial by-products) and is used in 'emerging' technological applications, such as: a) 'Electrolytic' gas-fired power generation (SOFC) with two-fold efficiency compared to the current thermal power plants, b) Aluminium-Scandium Alloys of very high resistance, such as for example the alloy Al-Sc-Mg being used by AIRBUS in 3D printing technology of accessories. <http://scale-project.eu/>

2018 saw the launch of the project ENSUREAL (Ensuring sustainable alumina production - Duration: 2017-2021), to develop new methods for alumina production from alternative sources, such as bauxite poorer deposits and residues. In the framework of ENSUREAL program, under the coordination of SINTEF institute of Norway, the extraction of cast iron and alumina from bauxite residues will be tested on pilot basis in MYTILINEOS Metallurgy Sector, through a combination of pyrometallurgy and hydrometallurgy treatment. The first fusion tests of medium scale with Greek bauxite and bauxite residues were carried out successfully in Norway. <https://www.ensureal.com/>

Also, in 2018, started the program SIDERWIN (Sustainable Electro-winning of Iron-Duration: 2017-2022), led by ArcelorMittal, the world's leading steel and mining company. The project aims to test, on a pilot basis, a new sustainable technology for producing iron by alkaline electrolysis. MYTILINEOS Metallurgy sector in collaboration with the National Technical University will examine the use of bauxite residues as an alternative source of iron in this process. <https://www.siderwin-spire.eu/content/home>

Finally, the RemovAL research program (Removing the waste streams from the primary Aluminium production and other metal sectors in Europe-Duration 2018-2022), has started, coordinated by MYTILINEOS Metallurgy Sector. The program will last 4 years, its total budget stands at €11.5 m. Among the 27 partners in the consortium there are the largest alumina producers outside Asia (RUSAL, RIO TINTO, ALCOA), the European Aluminium Association and the International Aluminium Institute. The RemovAL program intends to try out at pilot level different technologies in bauxite residues utilization. The technologies and the pilot plants to be used in most cases have already been developed in previous research projects or in current projects and through RemovAL, they will be collected and utilized as a common base for a European network of industrial symbiosis. <https://www.removal-project.com/>

In addition, in the EPC & Infrastructure Projects sector the proper management and disposal of generated waste is promoted by systematic practices including:

- The development of a Site Waste Management Plan (SWMP) for every project carried out by the company. The SWMP, which is developed prior to the commencement of all construction activities, aims to minimise the production of waste and to examine ways to reuse or recycle this waste.

- The specification of the types, categories (urban waste water, non-hazardous and hazardous waste) and the quantities of waste so that can be classified for re-use, recycling or other disposal method. As regards the management of the liquid waste and water discharges resulting from MYTILINEOS' activity, this is fully controlled and takes place in accordance with the parameters determined by the environmental terms and regulations under which the facilities of the company's Business sectors

have obtained their environmental licenses. In Metallurgy sector, which produces the largest quantity of liquid waste, the largest part of this type of waste is recycled within the production process itself. More specifically, the aluminium production plant uses an underground system of water or waste 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 on-line. There is also a safety tank with a capacity of 800 m3, to which waste is fed, when necessary, by an automatic diversion system.

Table of water discharges [GRI 306-1]

Business Sector	Water discharge category	Quantity m³/year	Destination	Quality of water discharges, including treatment method
METALLURGY SECTOR	From the cooling process of the Combined Heat and Power (CHP) plant	161,828,918.8	Discharge to the sea (determined by legislation)	pH: 8,2 (limit 6 - 9) Temperature: 21,8°C (limit 34°C)
	Waste water, including rainwater, measured at the point of exit from the primary treatment facilities	452,022.9	Discharge to the sea (determined by legislation)	Primary treatment (Settlement of floating particles, Filtration of supernatant fluid, Chlorination, Discharge). <ul style="list-style-type: none">• pH: 7,71 (limit 6-9)• Biochemical Oxygen Demand (BOD5): 5,4mg/l (limit 40mg/l)• Chemical Oxygen Demand (COD): <10mg/l (limit 150 mg/l)• Total Solids(TDS): 828mg/l (limit 1.500 mg/l)• Total Suspended Solids (TSS): 15,8mg/l (limit 40mg/l)• Sulphides: <0,005mg/l (limit 1mg/l)
	Waste water from the mining process	21,045	Subsoil	No particular treatment. This waste is water (from licensed drills or water collected in underground mining sites) used in the mining process, which with the addition of inert bauxite or limestone dust (depending on the particular mining activity), becomes a liquid mix that ends in the aquifer.
	Water used for road wetting, Watering - Environmental restoration	18,897.5	Subsoil	No special treatment applied. Concerns water from licensed drills.
	Waste water from mining site workshops	1,040	Watering of rehabilitated areas.	Cleaning of liquid waste from sites using a system of physical separation. The results of the analyzes (BOD, COD, E-coli, TSS, chlorine, nitrogen & phosphorus) provide water suitable for irrigation.
ELECTRIC POWER SECTOR	Industrial service water in the power generation process	29,349	Disposal to a Motor Oil liquid waste treatment plant	In the amount of industrial water intended for disposal to Motor Oil, pH is set to be within limits (6.5 - 9) and temperature <45°C.

Moreover, three Biological Treatment Facilities are in operation in the Metallurgy sector, covering the aluminium production plant and the local communities water needs: the Biological Treatment Facility in Aspra Spitia & Antikyra, the Biological Treatment Facility in Saint Nikolaos, with a capacity of 200 residents, serving the homonymous settlement, and the Plant's Biological Treatment Facility with a capacity of 2,000 people, serving the plant's population.

The Biological Treatment Facility in Aspra Spitia & Antikyra was the first biological treatment facility for urban waste water in Greece and was built together with the settlement, by the company Degremont France. Following its upgrade

in 1995, the facility has a capacity of 10,000 people. In accordance with the Environmental Terms Approval Decision, monthly analyses are carried out by the scientific quality control laboratory, which has been accredited by the Hellenic Accreditation System in accordance with the EL0T EN ISO 17025 standard. During the bathing season (May - September), seawater samples are taken at 8 locations in the Antikyra Gulf. These locations include the sea point exit of the treated waste water pipe from the Biological Treatment Station of Aspra Spitia & Antikyra. The results related to this location have demonstrated that the samples taken comply with the legally required limits for exceptional-quality coastal water and are completely free of pathogenic micro-organisms.



Raw and other materials

As regards the use of basic natural resources, the quantity of bauxite used in the Metallurgy sector to produce aluminium and alumina in 2018 posted a marginal increase by 1% compared to 2017, while the total quantity of natural gas used in the Electric Power sector, which is not recyclable and is not a renewable source, decreased by 4%. The EPC & Infrastructure Project sectors does not manage primary natural resources, but instead uses semi-finished or finished products. In detail:

In the **Metallurgy sector**, approximately 2.46 m tons of raw materials were used in 2018, to produce primary aluminium products, a marginally increased quantity since 2017. A 76% of this quantity was bauxite deriving (by 28%) from the exploitation of mines in Fokida and Viotia prefectures and constitutes the basic raw material for the production of alumina and by extension aluminium. The remaining 24% regarded the use of other raw materials from non renewable

sources. MYTILINEOS, in its effort to limit the consumption of natural resources and to reduce the energy required in aluminium production, in 2018 adopted in its production process the practice of recasting aluminium waste (scrap) that replaces the use of raw materials. The production of aluminium deriving from this process requires only 5% of the energy required in the primary aluminium production, i.e of the aluminium produced from bauxite, limiting at the same time the gaseous emissions by 95%. Furthermore, to this direction, in 2018, the company announced the agreement for the acquisition of EPALME SA., A company operating in industrial production, metals treatment and trading and in particular of aluminium alloys and their products. Based on the company's long-term know-how in the optimal treatment of aluminium scrap, MYTILINEOS will be able in the upcoming years to produce raw materials anew, spending a much lower quantity of energy, thus cutting the cost and mitigating the environmental impact. **[GRI 301-2]**

METALLURGY SECTOR [GRI 301-1]	2015	2016	2017	2018	Measurement Method	Origin of supplies	
Type and weight of Raw Materials (tonnes)*							
Bauxite	1,833,201	1,875,509	1,855,677	1,873,622	Direct measurement	Internal & External Sources	
Anhydrous aloumina	345,587	347,882	348,733	354,889		Internal sources or production	
Casthouse metals	2,473	2,473	2,459	2,330		External Supplier	
Subtotal (1)	2,181,261	2,225,864	2,206,869	2,230,841			
Type and weight of Materials (not incorporated in the end product) (tonnes)*							
Anode electrodes	74,835	75,797	75,245	76,490	Direct measurement	Internal sources or production	
Coke	64,490	64,529	59,668	52,230		External supplier	
Lime	61,459	60,999	58,584	57,582			
Soda	22,659	23,516	25,051	26,293			
Tar	13,296	14,039	13,201	11,314			
Aluminum scrap	-	-	-	2,886		Internal sources or production	
Aluminium fluoride	3,152	3,239	3,588	3,572			
Cathode electrodes	-	-	314	187			
Cast iron	-	-	166	101			
Silicomanganese(SiMn) alloys	-	-	31	31			
Lubricrants	110	140	120	132			
Subtotal (2)	240,001	242,259	235,968	230,818			
Type and weight of packaging Materials (tonnes)*							
Pine buds	667	968	972	964	Direct measurement	External Supplier	
Polyester rings	28	0	15	14			
Subtotal (3)	695	968	987	978			
Total (1+2+3)	2,421,957	2,469,091	2,443,739	2,462,637			

* From Non-Renewable Sources

The **EPC & Infrastructure Project sector** does not manage primary natural resources, but instead uses semi-finished or finished products, according to the detailed plans/drawings and procedures for each project, which specify with great accuracy each material to be used, its manufacturing method and its exact position and operation. These plans/ drawings and procedures of the company conform to the latest developments in the respective fields of expertise. They involve the use of complex materials/products such as turbines,

power generators, pumps etc. for incorporation in its products/ projects, together with more simple ones such as merchant bars (beams, pipes, steel plates, axles, cast parts etc.) for manufacturing (cutting, welding, processing, hardening) in its industrial facilities or in those of its subcontractors. The manufactured products are then transported to the customer's facility / construction site, where assembly/erection of the final product (e.g. a power plant) takes place.

EPC & INFRASTRUCTURE PROJECTS SECTOR [GRI 301-1]	2015	2016	2017	2018	Measurement Method	Origin of supplies
Type and weight of Materials (not incorporated in the end product) (tonnes)*						
Oxygen**	1046	1035	830	76.5	Direct measurement	External supplier
Welding gases (Argon & Nitrogen)**	114.7	116.6	1179	124.2		
Carbon dioxide*	17.3	22.7	28.6	27.7		
Acetylene*	51	41	4.2	1.78		
Liquid coolant*	5.5	6.9	7.0	21.3		
Mineral Oils*	0.8	1.6	1.3	1.2		
Subtotal (1)	247.9	255.4	242.0	252.68		
Type and weight of semi-finished products (incorporated in the end product) (tonnes)*						
Steel in plates/merchant bars	226.1	747.5	782.5	507.8	Direct measurement	External supplier
Special materials for projects	181.2	182.6	51.2	44.9		
Welding materials	32.7	24.5	20.7	9.48		
Paints	24.8	53.5	2.7	9.86		
Connection materials	1.5	1.8	1.6	1.2		
Solvents	6.4	14.2	7.7	4.7		
Subtotal (2)	472.9	1024.1	866.4	577.94		
Type and weight of packaging Materials (tonnes)*						
Nylon	2.3	5.8	4.1	3.4	Direct measurement	External supplier
Tarpauilin	0.1	0.4	0.5	2.1		
Cardboard	-	1.4	1.1	0.9		
Plastic packaging	-	0.1	0.2	-		
Subtotal (3)	2.4	7.7	5.9	6.4		
Total (1+2+3)	723.2	1,287.2	1,114.2	837.0		

*From Non-Reweable Sources **From Renewable Sources

The percentage of recycled materials used in the implementation of projects in the EPC & Infrastructure Projects sector, **in 2018, stood at 24,2%². [GRI 301-2]** Additionally, a key criterion in the design stage of the projects that the company is carrying out as an EPC Contractor is the maximum possible use of recyclable materials. The company's requests for proposals and contracts with suppliers of materials and equipment contain a specific clause regarding their compliance with the requirements of the ISO-14001 International Standard, specifically

referring to the prohibition of using environmentally hazardous materials and the obligation to make the maximum possible use of recyclable materials.

In the **Electric Power & Gas trading Sector**, the raw material used in power plants is natural gas, which cannot be recycled and is not a renewable source **[GRI 301-2]**. The annual natural gas consumption at the company's thermal plants is associated with the ups and downs of electricity production annually.

ELECTRIC POWER & GAS TRADING SECTOR [GRI 301-1]	2015	2016	2017	2018	Measurement method	Origin of supplies
Type and weight of Raw Materials*						
Natural Gas (million Nm³)	2234	5076	6720	645.4	Direct measurement	External supplier
Type and weight of Materials (tonnes) (not incorporated in the end product)*						
Lubricating oils (lt)	74	161	123	4.3	Direct measurement	External supplier
Chemical solutions and treatment	-	-	-	77.5		

*From Non-Renewable sources



Water management

In 2018, no water withdawal source was affected negatively from MYTILINEOS activity. **[GRI 303-2]** In total, 168.0 m m³ of water were pumped; 5.7m m³ were consumed, while the quantity of waste water that was discharged after qualitative treatment was 162.3 m m³. The total water withdrawal quantity

presented a slide increase by 2.2% that came mainly from the increase of sea water quantity that is used to cool the Metallurgy sector co-generation heat and power plant, whereas the total consumption, compared to the respective one in 2017, remained almost unchanged (-1%).

All business sectors (m³)	2017	2018
Total water withdrawal	164,418,993	168,055,385
Total water consumption	5,759,435	5,704,112
Total water discharge	158,659,558	162,351,273

2 Out of the 837 tons of the total weight of used materials constituting part of the finished product, the 507 tons approximately were steel materials (in the form of sheet metal, merchant bars or other project materials). Approximately 40% of steel production in the EU comes from electric arc furnaces allowing

for steel production out of 100% recycled scrap raw material (Source: [http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EL:PD-F:Strasburg,11.6.2013,COM\(2013\)407final,p.27](http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EL:PD-F:Strasburg,11.6.2013,COM(2013)407final,p.27)). Therefore, the 202.08 tons (40% of 507 tons) correspond to recycled Steel.

- **74%** of the total water volume the company consumed was pumped from ground water and in particular from controlled drilling network of shallow depth allowing water to be replenished naturally after being pumped (renewable sources).
- Only **1.7%** of total consumption regarded water that was pumped from the public water supply enterprise.
- In addition, **17.3%** (986,610 m³) of total consumption regard- ed the supply of residential areas Aspra Spitia, Antikyra and Saint Nikolaos in Viotia, with drinking water to cover the needs of citizens.

Water withdrawals - volumes by source [GRI 303-1]	2017	2018
Surface water (m³)		
Volume of seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy sector. The limit to the volume of water withdrawn annually is determined by the Water Resources Management Directorate of the Sterea Regional Administration.	159,367,229	162,930,049
Ground water (m³)		
Volume of industrial service and drinking water, used primarily to meet the manufacturing / processing, energy and water supply needs of the company's industrial facilities. This quantity is obtained from a network of 17 drills, owned by the Metallurgy sector, which the company operates in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration.	4,801,581	4,783,785
Municipal water supplies and other public water utilities (m³)		
Volume of water from municipal water supplies and public water utilities, used to meet the needs of the buildings and primarily of MYTILINEOS' industrial facilities.	29,421	99,836
Discharges of waste water from another organisation (m³)		
Seawater returned by Motor Oil and used in the desalination process for the production of industrial water in a thermal power station of the Electric Power sector.	213,762	234,715
Rainwater (m³)		
Rainwater collected directly in a special reservoir configured in the area of a disused mine, used by MYTILINEOS' subsidiary DELPHI-DISTOMON.	7,000	7,000

With regard to the company's efforts for efficient water management, on annual basis, water recycling and reuse programs are applied in its production processes or in secondary uses, as well as rainwater collection and utilization practices.

In the Metallurgy sector in particular, that manages 99.8% of total water withdrawal volume required for all company's activities, improvements were recorded in special water consumptions per ton of aluminium, hydrate alumina and primary aluminium production.

Metallurgy sector specific water consumptions (m³)	2017	2018	Change %
Water consumption/ton of hydrate alumina production	4.64	4.09	-11.8%
Water consumption/ton of primary aluminium production	2.52	2.49	-1.2%

The above result illustrates the effort made in the context of gradual implementation of the 'Black Belt' project, launched in 2017, aimed at reducing the consumption of industrial and drinking water, 10.500 m³/day from 12.950 m³/day currently, based on water reuse, the utilization of treated water and the use of modern equipment.

With regard to the use of sea water for cooling the co-generation heat and power plant of the Metallurgy sector, besides adhering rigorously to the relevant legislative provisions that determine the context of avoiding any environmental impact, the company assigns to a valid organization (HCMR-Hellenic Centre for Marine Research) the elaboration of a research study to monitor the condition of living organisms (benthic biosocieties with emphasis on thermophile species) in the seabed of Antikyra Bay. The studies being elaborated by the company on the basis of the applicable environmental terms and their results are published every year, as foreseen, to the competent authorities (Ministry of Environment & Energy and

Waters Directorate of the Decentralized Region). The results from the studies of the 1st five-year period (2010-2015) and of the new study (2017-2018) show a stable ecological situation with improvement trends in several observation terminals. The studies will continue for five more years.

In addition, the water quantity reused in other company's plants before it was discharged **amounted to 5.06 mn m³** (2017: 5,14 mn. m³) corresponding to **3.01%** of the total pumped water volume. **[GRI 303-3]** This quantity regards the Electric Power sector by 99.8% and in particular: the reuse of 5,024,914 m³ of sea water from the cooling network of the co-generation plant (heat and power) of the Metallurgy sector in the thermal power plant of Agios Nikolaos and the return of this quantity to this sector and the recycling of 30,396 m³ of liquid waste from the Heat recovery Boiler of the power generation plant of combined cycle (thermal power plant), in Agioi Theodoroi, Korinthia. The remaining quantity relates to the use of rainwater 7,000 m³ being collected in the raw materials mining activity.



Finally, in 2018, MYTILINEOS participated voluntarily, for a 3rd consecutive year, in the international initiative for Sustainable CDP Water Security. The evaluation results in 2018 brought the company one level lower (**MANAGEMENT LEVEL - Score: B-**) compared to 2017 performance (**LEADERSHIP LEVEL - Score: A-**). This result was anticipated following the evaluation questionnaire upgrading which was enriched with more and more demanding issues. MYTILINEOS was one of those 193 companies worldwide, out of 1,268 in total that submitted sufficient data for their assessment, classified in MANAGEMENT LEVEL

- Score: B-, while its performance is continued for a third consecutive year standing above the global average in the Metallurgy sector (**AWARENESS LEVEL - Score: C**). The company's official report as well as the relevant CDP initiative assessment, where key suggested actions for improvement are included, are available on the company's webpage on the address: <https://www.mytilineos.gr/el-gr/memberships-initiatives-and-standards/about-corporate-social-responsibility#tab-cdp-water>.



Environmental restoration & Biodiversity

MYTILINEOS has taken care so that its operation does not affect areas usually protected by the law and areas of high biodiversity value. Therefore, there are no significant effects likely to negatively affect the integrity of the geographical area or the region where the business units of its Activity Sectors are located, either directly or indirectly. In particular:

In the **Metallurgy sector**, the area of aluminium production plant does not fall under a category of area protected by law, while the mining activity carried out by DELPHI-DISTOMON company, a MYTILINEOS subsidiary, and regards mainly underground holdings in Fokida area, is performed showing respect to the area's biodiversity, by drawing up and elaborating Environmental Impact Studies and rehabilitation plans of the usable areas.

The environmental remediation is carried out through systematic tree planting of approximately **15-20,000** plants/year. To this day, DELPHI-DISTOMON has planted approximately **1,139,000 trees covering a total afforested surface outnumbering 1.800 acres**. Moreover, a fencing of 73.1 km has been placed (to protect the tree planting) and a network of watering-irrigation pipes of 695 km long for those trees. It should be mentioned that over the last 6 years, on average, 250,000 tons of sterilized limestone are produced during the mining process. This quantity has already been discarded in already existing sinkholes of surface and underground sites; as a result, it is not necessary to commit not even a single square meter of surface for discarding this type of waste.

In the end of 2018, the total surface used in the mining process covers **126 acres** (same as the respective one in 2017), the total surface of land in the remediation process stands at **221 acres (reduced by 8.3% compared to 2017)** while the percentage of soil that has been restored since the beginning of the mining activity, in the entire usable surface, amounts to **81.13%, increased by 1.36% compared to 2017**.

In the **Electric Power & Gas trading sector** and with respect to the activities which concern the construction of wind farms located near or inside areas designated as Special Protection Areas, a key prerequisite is the development of the respective environmental impact studies foreseen (specific ecological assessment, annual monitoring of the protected area), to confirm that there are no impacts or, in cases where there are impacts, to describe the measures which may be adopted in order for these impacts to be avoided. In line with the above, the impacts in the locations of the company's activities are negligible in terms of pollution (gaseous, solid or liquid waste), the movement of animals is not obstructed as there is no fencing, and the disturbance to the local population of birds is negligible (where necessary, technical systems for the protection of birds are installed). In what furthermore concerns the restoration of the environment, the company applies and systematically promotes the obligation to reforest areas destroyed by fire (areas under reforestation), in accordance with the applicable laws and the instructions of the corresponding Forest Departments. Over the next two years, it is estimated that the company will reforest more than **570,000 m²** of such areas in total.



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

Biodiversity value of protected area [GRI 304-2]

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

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

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

Concerns the lease of 27.182 acres of land from the Municipality of Sintiki. Size of operational site: 0.035 km²

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

Concerns the lease of 57.9 acres from private land owners holding the ownership rights to the “Dafniza-Kalipeti” private forest. Size of operational site: 0.042 km².

4. Wind Farm at the locality ‘Chelona’ in the Municipality of Karystos, Regional Unit of Evia, capacity at 8.1MW, constructed by the company Eoliki of Evia, Pyrgos, located at a maximum distance of 200m within the external limits of the Special Protection Area (SPA) for Birds ‘Ochi Mountain, Coastal Zone and Islets’ with code number GR 2420012 belonging to NATURA 2000 network. Seven (7) wind turbines belong within the zone.

Operational facility size 0,025km².

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

In 2018 in the area of solar power plants, an annual study was conducted to monitor the bird fauna and the study will be submitted to the competent service for Natural Protected Areas monitoring.

No impacts on the protected area, as the operation areas of the Wind Farms are located in the area's peripheral zone, away from the Priority Habitats. [GRI 304-3]

In the Natura “GR2120012” area (Mt Ochi, Coastal Area and Islets), 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, as well as 38 important species of migratory birds.

The protected area “GR2420001” (Mt Ochi - Karystos Plain - River - Cape Kafireas – Marine coastal area) is mainly mountainous, with a relatively wild and difficult to access coastline on the northeastern foothills of Mt Ochi. 16 habitats in this area are listed in Annex I of Directive 92/43/EEC, of which Habitat 1120* - Marine vegetation areas with Posidonia (Posidonion oceanicae) is a priority habitat. Four species of reptiles, two of invertebrate and two of mammals are listed in Annex II of Directive 92/43/EEC and in article 4 of Directive 2009/147/EC. The two species of mammals (Mediterranean monk seal and otter) are priority species.

Limited impact on the area's fauna and bird fauna due to the work site operation for the construction of a wind power station, pursuant to the relevant Environmental Terms Approval License. [GRI 304-3]

The Natura area GR2420012 ‘Ochi Mountain, Coastal Zone and Islets’ is mainly mountainous characterized by a relatively inhospitable and inaccessible coastal line on the steep northern and eastern foothills of Ochi Mountain. Fifty five (55) bird species of Annex 1 of the Directive 79/409/EC and 38 important species of migratory bird fauna have been recorded. The species that characterize the Special Protection Area (SPA) are Puffinus yelkouan (Yelkouan Sheawater), Larus audouinii (Audouin’s gull), Hieraaetus fasciatus (Bonelli’s eagle), Bubo bubo(Eurasian eagle-owl) and Emberiza caesia (Cretzchmar’s bunting), whereas its delimitation species are Phalacrocorax aristotelis (Great Cormorant), Circaetus gallicus (short-toed snake eagle), Falco peregrinus (Peregrine Falcon), Apus melba (Pallid Swift), Lullula arborea (woodlark), Anthus campestris (Tawny Pipit).

Limited impact on the area's fauna and bird fauna due to the work site operation for the construction of a wind power station, pursuant to the relevant Environmental Terms Approval License [GRI 304-3]

Our people is what we are



Percentages of employees from local communities

2018	93.2%
2017	88.4%



New jobs

2018	45
2017	95



Employee turnover rate¹

2018	5.6%
2017	3.3%



Number of fatalities

2018	0
2017	0



Number of accidents of direct employees

2018	5
2017	3

(Lost-time accidents)



Incidents of occupational diseases

2018	0
2017	0



Training man-hours

2018	43,950
2017	45,833



Percentage of employees who received a performance review²

2018	74%
2017	80.8%



Percentage of women in positions of extended responsibility

2018	18.8%
2017	22.7%

(Percentages on the company's executives)



Percentage of women in work (Direct employees)

2018	17.4%
2017	15.4%



Percentage of young employees ,30 years old (Direct employees)

2018	11.0%
2017	11.2%



Social Investments

2018	€2.29
2017	€2.02

(million)

Material Issues

- Occupational Health & Safety
- Combatting Corruption
- Labor practices & Human Rights
- Local Communities
- Market Presence

Alignment with the UN Global Compact Principles

1st Principle, 2nd Principle, 3rd Principle, 4th Principle, 5th Principle, 10th Principle

Alignment with the Global Sustainable Development Goals



¹Percentage of total volunteer retirements of employees on the annual average number of direct employees.
²Percentage on the total number of direct employees. The respective percentage on the total number of eligible employees reaches 82.3%. The term eligible includes the employees who fulfill the

prerequisites to be included in the performance's annual evaluation procedure. Any employees working in the company for less than 6 months are not included, nor some special employees' categories based on the role/object.

Occupational Health & Safety

Disclosure Management Approach [GRI 102-15]

This disclosure aims at the best possible understanding on behalf of MYTILINEOS social partners about how the company handles this material issue which contributes decisively to its responsible and sustainable development. [GRI 103-2b]

Relevance of the material issue [GRI 103-1a]

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

MYTILINEOS acknowledges that the elimination of accidents and occupational disease incidents at the workplace and especially at its production facilities promotes sustainable, productive employment and decent work, whereas plays a decisive role in boosting its competitiveness.

The company's Business Sectors, by virtue of their operation, run Occupational Health and Safety risks (minor accidents, lost time accidents, occupational diseases and accidents) that can cause significant or less significant social impacts, not just to the employees themselves and their families but also by third parties such as: employees of independent contractors, associates, trainee students and employees, but also any visitor in their premises. In addition, these issues can cause effects related to degrading satisfaction and morale among employ-

ees, increasing accident/absenteeism costs and negatively affecting the MYTILINEOS image and reputation..

Boundaries of the material issue [GRI 103-1b]

The boundaries of the impacts from MYTILINEOS operation in the field of occupational Health & Safety encompass all areas of the industrial facilities, factories and underground mines owned by the company and its subsidiaries in Greece, the worksites of the EPC Projects Sector in countries abroad, all office buildings as well as local communities, where the company operates and carries out its business. The company's Business Sectors are directly involved in these effects; while independent contractors, for whom the company is responsible regarding general safety at the workplace, are indirectly involved. In order to improve its overall performance, the company focuses on encouraging its contractors, suppliers and other associates to adopt practices that ensure decent working conditions, in order to secure their employees' Health and Safety.

Major risks and risk control practices [GRI 103-2a]

The company has identified the following risk categories within the scope of its operation:

Major Risks	Risk control practices
Direct or Indirect Accident Risks: Indirect Accident Risks create the conditions which lead to accidents and include the physical layout, functionality, access-evacuation routes, lighting and temperature of work areas. Direct Accident Risks lead to accident or occupational illness and include natural, chemical and biological factors.	Responsibility for Occupational Health and Safety extends from the Company's Management and the General Management of the Business Sectors to all stages production process. In order to address these risks, the company has put in place and is strictly applying safety systems and measurements, in order to assess their impact on the human body and to identify the needs for corrective measures in its work areas (offices and industrial units). At the same time, continuous progress and self-improvement are a function of the experiences that the company gains from every individual incident and near misses, while personnel training and development at all levels of the company's hierarchy is crucial for maintaining and further developing the employees' accident prevention mentality.
Non-Accident Risks concern organizational, psychological and ergonomic parameters that do not lead to accidents but affect in the short or long-term the mental and physical health of employees.	



Management of the material issue [GRI 103-2a]

- Occupational Health & Safety is a key point of MYTILINEOS' Code of Business Conduct and corporate principles and one of the main topics of the company's Consultation with the key groups of its social partners.
- MYTILINEOS adheres to the applicable Greek and European laws and the national regulatory provisions on Occupational Health & Safety without fail. In many cases, the compliance of the company's Business Sectors with the relevant legislation is achieved by the company itself imposing much stricter limits through the relevant Management programs and systems in place.
- The company applies an **OHSAS 18001** certified Occupational Health & Safety Management System in all work areas (with the prospect of moving to ISO 45001 in 2019). This system is designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture. **[GRI 403-2c]** The system is characterized by the following specific basic practices, which are applied in all company Business sectors:

- Constant recognition and assessment of occupational risks to which the precautionary principle applies, and implementation of the necessary measures to prevent them.
- Use of advanced prevention tools and exhaustive analysis of all accidents, near misses and safety incidents.
- Constant provision of information to employees and systematic participation of personnel in special training programmes on Occupational Health & Safety.
- Implementation of targeted communication initiatives to raise employee awareness.
- Systematic inspection of the organization and the processes in place to ensure complete adherence to safe work rules across all company activities and to protect the safety of employees, clients, associates and other citizens visiting the Group's facilities.

- Additionally, the individual relevant policies in each Business Sector acknowledge the improvements in Health and Safety performance through the application of best practices, as a primary business goal and a commitment of the company's Management. **(Health & Safety Policy, Metallurgy - Health & Safety Policy, Integrated Projects & Infrastructure - Health Policy & Security Sector of Electricity & Trading Natural Gas).** [GRI 103-2c-ii]
- The systematic and continuous efforts to foster and promote a Health and Safety culture that encourages all personnel to act responsibly for their own personal safety as well as for the safety of those around them, is a long-standing commitment in daily operations.
- Scheduled or ad hoc safety inspections/audits are carried out by internal inspectors and by independent external safety auditors and their results are considered in the formulation of action plans for further improvements in H&S.
- Monitoring the Occupational Health & Safety function within the company, relevant Departments are in operation in each Business Sector, together with committees on Health & Safety issues in the Metallurgy & Mining and EPC & Infrastructure Sectors covering the employees. [GRI 103-2c-iv]

Occupational Health and Safety has always been fundamental to the operation of MYTILINEOS

Targets of the material Issue [GRI 103-2c-iii]

MYTILINEOS attaches the utmost priority to the Health & Safety of its employees in the work areas of all its Business Units daily. MYTILINEOS continues to take constant care to ensure the achievement of the only acceptable target **“ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES”**, which is one of the major challenges for the industrial and construction sectors. Similarly, the following specific actions have been designed to improve the company’s performance in 2019:

- further strengthening of the personnel’s training,
- reinforcement of the safety culture in its executive staff,
- the presence of experienced subcontractors’ supervision personnel (Foremen-Engineers) and
- the adequacy of Personal Protection Equipment.

Main Health & Safety Targets	Performance in 2018	Targets 2019
Number of fatalities	0	0
Number of accidents (direct employees)	5	0
Number of accidents (indirect employees)	9	0
Total incidents related to occupational diseases	0	0

Performance in 2018 [GRI 103-3a-ii]

Occupational Health & Safety is one of the most material issues of Sustainable Development both for MYTILINEOS and Social Partners. During 2018, the company's efforts continued focusing on improving and showcasing issues of safe work to its direct and indirect personnel. The specialized campaign on safety at workplace continued for 5th consecutive year with the **pioneering method of activating the ‘right hemisphere’³** of the brain in the Metallurgy sector. [GRI 103-2c-viii]. The training hours of independent contractors’ employees, particularly in the EPC & Infrastructure Projects Sector,

increased fourfold compared to 2017, while the company was granted two important distinctions (**“Gold”** awards) in **«Health & Safety Awards - 2018»**, as a reward for its initiatives in promoting health & safety in the Metallurgy sector.

Nevertheless, despite the systematic efforts and the procedures followed to prevent and minimize accidents, across all company's activities, 2018 was a challenging year for the relevant indicators, resulting in exceeding the setting targets. In particular:

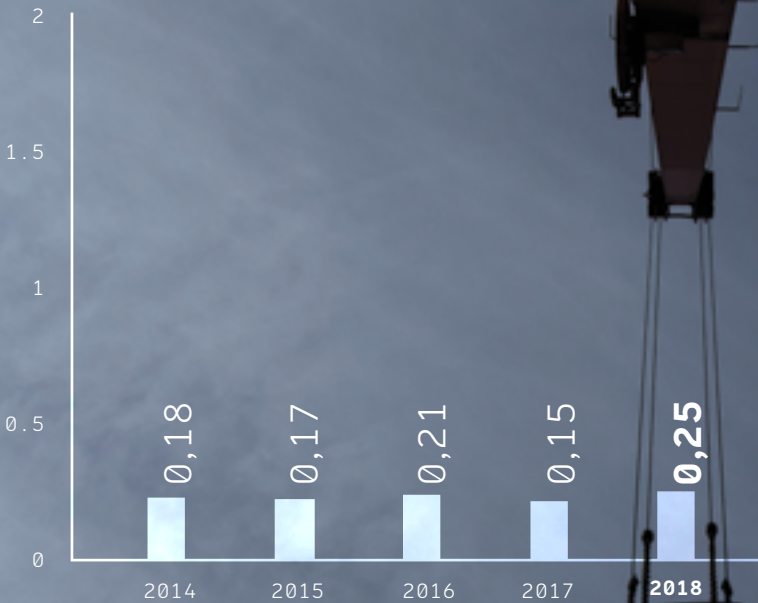
³ The campaign's concept was that to raise awareness, the appropriate stimuli/messages are required to allow the activation of employee's right brain hemisphere that activates imagination, creativity and emotions. The effort began by looking out for ideas, the photo shooting, the processing of images,

the printing and finally the placement of posters in various sites at the plant. The campaign is implemented by a team of employees consisting of members of the Health & Safety at Work Committee, volunteer graphic designers' employees and the safety department of the aluminium department.

Direct employees’ data

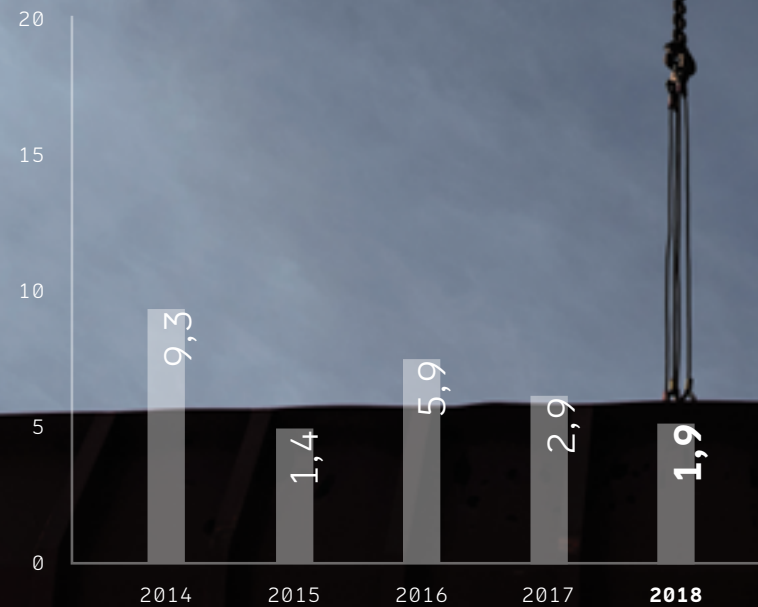
Neither accidents nor incidents of occupational diseases occurred to the direct employees in 2018. In total, five (5) lost time accidents were recorded (2017:3) resulting in an

increase of the lost time incident frequency rate by 66%, while the respective incident severity rate (lost workdays) posted a remarkable decrease by 67%, in comparison to 2017.



Injury Rate / 200.000 work hours (IR)

The injury rate includes fatalities and lost time incidents >3 days



Lost Days Rate / 200.000 work hours (LDR)

Lost days due to accidents are calculated starting on the day after the incident and refer to actual workdays

Health & Safety Indicators [GRI 403-2a]	2014	2015	2016	2017	2018
Injury Rate (IR) / 200,000 work hours					
IR (Total Rate)	0.18	0.17	0.21	0.15	0.25
IR (Men)	0.21	0.19	0.24	0.18	0.24
IR (Women)	0.00	0.00	0.00	0.00	0.30
Lost Days Rate (LDR) / 200,000 work hours					
LDR (Total Rate)	9.35	1.45	5.93	2.91	1.96
LDR (Men)	10.67	1.65	6.74	3.47	2.19
LDR (Women)	0.00	0.00	0.00	0.00	0.80
Occupational Diseases Rate (ODR) / 200,000 work hours					
ODR (Total Rate)	0.00	0.00	0.00	0.00	0.00
ODR (Men)	0.00	0.00	0.00	0.00	0.00
ODR (Women)	0.00	0.00	0.00	0.00	0.00
Absenteeism Rate (AR) Days on which employees are absent as a percentage of the total number of working days.					
LDR (Total Rate)	-	-	1.31%	2.89%	8.1%
LDR (Men)	-	-	1.31%	2.44%	8.9%
LDR (Women)	-	-	0.62%	5.36%	5.1%

Three (3) accidents occurred in the **Metallurgy sector**, with a total loss of 28 workdays. Two accidents occurred in the Electrolysis department, affecting male employees and one in the training department affecting a female employee of the company's central services, at the Aluminium plant (Saint Nikolaos, Viotia). The two accidents in the Electrolysis department regarded minor falls when the employees involved lost their balance, while executing a frame hoisting work; one employee ended up with small abrasions on the face, hand and leg and respectively small abrasions on the other employee's back. The third incident occurred at the plant's training offices, where an employee's wrong body posture resulted in a 2nd degree sprain in the lower limb when she lost balance while trying to stand up and lost balance.

All incidents were analyzed with the Cause Tree Method (CTM), in order to record the causes that resulted in such events and to disseminate the investigation results to deter reoccurrence of similar situations. By the end of 2018, all employees had returned to work healthy, while specific

remedy measures were taken. The following are some indicative examples:

- to review the way of 'frame hoisting work' and of the relevant illustrated work instructions with photographs (CPA)⁴ & video (CPB)⁵,
- to create the illustrated instruction 'CORRECT BODY POSTURE' and communication with the Heads of departments where office work is involved,
- to control all ways of working in motion without checking the area and to review, whenever required,
- to review the campaign regarding the control of lighting fixtures,
- presentation by the incident's sufferer to the Operational Organizing Team on the topic 'Body posture in various works'),
- to assign to a safety mission the investigation and suggestion of ways to cope with undermining situations,
- to analyze to the Operational Organizational Unit for Hoisting Works the optimum way of working and the tool

4 Right professional move
5 Good professional behavior

- specifications design for depositing rod bundles when a crane is used,
- to improve the overall way of working regarding rods emptying/loading,
 - to inform the plant's personnel and the associated contractors about the incident and to remind of the safety instructions while driving carrying loads,
 - to increase the safety actions (doubling of safety visits, inspections etc)
 - to review the seminar's syllabus "Safety in the Offices".

In the **EPC & Infrastructure Projects Sector**, two (2) accidents occurred with a total loss of 46 workdays. One accident involved a hit on the employee's knee due to false step; after the incident's investigation, an induction training was carried out in Health & Safety issues (what is an accident-Risk & Hazard) and the second incident involved a car accident on the employee's way to work. By the end of 2018, all employees had returned to work healthy.

Institution: “Safety Missions” “Health & Safety Awards - 2018” GOLD AWARD

The aim of this practice is to render safety a key component of each employee's mindset. In the context of employees' training in Safety, in the Metallurgy sector and in combination with their hierarchical evolution, an exclusive involvement with the '**Safety Missions**' is foreseen for a specific period.

- The Safety Missions may refer to:
- Specific safety issues related to the employee's work object (specialization)
 - a Project involving general safety issues (safety culture, CSR etc)
 - Guidelines, procedures and ways of working. Reviews, 'modernization' are included with the addition of photographs and videos and the re-evaluation of existing documents of each department.

The object of the 'Safety Mission' institution is for every employee to be trained, away from daily routine, in safe work through a substantial in-service training and embed it into his/her mindset. Upon completion of the 'Safety Mission', the employee should be able to incorporate safety in his/her new duties by priority. The 'Safety Mission' regards all newly recruited engineers and foremen as well as all individuals climbing up the hierarchy levels. The 'Safety Mission' s duration ranges from one week up to two months, depending on the employee's ranking.

Indirect employees' data

Managing the safety of the personnel of independent contractors is a particular challenge for MYTILINEOS. The company is consistent in its efforts in this area and focuses on the need to alter everyone's behaviour and mentality about accident prevention. For example, contractors who employ a significant number of personnel at the facilities of the Metallurgy sector's aluminium plant, are required to implement an OHSAS 18001 certified Occupational Health & Safety management system, while the company evaluates regularly their performance

using specific criteria. Similarly, the management of Health & Safety issues in the Sector of EPC and Infrastructure is governed by a series of actions that should be implemented by associated contractors for proper implementation of employees' Health & Safety system and appropriate measures' taking, in the context of the undertaken project. In 2018, **no fatalities were recorded**, while in total, nine (9) lost time accidents were recorded (2017:5) resulting in an increase of the incident frequency rate by 42%, in comparison to 2017.

Health & Safety Indicators [GRI 403-2b]	2014	2015	2016	2017	2018
Injury Rate (IR) / 200,000 work hours					
IR (Total Rate)	0.45	0.37	0.49	0.19	0.27
IR (Men)	0.46	0.38	0.50	0.20	0.27
IR (Women)	0.00	0.00	0.00	0.00	0.00

The incident frequency rate includes fatalities and lost time accidents.

In the **Metallurgy sector**, 2 accidents occurred at the port facilities of aluminium plant (Saint Nikolaos, Viotia) and 1 accident in a work site of mining activities carried out by MYTILINEOS subsidiary, DELPHI-DISTOMON (Prefecture of Fokida). The first two accidents involved falls of employees while performing vessel loading operations with aluminium and removal of a protective tarpaulin from piled up sacs of hydrated alumina. In the first accident, the employee fell within the vessel's hold. The Occupational Physician was called to offer first aid and the Fire Protection for its secure Hospital transfer. In the second accident, the employee lost his balance, after being dizzy and fell from height on the floor; as a result, he suffered a cervical whiplash. The third accident, during mining activities, also involved a contractor's employee's fall after taking a false step on the stairs of the Public Use Truck and fell on the floor, causing an injury to his right thigh. The company's ambulance transferred the employee to Amfissa Hospital where a fracture in the right femoral bone was diagnosed.

All incidents were analyzed with the Cause Tree Method (CTM). By the end of 2018, all employees had returned to work healthy, while the following remedy measures were taken:

- Work ban at a distance smaller than 1.5 m from the end of loading on the side where there is a gap in the vessel's hold.
- Establishment of a working group that undertook the following: a) Work tests with a mobile life thread (protection from fall) and b) market research and testing of materials to mitigate the effects from the fall (protection after fall).
- Meeting between the Market-Transports Manager and the Port Transport service management with the contractor's INTERKAT S.A work force on safety issues, placing emphasis on works at height.
- Control by the Operational Organizational Units of the Transports-Port service of all operations from heights beyond 75 cm., to confirm that there is no work lacking foreseeable enough measures.
- Drafting of a new work guideline for filling up, storing and transporting for loading on a vessel big bags of a hydrated alumina.
- Preparation of a new Health & Safety and Environmental Plan by the contractor INTERKAT S.A for works at height.
- Update of the written occupational risk assessment regarding filling, storing and transporting big bags of hydrated/anhydrous alumina for vessels loading.
- Update of the written occupational risk assessment regarding risks in working at height.
- Detailed accident presentation and report on improvement actions during the 2-hour safety meetings.

In the **EPC & Infrastructure Sector**, six (6) accidents occurred (male employees), with a total loss of 83 workdays. Three accidents occurred at the company's work sites in Greece. One accident regarded an employee's eye injury due to a blast of a small metallic object during maintenance works; another one involved a fall from a stair placed on a scaffold and one accident involved a wrist trauma on an employee's hand. The three remaining incidents regarded injuries (laceration, strain,

knee dislocation) of the lower limbs due to employees' false step at a company's work site for the construction of a power generation plant in Ghana. By the end of 2018, all employees had returned to work healthy, while the following remedy measures were taken, after the assessment of incidents:

- Employees' retraining.
- Signed delivery of Personal Protective Equipment (PPP).
- Repeated control of the protective equipment against falls, belonging to the Subcontractor.
- Cleaning of circulation routes.
- Control and rehabilitation of accesses.
- Better work planning.

Moreover, through recording and investigating the safety incidents (near misses or near accidents) that could lead, under certain circumstances, to accidents, **43 incidents have been reported, a number decreased by 36% compared to 2017**. Such findings are analyzed to improve the safe work procedures and to inform the employees.

Basic Occupational Health & Safety training issues:

[GRI 103-2c-vii]

- Identification of risks
- Rescue Techniques at Height
- Safety of new employees
- Safe Work at height
- Risk assessment
- Musculoskeletal risks
- Lifting Machinery
- Emergency Plans
- Safety of High-Pressure Hydraulic Tools
- Safe execution of electrological works
- Safe work with chemicals
- Use of fire extinction means
- Use of metal scaffolding
- Facilities' Lockout-Tagout
- Health & Safety in the offices
- First aid emergency at work
- Health & safety induction training
- Loads lifting
- Installation of a scaffold
- Cleanness of premises
- Emergencies
- Use of hand-piece tools

Continuous self-improvement is conditional on the teachings drawn by MYTILINEOS from each incident and near accident, constituting an object of investigation and personnel training. To this end, MYTILINEOS planned and implemented in all its business activity Sectors more than **46,000 hours of training**, in order to prevent and eliminate specific risks; almost **1,000 direct and more than 5,000 indirect employees** joined this training.

Occupational Health and Safety is a line of responsibility that starts from the Directorates General and stretches along all stages of production of every MYTILINEOS Business Activity Sector. Health & Safety Committees operate in 66% of the company's Activity Sectors. In particular:

An official Health & Safety Plant Committee operates in the Metallurgy Sector, representing 100% of employees. The Committee consists of 6 members who are elected by the Sector's employees. Additional safety committees have been set up and are run by management executives, while representatives across all plant departments participate in such committees. These committees are the following: Committee for Working at height-Committee for Lockout-Tagout and enclosed areas, Circulation committee, Contracting and training committee. The issues discussed at the Committees covers the ones related to the main plant processes; improvement and revision proposals of those processes are discussed in those committees. [GRI 403-1]

In the EPC & Infrastructure Projects Sector, the Health & Safety committees operate at facility level (in every work site or plant) and represent 100% of direct employees. There is a three-member Health & Safety Committee in the plant of Volos, consisting of employees, trade union members and Management executives; the Committee is convened and is incorporated pursuant to the Greek law. In addition, the Safety Technician and the Occupational Physician are in constant cooperation with the Committee for issues related to safety, employees' protection and hygiene. The Committee members, the Safety Technician, the Occupational Physician and the company's representatives participate in training programs pertaining to Health & Safety and in official information conferences. Moreover, in every work site facility, specialized personnel are constantly present for Health & Safety issues management, first aid provision services (personnel and equipment); an ambulance and an Occupational Physician are present to offer first aid and cope with emergencies. [GRI 403-1]

Children Accident Prevention

The accidents are the first cause of death and disability of children in Greece. MYTILINEOS, contributing to safety reinforcement in a broader social level, acknowledges that the most effective way to inform and sensitize children is through the Educational System. After parents, teachers are the ones spending more time with children and therefore know them well; they also know the particularities of the area

In the Energy Sector, no official Health & Safety Committee has been set up at any level or per facility. The consultation process is applied with active personnel participation of the company's Energy Centers on H&S issues in the context of OHSAS 18001 Management System. Relevant consultations take place at least twice per year in order to promote the application of the company's current policy in H & S, to communicate H&S actions and programs and to involve the employees through active participation and consultation in professional risk management. In the context of H&S audits, in accordance with the OHSAS 18001 Management System, a mechanism has been established to monitor the H&S regulations application at the facilities and the Energy Centers activities [GRI 403-1]

Finally, Health and hygiene matters are key to the quality of life of employees and, by extension, of the communities in which the company operates. MYTILINEOS has been consistently investing in this area, monitoring, assessing and controlling all work environment parameters to constantly improve the good health of employees and ensuring healthy living conditions at the workplace. Exposure to dust, noise, high temperatures and substances such as fluorine compounds, sulphur dioxide, carbon monoxide and aromatic polycyclic hydrocarbons, are the main factors monitored systematically.

Finally, in order to constantly improve the health of employees, the occupational physicians help to promote a healthy lifestyle at the workplace, while the company offers medical care plans, over and above the statutory ones.

they grow up. In 2018, to this direction, the company supported the “Children Accident Prevention” program of the “Children Trauma Management” association by publishing and distributing the specialised “Safety at School” leaflet, an initiative that helped over 2.500 children to get informed. [GRI 103-2c-vii]

Anti - Corruption

Disclosure Management approach [GRI 102-15]

This disclosure aims to inform MYTILINEOS Social partners on the way the company handles the absolute limitations of its exposure to conditions of corruption & bribery and the strengthening of compliance culture with the legislation against corruption. MYTILINEOS acknowledges that ensuring transparency in all transactions being developed in the context of its business activities, constitute a key point for its sustainability and further development in the framework of its international activity. [GRI 103-2b]

Relevance of the material issue [GRI 103-1a]

MYTILINEOS acknowledges that corruption, bribery, fraud and money laundering undermine the ethical environment of every business, and among the possible impacts that may be involved are violations of Human Rights, adverse impacts on the environment, distortion of the competition as well as preventing the distribution of wealth and economic growth. These phenomena constitute a serious obstacle to sustainable development, with a disproportionate impact on poor communities, eroding the structure of society. Addressing corruption and bribery is of major significance for MYTILINEOS because: a) it contributes to improve risk assessment and management, as well as the compliance with the laws against bribery and corruption, a MYTILINEOS' s non-negotiable principle in every region or country where

it operates, b) it serves its business goals (such as fulfilling the relevant tender requirements for construction projects), and c) it helps to protect the company from fraud and abuse, further enhancing its corporate image.

Boundaries of the material issue [GRI 103-1b]

Although no incidents of corruption or bribery have been confirmed, since the company's establishment to this day, nevertheless, the risk of occurrence of such an incident is acknowledged due to the company's transactions, both within its business activity sectors and beyond, with the main groups of social partners, such as: public authorities, the business and regulatory bodies, customers, volunteers, NGOs, local community, financial institutions and its supply chain.

Major risks and risk control practices

[GRI 103-2a]

Major risks

During the business activity of MYTILINEOS' s EPC Project Sector in developing countries that find themselves high in the Transparency International's corruption index, facilitation payments or other benefits to local partners may be required to continue the unobstructed operation of the projects

Risk control practices

MYTILINEOS has been formally committed to the 10th principle of UN Global Compact, whereby 'Businesses should work against corruption in all its forms, including extortion and bribery and facilitation payments'. This principle acts as a catalyst in establishing a culture of ethics across the company.

MYTILINEOS puts in place systems and controls both to prevent and to detect any mishaps; the aim is to ensure proper selection of vendors, avoid doubtful payments, proceed to proper payments and enter them in the company's accounting books in a correct and transparent manner.

In countries with a high risk of corruption, the company establishes a grievance mechanism accessed by each employee (direct or indirect), either to anonymously denounce breaches in personal data protection policies, bribery and corruption, human rights or the company's code of ethics. The company protects the complainants from eventual retaliation on condition that the complaint is filed in good faith even if it is not corroborated by the investigation result.

Any deviation from the company's principles and moral practices jeopardizes the good reputation, the reliability, the confidence of social partners and by extension the company's economic results and its ability to take over projects.

The setting up of MYTILINEOS Regulatory Compliance Division, in 2018, the renewal of policies against corruption and bribery to safeguard fair competition, to protect personal data and to screen business partners prior to the conclusion of agreements boosts the importance of business ethics mind-set for the company across the range of its activities alongside the management's focus on transparent procedures and zero tolerance vis-à-vis breaches of rules and policies.

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



Management of the material issue [GRI 103-2a]

Addressing corruption and bribery is a key element of the company's "Code of Business Conduct" and "Suppliers and Business Partners Code of Conduct". Also, the reference for MYTILINEOS when it comes to addressing this issue, is the principle of integrity, which relates to the company's long-standing commitment to zero tolerance of corruption and bribery and is implemented by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging conditions giving rise to corruption, extortion or bribery. [GRI 103-2c-ii]

The company's policy on the prevention of corruption and bribery incidents is characterized from three key stages: [GRI 103-2c-i]

- The analysis of prevailing conditions and potential risks or threats may encourage the occurrence of incidents of corruption or bribery in the corporate environment, through a process of scrutiny and third parties. This practice covers corporate activities that pose risks for the occurrence of such incidents, such as charitable contributions, sponsorships, gifts and hospitality, third party audits in relation to terrorism restrictions lists, brokering services and advisory services with a view to establishing respective prevention procedures, where these are not in place.
- Ensuring that all the transactions carried out on behalf of the Company by its shareholders, employees, and its major business partners and suppliers, are characterized by a high level of integrity. Through established procedures, applying primarily in the Purchases-Procurement departments in connection with the selection of suppliers and other business partners, controls are carried out annually of the conditions under which every single transaction takes place, in order to identify and eliminate those which may give rise to incidents of corruption.
- The company's function as a 'Responsible Corporate Citizen' reflected upon its participation in international initiatives boosting transparency (UN Global Compact), in national working groups and its commitment to ethical business practices and sound corporate governance.

The Legal and Regulatory General Central Support Function, which owns the Compliance Division of the company, has been entrusted the creation and implementation of mechanisms to safeguard the company protection from corruption and bribery at both preventive and control levels. [GRI 103-2c-iv]

Targets of the material Issue [GRI 103-2c-iii]

In 2019, MYTILINEOS aims to implement the relevant formal due diligence process, to safeguard the precautionary policy it applies on these issues. Through this initiative, the company

seeks systematic evaluation and further improvement of corruption risk management processes, as well as to verify that the operation of its Business Sectors comply with the established corporate policies and procedures, as these are defined in the Code of Business Conduct, the Internal Regulation Code and the Suppliers and Business Partners Code of Conduct, in full compliance with the laws and the relevant regulatory provisions in force.

Performance in 2018 [GRI 103-3a-ii]

In 2018, MYTILINEOS applied all necessary internal procedures to secure its policy. Through the screening mechanisms applied in its Purchases-Procurement Departments, where investigated both the selection of associates process and every kind of transaction, no confirmed corruption incidents were found or incidents that could possibly lead to dismissal or disciplinary action against employees, or confirmed corruption-related incidents resulting in termination or non-renewal of cooperation with suppliers/associates or public judicial cases related to corruption against the company or its employees. [GRI 205-3]

The Code of Business Conduct

The MYTILINEOS's "Code of Business Conduct" sets out the general principles that define responsible business conduct and the ethical rules that all the employees involved in its activities, as well as the associates, including contractors, suppliers and business partners are expected to adhere to. The Code is important to the company because its application is a substantial step towards achieving its main strategic goal of Continuous and Responsible Development. The Code ensures that all MYTILINEOS activities are carried out with integrity,thus protecting its reputation, which is its most valuable intangible asset, and creates the right setting for the company's further growth.

Labor practices and Human Rights

Disclosure Management approach [GRI 102-11] - [GRI 102-15]

This disclosure outlines basic information to MYTILINEOS stakeholders so they can understand the way the company manages its Human Capital, against the backdrop of its new operational structure. [GRI 103-2b]

Relevance of the material issue [GRI 103-1a]

MYTILINEOS has entered a new era in its evolution, moving forward with increased prospects for growth and aiming to achieve even more ambitious goals and higher performance levels.

As an employer, the company contributes to one of the broadly accepted social goals, the improvement of living standards through full and safe employment and decent work. MYTILINEOS has placed as priorities the safety and the protection of its employees' interests and rights, given that one of the success factors is the total devotion of its employees to their duties. The issue, in the context of Sustainable Development, is of great importance to the company as relations between Management and employees contribute, inter alia, to its smooth operation and, consequently, to its overall contribution to the achievement of Global Sustainable Development Goals.

Employment is an internationally recognized goal related to economic and social progress. It is considered as an exceptionally important topic for MYTILINEOS's Business Activity Sectors due to high localization and high number of employees. Creating opportunities for long term employment yields benefits not only for MYTILINEOS business activities but also for local communities contributing to their sustainability.

In addition, safeguarding decent working conditions (e.g. working environment, wages and other forms of compensation, working time, rest periods, leaves of absence, disciplinary practices and redundancy practices, protection of motherhood, benefits and other welfare issues) is a top issue for the company aimed at its personnel satisfaction; at the same time, it is a key factor for employees' retention.

The company seeks to grow and improve its employees' competitiveness through appropriate occupational training and technical specialization. This is the way to support their optimal response to the current and future challenges of both professional and personal life. This is very important for all its Business Activity Sectors due to the requirements in specialized personnel being necessary to run specific activities.

Through the employee performance system, MYTILINEOS ensures objectivity, transparency and meritocracy in aligning its practices with its vision, values and strategic objectives.

Also, the safeguarding of human rights, such as: promoting diversity and equal opportunities, avoiding discrimination, forced & child labor, the protection of trade union right and the establishment of labor relations endorsing mutual trust, cooperation, two-way communication and recognition, contribute to individual improvement of employees both at personal and professional level.

According to the company's Materiality process findings, the issue of labor practices & the respect of Human Rights is important for all MYTILINEOS's Stakeholder groups.

Boundaries of the material issue [GRI 103-1b]

The boundaries from MYTILINEOS operation impact, in the field of Labor Practices and Human Rights, span across all areas of industrial plants and underground mines owned by the company and its subsidiaries in Greece, the work sites of EPC & Infrastructure Projects Sector in countries abroad and all office buildings. Directly involved in these impacts are the company's Business Activity Sectors, while an indirect connection is reserved (particularly in Human rights protection) to contractors/suppliers located mainly in developing countries. In the context of its responsible operation, MYTILINEOS focuses on committing its contractors, suppliers and other associates to adopting practices that ensure decent working conditions for their employees.

Major risks and risk control practices

[GRI 103-2a]

MYTILINEOS, in the context of its Business Activities, recognizes the following risks:

Major Risks	Risk control practices
The company, after completing its restructuring, may face risks of reducing performance and / or retirement due to the employees' lack of adaptability to organizational changes and the relevant procedures and thus to the consolidation of a common corporate culture.	Adoption and application of practices concerning: a) employees timely and continuous updating of information about changes in organizational structures and processes due to the corporate restructuring, and b) the development of programs for formulating the new common corporate culture, based on the employees' shared values and their behaviors.
Moreover, as there is no official due diligence procedure for safeguarding the protection of Human Rights, the company may have to confront situations jeopardizing such rights and may proceed to taking emergency measures, beyond the ones foreseen under normal business conditions. Through the EPC & Infrastructure Projects Sector, the company owns work sites in countries abroad and cooperates with suppliers of developing countries in Middle East and Africa where there is a risk of Human Rights restriction or breach, likely to result even in suspension of works for some time, incurring an immediate economic cost for the company.	The company already envisages to apply the international Global Compact Self-Assessment Tool concerning the Human Rights protection across its business units. About its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that should be implemented for proper implementation of employees' Health & Safety system and appropriate measures' taking. In the contracts signed with contractors and suppliers, an explicit provision is mentioned about the company's Code of Conduct to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.



Magement of the material issue [GRI 103-2a]

The MYTILINEOS approach in the management of its human capital is consistently aligned with its corporate values. MYTILINEOS has promoted occupational health and safety as its utmost priority, ensures continuous improvement of labor relations, while at the same time aims at the protection of Human Rights in all its workplaces and its key suppliers and partners. In this respect, employment in all range of company's activities is characterised by the existence of long-standing and stable relations with employees. Moreover, the MYTILINEOS "Code of Business Conduct" underlines the commitment to respect the UN Universal Declaration of Human Rights (U.N.D.H.R.) as well as the Conventions of the International Labour Organisation (ILO) on labour rights and work conditions.

The main areas of Human Resource Management implemented by the company are the following: **[GRI 103-2c-i]**

- The company's labour practices comply as a minimum with all the provisions of the legislation in force and respect the fundamental principles laid down by the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.
- Attraction and retention of capable executives
- Continuous improvement of relations with employees and implementation of modern performance evaluation systems.
- Implementation of training and skills development programs in areas that are consistent with the company's strategic goals for business growth enabling employees to achieve their professional goals.
- The promotion of the "Code of Business Conduct" to all personnel.
- Continuous improvement of working conditions and occupational Health & Safety for all personnel and associates.

- Self-assessment reviews on the protection of Human Rights with an emphasis on labour rights.
- The securement of the flow of information and the prompt communication on the organizational changes through available communication channels: e-mail, SharePoint application and non-electronic ways of communication, i.e. evening consultation events with top hierarchy, consultation meetings between the management and 25-employee groups, written announcements in production areas and open communication with employees via the role of HR-Business Partner per Business Activity Sector.
- Protection of the personal data of employees, allowing access by authorised persons and only in cases where it is required by law for purposes related to the functioning of labour relations and to the company's business activity.

MYTILINEOS Human Resources Central Function is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to each company's Business Activity Sector in coping with human resources related issues. **[GRI 103-2c-iv]**

Targets of the material issue [GRI 103-2c-iii]

MYTILINEOS main objective is to operate with a sense of responsibility and consistency towards its people, remaining their first option throughout their professional career. The company's immediate goals are both the application of a self-assessment procedure in terms of Human Rights protection and the establishment of an Internal Communication System that will promote the vertical and horizontal communication strengthening the corporate culture.

Labor Practices specific targets	Targets 2018	Performance 2018	Targets 2019
Full-time employee's retention rate	>90%	90%	>90%
Average of training man-hours per employee	>21	21.6	>21
Employees' evaluation rate	>80%	73%	>80%
Incidents of Human Rights violation	0	0	0
Incidents of discrimination	0	0	0

Performance in 2018 [GRI 103-3a-ii]

Employment: MYTILINEOS strategic priority is to attract, evaluate, recruit and retain the appropriate employees who contribute to the company's continuing development and competitiveness. At the end of 2018, the total number of direct employees stood at **2,087** persons with a 93% there of being employed in Greece. Concerning indirect employment, MYTILINEOS supports a significant number of jobs assigning important projects for its operation (such as mining, new projects construction, maintenance services, transports etc) to specialized contractors. In 2018, the total number of employees of permanent independent contractors executing significant operations for the company as well as the number of employees with long term agreements or employment contracts was 1,229, raising the company's number of direct

and indirect employees to **3,379 persons**. There are no seasonal workers in the company's activities, excluding the Metallurgy sector where there are seasonal variations in the workforce with a fixed-term employment contract (2018: 61 persons) mainly during summertime. There are also several trained employees, graduates from technological institutions (2018: 50 persons) who were employed in the company on fixed-time employment contracts to complete their internship training. Moreover, MYTILINEOS employment policy, focusing on localization, ensures that a large percentage of its employees comes from communities neighboring with its main industrial plants. This fact, combined with the priority placed on the support of local suppliers, creates income and by extension reinforces the local communities' economic growth.

Overview:

- The number of company's direct employees, in 2018, rose further by **3.2%** (2017: 7%).
- **9 out of 10 employees** are working with a permanent employment contract (2017:17%).
- The full-time employee's retention rate was maintained at high levels, 90% (2017: 92%).
- The low rates of **employment (10.2%)** and part-time employees (0.9%) were maintained, supporting the long-term relations between the company and its people.
- **9 out of 10 employees** come from the company's local communities (2017:8,8 στους 10).
- **6 out of 10** employees are covered by business collective agreements (2017: 7 στους 10).

[GRI 102-41]

Employees' data (Direct employees) [GRI 102-8]

20172018

Analysis/gender		
Total	2,021	2,087
Males	1,710	1,723
Females	311	364
Analysis of employment contract/gender		
Permanent	1,785	1,873
Males	1,521	1,559
Females	264	314
Temporary	236	214
Males	189	164
Females	47	50
Analysis of employment contract/country		
Permanent	1,785	1,873
Greece	1,766	1,845
Ghana	4	6
United Kingdom	9	8
Spain	-	2
Nigeria	1	-
Puerto Rico	-	3
Saudi Arabia	-	1
Turkey	3	3
Chile	2	5
Temporary	236	214
Greece	151	103
Algeria	14	7
Ghana	31	60
United Kingdom	12	12
Iran	8	-
Spain	-	3
Kazakhstan	9	14
Nigeria	7	8
Uganda	-	4
Puerto Rico	4	-
Chile	-	3
Analysis of employment type/gender		
Full-time	2,006	2,069
Males	1,710	1,721
Females	296	348
Part-time	15	18
Males	-	2
Females	15	16

MYTILINEOS aims at securing the sustainability of as many jobs as possible. To this end, in 2018, the company created **45 new jobs**, raising the total number to **710 new hires over the last 9 years**. With respect to employee turnover, out of the total number of departures, a 29.4% rate was voluntary, while the remaining 70.6% were mainly due to the termination of employment contracts, in the EPC & Infrastructure Projects Sector where, due to the nature of the activities, a number of

employees who undertake to perform a specific part of the work are employed under temporary contracts which expire upon delivery of the project, as well as in the Metallurgy sector with the termination of seasonal workers' contracts covering the needs of the aluminum factory during the summer leave, and the trainees who completed their internship training.

Employees' data (Direct employees): [GRI 401-1]	Recruitments			Departures		
	2017	2018		2017	2018	
Analysis/gender						
Total	321	429	20%	226	384	18%
Males	253	311	18%	203	314	18%
Females	68	118	32%	23	70	19%
Analysis/age category						
<30 years old	137	210	92%	86	151	66%
30 - 50 years old	167	198	13.2%	109	180	12%
>50 years old	17	21	5.6%	31	53	14%
Analysis/country						
Greece	269	346	18%	194	339	17%
Algeria	-	2	28%	-	9	129%
Ghana	29	38	57%	2	7	11%
United Kingdom	-	6	30%	-	7	35%
Nigeria	6	4	50%	-	3	38%
Iran	5	3	-	1	9	-
Spain	-	5	100%	-	-	-
Uganda	-	4	100%	-	-	-
Puerto Rico	3	-	0	10	1	33%
Kazakhstan	7	14	100%	-	8	57%
Chile	-	7	87%	-	1	12.5%

The employee turnover¹ increased by two percentage points reaching the percentage of 5.8% (2017:3.3%).

¹Total volunteer departures of employees divided to the company's annual average number of direct employees in the reporting year.

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

Moreover, MYTILINEOS provides a series of benefits to full-time employment employees of all its hierarchy levels that remained unchanged in 2018. These benefits vary per activity sector and include medical care, life assurance, disability coverage/incapacitation, retirement provision, maternity/paternity leave, loans granting in case of emergency. These privileges are non-discriminatory and are governed by the principles of equal treatment and transparency, setting clear policies in each personnel category. [GRI 401-2]

Management-Employees Relations
[GRI 402-1a]

One of the main goals of MYTILINEOS, as an important social entity, is the fulfilment of its social role. The company is an economic organization with its capital being a main element and the making of profit being its primary aim. Yet at the same time, through profit, it also seeks to ensure the wellbeing of its employees who are seen by the company as an important factor for its growth. Therefore, employees are considered to be "integrated" within the company, beyond the employment-remuneration provision relationship that formally connects them with it, in the sense that the continuous improvement of their capabilities and of the outcome of their work is inextricably linked to the company's progress.

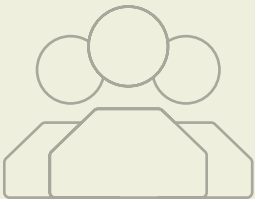
This interdependence, together with the creative coexistence of the economic with the social character of the company, serves as the guide for formulating the general principles of its social policy. The company sees to it that these general principles, characterized by clarity, dynamism, timeliness and

flexibility, are communicated to all its personnel, while adherence to them is one of the main objectives of its social policy.

The company's Management has set as its priorities the safety of its employees and the protection of their interests and rights in the framework of sound corporate management, given that one of the key success factors is the employees' full dedication to their duties. Thus, employees can communicate with authorized members of the Management about all matters of concern to them and are provided with timely answers and solutions.

A key aspect characteristic of MYTILINEOS' consistency towards its employees is its policy to inform them in a timely manner prior to the implementation of major changes in corporate operations which might affect them significantly. The length of the notice period varies, depending on the importance of the change involved as well as on the specific Business Unit. The following examples are indicative:

- In the Metallurgy Sector, the Plant Steering Committee holds weekly meetings to discuss matters concerning
- Safety, the Environment, Production and Finance, as well as organizational / operational changes (if any), with the participation of all Company Managers. The results of these meetings are immediately communicated to all other employees by the company's Executives.
- In the EPC & Infrastructure Projects Sector, a reasonable notice period applies, depending on the circumstances and in consultation with the employees' elected representatives, to ensure that employees are notified in the best possible way. The Management meets regularly with the Board of the Employees' Union to inform them of any issues that may concern them. In extraordinary cases, the meeting and the provision of information by the company to the Board of the Employees' Union precedes the implementation of any positive or negative change that affects employees, with provisions made for the time necessary to disseminate the information and hold consultations.



Employee Training & Evaluation

The activity of MYTILINEOS in different sectors, such as processing of metals, specialized construction works and activity in electricity generation and supply gives rise to different training needs, while giving employees a wide range of knowledge, affording them the opportunity to develop management and problem resolution skills, as they are daily confronted with new local and international challenges. The suitable professional education, training and technical knowledge of employees as well as the investment in their evolution constitute top priorities of MYTILINEOS. The company's vocational training and development program continued in 2018, aiming at improving the employee's professional

skills and capabilities required to cope with the current and future business challenges as well as their personal life. In detail, €392,362 was invested (2017: €315,000), an amount increased by 24% compared to the previous year, for the implementation of **43,950 training man-hours** (2017: 45,833) fewer by 4%, compared to the respective number of hours in 2017. The company's training program mainly focused on the following four axes absorbing almost 84% of total training hours: **a) Occupational Health & Safety, b) Job training within the department (in-business training), c) Technical education and d) Training in administrative issues, whereas the training cost per employee stood at €188** (2017: €156).

Employees' data (Direct employees):	Average of training man-hours per employee [GRI 404-1]		Percentage of employees who received a performance review [GRI 404-3]	
	2017	2018	2017	2018
Analysis/gender				
Total	22.7	21.6	80.8%	72.9% ¹
Males	24.4	22.6	80.6%	76.6%
Females	13.1	13.6	82.3%	55.6%
Analysis/employee category				
Executives	23.7	32.6	80.1%	78.8%
Administrative staff	15.8	14.5	91.5%	62.4%
Workers and technical staff	27.0	24.5	82.8%	80.5%

- Overview:
- **7 out of 10 employees** participated in the company's training programs in 2018 (2017: 7 out of 10).
 - The training cost per employee **increased by 20%**.
 - **57 promotions were carried out** resulting from the performance evaluation process.

¹ Percentage on the total number of direct employees. The respective percentage on the total number of eligible employees reaches 82.3%. The term eligible includes the employees who fulfill the prerequisites to be included in the performance's annual evaluation procedure. Any employees working in the company for less than 6 months are not included, nor are some special employees' categories based on the role/object.

As regards the programs aiming at continuous employability, through upgrading or the acquisition of new employee skills, indicatively the following are mentioned: **[GRI 404-2]**

In the **Metallurgy sector**, the staff training is divided in the General Education, under the responsibility of Training Department and in the In-Service Training, for which the Sector's individual Activities/Departments are competent. In 2018, 12,889 hours of in-service training were carried out (internal on the job training programs within the department); attended by 558 employees (executives, head foremen, foremen, employees, specialized technicians and technicians and trainees) covering the following activities: chemical laboratory analysts, alumina technicians training, anode-assembling, training of newly-recruited electrolysis technicians and training at the foundry facilities. In addition, 1,206 hours of external training programs of personal skills development were implemented, focusing on issues such as: organization and management of time, techniques of efficient meetings, negotiations techniques and presentations techniques covering the needs of 62 employees of all staff categories (Executives, Engineers, Head foremen, foremen, specialized technicians and technicians).

In the **EPC & Infrastructure Projects Sector**, in 2018, two internal training Health & Safety programs were carried out, of a total duration of 146 hours, focusing on the following thematic units: a) the induction training in Health & Safety issues and b) the training in Health & Safety issues at the company's work sites. Nine (9) employees from the administrative personnel and 47 workers & technicians participated. In addition, 10 external programs were implemented (5 regarded skills development, 4 regarded certifications in quality control issues and 1 in technical knowledge development), lasting in total 128 hours. Those programs were attended by all personnel categories.

In the **Electric Power & Natural Gas Trading Sector**, aiming at the successful inclusion of employees, skills development, strengthening of technical capabilities, knowledge of the company and its procedures and information on EHS issues, 57 internal seminars were held lasting in total 3,519 hours, covering the needs of 232 employees of all personnel categories. The thematic issues covered by this training were the following: a) training of newly recruited, b) General Safety Rules- Use of PPE, c) Health & Safety at Work, c) technical trainings related to the work object, e) Performance evaluation system, f)

quality & EHS management systems. Regarding the external programs, 54 seminars were held lasting totally 3,775 hours covering the needs of 187 employees across all ranks in order to develop/upgrade employees' skills in the training objects, aimed at satisfying the company's strategic needs and at improving their performance. The thematic categories that were elaborated were the following: a) Development of skills and personal capabilities, b) Technical issues, c) Negotiations, d) Health & Safety issues e) Soft skills & Management.

The employees' performance evaluation procedure continued also in 2018, in accordance with the unified company evaluation system; **more than 7 out of 10 employees** participated in this evaluation from all personnel categories. Besides performance evaluation, this procedure aims to ensure that all training programs respond, both on short-term and long-term basis, to employees' priorities and needs, combining the planning of further knowledge improvement and skills development with the servicing of MYTILINEOS future business and organizational needs.

Finally, as regards the practices relating to the provision of transition programmes designed to support employees about to retire, the company for the time being does not provide placement services or support, training and advice programmes. However, it maintains in effect and applies specific pension plans. Furthermore, to ensure the smooth succession of retiring employees, succession plans are developed to identify suitable successors to the positions vacated and to help these persons adjust smoothly to their new jobs. In addition, the "Talent Management System" helps identify employees with exceptional capabilities who become candidates for senior management positions. In the case of dismissals, compensation is payable in accordance with the provisions of Law 2112/20 and Law 3198/55, while in some cases the compensation actually paid is higher than the statutory one. **[GRI 404-2]**

Human Rights

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

The company also subscribes to and complies with the Principles of the UN Global Compact, which are based on 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 the six first Principles of the UN Global Compact and its recently revised Code of Business Conduct promote the protection of and respect for Human Rights and ensure the absence of any related incidents in its working environment.

Labor rights are of major significance for all employees. Direct employees are covered by business collective agree-

ments, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. In parallel, Employees Unions are in place in the Metallurgy and the EPC & Infrastructure Project Sectors. In the latter, a first-degree trade union body is established and functions at business unit level (Volos plant), whose members are elected by the general assembly of the plant's employees, with representatives also elected to the second-degree trade union organization (Volos Labor Centre) and to the Panhellenic Metal Workers' Federation.

In 2018, the company implemented for the 2nd consecutive year the self-assessment process regarding the protection of Human rights in its Business Sectors, in line with the methodology recommended by the Global Compact Self-Assessment Tool. The areas examined in accordance with the above process, which was also supported by daily communications and the Human Resources Department procedures are summarized in the table below. **[GRI 412-1]**

in some company activities, employees may be called upon to work beyond 40 hours. The company has procedures installed for planning, recording and monitoring each employee's work hours to check any overtime; it also provides employees with a reasonable break during work (as laid down in the law and the industrial standards). No incident of a violation of these rights was reported to the Human Resources Central Support Function through the formal procedure in place for reporting violations of the company's Code of Business Conduct.

Assessment area: FAIR TREATMENT OF EMPLOYEES

Results: In accordance with the Code of Business Conduct and the Internal Regulation Code, the company protects its employees from all forms of harassment at the workplace, as well as from physical, verbal, sexual or psychological abuse and harassment and from threats of any kind. The company also respects the privacy of its employees' personal data.

No incident of unfair employee treatment was reported to the Human Resources Central Support Function through the formal procedure in place for reporting violations of the company's Code of Business Conduct.

Assessment area: OCCUPATIONAL HEALTH & SAFETY

Results: During the self-assessment exercise, no deficiencies were established in terms of procedures or policies regarding the Health and Safety of employees. The company guarantees safe facilities and healthy working conditions for its employees. It also ensures that its employees are equipped with the necessary protective equipment and are properly trained to carry out their work safely. In addition, the employee's active participation in the Health and Safety company's procedures is encouraged. The policy, the scheduled actions for the achievement of the targets set and the initiatives adopted voluntarily by the company to ensure the Health and Safety of employees, are rigorously applied, as presented in the relevant section of this report.

Assessment area: PERSONNEL WORK HOURS, WAGES AND LEAVES

Results: For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates. The company confirms that all employees have a formal employment status. The company also secures the 40-hour weekly work; nevertheless, due to workload,

Assessment area: FREEDOM OF ASSOCIATION

Results: The legal framework on labor includes provisions on the recognition and safeguarding of the employees' right to freedom of association and collective bargaining, which MYTILINEOS fully respects. The employees' right to freedom of association is recognised in all the company's Business Sectors. During 2018, no areas were identified, and no incidents were reported in connection with a threat to or violation of this right. This has been the result of the implementation of a specific social negotiation process, whose fundamental prerequisite is the commitment of the company's Management and employees to detailed arrangements on social and labour issues, taking into consideration the rights and interests of both sides. Based on the findings of the first evaluation of the company's key suppliers, implemented by the company in 2018, the issue of freedom of association is not on the list of the 6 main impacts of their activity, both labor-related and social. However, it is acknowledged as an impact by 4 out of 10 suppliers abroad (Switzerland, Germany, Netherlands, Italy, Austria, Spain, China, Korea) and only by 2 out of 10 Greek suppliers. **[GRI 407-1]**

Assessment area: IMPACT ON LOCAL COMMUNITIES

Results: No conditions, that would excuse the possibility of human rights violations at community level, were identified through the mechanisms maintained by the company for formal and informal interactions with local communities, in each one of its Business Sectors. The company's activity does not limit but on the contrary, it ensures the access of citizens to natural resources or various other methods of living. For example, in the Metallurgy sector where the company's drilling network serves local communities with more than 900,000 m³ of drinking water annually. In addition, the company takes care to record the concerns of local communities regarding the overall impact from its activity, taking the appropriate measures, when required.

Assessment area: CHILD LABOR

Results: MYTILINEOS does not employ employees younger than 15 or 18 years of age to work. Therefore, in Greece no company activity presents any risk (significant or non-significant) of child labor incidents or any condition likely to drive young employees to a hazardous work. Based on the findings of

the first evaluation of the company's key suppliers, implemented in 2018, the Child Labor issue is not on the list of the 6 main impacts of their activity, both labor-related and social. However, it is acknowledged as an impact by 3 out of 10 Greek suppliers and respectively by 4 out of 10 suppliers abroad (Switzerland, Austria, Spain, Germany, Netherlands and Korea). **[GRI 408-1]**

Assessment area: FORCED LABOR

Results: In compliance with the Greek Constitution (article 22 para. 4), that protects the freedom of work, MYTILINEOS bans, through its Code of Business Conduct, any form of forced or compulsory labor in its working environment. As a result, in any activity of the company, in Greece, there is no significant risk of conditions that may lead to incidents of forced labor. In 2018, through the official violations reporting procedure of the company's Code of Business Conduct, no complaint or incident of forced or compulsory labor was reported to the General Directorate of Human Resources. Based on the findings of the first evaluation of the company's key suppliers, the Forced Labor issue is not on the list of the of the 6 main impacts of their activity, both labor-related and social. However, it is acknowledged as an impact by 2 out of 10 Greek suppliers and respectively by 3 out of 10 suppliers abroad (Switzerland, Austria, Germany, Netherlands, America and Korea). **[GRI 409-1]**

Assessment area: DISCRIMINATION

Results: MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.

No incident of discrimination was reported to the Human Resources Central Support Function through the formal procedure in place for reporting violations of the company's Code of Business Conduct. **[GRI 406-1]**

In addition, MYTILINEOS, through the EPC & Infrastructure Project Sector, maintains work sites in countries abroad and cooperates with suppliers of developing countries where there is a risk of human rights restriction or violation. In those countries, MYTILINEOS takes all requisite measures to comply with the applicable law. The company's contracts with suppliers, contain clauses on the adherence to the applicable national laws and statutory rules and regulations, and on the strict compliance with the provisions of the labour laws, with a view to ensuring the protection of labour rights [GRI 407-1]. Moreover, those contracts include terms of mandatory compliance with the applicable national laws, provisions and regulations aimed at excluding incidents of forced and child labor or employment of young employees in hazardous work. Those contracts also include the endorsement of the Suppliers & Business Partners Code of Conduct as a prerequisite of cooperation and the

company's right to request the audit of suppliers or sub-contractors by official international organizations for the assurance of Human Rights protection. Through a rigorous personnel selection procedure and the audit mechanisms it has elaborated (e.g. documents validation), the company aims to eradicate any form of child labor. Moreover, it commits Managers and Senior Executives to fully adopting and defending those principles and to respecting the legislative framework as responsible individuals for auditing and rejecting any supplier or contractor likely to be related with child labor incidents. [GRI 408-1] [GRI 409-1]



Diversity & Equal opportunities

The provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to the abilities that they have in order to respond to their assigned roles, is a core value of MYTILINEOS. In addition, the company, faithful to its commitment to apply best practices of Corporate Governance, intends to apply the Diversity principle (the basic parameters being, inter alia, gender, age, experience, skills and knowledge) in the composition of its Board of Directors, its senior executives force and in its direct employees, where feasible. With

the main part of the company's activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the specifications of each activity sector) constitute the main issues of promoting equal opportunities and diversity at the workplace. In 2018, at the Board of Directors level, diversity was boosted in order to express different perspectives both with respect to experience, skills, knowledge and gender, while changes were recorded in individual indexes of female and young employees' participation in direct employment, as mentioned below:

Diversity of the Mytilineos Governance bodies and Executives/Administrative employees [GRI 405-1]	2017	2018
Board of Directors		
Males	87.5%	81.8%
Females	12.5%	18.2%
<30 years old	0.0%	0.0%
30 - 50 years old	0.0%	27.3%
>50 years old	100.0%	72.7%
Executive Committee		
Males	83.3%	83.3%
Females	16.7%	16.7%
<30 years old	0.0%	0.0%
30 - 50 years old	33.3%	33.3%
>50 years old	66.7%	66.7%
Executives		
Males	77.3%	81.2%
Females	22.7%	18.8%
<30 years old	4.3%	2.4%
30 - 50 years old	75.7%	65.5%
>50 years old	19.2%	27.3%
Administrative employees		
Males	68.4%	64.6%
Females	31.6%	35.4%
<30 years old	10.1%	10.4%
30 - 50 years old	66.4%	68.2%
>50 years old	23.4%	21.3%

- Overview:
- The rate of female presence in the Board was reinforced by 45%.
 - The female participation, in direct employment rose sensibly, reaching 17.4% (2017:15.4%).
 - The female participation rate in responsibility positions dropped by 17%, mainly due to a change in the way of identifying the executive staff, as a result of the company's transformation.
 - The participation of young employees <30 years old in direct employment remained stable at 11.0% (2017:11.2%).

Local Communities

Disclosure Management approach [GRI 102-15]

The purpose of this disclosure is the access of MYTILINEOS stakeholders to substantial information regarding the company's engagement with its local communities. The company's objective is to get familiar with the local needs and priorities so that its development and other efforts are as compatible as possible with local communities' and broader society's needs [GRI 103-2b]

Relevance of the material issue [GRI 103-1a]

Social engagement constitutes a preventive approach adopted by MYTILINEOS, mitigating the unpredictable non-financial risks and contributing to preserving its "social license" to operate along with its good reputation. This is an ongoing effort taking various forms, that in their combination result in the company's commitment to understand and respond to local communities' concerns through open dialogue processes. Moreover, it aims at prevention and at problems resolution, by means of partnerships with local social bodies allowing the company to operate as a 'responsible corporate citizen'.

MYTILINEOS, aware of the modern socio-economic environment, wherever feasible, supports the work of local government offering its know-how and experience; at the same time

through collective efforts, it builds on forms of cooperation yielding multiplying benefits, creating added value and contributing to long term social cohesion strengthening.

Boundaries of the material issue [GRI 103-1b]

All Business Activity Sectors of MYTILINEOS have a direct involvement in the foregoing impacts, while the local government, as well as the volunteer & Non-Governmental Organizations contribute indirectly in the form of partnerships, implementing social actions, as foreseen by the company's social policy annual implementation plan.

Major risk and risk control practices [GRI 103-2a]

In the context of its activities, MYTILINEOS is likely to face the following basic risk:

Major Risk

The weakness on behalf of MYTILINEOS to promptly determine and manage the unique and often changing social, economic and cultural priorities determining the outlook of its local communities, may reverse the existing assumption that the company constitutes an inseparable member thereof with common interests. This is likely to affect the preservation of the company's "social license" to operate, restricting therefore its future growth.

Risk control practices

- The General Management of each Business Sector of MYTILINEOS is responsible for managing relationships with the local communities where the Sector operates. The main objective is to identify any negative impacts from the company's business activity and to minimize them, through the responsible operation.
- Moreover, a Corporate Social Responsibility team has been appointed and is operating in each Business Sector. This team is managing the implementation of the company's social policy, the annual Stakeholder engagement process, the use of local social media and the organization of visits of members of the local community to the company's facilities, when this is requested.
- The company communicates with local communities in a clear and transparent way, opting for an 'open door' policy, applied in areas where the company owns industrial plants; it also communicates by organizing annual, thematic or general open consultations with local communities' representatives to attend and discuss special issues of local interest.

Management of the material issue [GRI 103-2a]

MYTILINEOS in implementing its social policy, focuses on the following areas: [GRI 103-2c-i]

- **Bolstering local employment:** As the core activities of MYTILINEOS are primarily located in the Greek region, the company acknowledges and accepts its important role in the development and preservation of the prosperity of the local communities. In all the geographical regions where the company operates, its human workforce derives mainly from the local population
- **Supporting the development of the local economy:** All company's Business Sectors adhere to the principle of giving priority to the selection of local suppliers, provided that these meet their needs and particular requirements.
- **Substantial contribution through the annual Social Policy program by implementing social programs and initiatives:** The company's ambition is to contribute to empowering social cohesion, strategically seeking its maximum activation, through selected actions, in sectors directly connected with:
 - Its culture and corporate values,
 - Its business activity impacts,
 - The basic social needs that have emerged through the financial crisis conditions and continue to exist and
 - The Sustainable Development Goals (Agenda 2030).

Building on its constructive relation with social bodies over the years, MYTILINEOS has reviewed its internal processes, fixing a new way of managing social demands, in order to

reinforce transparency and qualitative improvement of its social actions. An open procedure has been established to this end, through the company's web page, where requests are submitted by social bodies, based on concrete specifications.

Specialized executives in each Business Activity Sector manage the company's relations with local communities and in cooperation with the central service of MYTILINEOS Corporate Social Responsibility implement the annual stakeholder consultation at local level, in order to record local needs and explore new partnership opportunities. [GRI 103-2c-iv]

Target of the material issue [GRI 103-2c-iii]

The long-standing goal of MYTILINEOS is to listen and evaluate local needs or expectations and contribute to their fulfillment, in order to enhance the sustainable development conditions of its local communities. Also, the company strategically seeks to maximize its activation through selected actions in critical social issues (poverty, unemployment, public benefit infrastructures, education, health etc.) which resulted from the alignment of its social strategy with the **UN Sustainable Development Goals, and the respective national priorities.**



Performance in 2018 [GRI 103-3a-ii]

Local employment and development: In 2018, MYTILINEOS created 45 new jobs, outnumbering 700 in total over the last 9 years. Moreover, the company, acknowledging its important role in generating income in the local communities, continued its local employment boosting policy with more than 9 out of 10 direct and indirect employees coming from the local population; the company also pursued the support of local suppliers preserving almost 1.300 indirect jobs⁶ across all its activities.

Social Policy [GRI 203-1] [GRI 413-1a-iv]:
In 2018, MYTILINEOS pursued the implementation of its social policy through a three-year Social Contribution Plan "IN PRAC-TICE" (2016-2019) raising its social expenditure by 13.8% compared to 2017, implementing actions in social sectors directly associated with the Global Sustainable Development Goals (SDGs) and the respective national priorities. In particular:

Year	Social investments
2018	2,296,020
2017	2,018,275
2016	1,456,714
2015	1,135,037
2014	852,000

Social investments analysis 2018

Social sectors	Relevant SDGs (2030)	% on total social investments
Local Infrastructure & Services	SDGs 11 & 17	45.4%
Support to culture/sports	SDG 11	31.4%
Reinforcement of quality education	SDGs 4 & 17	10.4%
Access to health services	SDGs 3 & 17	5.5%
Alleviation of Poverty	SDGs 1 & 17	3.2%
Child protection from any kind of exploitation	SDGs 16 & 17	2.3%
Mitigation of food insecurity	SDGs 2 & 17	1.8%

⁶ Indirect jobs: They regard the total number of employees of permanent contractors and self-employed who execute important works on behalf of the company.



Local Infrastructure & Services

Aiming at safeguarding the sustainability of its local communities and at improving the living conditions of residents, MYTILINEOS invested more than €1,000,000 to cover needs pertaining to local infrastructure and services with direct public benefit. In particular:

Centrally, MYTILINEOS proved its support to our fellow citizens affected by the ravaging fires of July 2018. The company assisted the competent authorities in providing any possible support to the Municipalities of Marathonas, Rafina and Pikermi, sending staple commodities and organizing emergency blood donation. Moreover, following an initiative by the company's President, the Board of Directors issued a relevant decision on 30/7/2018 regarding the **allocation of €1,000,000 as assistance to the affected individuals and for future disasters prevention**. Following consultation with the Municipal Authorities, the residents' committees and the Fire Brigade, the company decided to allocate this amount in two stages as follows: A) In 2018, **€100,000 was allocated via a program implemented by the Hellenic Federation of Enterprises (SEV) to support 130 families in a state of emergency** and b) in 2019 an amount of €600,000 will be given for the energy upgrading of a high school complex and the adjoining sheltered gym of the Municipal Community of Rafina - Pikermi Municipality, accommodating the schooling needs of 600 children and the sports activities of 1,000 children from the fire-affected areas of the Municipality and the neighboring municipalities and €300,000 shall be allocated for the donation of 6 standalone fire trucks to the Fire Brigade Headquarters, thus contributing effectively to its operational readiness.

In particular, MYTILINEOS decision to support the initiatives that combine safeguarding the cultural and natural heritage with local development turned into practice by financing the implementation of the study '**Nature and Cultural Route of Central Greece**', a program run by DIAZOMA Association with the ultimate purpose, through promoting and developing natural and cultural monuments, to benefit the undertakings established in the Mainland Greece Region as well as the producers of agricultural products, craftsmanship and industries as well as the producers of modern cultural products.

Locally, the individual company's initiatives are important, via its Business Activity Sectors:

- The long standing cooperation between the Metallurgy sector and the Municipality of Livadia for the implementation of a **Community Service program**, where the company **offered specific materials and economic resources amounting to €100,000** to implement selected projects (road construction, renovation of a music school etc) aimed at improving services provided directly and daily to fellow citizens, at maintaining and upgrading social infrastructure, at upgrading the operation of municipal services,

at improving the natural environment and at supporting the local market, while tackling at the same time the issue of unemployment, promoting the employment of the long-term unemployed citizens. In addition, through the Metallurgy sector, investments were made exceeding the amount of **€200,000** for the renewal of basic infrastructure in the model residential area of Aspra Spitia, such as: a) construction of a sheltered gym building b) supply of electrical equipment for sports facilities lighting, project designs for energy upgrading, road construction, and the training center as well as other initiatives, such as: completion of works in the church, and the works in Saint Loucas Monastery, school infrastructure, reinforcement of security forces infrastructure (Port Authority, Fire brigade, Hellenic Police)

- In addition, the added value being highlighted by the company's business operation, with the elaboration of Renewable Energy Sources projects, through the Electricity Sector, is identified not only in the attainment of national environmental objectives but also in the significant benefits towards local communities. As a result, in 2018, the total investment in supporting infrastructure projects and services in Municipalities where new RES projects are running or are about to be elaborated exceeded **€350,000**. The following are some indicative examples: supply of vehicles to municipalities, renovation of access infrastructure to children's playgrounds, holy temples, municipal libraries, asphalt dressing and maintenance of central and rural roads and repairs in school buildings, financing of designs for the modernization of a biological treatment plant, water supply to a residential area, construction of a transport hub of local communities etc

Internationally, and particularly in Africa, where MYTILINEOS EPC & Infrastructure Project Sector is prominently present, the company, in the framework of the implemented projects, has pledged to support the emergency needs of local communities pushing forward their development and prosperity. In 2018, the company offered more than **€120,000** in order to: a) to build a secondary education school in the area of Okoloma Ndoki in Nigeria, b) to cover the emergency needs of St. Nicolas Preparatory School, in Ghana, that was established to teach children in extreme poverty, making sure that many meals will be offered, prepared by the school for those children, both by upgrading the catering equipment and by constructing a new dining room and c) to provide support to Bufulubi Primary School in Mayuge province, in Uganda, with modern equipment in the teaching rooms and sports equipment, giving pupils the stimuli and the incentive to concentrate and combine studying with the athletic spirit. This initiative is of vital importance for children and their families living in a severely deprived area. Besides assistance to the school, the company helped the local families covering all school meals of the year.

SDG:



Support to Culture & Sports

More than **€720,000** was invested to support important events in the cultural life of the country promoting the dissemination and familiarization of Greek people with the cultural values as well as to support local sports associations and national federations in sports with dynamic growth. The following initiatives can also be mentioned among others:

- The unfailing support to the important work carried out by 'DIAZOMA' association, annually supporting the elaboration of studies both for the restoration of the Ancient theater of Orchomenos, in Viotia and the creation of the archaeological park in the same area.
- The cooperation with the National Opera in the framework of sponsoring selected theatrical plays.
- The cooperation with the Byzantine Museum in the Exhibition 'The Tomb of Christ-The monument and the project'
- The sponsorship to the French Film Festival of the French Institute.

- The support to the institution of cultural events 'Prespeia 2018'.
- The cooperation with the arts company 'To treno sto Rouf' for the participation of children and employees' children in theatrical plays.
- The cooperation with the Hellenic Equestrian Federation in the organization of the Panhellenic Equestrian Championship.
- The sponsorship to Metropolitan Opera
- The sponsorship for the implementation of Stamatis Spanoudakis concert at Palace theater
- The cooperation and support of the Exhibition '160 years of Greek Industry' by Technopolis City of Athens.
- The sponsorship for the support of the cultural event 'MUSIC CHANNEL KARYSTOS'.
- The economic support and the sponsorships to events in 32 sports clubs and cultural associations in Viotia and Fokida.
- The grant to "Argonauts" Volos Naval Association for organizing the Pan-hellenic Swimming Championship.
- Sponsorship to men's National Volleyball Team.

SDGs:



Reinforcement quality education

Acknowledging that quality education is a fundamental factor of sustainable development and of human life improvement, the company, during 2018, continued implementing a set of

initiatives of high social value in this field. Indicative examples are presented below:

1. The completion of the 3rd and last round of the pilot social program for combating the School Dropout phenomenon, 'I AM IN', in cooperation with the Association 'Together for the Child'. Upon completion of the program, MYTILINEOS identified and analyzed its social value through the international methodology **Social Return on Investment (SROI)** that applies in its significant CSR programs, constituting an innovation and a pioneering method in the field of industry. Based on this analysis, the total investment for 'I AM IN' program generated a social value of **€768,193.18**, with an **SROI indicator** equal to **4,75:1**. This means that for each €1 invested in the program, the social value produced was €4.75. In summary, the program's most significant achievements over the period 2016-2018, when 56 B' & C' grade of lower secondary school students participated, were the following:

- **56 students from vulnerable social groups successfully completed their basic education** and pursue their studies in upper secondary school (lyceum), being the program's main objective.

- **16 new jobs were created**, while 15 individuals from 4 different social organizations were employed in the program's management.
- **6.800 healthy meals were offered** to all students.
- **A total of 1.358 hours of remedial teaching were completed and 127 hours of experiential actions.**
- **More than 400 hours of psychological intervention** to students and counseling by school psychology experts to the program's participating teachers were carried out.

We completed the three-year social, pilot program **'I AM IN'** with total **social value of €768,000** for combating school dropout.

2. Reinforcing youth entrepreneurship and equal opportunities in education. In 2018, MYTILINEOS launched its cooperation with **Athens University of Economics** and in particular with the Department of Administrative Science and Technology, to support the **9th Summer School of Youth Entrepreneurship** (YES program), that has turned into an institution by now and attracts the interest of an increasing number of students across the country. The company offered in total **15 scholarships** to upper secondary school students of all grades, enabling children of its employees and students from Attica and the rest of Greece to explore their capabilities as future executives or entrepreneurs and perceive more directly the prospects offered by this dynamically developing sector of economy.

In addition, the company supported **the Scholarships Program of Piraeus University** for 11th consecutive year with **3 scholarships**. This program aims to upgrade the studies and

showcase excellence for a better future for young people and particularly for those coming from economically feeble families and to give them an equal opportunity of accessing the best possible education.

We granted **18 Scholarships** for the **Summer School of Youth Entrepreneurship of Athens University of Economics** and for the **Scholarship Program of Piraeus University**.

3. Upgrading schools with a new technology equipment. The acquisition of appropriate technological equipment is undoubtedly a means to upgrade the digital infrastructure of schools to reinforce the use of digital technology and to create equal access opportunities in the effective use of modern technology by anyone participating in the educational system. In this context, MYTILINEOS, offered **50 new PC** (desk & laptop), **15 screens**, **2 projectors**, **1 board** and **1 photocopy machine**, satisfying the demands of schools,

mainly from the Greek region, to upgrade their technological equipment.

We provided **25 Schools** from the Greek regions with modern **technological equipment**.

4. Supporting specialized actions to promote the educational method S.T.E.M. (Science-Technology-Engineering-Mathematics) to students. MYTILINEOS cooperated for the first time with the Non-profit organization **'WRO Hellas'** in order to disseminate educational robotics. The company offered **25 Lego education robotics packages** to 25 public schools of primary and secondary education in the municipalities of Viotia and Magnesia, giving students from local communities the possibility to develop their digital skills, teamwork, imagination, creativity and critical thinking and to participate in the respective Pan-hellenic competitions.

Moreover, the company supported the **"F1 in Schools"** institution carried out over the last 12 years now under

the auspices of Formula One and constitutes one of the most integrated S.T.E.M. programs Education. The company offered economic support to the scientific work of students' teams from the schools 'Educational Renaissance' and Arsakia-Tosit-sia Schools of Ekali, that represented Greece in the finals of the world championship 'f1 in schools', completed on September 12, 2018 in Singapore.

We supplied **25 Schools** in the prefectures of Viotia and Magnesia **with equipment in educational robotics**.

5. The creation and enrichment of 4 Lending Libraries in the following elementary schools: Davlia, Antikythira, Distomo and Paralia Distomou of Viotia Prefecture. By fostering the program **‘Lending Libraries’ of the Hellenic Book Club**, MYTILINEOS offered a gift of knowledge to **370 students and their families as well as to 60 teachers**, promoting the true-qualitative book and the reading as well as the active

education of children having their library as the core of their operation. The program will continue also in 2019, having as an overall objective to create **20 lending libraries**.

We created 4 lending libraries in elementary schools of Viotia.

6. In the context of developing important partnerships for the attainment of the Global Sustainable Development Goals, MYTILINEOS participates in **G.E.F.Y.R.A.** program (Greek Enterprises For Youth Reinforcement Acceleration), seeking to create employment preparation qualitative positions. In 2018, under this initiative, the company developed **6 new forms of cooperation** with higher educational institutions, while it continued the application of the successful program **“ENGINEERS IN ACTION”** (12-month salaried internship training) that constitutes an important option for young people who

find themselves excluded from the labor market. In total 81 new quality traineeship, internship and apprenticeship positions were created, while 5 of these were converted into new hires in the METALLURGY sector.

We created 81new qualitative traineeship, internship and apprenticeship positions.



Access to health services

Regarding health promotion and securing access by all to all basic care quality services, MYTILINEOS, continued in 2018 the important cooperation launched in the previous year, with the Charity "Pediatric Trauma Care". Through this collaboration, the company aims to contribute to creating and upgrading the Emergency Departments at State Hospitals and Health Centers and to inform parents and teachers on pediatric trauma.

In the context of this cooperation, MYTILINEOS in 2018 undertook and completed a full upgrading of three (3) Emergency Departments: **1) the Pediatric Department of Livadia General Hospital, 2) Hydra Healthcare Center and 3) the Pediatric Clinic of Ioannina General University Hospital**, with the necessary medical equipment. Considering also the company's contribution to the respective Emergency Department of the **General Hospital of Larissa**, in the end of 2017, the specific healthcare infrastructure is set to serve currently more than **16,000 children annually**. In addition, the company supported the **“Children Accident Prevention”** program of the association by publishing and distributing the specialised “Safety at School” leaflet, an initiative that helped over **2,500 children** to get informed.

Similarly, the company's contribution to this sector was important also at local communities' level. In particular, the company a) offered 7 new beds to the Artificial Kidney Unit

at Livadia Hospital, b) supported the maintenance and the equipment of Distomo Healthcare Center, c) supported financially the work of volunteer health associations, such as the Cancer Society (Livadia branch), the Hellenic Care Society of Volos, the Floge Association etc, while d) a special action by MYTILINEOS is the long standing approach to the HIPPOLYSIS Center aimed at disseminating the effective equine therapy method to an increasing number of people.

Similar important initiatives were implemented in this field and in countries abroad where the company operates, such as: The financial support to the work of the Greek community hospital in Cairo, Egypt and the support to the efforts by the public welfare institution “Servir” for the finalization of an international medical center for patients under kidney treatment (kidney transplants, dialysis) in Abidjan, in Ivory Coast that will be able to serve patients across the entire South Africa.

We upgraded the medical equipment of 3 Emergency Departments in the country's Public Hospitals and Health Centers.



Poverty mitigation

MYTILINEOS considers that although combating poverty is conditional on many different factors, however, a key practice is to ensure the right of access to employment, besides creating and preserving jobs.

With the aim to increase employability, focusing in particular on practices bridging the gap between skills offered (by engineers) and skills sought after (by the market), MYTILINEOS, in cooperation with the social enterprise **‘knowl’** for Education & Lifelong Learning, proceeded to the planning and implementation of the **“#skills4engineers”** program, offering a specialized, free program of professional skills development and support **to 25 young unemployed graduates from Technical Universities and Technological Foundations** aimed at covering the gaps in soft & hard skills, in order to improve their professional profile and match it to the desired job. The **#skills4engineers** program adopts an exceptionally customized approach empowering each individual separately with skills, based on his/her personal 'likes and capabilities', successfully matching the professional profile with the desired job and the direct interconnection with the labor market. It utilizes specialised learning tools and applies the innovative, awarded methodology of **‘Mellon Skills Accelerator’** with 1 out of 2 participants finding the desired job based on the professional target.

Moreover, important in this field was MYTILINEOS participation **in the social program ‘Solidarity Subscription’** of the street magazine **“Schedia”**. Through the **150 subscriptions secured**

by the company, the magazine's salesmen are supported; those salesmen are elderly or approaching that age and are affected both by financial and social plights.

In particular, sellers come from vulnerable social groups: homeless, unemployed and in general people who evidently live below the poverty line. The program aims at supporting those people and is structured in such a way so that the salesperson remains the main benefited party with a financial support, office work and participation in life coaching courses and computer learning courses.

MYTILINEOS, steadfast in supporting the vulnerable social groups, proceeded to the economic support of the families that joined 'Arogi' foundation of the Holy Metropolis of Thebes & Livadia, facing serious financial and health problems. The company's support intended to cover their daily subsistence needs. Moreover, the company offered heating oil to the Metropolis foundations, while also supporting the operation of social groceries of the Municipality of Karystos and Delphi Municipality.



SDGs:



Child protection from any kind of exploitation

Contributing to the attainment of the Global Sustainable Development Goal 16 that focuses on the elimination of all forms of violence, abuse and exploitation of children, MYTILINEOS supported actively as **‘Great Panhellenic Sponsor’** the implementation of **12 training seminars, entitled “Protect your Child from the Electronic Crime” in 10 cities of the country.** For the company, this initiative is part of high social value actions since **3,166 students, parents and teachers** had the opportunity to be informed about the safe use of Internet, the phenomena of our time such as: addiction, high risk behaviors, ways of coping with the digital world challenges and to get answers in more than **200 different** questions on their daily life submitted by the retired Police Lieutenant General of the Hellenic Police and President of Cyber Security International Institute Mr. Manolis Sfakianakis, who was the action’s main rapporteur. This initiative was carried out with the support by the European Parliament Office in Greece.

The Company also supported the campaign **“ONE in FIVE” of the Council of Europe in Greece on the elimination of child sexual abuse.** Aimed at informing and sensitizing the Greek society, in order to transmit the message of the campaign with greater intensity, MYTILINEOS undertook the reproduction of **20,000 DVD** copies containing the information material of the initiative, with the approval by the Council of Europe and a positive opinion by the Institute of Educational Policy of the Education Ministry. **The campaign visited more than 85 municipalities and 50 cities in the Greek territory, and it was hosted in 164 TV shows.**

We supported the implementation of **12 training seminars about the child protection from the electronic crime, informing 3,166** parents & children

SDGs:



Mitigation of food insecurity

MYTILINEOS, contributing to mitigate food insecurity, in 2018, joined the **Prolepsis Institute’s “DIATROFI” Program.** The program supports primary and secondary education schools’ students who come from vulnerable areas across the country, helping to cope with feeding problem promoting at the same time healthy nutrition habits. Through “DIATROFI” program, the company ensured in total the distribution of **22,682 meals**, providing daily a healthy, high standard meal to **212 students studying in 5 schools of vulnerable areas in Sterea Hellas region** during the school year 2018-2019.

We ensured **22,682** healthy meals through our participation in the program **“DIATROFI” for 212 students from 5 schools** of the municipalities of Livadia, Thebes and Delphi.



Market Presence

Disclosure Management approach [GRI 102-11] - [GRI 102-15]

The aim of this disclosure is to provide basic information to MYTILINEOS social partners in order to understand how the company handles the assurance of: a) its products' quality and safety, b) natural persons' personal data protection, c) responsible methods and actions used in order to promote its reputation, products and services and d) the way it aims to incorporate responsible entrepreneurship in its supply chain.

[GRI 103-2b]

Relevance of the material issue [GRI 103-1a]

- At MYTILINEOS, emphasis is placed on the quality of its products as a significant factor for its development. In the Metallurgy sector, the impact on the company's primary products' health & safety specifications are related to the end use of secondary products that will derive from the company's processing customers. The company is committed to ensuring the maximum quality of offered products (alumina, primary aluminium), in accordance with its customers' expectations and demands. In the sector of EPC & Infrastructure Projects, besides the fact that the internationally applicable regulations are considered for the design of industrial production projects, there exists a detailed monitoring of measures and quality characteristics, in order to ensure the satisfaction of customers' defined requirements. In the Electric Power sector, it is very important for MYTILINEOS to secure the maximum possible availability of its thermal plants in electricity generation and to constantly improve the quality of provided energy and its accompanying services, taking advantage at the same time of the new developments in sectors such as: electromobility, energy efficiency and net metering.
- The company's suppliers and business partners play a decisive role in its efficient operation, as they supply a broad range of products and services for use from the mining process and the production and maintenance of the aluminium industry, to the manufacturing and purchase of equipment for the delivery of EPC & Infrastructure projects and the operation and maintenance of gas fired thermal energy production plants as well as in the development, construction and maintenance of RES plants. Given that the demand for new products with longer lifecycle spans and reduced environmental impacts is steadily increasing, the company invests in Research and Development, looking for solutions that will satisfy the varying need of its clients, to offer a comprehensive service with the lowest possible burden on the environment. In this direction, the company's key business partners and suppliers can act as catalysts, as they are an integral part of its efforts.

- The protection of natural persons against the processing of personal data is a recognized national and European objective in the context of building effective, reliable and transparent institutions and constitutes a topic of vital importance for MYTILINEOS. The compliance with the legislation applied by the company across all its business activity sectors contributes to avoiding immediate economic repercussions and to its customers' dedication and satisfaction.
- Finally, one more significant aspect for the company is to ensure transparent imparting of information and full comprehension of its messages by all its existing and potential customers in all its business activity sectors. In particular, the advertising and the promotion of electricity supply services is carried out in compliance with the legislation in force regarding advertising and pertaining to consumers' protection and the use of personal data, as in force.

Boundaries of the material issue [GRI 103-1b]

All MYTILINEOS Business Activity Sectors have a direct involvement in the effects; the contractors, suppliers, associates and the company's customers are indirectly involved.

Major risks and risk control practices [GRI 103-2a]

Although all foregoing issues contribute to fulfilling MYTILINEOS Sustainable Development goals, however, the company identifies two main risks in two of those issues (quality of products and supply chain):

Major Risks

Any deviation from the qualitative specifications of the company's products and services affects its responsible operation affecting its customers' level of satisfaction, its reputation, reliability and therefore its financial results.

Risk control practices

- In the Metallurgy sector, the company's activities have been harmonized with the provisions of the European Regulation 'REACH' regarding effective treatment of chemical substances used in industrial processes. Moreover, methodologies are applied for the identification and analysis of operational risks and improvement opportunities, such as the risk analysis in the context of ISO 9001:2015. Finally, the Sector's quality control laboratory is accredited pursuant to the requirements of the international standard ISO 17025:2005, by the National Accreditation Council; the accreditation field covers the analysis of bauxites, aluminas, aluminium and its alloys.
- In the EPC & Infrastructure Projects Sector, in all stages of industrial production, the highest international quality criteria are applied as well as the requirements of specialized international specifications and codes in order to secure the quality of heavy and/or complex metal constructions undertaken. For each construction project the company undertakes and prior to commencing the construction, a Hazard and Operability Study - HAZOP is conducted. The aim of HAZOP is to identify and evaluate the problems likely to entail risks for the personnel or the equipment that have not been detected in the project's stages of design and planning.
- During suppliers' selection process in the Metallurgy Sector, meritocratic procedures are applied, on specific criteria regarding health and safety at work and environmental responsibility, besides the quality requirements, the compliance with technical specifications, issues of reliability, competitiveness and localization.
- In the countries where the company operates, through the Sector of EPC & Infrastructure Projects, there is a close cooperation with the competent Authorities for the implementation of the regulatory framework. About the management of environmental issues, the company notifies to subcontractors a project-specific Environmental Plan to be implemented; based on the work contract, they shall be bound to apply this plan in order to minimize the environmental impact. Similarly, the management of health & safety issues is governed by a series of actions that should be implemented for proper implementation of employees' Health & Safety system and appropriate measures' taking. In the contracts signed with contractors and suppliers, an explicit provision is mentioned about the Code of Ethics to safeguard the protection of human rights and to prevent conditions of corruption and bribery.

Management of the material issue [GRI 103-2a]

Quality of products:

- In all Business Activity Sectors of the company, a certified system of Quality management is applied by the international standard **ISO 9001/2015**, accompanied by the relevant policies per Business Activity sector (**Metallurgy sector Quality Policy - Quality Policy of the Integrated Projects & Infrastructure Sector - Quality Policy of the Electricity Sector**) **[GRI 103-2c-i]**
- The Metallurgy Sector is constantly striving for quality assurance. The company's laboratories, key factor of the quality program, systematically control all stages of production, from raw materials until the finished products. To this direction, the official publication of Safety Data Sheet describes the risks related to the product and all necessary precautions to be taken to avoid such risks. The company pledges to secure the best quality of its products, in accordance with its customers' expectations and requirements, offering them alumina products and primary aluminium and relevant services that respond to the quality requirements.
- In the EPC & Infrastructure Sector, a single System for Quality Management, Environment, Employees' Health & Safety is applied, in accordance with the international standards. This System makes sure that each project's implementation is aligned with the requirements of contracts with customers, the Sector's quality policy, the legislation, the regulations and customers' satisfaction.
- In the Sector of Electric Power and Natural Gas Trading, the aim is to guarantee reliable supply of electricity and natural gas to enterprises, professionals and households, satisfying customers' needs for competitive prices, through a series of specially designed modern and reliable procedures, advices & energy saving services.

Management of supply chain:

MYTILINEOS "Suppliers & Business Partners Code of Conduct" includes the description of minimum requirements/expectations of the company from its supply chain, in Responsible Entrepreneurship related issues. This Code constitutes a key prerequisite for the commercial cooperation between the two parties. The sections of this code cover

topics on environmental protection, assurance of health & safety, working conditions, code of ethics & integrity. This initiative aims to commit suppliers to best practices of sustainable development; this fact will yield mutual benefits.

Customers' Personal Data Protection:

The collection and processing of personal data by MYTILINEOS adheres to the General Data Protection Regulation (GDPR) of the European Parliament and the Council, the legislation in force and wherever required the Company's labor relations and business activity. The Company allows the access of only authorized persons to those data and takes increased safety measures of those data to protect them from loss, erroneous handling, non-authorized access, modification or disclosure.

Responsible communication:

MYTILINEOS keeps abreast with the developments in the relevant legislation and volunteer codes of behavior in order to secure the lawfulness of its communication and promotions actions. In this respect, the company's communication associates commit to the Greek Code of Advertising-Communication, whose compliance is verified on a consulting, preventive and suppressive basis by the Communication Control Board in the framework of the Greek law. The principles of the Greek Code of Advertising-Communication require that all promotion actions should be lawful, decent, honest, created in a spirit of social responsibility and in line with the principles of fair competition, as it is generally accepted in the market.

Targets of material issue: [GRI 103-2c-iii]

MYTILINEOS main targets are the following: a) its products to be evaluated by 100% for their impact on health and safety regarding their use (whenever applied), b) to complete the evaluation of its basic suppliers in social and environmental issues by 2020 and c) to ensure the stability of its level of compliance with the legislation regarding the personal data protection and its communication practices that contribute to the mitigation of financial risks and that enhances the company's ability to expand its activities.



Performance in 2018 [GRI 103-3a-ii]

Quality of products

In 2018 no incidents of non-compliance with regulations and voluntary codes were recorded concerning the impact of MYTILINEOS products and services on health and safety. [GRI 416-2]

Management of supply chain

In 2018, MYTILINEOS carried out the 1st official self-assessment of its key suppliers, as they were identified by each Business Activity Sector, through a structured questionnaire. The aim of this initiative was dual: 1) to investigate whether the company's suppliers own a recognition and management procedure of the most important, existing and potential impacts (environmental and social) stemming from their activity and 2) the recording of these impacts allowing the company to assess them planning any corrective actions, in the context of its effort to develop a responsible supply chain.

A total percentage of 53% (146 key suppliers) responded to this first attempt of bringing closer the company's suppliers with Sustainable Development issues. The most important findings of the evaluation are presented below:

- 7 out of 10 declared having a recognition and management procedure of environmental & labor/social effects.
- Moreover, 7 out of 10 reported practices they put in place to mitigate both environmental and labor/social effects deriving from their activity.
- Almost 5 out of 10 own certified environmental management and Health & Safety at work systems (ISO 14001 & OHSAS 18001).
- Overall, there seems to be a deviation in the correlation between the recognition procedure of effects/risks (environmental, labor/social) and the certified systems, either for Environmental management or for Health & Safety at Work. This deviation is more pronounced in domestic suppliers and is mainly attributed both to the small size of enterprises (lack of information and support, difficulty to cope with the relevant cost), as well as their exemption from or compliance with the legislation; as they mention, this practice usually covers this 'need'.
- The degree of correlation between the suppliers who declared having a recognition procedure of effects/risks and the reporting of respective practices applied for preventing or coping with such risks is very high reaching 97%. As far as the declared practices is concerned, compliance with the legislation ranks very high, in labor issues mostly, while reference to more specialized initiatives is limited.

- In addition, both domestic and foreign suppliers have a common identification of the areas likely to incur potential negative effects. Regarding the most important potential environmental effects, the suppliers reported the following: Waste management, energy consumption, pollution of the natural environment, gaseous pollutants emissions and water consumption. Similarly, Health and Safety at work, fair treatment, remuneration-leaves-employees' overtime, products' quality and safety, issues of corruption and bribery constitute the most recognized labor-related and social effects.

Finally, following the study on results and the practices declared by suppliers, the company designed specific improvement actions (b' cycle of self-assessment with non-responding suppliers, training conferences, sending incentivizing letters etc) which are still in the approval stage in view of a stepwise implementation starting in 2019.

Customers' Personal Data Protection

In 2018, there was no documented reporting to the company regarding violations of customers' confidentiality or customers' data losses. [GRI 418-1]

Responsible communication and labeling of products

The appropriateness of forms of communication and marketing applied by MYTILINEOS is ensured via monitoring and incorporating all developments in current legislation and via applying responsible practices governing the below the line promotion of its products and subsidiaries, the above the line communication at central level and the communication of sponsorships and social programs. The company's pursuit is to provide transparent information and ensure full comprehension of its messages by all its existing and potential customers.

In 2018, non-compliance incidents with the regulations and optional communication codes were not observed during MYTILINEOS communication strategy implementation, nor during promotion activities and sponsorships. The company's products do not fall under any distribution restriction in specific markets, while there were no significant issues to have preoccupied social partners groups regarding the communication of products. [GRI 417-3]

MYTILINEOS responds fully to verifiable and clear information pertaining to the labeling of products. Each customer has all means available to check all significant information and, if so desired, to proceed to the corresponding control. In 2018, incidents of non-compliance with the regulations, regarding the company's products' information and labeling, were not recorded. [GRI 417-2]

Type of information related to product labelling

[GRI 417-1]

Major categories of products subject to the following information requirements	Aluminium	Alumina	EPC projects	Metal & Machinering Constructions
Information on the origin of product elements or ingredients.	100%	100%	100%	100%
Information on content, especially regarding substances which may have an environmental or social Impact.				
Information on the safe use of the product or service.	Non-applicable requirements			Non-applicable requirements
Information on the product's disposal method and its potential environmental/ social impact.				

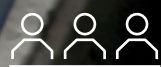
In the Metallurgy sector, the labeling requirements regard the products for sale aluminium billets & slabs as well as to calcined and hydrated alumina. For every aluminium or alumina cargo, a Certificate of Conformity is issued containing all information required for the material.

In the EPC & Infrastructure Projects Sector, the company's projects and services are in full agreement with the contracts and the contractual obligations towards its customers to whom all information and warnings about Health, Safety

and Environment are delivered, such as:

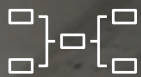
- Instructions for use, maintenance and discarding for the entire equipment (Operation & Maintenance Manuals) and of materials.
- Labeling of all materials and equipment (trademarks, warnings and relevant instructions) in a conspicuous position.
- Instructions for use-recycling, in the form of Material Safety Data Sheets (MSDS) for all hazardous materials.

Ensuring transparency
towards investors,
safeguarding the Company's
shareholders' interests



Size of the Board

2018	11
2017	7



Board Composition

2018	E: 27.3% NE: 72.7% INE: 63.6%
-------------	--

2017	E: 28.5% NE: 43% INE: 28.5%
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E: Executive Members
NE: Non-Executives Members
INE: Independent Non-Executive Members



Board Composition

2018	I: 63.6% IN: 36.3%
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2017	I: 28.6% IN: 71.4%
------	-----------------------

I: Independent Members
NI: Non-Independent Members)



President Duality

2018	Yes
2017	Yes



Appointment of
Independent
Vice-Chairman

2018	No¹
2017	No



Board Duration

2018	4
2017	4

years



Number of
Board Meetings

2018	58
2017	91



Board Meetings
attendance <75%

2018	0
2017	0

Number of Board Members



Gender representation
in the Board

2018	M: 81.2% W: 18.8%
-------------	------------------------------------

2017	M: 85.8% N: 14.2%
------	----------------------

M: Men - W: Women



Voting Standard

2018	majority
2017	majority



Number of Board
Committees

2018	2
2017	2

Audit Committee &
Remunerations Committee



Corporate
Governance Code

2018	GCGC (2013)
2017	GCGC (2013)

Greek Corporate Governance Code

Alignment with the Global
Sustainable Development Goals



¹Although there is no Independent Vice President, one of the improvements that were made in the context of the reorganization of the company's Board of Directors in 2018 was the appointment of a Lead Independent Director



MYTILINEOS applies the Corporate Governance Principles, streamlined with the Greek legislation, adopting internationally recognized practices, aimed at transparency and responsible Company operation across all sectors of its activity. Up to the financial year 2018, the company was complying with the 'Greek Corporate Governance Code for Listed Companies' of the Hellenic Corporate Governance Board, as finally established after its revision in October 2013 and is uploaded on the relevant webpage of Athens Exchange (ATHEX) www.helex.com/el/web/guest/esed.

Since 1/1/2019, following a relevant decision dated 15.11.2018 by its Board of Directors, aiming at ensuring transparency and responsible operation across all sectors of its activity, the company voluntarily adopts the UK Corporate Governance Code -2018), <https://www.mytilineos.gr/el-gr/corporate-governance-code/presentation>, uploaded on the Company's webpage. Based on the highest entrepreneurship standards, MYTILINEOS seeks to strengthen dialogue with its investors with the ultimate purpose of unlocking further value for its shareholders. Guided by the best corporate governance practices, MYTILINEOS carves its strategy and develops the general guidelines, policies, principles and values governing its operation, ensuring transparency and the interests of its shareholders

Main developments in the company's Corporate Governance in 2018

In 2017, a significant part of the corporate restructuring involved the full review of the overall Corporate Governance framework, namely of Executive Governance and Board Governance.

With regard to the Executive Governance:

- Establishment of an Executive Committee dealing with the Company's day-to-day operation and Management, assisted by competent Board committees (Metallurgy, Energy EPC, Finance, Capital allocation).
- Also, a new Corporate Governance Department was created.

With regard to the Board of Directors restructuring, the following improvements took place:

- Restructuring of the Board of Directors choosing new members through a candidates nomination procedure by an internationally recognized consultant
- Significant reinforcement of formal and substantial independence of the BoD: 64% independence in the BoD- 100% independence in the Bod Committees (Remuneration & Audit & Candidatures) - Upgrading of the Corporate Social Responsibility Committee
- Diversity so that many different perspectives can be expressed both with respect to experience, skills, knowledge and gender
- Specialization in all company's business activities, experience in BoD, in financial, legal and regulatory issues, in the international capital markets as well as international and academic experience
- Appointment of a Lead Independent Director and upgrading of the Corporate Secretary's role.

Other important improvements:

- Granting shareholders a voting right to vote for each individual BoD member separately (unbundling).
- Cooperation with internationally recognized directors for all improvements; McKinsey, EgonZehnder, D.F. King, KornFerry-Hay.

MYTILINEOS organization

MYTILINEOS has a determined structure of organization that runs in the context of principles and practices safeguarding and satisfying all company's stakeholders' legitimate interests. The company's organization includes its organizational structure, the executive governance structure, the organizational chart, the internal procedures and the internal communication system.

Organizational Structure

The organizational structure, i.e. the allocation of business activities that create the company's added value in sectors and the determination of central services and operations that ensure support, synergies, compliance with the legislation in force and regulations and add on goodwill, is placed under the Chief Executive Officer's responsibility; the latter is supported by the CEO's Office entrusted with the coordination of the organization and the arrangement of issues not requiring the CEO's intervention; this organizational structure includes the following:

- The company's four Business Activity Sectors,
- the team of Central Services supporting the Business Activity Sectors with specialized services, besides the coverage of corporate functions and obligations,
- the Central operations and
- the special Management directors.

Executive Governance

The executive governance structure ensures fast and correct decision making with full picture and optimal use of the senior management's time. It includes committees for decisions preparation, decision making and coordination.

Organizational chart

MYTILINEOS organizational chart facilitates decision making and implementation in the framework of the company's strategy implementation; while the entire raft of relations

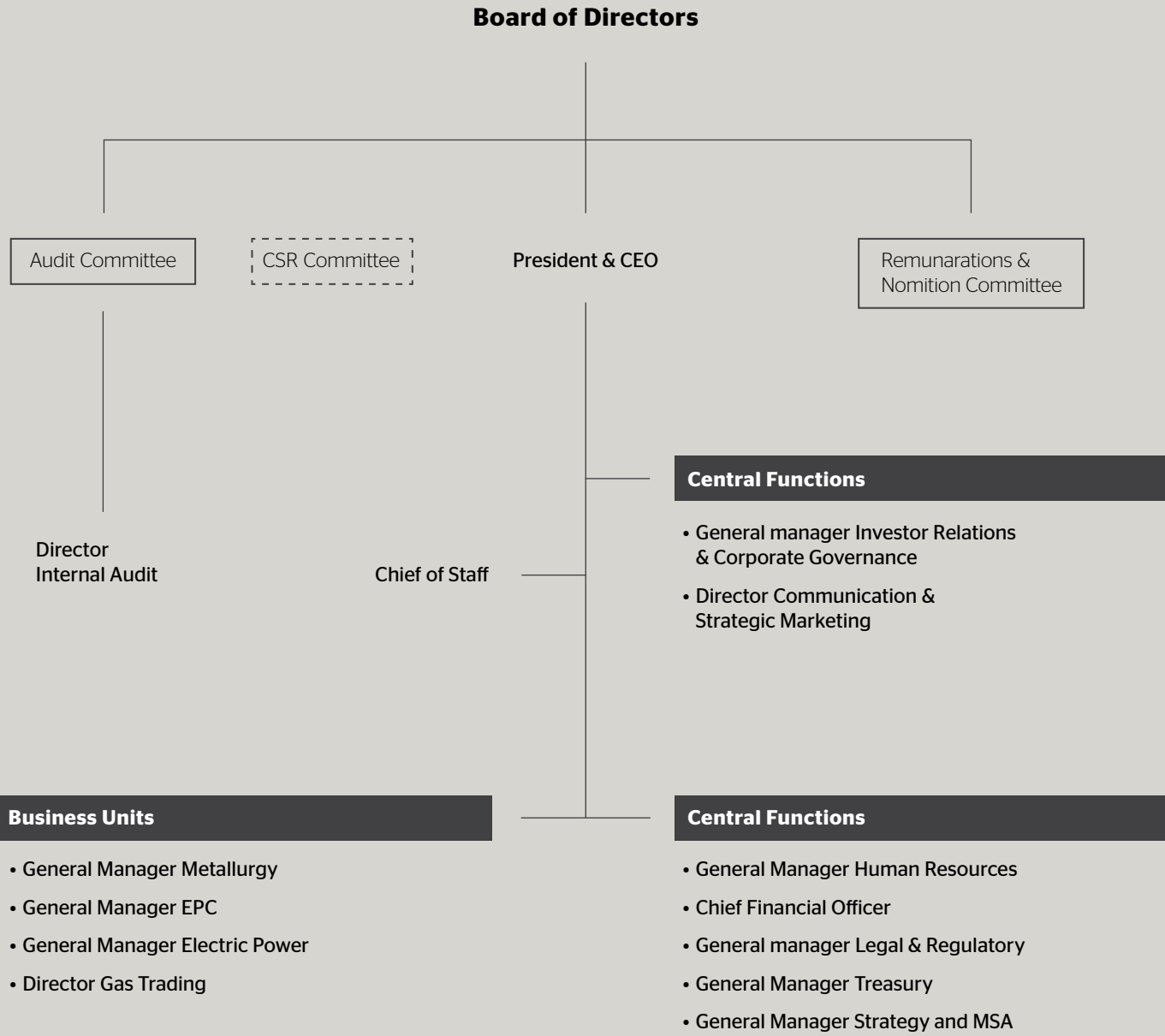
and roles for the coordination of projects is determined with a central control system for the entire company. The organizational chart displays the organization posts, the hierarchical link between them (full connection lines) and, should there be any, the functional relations between various positions (focused connection lines). Through ranking levels, it is determined each time the hierarchically superior position of reference that carries the responsibility of development, mobilization and performance evaluation.

Internal procedures

The internal procedures include MYTILINEOS policies and: a) provide information on the company's organization for developing a common understanding between employees, b) clarify roles and responsibilities in issues where competent persons intervene from different Business Activity Sectors and Central Services, c) define the way of Business Activity Sectors support by the Central Services, as well as the way of resolving issues resulting in the interfaces, d) define the Company's practices in human resources management issues and e) express the policies adopted by the company.

Internal Communication

The internal Communication system involves hierarchical communication for the coordination of operations, as well as debriefing, mobilization and resolution of issues related to works, facilities, employees or groups of employees. The internal communication has an informative character and completes the hierarchical communication so that employees get a broad picture on issues related to the company. Finally, it also includes the informal communication between the members of the organization; this complements the hierarchical and formal internal Communication covering gaps likely to bring about dysfunctions in the organization.



MYTILINEOS management

[GRI 102-18 a,b]

General Shareholders Meeting

It is the supreme company body and is entitled to resolve upon any company-related affair. Its legal decisions bind shareholders who are absent or disagree.

Board of Directors

The Board of Directors is the guardian of MYTILINEOS Corporate Governance Principles. It consists of seven (7) to fifteen (15) directors and is elected by the General Shareholders Meeting for four-year tenure, extended automatically until the first Ordinary General Meeting, following the expiry of its tenure which cannot exceed five years. Within a short period of time, after the merger, MYTILINEOS evaluated its Board of Directors structure, taking into account the best practices of corporate governance and suggested a new BoD which was elected by the Ordinary General Meeting on 7 June 2018.

In particular, upon examining the new BoD structure, MYTILINEOS set as objective to maximize the independence and to boost the capacity of the BoD as a body, as well as of the practices it applies, by attracting members who shall be able to contribute collectively the required collective and special skills drawn from the sectors of their experience, so that the Company can cope with the challenges for its business growth in the future.

MYTILINEOS sought to achieve the optimum diversification of skills, views, capabilities, knowledge, qualifications and experience, including the gender representation in the BoD synthesis. In brief, the selection and evaluation procedure followed by the company is as follows: [GRI 102-24 a]

The process of need identification involved profiling the required skill set and projected needs, key competencies functional skill sets and industry backgrounds for the members of the Company’s Board. Based on these, role specifications were prepared, and the search strategy was defined. The identification of potential candidates included individual early due diligence and background checks, in order to prepare a list of candidates who were then interviewed by the Company.

The core competencies used for assessing all individual candidates were the following:

- Board results orientation
- Strategic orientation
- Collaboration & influencing
- Independence & integrity [GRI 102-24 b-iii]

Additional Selection Criteria:

In addition to the core competences, account was also taken of the following experiences, skills and qualities, so as to ensure that the Board as a whole would be credible and knowledgeable with sufficient business acumen, and able to properly evaluate corporate performance and support the Management, as well as to provide directions and guidance where and as required:

- Understanding of finance, strategy, technology, marketing, leadership and international knowhow.
- Integrity, accountability, sound judgment, confidence, incisiveness.
- Diversity in terms of age, gender and professional experience. [GRI 102-24 b-ii]

After reviewing the potential conflicts of interests of the nominees, Mytilineos came to the conclusion that no such conflicts existed. The final list of nominees submitted unbundled to the General Meeting of the Shareholders for approval. Elected Board members serve a term of four years.

The current Board of Directors is composed of eleven (11) members and was elected by the General Meeting of the Shareholders on 07.06.2018 for a term of four (4) years, due to expire on 06.06.2022. Of the total number of Board members, three (3) are executive and eight (8) are non-executive members, of which seven (7) are independent.

The Board members, bar the executive ones, who are exclusively involved with the company’s activities, as results from their CVs, are active professionally in the various sectors of their specialization, while also having other external professional engagement⁷. [GRI 102-22 iv,vii] - [GRI 102-24 b-iv]

In addition, each member of the Board has a duty of loyalty to the Company. Board members act with integrity and in the Company’s interests and safeguard the confidentiality of information that is not publicly available. They must not have a relationship of competition with the Company and should avoid any position or activity that creates or appears to create a conflict between their personal interests and those of the Company, including holding positions on the board of directors or the management of competitor companies, without permission from the General Meeting of the Company’s shareholders. Board members must contribute their experience and devote to their duties the necessary time and attention. Prior to their appointment, they should notify the Board of Directors of their other professional commitments, including significant non-executive commitments, to companies and non-profit institutions, and should report to the Board any changes in such commitments, as soon as these arise.

⁷ The concise curriculum vitae and other professional engagements of the BoD members are outlined in MYTILINEOS Corporate Governance Statement, included in the Annual Report 2018, uploaded on the company’s webpage www.mytilineos.gr

Finally, the Internal Audit Department reports to the Audit Committee any cases of conflict of the private interests of Board members with the interests of the Company, which it ascertains in the performance of their duties. [GRI 102-25 a]

Role and responsibilities of the Board

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

Executive, Non-Executive and Independent Members of the Board

The Executive Members of the Board deal with the issues involved in the day-to-day Management of the Company and supervise the implementation of the Board’s resolutions. Non-Executive Members are charged with supervising the implementation of the Board’s resolutions as well as with other issues or areas of activity of the Company that have been specifically assigned to them by resolution of the Board of Directors. The independent non-executive members⁸ are members not involved in any business activity or any other commercial relation with the Company likely to affect their independent judgment.



⁸ Detailed information for the identification of the independent non-executive members are outlined in MYTILINEOS Corporate Governance Statement, included in the Annual Report 2018, uploaded on the company’s webpage www.mytilineos.gr

Name	Status	Committees	Age	Gender	Tenure in office (as at 31/12/2018)	Business leadership
Evangelos Mytilineos	Chairman & CEO [GRI 102-23]		64	M	26 years and 9 months	✓
Spyridon Kaldas	Vice-Chairman A' - Non-Executive Member		72	M	7 months	✓
Evangelos Chrisafis	Vice-Chairman A' - Executive Member		55	M	7 months	
Christos Zerefos	Lead Independent Director - Independent Non-Executive Member		75	M	10 years and 7 months	
Panagiota Antonakou	Independent Non-Executive Member	Corporate Social Responsibility Committee (non BoD)	44	F	7 months	✓
Emmanouil Kakaras	Independent Non-Executive Member	Remuneration & Nomination Committee	56	M	7 months	
Konstantina Mavraki	Independent Non-Executive Member	Remuneration & Nomination Committee, Corporate Social Responsibility Committee (non BoD)	42	F	7 months	✓
Dimitrios Papadopoulos	Executive Member	Corporate Social Responsibility Committee (non BoD)	56	M	7 months	✓
Ioannis Petrides	Independent Non-Executive Member	Audit Committee	60	M	7 months	✓
Alexios Pilavios	Independent Non-Executive Member	Audit Committee Chairman	65	M	7 months	
George Chryssikos	Independent Non-Executive Member	Remuneration & Nomination Committee Chairman	45	M	1 year and 3 months	✓
Constantine Cotsilinis	Independent Member of the Audit Committee (non-Board member) elected by the General Meeting of the Shareholders	Audit Committee	65	M	1 year and 3 months	
Secretariat						
Dr. Lida Condoyanni	Corporate Secretary	Remuneration & Nomination Committee	57	F	7 months	✓
Vasiliki Prantzou	Audit Committee Secretary	Audit Committee	37	F	5 years	
Panagiotis Psarreas	Deputy Corporate Secretary	Remuneration & Nomination Committee	38	M	6 years	

Finance	BoD membership experience	International Exposure	Specialisation	Academic Experience	International Capital Markets
✓	✓	✓	Metallurgy, Electric Power & Natural Gas, EPC		
	✓	✓	Metallurgy, Mines		
	✓		Legal & Regulatory Affairs, Energy		
		✓	Environment, Climate Change	✓	
		✓	IT, Marketing		
	✓	✓	Energy	✓	
✓		✓	Finance, Commodities		✓
✓	✓		Banks, Investments		✓
✓	✓	✓	Consumer products		✓
✓	✓		Asset Management, Capital Market Supervision, Banks		✓
✓	✓		Real Estate, Investments		✓
	✓		Auditing, Supervision, Chartered Accountant		
✓	✓	✓	Corporate Governance, Asset Management, Corporate Affairs	✓	
			Legal		
			Communication		

Role of the Chairman

The Chairman of the Board of Directors coordinates and directs the Board’s meetings and overall functioning. He heads the Board of Directors and is responsible for convening meetings, determining the agenda and ensuring the proper organisation of the Board’s activities and the efficient conduct of its meetings. The Chairman is also responsible for ensuring the provision of timely and accurate information to the Board members, as well as for effective communications with all shareholders, seeking to guarantee the fair and equitable treatment of the interests of all shareholders. In the event that the Chairman is absent or prevented from attending, he is replaced in all his responsibilities and powers by the Vice-Chairman A’, who is in turn replaced, when absent or prevented from attending, by the Vice-Chairman B’.

Role of the Non-Executive Vice-Chairman A’

The Board’s Vice-Chairman A’ replaces the Chairman of the Board in all of the latter’s responsibilities and powers, in the event that the latter is absent or prevented from attending. The Vice-Chairman A’ also chairs the procedure cornering the evaluation of the Board of Directors. Finally, he follows up on and ensures the smooth and effective collaboration and communication between the Board Committees and the Board of Directors.

Role of the Lead Independent Director

The Lead Independent Director is charged with coordinating the Board’s Executive and Non Executive Members and ensuring effective communication between them. He also chairs the procedure concerning the evaluation of the Chairman by the Board Members, as well as the meetings of the Board’s Non Executive Members. Finally, he is available and attends the General Meetings of the Company’s shareholders, in order to discuss matters pertaining to corporate governance, as and when the need arises.

Role of the CEO

The CEO follows up on and checks the implementation of the Company’s strategic goals, monitors its day-to-day management and sets out the guidelines for the Company’s Business Units and Central Functions. He supervises and ensures the smooth, orderly and effective operation of the Company in accordance with the strategic goals, the business plans and the action plan, as these are specified by the resolutions of the Board of Directors and of the General Meeting of the Company’s Shareholders. The CEO sits on and reports to the Board of Directors and implements the Company’s strategic choices and key decisions.

[GRI 102-23 b]



Board Committees and other Committees

[GRI 102-18] [GRI 102-22]

The Board of Directors is assisted in its work by the following Committees, which, in order to ensure the best possible performance of their tasks, may retain the services of financial, legal and other specialist consultants.

The **Audit Committee** meets at least four (4) times per year and its key responsibilities are to monitor the statutory audit of the Company's individual and consolidated financial statements, the financial reporting process and the effectiveness of the internal control systems, including the provision to the Internal Audit Department of general guidelines on the audit framework and the activities to be audited, to examine the activities of the Internal Audit Department, with a view to assessing its effectiveness, to receive regular updates on the

progress of the activities of the Internal Audit Department and to confirm that significant problems and weaknesses identified, as well as the related recommendations, have been notified to and discussed in a timely manner with the Management, which has taken the necessary corrective actions. Additionally, the Audit Committee has the right, when it considers this to be necessary, to request from the Internal Audit Department or from third parties any information it deems necessary in order to properly carry out its work. [GRI 102-33]

Composition of the Audit Committee (01.01.2018 - 06.06.2018)

Composition of the Audit Committee	Status	Tenure in office	Meetings during the period from 01.01.2018 to 06.06.2018 (3)	Attendance rate of meetings
Apostolos Georgiadis	Chairman	18.06.2014 - 07.06.2018	3/3	100%
Christos Zerefos	Member		3/3	100%
Constantine Cotsilinis	Member	01.06.2017 - 07.06.2018	3/3	100%

Composition of the Audit Committee (07.06.2018 - 31.12.2018)

Composition of the Audit Committee	Status	Tenure in office	Meetings during the period from 07.06.2018 to 31.12.2018 (7)	Attendance rate of meetings
Alexios Pilavios	Chairman	07.06.2018 - 07.06.2022	7/7	100%
Ioannis Petrides	Member		7/7	100%
Constantine Cotsilinis	Member		7/7	100%

Analytically, the duties and responsibilities of the Audit Committee⁹ and its Regulation Code are posted on the Company's website www.mytilineos.gr at the following address: www.mytilineos.gr/el-gr/committees/and-external-auditors#tab-audit-committee.

⁹ The items of the Audit Committee meetings are extensively reported in the MYTILINEOS Corporate Governance Statement contained in the 2018 Annual Report, which is posted on the company's website www.mytilineos.gr.



The **Remuneration-Nomination Committee of candidatures**, was set up by virtue of decision dated 07.06.2018 by the Board of Directors and consists of three independent non-executive members of the Board of Directors. By virtue of the same decision, the Remuneration Committee that had been set up based on a past decision and did not meet during 2018, was abolished.

The duties and responsibilities of the Remuneration and Nomination Committee are posted on the Company's website, at the following address: www.mytilineos.gr/el-gr/committees/and-external-auditors#tab-remunerations-committee.

The Committee's Regulation Code is currently under development.

Composition of the Remuneration and Nomination Committee	Status	Tenure in office	Meetings from 7/2018 onwards (4)	Attendance rate of meetings
George Chryssikos	Chairman	07.06.2018 - 07.06.2022	4/4	100%
Emmanouil Kakaras	Member		4/4	100%
Konstantina Mavraki	Member		4/4	100%

In addition to the two Board Committees mentioned above, MYTILINEOS has also established the Corporate Social

Responsibility Committee, composed of executive and non-executive Board members and of Company executives.





The **Corporate Social Responsibility Committee** was established by the Board of Directors resolution of 17.11.2010. Its composition, as amended by the Board of Directors resolution of 07.06.2018, comprises seven (7) members, as follows: Three (3) members of the Company's Board of Directors, of which

one (1) executive member and two (2) independent non-executive members, the Special Advisor to the CEO on CSR, the Human Resources General Manager, the Corporate Social Responsibility Manager, the Corporate Communication Manager. **[GRI 102-18]**

Composition of the CSR Committee (01.01.2018 - 07.06.2018)

Composition of the CSR Committee	Status	Tenure in office
Christos Zerefos	Chair	01.01.2018 - 07.06.2022
Evangelos Mytilineos	Member	
Sophia Daskalaki-Mytilineou	Member	
Fotios Spyrakos	Member	
Vivian Bouzali	Member	

The CSR Committee did not hold any meetings during the period from 01.01.2018 to 07.06.2018.

Composition of the CSR Committee (07.06.2018 - 31.12.2018)

Composition of the CSR Committee	Status	Tenure in office	Meetings during the period from 07.06.2018 to 31.12.2018 (2)	Attendance rate of meetings
Sophia Daskalaki-Mytilineou	Chair	07.06.2018 - 07.06.2022	2/2	100%
Dimitrios Papadopoulos	Member		2/2	100%
Panagiota Antonakou	Member		1/2	50%
Konstantina Mavraki	Member		2/2	100%
Dimitra Brakatselou	Member		2/2	100%
George Galanis	Member		2/2	100%
Trantafilia Lanara	Member		2/2	100%

The Committee held during the period from 07.06.2018 to 31.12.2018 twice and the results are presented below:

Date of Meeting	Agenda
28.06.2018	Subject 1: Establishment of the CSR Committee and appointment of Chairman.
16.07.2018	Subject 1: Approval of the draft "CSR Committee Regulation Code". Subject 2: Approval of the "CSR Action Plan - 2018".

CSR Governance

Management of the issues related to responsible entrepreneurship is exercised by the Senior Management Team of MYTILINEOS and covers all policies and actions aimed at meeting the expectations of its Stakeholders, over and above the company's legal and regulatory obligations. The system for the governance of Corporate Social Responsibility (CSR) in place at the company is presented below:

Description of the CSR Government System

CSR Committee [GRI 102-32]

The CSR Committee is responsible for monitoring and ensuring the correct implementation of Corporate Social Responsibility in the company, while at the same time checking and approving the material issues that determine the structure of the company's annual Sustainability Report. It may also act in the role of advisor to the Management of MYTILINEOS on environmental, social and ethical matters.

CEO's Office General Management

With its crucial coordinating role and also through the specialized CSR support service unit that forms part of it, the CEO's Office General Management sets the short-term strategic priorities as well as the long-term overall CSR strategy of the company. It is also responsible for providing support to all Business Sectors of the company, in order to ensure compliance with the relevant standards and with the CSR goals of MYTILINEOS.

Business Sectors

The Heads of the Business Sectors are actively involved in the management of social and environmental issues, providing the respective CSR teams of their Sector with the necessary directions and ensuring the the Key Performance Indicators (KPI's) are in line with the Group's strategic goals.

The individual CSR teams operate within specific and clearly defined duties and obligations, to implement the central strategic goals and policies, as well as the CSR programmes.

Open Social Dialogue

The Stakeholder Engagement process is a long-established principle of MYTILINEOS' responsible operation, contributing to greater transparency and to the further improvement of the CSR strategy and of the related initiatives of its individual Business Units.

Company Codes

The following codes play an important role in the governance of CSR:

1. The "Code of Business Code" of MYTILINEOS, which refers to the rules of acceptable conduct regarding the conduct of the company's Management towards employees, the principles of professional ethics and the rules that govern the conduct of employees between themselves and towards third parties.

2. The "Suppliers and Business Partners Code of Conduct", which describes the company's minimum requirements/ expectations of its supply chain actors regarding CSR-relates issues as a prerequisite for the establishment of the commercial association.

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

MYTILINEOS, operating in three key business sectors, addresses a number of different risk factors that may affect its operation, financial and non-financial status or its operating results.

Ensuring the credibility of the Company's Financial Statements is achieved through the implementation of Internal Audit and Risk Management Procedures¹⁰.

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

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

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

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

With regard to Non-Financial Information, since 2010 MYTILINEOS has introduced a specific Stakeholder engagement process for evaluating the materiality of the sustainability issues which are related to its activity. This process, combined with the corresponding prioritisation of these issues by the Company's Business Units, is at the core of the accountability policy applied by the Company.

The process for determining the material sustainability issues is an ongoing exercise that is constantly developed and improved. The purpose of this process is to highlight the issues

that reflect the MYTILINEOS's significant environmental and social impacts and influence substantially the decisions of its Stakeholders.

The presentation of these risks as well as the ways of dealing with are analyzed in the Disclosure Management approaches of each Material issue, whereas more information concerning financial risks of MYTILINEOS are presented in the Management Board Report 2018.

In addition, the Company conducts regular internal audits to ensure the appropriate and effective implementation of the risk identification and assessment processes and of the management policies for such risks.

Internal Control System

The Internal Audit Division of the Company is an independent organisational unit which reports to the Board of Directors. Its competences include the assessment and improvement of the risk management and internal control systems, as well as the monitoring of the compliance with the established policies and procedures as these are determined by the Internal Regulations of Operation, the legislation in force and the regulatory provisions.

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

Objectives of the CSR Governance System

- To highlight the scope and breadth concepts which is attributed to the concept of CSR, with the ultimate goal of preventing business, social and environmental risks.
- To identify and implement policies and initiatives that will substantially contribute to the achievement of Sustainable Development (Agenda 2030) and the

- respective national priorities.
- To balance the economic, social and environmental implications of the company's activities, while generating value for the stakeholders and all other main Stakeholder groups in general.

¹⁰ The internal control and risk management framework of the Company in relation to the preparation of the financial statements is detailed in the MYTILINEOS Corporate Governance Statement contained in the 2018 Annual Report, which is posted on the company's website www.mytilineos.gr

UN Global Compact Communication on Progress (Advanced level)

The United Nations Global Compact is a commitment platform and a practical framework for businesses which voluntarily declare their pledge to serve the Sustainable Development agenda and promote responsible business practices.

MYTILINEOS, has declared, since 2008, its commitment to uphold the ten principles of the Global Compact, disclosing on

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



THE 10 PRINCIPLES OF THE UN “GLOBAL COMPACT”	REFERENCES (Sustainability Report 2018)
1st: Businesses should support and respect the protection of internationally proclaimed human rights.	SOCIAL PERFORMANCE - Material issues: <ul style="list-style-type: none">Occupational Health & Safety (p. 70)Labor Practices & Human Rights (p. 82)
2nd: Businesses should make sure that they are not complicit in human rights abuses.	
3rd: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	
4th: Businesses should uphold the elimination of all forms of forced and compulsory labour.	
5th: Businesses should uphold the effective abolition of child labour.	
6th: Businesses should uphold the elimination of discrimination in respect of employment and occupation.	ENVIRONMENTAL PERFORMANCE - Material issues: <ul style="list-style-type: none">Environmental management (p. 48)Climate Change (p. 48)
7th: Businesses should support a precautionary approach to environmental challenges.	
8th: Businesses should undertake initiatives to promote greater environmental responsibility.	
9th: Businesses should encourage the development and diffusion of environmentally friendly technologies.	SOCIAL PERFORMANCE - Material issue: Anti-Corruption (p. 78)
10th: Businesses should work against corruption in all its forms, including extortion and bribery	

The Greek Sustainability Code



The Greek Sustainability Code is linked to the GERMAN SUSTAINABILITY CODE. The GREEK SUSTAINABILITY CODE constitutes an official framework with regards to non-financial data according to the EU Guidelines. It responds to the requirements of the Greek legislation as depicted in the provisions N.4403/2016 in combination with the circular No. 62784/06-06-2017 of the Ministry of the Economy and Development. It responds to the need for measuring the eco-

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



PILLAR	CRITERIA	REFERENCES (Sustainability Report 2018)
STRATEGY	1. Strategic Analysis & Action	<ul style="list-style-type: none">Message from the Chairman (p. 5)Strategic Priorities (p. 16)Our approach to Sustainable Development (p. 26)Disclosure Management Approaches of material issues
	2. Materiality	Materiality analysis of sustainability issues (p. 28)
	3. Objectives	<ul style="list-style-type: none">Our approach to Sustainable Development (p. 26)Disclosure Management Approaches of material issues
	4. Management of Value Chain	<ul style="list-style-type: none">Supply chain (p. 18)Stakeholders Engagement (p. 35)Social Performance-Material Issue:<ul style="list-style-type: none">Market Presence (p. 106)
PROCEDURE MANAGEMENT	5. Responsibility	Corporate Governance <ul style="list-style-type: none">CSR Governance (p. 128)
	6. Rules & Processes	<ul style="list-style-type: none">Our approach to Sustainable Development (p. 26)Disclosure Management Approaches of material issuesCorporate Governance (p. 112)
	7. Monitoring	<ul style="list-style-type: none">Corporate Governance (p. 112)Our approach to Sustainable Development (p. 26)Integration Value Creation Scorecard http://scorecard.mytilineos.gr/Strategic Priorities (p. 17)Parameters of Sustainable Development Report (p. 132)
	8. Incentive and reward systems for Sustainable Development	Annual Report 2018 (Board directors remunerations).
	9. Stakeholder engagement	Stakeholders Engagement (p. 35)
	10. Product Responsibility and innovation	SOCIAL PERFORMANCE-MATERIAL ISSUE: <ul style="list-style-type: none">Market Presence (p. 106)
ENVIRONMENT	11. Usage of Natural Resources	ENVIRONMENTAL PERFORMANCE-MATERIAL ISSUES: <ul style="list-style-type: none">Environmental Management (p. 48)Climate Change (p. 48)
	12. Resource Management	
	13. Climate relevant emissions	
SOCIETY	14. Employment Rights	SOCIAL PERFORMANCE - Material Issues: <ul style="list-style-type: none">Occupational Health & Safety (p. 70)Labor practices & Human rights (p. 82)Anti-Corruption (p. 78)Local Communities (p. 96)
	15. Equal Opportunities	
	16. Qualifications	
	17. Human Rights in the Supply Chain	
	18. Corporate Citizenship	
	19. Initiatives and Political Influence	
	20. Corruption prevention and alleviation	

This statement has been translated from the original Greek version

INDEPENDENT ASSURANCE STATEMENT

To the Management of MYTILINEOS HOLDINGS S.A.

The 2018 Sustainable Development Report (“the Report”) of MYTILINEOS HOLDINGS S.A. (“the Company”) has been prepared by the Company’s Management, which is responsible for the collection and presentation of the information contained therein. Our responsibility is to carry out a “limited level” assurance engagement on the Report.

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

Work scope and criteria

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

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

What we did to form our conclusions

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

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

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

Level of assurance

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

Limitations of our review

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

Conclusions

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

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

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

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

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

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

Responsiveness: Has the Company responded to stakeholder concerns?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Independence

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

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

Assurance team

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

Athens, 27 May 2019

For and on behalf of

ERNST & YOUNG (HELLAS)

Certified Auditors Accountants S.A.

Vassilios Kaminaris





Parameters of the Sustainable Development Report

The MYTILINEOS Sustainable Development Report (hereinafter the “Report”), published annually [GRI 102-52], refers to the review of the company's non-financial performance, supplementing its Annual Financial Report and is available online at www.mytilineos.gr.

Principles of drafting the Report

The following were taken into account for drafting the content of the Report:

- The New Standards of the Global Reporting Initiative Organisation (GRI STANDARDS). (Please refer to the relevant GRI Content Index at: <https://www.mytilineos.gr/en-us/csr-reports/publications>) [GRI 102-55]
- The International Corporate Social Responsibility Standard ISO 26000. (Please refer to the relevant table at www.mytilineos.gr/en-us/membershipsinitiatives-and-standards/about-corporate-socialresponsibility#tab-iso-2006-international-standards)
- The 10 Principles of the UN Global Compact. (Please refer to the annual Progress Report (CoP) at: <https://www.mytilineos.gr/en-us/csr-reports/publications>)

Scope of the Report

[GRI 102-45] [GRI 102-50]

This Report covers the period from 1/1/2018 to 31/12/2018 and includes data from:

- MYTILINEOS head offices and all MYTILINEOS Business Areas within Greek territory.
- The construction sites kept by the company through the Integrated Works & Infrastructure Sector, in countries abroad.
- The subsidiaries, where the parent company's participation is over 50% and are located in Greece, as stated in the Annual Report of the company

It does not include any non-financial data from Zinc / Lead Metallurgy and Natural Gas Trading operations as well as METKA EGN's data referring to the number of suppliers and Environmental performance.

Report details

The structure of the Report aims at presenting MYTILINEOS quantitative and qualitative data on meeting basic Environmental and Social Criteria as well as Governance Criteria (ESG) and has been drafted in accordance with the international GRI STANDARDS “Core option”. [GRI 102-54]
The GRI STANDARDS Index table of contents is published separately from this report and is available at the company's website <https://www.mytilineos.gr/en-us/csr-reports/publications>. Report data has been compiled and processed using internal processes and management systems for electronic databases. The content focuses on issues of sustainability that are important for achieving MYTILINEOS strategic goals and which have been pointed out via the formal Materiality process according to GRI STANDARDS: GRI 102-40 to GRI 102-47. The report's information is supplemented by the required references in the company's 2018 Annual Report.

Communication [GRI 102-53]

You can send remarks, comments or suggestions on the Report content using the specially formulated questionnaire at: www.mytilineos.gr/en-us/csr-reports/publications#tab-survey, while for more information or clarifications please refer to the following contact details:

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