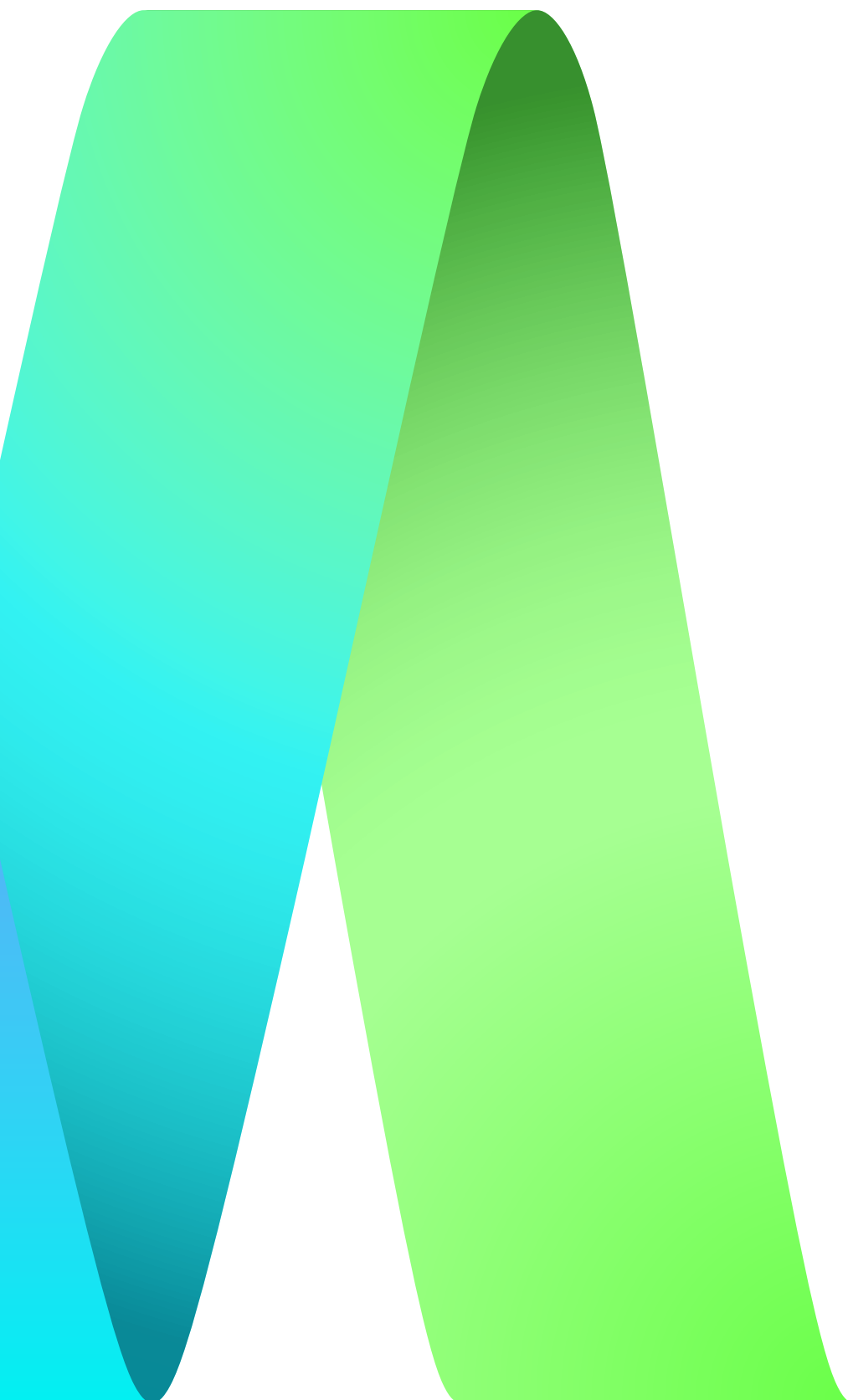


Report 2023

Sustainable Development & ESG Performance







Report 2023

Sustainable Development & ESG Performance



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ESG Performance Statement

This section aims to inform MYTILINEOS' Stakeholders about its performance on Environmental, Social and Governance (ESG) issues, as well as on the evolution of the significant performance indicators that the Company monitors (3-year trends).

MYTILINEOS takes a holistic approach to ESG criteria, enhancing its ability to create long-term value. The integration of ESG criteria in its business strategy is an important element for the responsible development of the Company, since through it seeks to:

- align its environmental, social and ethical priorities and values with its business objectives, and
- implement policies and initiatives that contribute to better management of relevant risks and opportunities by enhancing its sustainability.

At the same time, this process enhances the Company's response to specific requests related to ESG criteria, including:

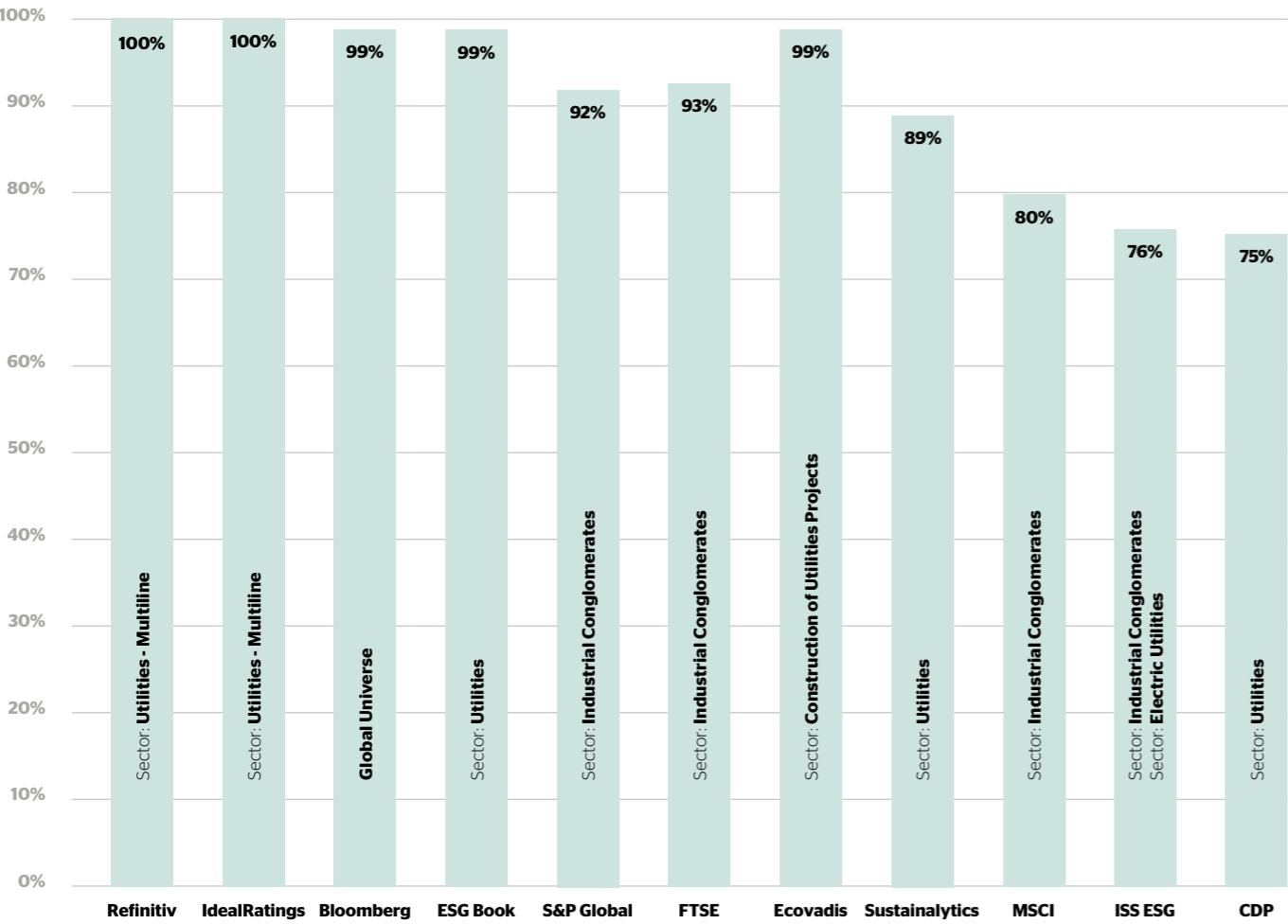
- the ever-increasing demand for relevant requests from investors and credit institutions,
- providing specialized information in the context of ESG ratings received from international organizations and
- increasing requirements in the context of Sustainable Development reporting.

International independent ESG rating agencies monitor MYTILINEOS' performance on an annual basis and, through different methodologies, evaluate the practices applied to manage and minimize ESG risks and exploit the corresponding opportunities in its operation.


In 2023, the Company received 16 ESG ratings, while remaining on track to further improve its performance and achieving significant progress, which led it to the top 10% of the best ESG performers in its field, in 7 of the 12 international organizations that evaluate it.

MYTILINEOS' percentage position in ESG rating agencies

(means that the company's performance is better than the specific percentage of the compared companies in the same rating and in the same industry)




Presence in international sustainability indices & ESG ratings




Member of
**Dow Jones
Sustainability Indices**
Powered by the S&P Global CSA

MYTILINEOS is the only company, based in Greece, selected to participate in the Dow Jones Sustainability Index Emerging Markets for 2nd consecutive year




S&P Global

MYTILINEOS, with a performance that ranks it in the top 8% of companies in its sector, participates in the Sustainability Yearbook 2023 for 2nd consecutive year.




MYTILINEOS S.A.
**MSCI
ESG RATINGS**
AA
LEADER

MYTILINEOS joined, for the 1st time, the group of leading companies in the MSCI ESG Ratings index, achieving an excellent ESG performance of "AA".




Rated
SUSTAINALYTICS

MYTILINEOS managed, for the 1st time, to be in the top 11% of Energy companies with the lowest ESG risk.




**CDP
SUPPORTER
2023**

MYTILINEOS maintained its performance (Level B), confirming once again that it undertakes coordinated actions on climate change and water resources management.




PLATINUM
2023
ecovadis
Sustainability Rating

MYTILINEOS was awarded for the 1st time with the highest distinction Platinum Award for its practices in Sustainable Development and is now one of the best performing companies.




**ENVIRONMENTAL
QUALITYSCORE**
RANKED BY ISS ESG

MYTILINEOS achieved for the 3rd consecutive year the highest score in the categories "Environment" and "Society" of the ISS Quality Score index.




FTSE
THE INDEX COMPANY

MYTILINEOS is ranked in the top 7% of companies with the highest ESG performance in the category "Industrial Goods & Services".



esgbook

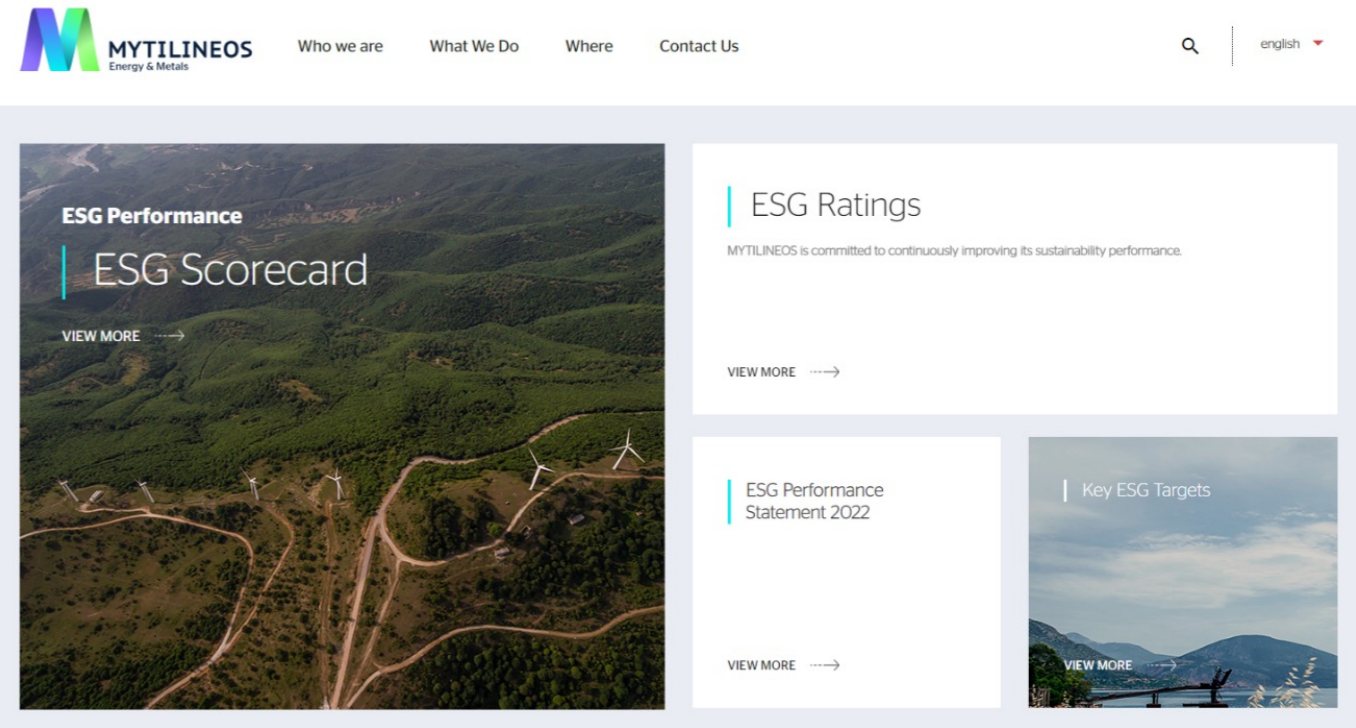
For the 1st time, MYTILINEOS managed to be in the top 1% of companies globally with the best sustainability performance, as assessed under the SASB standard.



LSEG

MYTILINEOS ranks 2nd among 49 companies in the "Multiline Utilities" sector, with excellent ESG performance and a high degree of transparency in disclosing data on material ESG issues.

More information on MYTILINEOS' individual performance is provided through the Company's official website in the following sections:



Key ESG performance indicators

	KPIs	2021	2022	2023	3-year trend
E	Total CO ₂ emissions (Scope 1 & 2 - t CO ₂ e)	4,063,959	3,922,790	4,285,345	+5.4%
	Total CO ₂ emissions (Scope 3)	5,612,393	8,720,182	7,942,217	+41.5%
	Total NO _x & SO _x emissions (t)	4,577	4,687	4,168	-8.9%
	Energy Sector: Specific CO ₂ emissions (kg CO ₂ e Scope 1 & 2 / MWh of electricity production)	322	317	297	-7.8%
	Total CO ₂ emissions avoided (t CO ₂ e) ¹	250,113	235,591	701,374	+180.4%
	Production of electricity from Renewable Energy Sources (% of total electricity production)	9.7%	9.8%	17.5%	+7.8%
	Fresh water consumption (ML) ²	5,301	5,309	4,638	-12.5%
	Solid waste reused, recycled, or recovered (% of total solid waste)	24.9%	36.9%	30.1%	+5.2%
	Landfilling of solid waste (% of total non-hazardous solid waste generated)	2.0%	1.3%	3.4%	+1.4%
	Confirmed incidents of biodiversity degradation	0	0	0	0.0%
S	Rate of restoration of exploitable area during the mining process	84.3%	84.9%	86.9%	+2.6%
	Total employment (direct & indirect employees)	4,823	5,442	6,583	+36.5%
	Turnover rate (%) ³	6.1%	8.8%	7.0%	+0.9%
	Number of fatalities (direct & indirect employees)	1	0	1	-
	Number of accidents with serious consequences on the lives of employees (direct & indirect employees)	1	0	0	-
	Incidence rate of accidents with lost time ≥ 3 days per 200,000 working hours (direct employees)	0.85	0.22	0.27	-68.2%
	Total accident frequency rate per 200,000 hours worked (direct employees) ⁴	0.85	0.33	0.40	-52.9%
	Incidents of Human Rights Violations	0	0	0	-
	Percentage of women in work (direct employees)	18.7%	20.1%	25.6%	+6.9%
	Percentage of women in positions of responsibility ⁵	21.1%	23.5%	24.6%	+3.5%
G	Average training days per employee/year	1.8	1.6	1.9	+5.6%
	Number of citizens benefiting from corporate social programmes/initiatives	52,899	89,605	162,470	+207.1%
	Number of suppliers trained on UN Global Compact principles	85	126	141	+65.9%
	Percentage of compliance with the UK Corporate Governance Code	75%	80%	82.5%	+7.5%
	Number of members of the Board of Directors	11	11	12	+9.1%
	Percentage of Independent Board Members	64%	64%	58%	-6.0%
	Percentage of women on the Board of Directors	27%	27%	25%	-2.0%
	Confirmed cases of corruption and bribery	0	0	0	0.0%
	Financial charges for non-compliance with regulations and legislation (economic, environmental, labour & social issues) (€)	0	0	0	0.0%

1. It concerns the emissions that would occur in the absence of renewable energy sources (RES) projects and in the absence of secondary aluminium production and its replacement by corresponding primary aluminium production. Regarding RES, the avoidance of CO₂ emissions is calculated by multiplying the energy produced (MWh) from RES (photovoltaic, wind, small hydro (<10MW)) in operation and the conversion factor of electricity to CO₂e based on the energy mix of each country in the reference year. The avoidance of CO₂ emissions for aluminium production shall be calculated on the basis of the specific emissions (t CO₂/t product) of primary and secondary cast aluminium respectively.

2. The difference between the total amount of fresh water pumped and the total amount of fresh water discharged. The methodology for calculating this indicator is in accordance with GRI 303-5 (2018).

3. Number of voluntary departures as a percentage of the number of direct employees of the Company as at 31.12.2023.

4. The methodology for measuring accidents has been carried out in accordance with GRI 403-9 (2018). It includes all accidents as well as accidents resulting in days off work, restricted work or transfer to another job, medical treatment other than first aid or loss of consciousness or serious injury or ill health diagnosed by a physician or other authorized health care professional.

5. Percentage of the Company's executive staff.

Key ESG Targets

		Targets 2023	Performance 2023	Targets 2024	Achievement time		
E	Total reduction in total Scope 1 & 2 CO ₂ emissions (compared to base year 2019) (t CO ₂ e)	-30%	-7.7%	-30%			
	Metallurgy Sector: Reduction of total Scope 1 & 2 CO ₂ emissions (relative to base year 2019) (t CO ₂ e) ASI	-65%	-11.2%	-65%			
	Metallurgy Sector: Reduction of specific CO ₂ emissions (tCO ₂ e) per tonne of aluminium produced (relative to base year 2019)	-75%	-17.4%	-75%			
	Energy Sector: Reduction of specific CO ₂ emissions (kgCO ₂ e) per tonne of KWh produced (relative to base year 2019)	-50%	-9.7%	-50%			
	Metallurgy Sector: Fluorine emissions (kg/t Al) ASI	≤ 1.25	✓	≤ 1.25	Annual		
	Metallurgy Sector: Carbon tetrafluoride emissions (kg CF4/t Al) ASI	<0.05	✓	<0.05	Annual		
	Metallurgy Sector: Sulphur dioxide (SO ₂) emissions (kg/t Al) - electrolysis process ASI	≤ 15	✓	≤ 15	Annual		
	Total production of secondary aluminium(t)	65,000	55,878	65,000			
	Metallurgy Sector: Total water withdrawal (industrial & drinking, m ³ / day) ASI	≤6,500	✓	≤6,500			
	Final disposal of hazardous solid waste in the landfill (kg/ t Al) ⁶	<50	✓	<50			
S	Significant environmental incidents	0	✓	0	Annual		
	Restoration rate of the total exploitable area from the mining process	87.0%	86.9%	87.0%			
	Number of fatalities	0	✓	0	Annual		
	Occupational diseases	0	✓	0	Annual		
	Number of serious accidents	0	✓	0	Annual		
	Incidence rate of accidents with lost time ≥ 3 days per 200,000 working hours (direct employees)	<0.3	✓	<0.3	Annual		
	Frequency rate of total recorded accidents per 200,000 hours worked (direct employees)	<0.6	✓	<0.6	Annual		
	Incidents of Human Rights violations	0	✓	0	Annual		
	United Nations Women's Empowerment Principles (UN WEPs)	Adoption of principles	In progress	Adoption of principles			
	Employee performance assessment rate ⁷	>80%	✓	>80%	Annual		
G	Retention rate of full-time employees ⁸	>90%	✗	>90%	Annual		
	Number of citizens benefiting from the development of social programmes	-250,000	162,470	-550,000			
	Percentage of key suppliers assessed against ESG criteria	40%	47%	68%			
	Percentage of women on the Board of Directors	30%	25%	30%			
	Confirmed cases of corruption and bribery	0	✓	0	Annual		
	Financial charges for violation of the Code of Business Conduct (€)	0	✓	0	Annual		
	Confirmed incidents of non-compliance with regulations and legislation (economic, environmental, labour & social issues)	0	✓	0	Annual		

6. Metallurgy Sector (Electrolysis, Smelter and Anodes activities).

7. The percentage in 2023 was 83.7% and related to employees who qualify to be included in the annual performance review process (i.e. excluding those who have been with the Company for less than 6 months, as well as special categories of employees based on role/object).

8. Retention rate of full-time workers in 2023 was 86.8%.

Short-term targets (1-3 years)

Medium-term targets (4-7 years)

Long-term targets (8-10 years)

Report parameters

MYTILINEOS' Sustainability Report (hereinafter referred to as the "Report") is published on an annual basis [\[GRI 2-3-a\]](#) and refers to the review of the Company's Non-Financial Performance, complementing its Annual Report. The Company's Sustainable Development Report and Annual Report are fully aligned with both the reporting period of the information and the official time of its publication, which is the date of the Annual General Meeting of the Company's Shareholders. The Report is also available in online form on the official [website](#)¹ of MYTILINEOS. [\[GRI 2-3-b\]](#) [\[GRI 2-3-c\]](#)

Principles of drafting the Report

The Report has been prepared in accordance with the Global Reporting Initiative (GRI STANDARDS), the 10 Principles of the UN Global Compact, the AA1000AP 2018 Accountability Principles, the international standard of Corporate Social Responsibility ISO 26000, while key indicators of the Sustainability Accounting Standards Board (SASB) are used. In addition, the Report is in accordance with the relevant obligations arising from Greek legislation and European Directives.

Scope of Report

This Report concerns the period from 1/1/2023 to 31/12/2023 [\[GRI 2-3-a\]](#) and includes data from all core activities listed in the following table, which identify the Company's impact on Sustainable Development, by Business Sector and subsidiary, in Greece and abroad, and especially where MYTILINEOS' participation is above 50%, as stated in its Annual Report. [\[GRI 2-2-a\]](#) [\[GRI 2-2-b\]](#)

Business Sectors	Main activities [GRI 2-6-a]
METALLURGY ASI	<ul style="list-style-type: none">Bauxite Mining.Production of anhydrous and hydrated alumina.Production of aluminium alloys.Processing of aluminium alloys.Operation of port facilities, loading and unloading of products and raw materials.Production of advanced steel structures.
ENERGY	<ul style="list-style-type: none">Design, construction, operation, maintenance, management, and operation of gas-fired thermal power plants.Development, construction and operation of solar energy projects, energy storage and other renewable energy projects.Generation, management of electricity and PPAs.Supply of electricity and natural gas to business and end consumers, as well as the provision of new retail products & services.Supply and marketing of natural gas, mainly in the Greek market, through the transportation of LNG cargoes.Development and construction of network upgrade projects in Greece and abroad.Development and construction of specialized energy projects (conventional, energy transition, electricity saving and digital transition projects).Cross-border trade in electricity and gas.Aggregate representation of RES / CHP producers on the electricity markets
Basic Subsidiaries	Main activities
METKA ATE	<ul style="list-style-type: none">Undertaking public and private sector infrastructure projects (roads, railways, buildings, etc.)Undertaking environmental management, and wastewater & solid waste treatment projects, both as a contractor of integrated EPC projects and as a provider of specialized technological solutions.
M CONCESSIONS	<ul style="list-style-type: none">Undertaking of Concessions and Partnerships (PPP) projects in Greece and abroad.

1. <https://www.mytilineos.com/sustainability/reports/sustainable-development-reporting/>

Details of the Report

The structure of the Report aims to present quantitative and qualitative Sustainable Development data of MYTILINEOS and to meet basic Environmental, Social and Governance criteria, while it has been prepared in accordance with the international GRI STANDARDS.

The data and information presented in the Report are collected, at first level, based on the procedures and recording methods applied in the Business Sectors and subsidiaries of the Company, but also from the databases maintained in the context of the implementation of central corporate systems. The data are then forwarded to the Central Division of Sustainable Development for further processing, evaluation, synthesis, and publication, through the integrated system for collecting and managing Sustainable Development information and performance, which consists of an internal development software platform (specially designed Excel files based on GRI Standards).

The calculation of the data composing the performance indicators included in the Report generally follows the definitions and methodology described in the respective GRI Standards and SASB Metrics. The data are checked and verified through the SAP system (where available) as well as by internationally accepted verification methods such as ISO 45001 Occupational Health and Safety management systems, ISO 14001 Environmental Management Standard, and ISO 9001 Quality Management Standard available to the Company. It also includes data derived from direct measurements or estimates, while for comparability reasons, mainly three-year data are reported. The calculation of overall performance is mainly done by consolidating (summing up the relevant quantities) the individual data coming from the Business Sectors and the Company's subsidiaries.

The content focuses on the Sustainable Development issues that are important for the achievement of MYTILINEOS' strategic goals and which were highlighted through the official Materiality process. The information in the Report is supplemented by the required references to the Company's Annual Report 2023. Some numbers have been rounded for homogeneity and better display.

Specifically for the Metallurgy Sector, throughout this Report, the information concerning the certification of the Aluminium plant with the Aluminium Stewardship Initiative (ASI) standard is accompanied by the distinctive mark: **ASI**.

External assurance

MYTILINEOS recognizes the importance of external assurance of the annual Sustainability Reports it publishes, aiming at transparency and enhancing the reliability of the data and information presented therein. To this end, the Company's Corporate Governance and Sustainable Development General Division assigned to the independent audit firm KPMG the external assurance of the content of the 2023 Report. The Independent Assurance Statement is included in this publication (p.166-173) [\[GRI 2-5-a\]](#) [\[GRI 2-5-b\]](#)

Changes compared to previous versions

In this year's Sustainable Development Report, the information structure follows the new GRI STANTARDS that are valid from 1/1/2023, resulting in additional information on Material topics compared to that given in the corresponding Report of 2022. Also:

- Correction to the total amount of indirect scope 3 emissions of the year 2022 (Table: Gaseous emissions in metric tons of CO₂

equivalent, p. 60-61) where a category was added that was not included in the final total, while the individual quantity of emissions was normally published.

- Correction to total energy consumption for the years 2021 and 2022 (Table: Total energy consumption (TJ) p. 57) following the improvement of the system for calculating energy consumed.
- For the years 2021 and 2022 (Table: Basic energy intensities, Energy Sector p. 58) the specific production consumption (TJ consumption of natural gas / TJ of electricity & steam production) was revised to include in addition to electricity production the production of superheated steam by the Cogeneration unit.
- The Table "Metallurgy Sector - Specific Emissions of Air Pollutants (t CO₂ eq.)", p. 59, has been revised to present scope 2 CO₂ emissions derived from the conversion factor of electricity consumed into CO₂ equivalent [DAPEEP 2022, [ENEPEIAKO-MEIFMA-2022.pdf](#) (dapeep.gr)].
- Revision for the years 2021 and 2022 of the indicator "Human Capital - ROI" (Table: ESG Performance Indicators - Social Indicators) p. 144. The revision then results in improvements to the Company's human capital value calculation system.
- Correction in the calculation of the total number of hours of implementation of external programs in order to reflect absolute hours of implementation, which are unaffected by the number of trainees participating in these programs (p. 106).
- Correction of financial data for the year 2022 (Table of Economic Value [\[GRI 201-I\]](#), p. 24, due to revision of data carried out in 2023. [\[GRI 2-4-a-i\]](#) [\[GRI 2-4-a-ii\]](#)

Contact [\[GRI 2-3-d\]](#)

Comments, comments or suggestions on the content of the Report can be sent through a specially designed questionnaire available digitally on the corporate website at the following email address: <https://www.mytilineos.com/sustainability/reports/sustainability-report-evaluation-questionnaire/>, while for more information or clarifications you can contact the following contact details:

George Galanis

Director of Sustainable Development
MYTILINEOS S.A.
Artemidos 8
Maroussi, 15125 Athens
E-mail: sustainability@mytilineos.com

Message from the Chairman



We are going through a new business era, where information related to Sustainable Development issues is gaining increasing economic importance. This is due to the ever-changing nature of the risks faced by businesses due to environmental changes, climate change, as well as increasing investor, social and legislative pressure for more transparent and responsible business practices. At the same time, exogenous factors such as pandemics, wars, social inequalities, and economic crises significantly affect the business environment and reinforce the need for resilience and adaptability.

The positive impact of our business activity on Sustainable Development

In this new era, MYTILINEOS has designed and implemented a business strategy based on its collaborative business model ensuring strong performance, creating vertical integration, cost savings, hedging the risks of its individual activities while being governed by the principles of Sustainable Development. The Company's business choices, especially in recent years and culminating in its latest transformation, are the greatest proof of its commitment to create a new era with activities characterized by a strong positive economic, social, and environmental footprint.

Specifically in the Energy Sector, MYTILINEOS is now a global manufacturer and contractor of solar energy and energy storage projects. With the construction and operation of RES projects, as well as the large projects of energy storage solutions with batteries, we contribute significantly to the energy mix of both our country and the other countries that are active in tackling climate change.

At the same time, by supplying electricity and natural gas, we are active in the retail market at competitive prices, serving more than 550,000 customers. Simultaneously, we develop advanced customer-centric services, with unlimited opportunities benefitting consumers, elements that are critical for the transition to a low-carbon economy, and the creation of a relevant culture.

Our activity in the development of energy infrastructure, with the construction of large-scale turnkey energy conventional projects and penetration into network upgrade projects in Greece and abroad, such as the construction of the first high-power submarine interconnection in the UK is designed to harness the huge

energy potential in Scotland's RES, in order to transfer clean energy to households and wherever else is required. This project plays a key role in the electricity value chain, which is essential for the smooth functioning of society and has indirect benefits through greenhouse gas mitigation objectives and thus climate change mitigation.

In addition, the utilization of natural gas by the Company in electricity production, through imports and trading, or even through the development of natural gas power plants to support the increased needs of electricity demand, ensures stable energy supply to the networks, when renewable sources are not available, as well as domestic and European energy security. It should be noted that natural gas has been officially recognized as a transitional fuel, following the conclusions of COP28 in the United Arab Emirates.

Regarding the Metals Sector, our activity in the production of recycled aluminium is at the core of the circular economy. It is associated with the use of much less energy and therefore significantly fewer greenhouse gas emissions, which contributes positively to mitigating both global warming and climate change and the need to consume bauxite, which is a key natural resource.

Additionally, the production of primary cast aluminium, although a highly energy-intensive process, creates significant value due to the recyclability, durability and contribution of the material to energy-efficient applications, and for this reason its demand is expected to increase significantly in the coming years. This activity is aligned with key Global Sustainable Development Goals, significantly enhancing employment in the domestic industrial sector, thus contributing substantially to the local and national economy.

At the same time, our Sustainable Development strategy incorporates policies that are considered vital for our long-term success and competitiveness at all levels, such as:

- On an economic level, our policies contribute to operational efficiency and cost savings. Examples include the adoption of energy-saving measures and the reduction of carbon emissions leading to significant savings in the medium and long term.
- On a social level, policies that improve our relationships with our stakeholders – from employees to local communities – have the effect of attracting and retaining skilled, talented

employees and maintaining social acceptance of our operation by local communities.

- At an environmental level, the Company mitigates its environmental footprint through its policies, reducing the risk of depletion and contamination of natural resources, and consequently the relevant regulatory sanctions. This not only protects the company from potential future liabilities, but also enhances its reputation among its customers and consumers, who are increasingly aware of the environmental impact of their purchases.

Key achievements and performance against targets for 2023

We continue our efforts, and adjustments to our operating model, in order to always lead in our Business Sectors in terms of Sustainable Development.

As in previous years, likewise in 2023, we managed to achieve our goals, which are presented in detail in this Report as well as in the Company's Annual Report, for each Material Issue, but also to draw lessons from the challenges we faced, particularly with regards to the issue of security.

In terms of overall ESG performance, again in 2023, we remained on a path of further improvement achieving significant progress, which led us to the top 1% of the best ESG performers, while also becoming a leader in our industries, according to 5 of the 12 international organizations that evaluated us. Characteristically, I mention the inclusion of MYTILINEOS, for the first time, in the category of leading companies in its sector "" in the MSCI ESG Ratings index, achieving an excellent "AA" ESG performance rating, our ranking in the top 11% of companies in the energy sector with the lowest ESG risk, according to the strict ESG rating of Sustainalytics, as well as the fact that MYTILINEOS is the only company, based in Greece, selected to participate in the Dow Jones Sustainability Index Emerging Markets for a second consecutive year.

In addition, the evolution of the specific hybrid intensity indicators we monitor, which mainly reflect the relationship between our environmental and economic performance, was also very important. These ratios continued to decline for the fourth consecutive year, indicating that the enhancement of the value of our Company's financial capital (net profit growth) has a lower impact on the

natural resources we use in order to conduct our activity. Indicatively, I mention the reduction of CO₂ emissions (Scope 1 & 2) >80%, as well as the reduction of water consumption >77% per million net profits with 2020 as the base year.

Key objectives for the next 3-5 years

We seek to be effective in the conditions that are being formed, but also in those that will occur in the coming years, in order to be able to create value for our shareholders and the rest of our Stakeholders. Our main goal is the smooth operation and further improvement of our collaborative and diversified business model, in order to make our Company even more resilient amid the costly struggle towards the energy transition.

In this direction, we continue the implementation of our Sustainable Development strategy, setting as our main priorities for the next 3-5 years: a) the review of our climate initiatives and targets in the context of securing our climate commitments, b) the implementation of the strategic development plan of our people focusing on corporate culture, equity, inclusion and skills development, c) the development of our environmental and human rights due diligence framework, covering most of our value chain, d) the completion of the digital transition of our key functions, including those related to the management of Sustainable Development and e) the publication of our first Integrated Report, in 2025, which will incorporate financial and Sustainable Development data, enabling a more holistic and transparent picture of our overall activity and performance, sending a strong message to investors, customers and society about how our economic and business evolution is being implemented, in parallel with our commitment to the principles of Sustainable Development.

We, at MYTILINEOS, continue to grow in business, operating responsibly with the aim of enhancing the value of every resource (economic, human, natural, social) we use for the production of our products and the development of our services, so that we can continue to pay dividends to our shareholders and maintain the social acceptance of our operation.

Evangelos Mytilineos
Chairman of the BoD and CEO
[\[GRI 2-22\]](#)



Business profile, sectors & areas of operation

Our Vision

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

Our Mission

“We operate in demanding local and international markets, with ingenuity, efficiency and respect for the environment and society. We rely on the potential of our people and create value for our customers, shareholders, employees and the Greek economy.”

Our Corporate Values

- Effectiveness with Safety First.
- Relentless struggle of our People for Competitiveness.
- Respect and Important Role for each Employee.
- Two success factors: teamwork and excellence.
- Continuous Progress by Everyone in Everything We Do.

Business Profile

MYTILINEOS – Energy & Metals (the "Company" or "MYTILINEOS") is an international industrial and energy company operating through two main business sectors, Energy and Metals. It is strategically placed at the forefront of the energy transition as an integrated Energy Provider, while establishing itself as a benchmark of competitive "green" metallurgy at European and global level. It has a dynamic presence in all 5 continents, is listed on the Athens Stock Exchange, with a consolidated turnover of €5.492bn., with 6,583 direct and indirect employees and more than 14,000 suppliers, in Greece and abroad. 2023 was the first year that the Company operated under its new organizational structure, following the transformation announced in December 2022 aimed at further developing and improving the competitiveness of all its activities, internationally. The new transformation has created two business segments, the Energy Sector, and the Metallurgy Sector, which are fully connected and complementary while allowing synergies that unlock multiple value for both the Company itself and its employees, shareholders, suppliers, and other groups of its Stakeholders. In addition, it transforms MYTILINEOS into an even more dynamic and flexible company, oriented towards the trends of energy transition and digital transformation, focusing on Sustainable Development and Circular Economy.

[GRI 2-1-a] [GRI 2-1-b]

ENERGY SECTOR

Today, MYTILINEOS is the largest private company operating in the entire energy spectrum and is an integrated energy utility, from the development, construction and operation of thermal plants and RES projects, the design and construction of electricity infrastructure projects, to the supply of retail electricity and natural gas, the supply and marketing of natural gas and the provision of competitive energy products and services (energy efficiency and upgrade, Smart Cities services and hydrogen infrastructure, etc.).

Through Protergia, it is active in the supply of electricity and natural gas to the retail market, aiming to offer reliable solutions, competitive products and modern services to businesses, professionals, and households, which now extend to services such as energy efficiency, smart cities, facility management, Internet of Things / digital services, etc., serving the needs of its customers. It is the largest independent electricity producer and supplier in Greece, with private investments in high-tech plants, has deep knowledge of the electricity market, and continuously implements environmentally friendly investments, contributing to the Greek economy and employment. With an energy portfolio with a capacity of more than 2 GW, exceeding 13.5% of the country's active and licensed installed capacity from thermal plants, it has a powerful Energy Management that concerns beyond the management and operation of thermal power plants of total capacity, market bidding & non-physical power trading, the management of energy produced by our own generation assets (thermal and RES) as well as 3rd party PPAs, the aggregators management and the creation of green VBL products.

The company's activity in the Energy Sector is strengthened by the activity in the supply and management of natural gas and other energy products in competitive terms and customer

facing and the provision of innovative products and services for B2B large corporate customers in Greece and abroad.

MYTILINEOS is a global manufacturer and contractor of solar and energy storage projects, offering reliable solutions across the entire development spectrum of these projects, from stand-alone projects to complex hybrid systems. With strong know-how, international activity, and unparalleled responsiveness, it designs and implements high quality projects for its customers, while it has a portfolio of RES (all technologies) and storage projects in Greece and abroad, in the order of 8.5 GW.

In addition, it is a leading international contractor in the construction of specialized, large-scale, and value-added energy projects, undertaking the full range of services required for the successful execution of the project, whether it is conventional power generation projects, energy transition projects (e.g. distribution networks, hydrogen, etc.), electricity saving projects, digital transition, smart cities & IoT platforms.

In summary, the new structure of the Sector has five new activities: **M Renewables** where the entire RES portfolio was consolidated, **M Energy Generation & Management** for the management of production and energy units, **M Energy Customer Solutions** for the retail supply of energy and natural gas as well as new retail products and services, **M Integrated Supply & Trading** for B2B customers and **M Power Projects** for conventional power generation projects, energy transition projects etc.

The Energy Sector, with the variety of projects it implements as well as its activities in the production and supply of electricity and gas, requires a series of specialized supplies (materials and services) for their effective execution and completion. From the detailed study and design to the final construction and delivery of projects, as well as the maintenance of the power plants either from natural gas, or from renewable energy sources, the

Introduction

Environment

Society

Governance

Sustainability Standards & Assurance

needs of the Sector extend to various sectors, such as materials and spare parts, services, and contractors, technical and administrative as well as domestic and international transport services. The sector's supply chain extends from large multinational companies to small local businesses in emerging markets such as the Middle East and Africa. This allows the industry to select the most suitable partners according to the specific requirements of its needs, enhancing the flexibility and adaptability of its activities. The main suppliers are mainly located in Europe and China. In addition, the Sector seeks to conclude contracts with specialized local contractors and service providers in the countries where it operates, for the execution of specific tasks, while maintaining strong relationships with specialized subcontractors and service providers, which guarantee high quality and cost-effectiveness in the implementation of its services. [GRI 2-6-b-ii]

At the same time, the Sector serves an extensive customer base with a variety of needs and requirements. From large commercial and industrial customers to public organizations, as well as professional and residential customers, it covers the spectrum of demand for Electricity and Natural Gas in Greece. Correspondingly, the customer base of the Sector, based on its activity abroad, includes Power Generation-Distribution companies, Institutional Investors, Industries and Private Investors interested in solar energy and energy storage projects, from stand-alone projects to complex hybrid systems as well as in the construction of specialized, large-scale energy projects, whether they are conventional power generation and energy transition projects (e.g. distribution networks, hydrogen, etc.), or electricity saving and digital transition projects. [GRI 2-6-b-iii]

METALLURGY SECTOR

MYTILINEOS holds a leading position in the Metallurgy sector. It operates the only vertically integrated bauxite, alumina, and primary cast aluminium production unit in Europe with privately owned port facilities and the largest cogeneration unit, while it has dynamically entered the field of recycled aluminium. The international business activity of the Sector It is a driving force for the national economy, but also for the development of the Greek periphery. The "Aluminium of Greece" plant, having completed more than 55 years of operation and more than 20 years of continuous development, with investments that exceeded € 600 million. for the technological modernization of its facilities and the development of its production and productivity, is one of the strong pillars of Greek industry and has established itself as one of the strongest representatives of the sector in the European Union, with an annual production capacity exceeding 185,000 tons of primary cast aluminum and 860,000 tons of alumina. At the same time, MYTILINEOS continues to invest in the production of recycled (secondary cast) Aluminium, in which the circular economy is fully implemented, reaching a production capacity of 65,000 tons per year, significantly reducing total energy consumption per ton of production and carbon dioxide emissions. **ASI**

MYTILINEOS procures two main raw materials used in the alumina production process: bauxite and sodium hydroxide (caustic soda)

The bauxite used at the Aluminium Greece plant is mainly

diasporic type (monohydrate) and comes from the mines maintained by MYTILINEOS through its subsidiary DELPHI-DISTOMON in the area of Amfissa, and from mines of IMERYS company located in the same area. In addition, for the needs of alumina production, the factory supplies tropical and other diasporic bauxite: a) Tropical bauxite is mainly imported from Latin America (Brazil) and West Africa (such as Guinea etc.) b) Diasporic bauxite is imported either from Turkey or Montenegro. The product is purchased either directly from the producers (mines) or through dealers, and then loaded onto ships and unloaded at the port of MYTILINEOS.

Caustic soda is liquid and used in a 50% solution. All available grades, diaphragm and membrane are imported from producers located in Europe, North Africa, the US Gulf, the Middle East and East Asia. The product is loaded into liquid tanks and unloaded in the tanks of the port of MYTILINEOS and is mainly purchased through merchants.

Regarding the remaining raw materials in the aluminium production process, coal products and other raw materials are used:

- Coal products (Calcined Petroleum Coke, Coal Tar Pitch, and anodes) are purchased directly from producers located in Europe, America, Asia, and China depending on the feedstock.
- The raw materials used in the production process of electrolysis and casting: aluminum fluoride, magnesium, silicon, manganese tablets, iron tablets, chromium tablets, copper and zinc, are purchased and transported in Big Bags placed in containers via ships or trucks. In most cases the suppliers are traders. These materials are mainly purchased from China and Europe.

[GRI 2-6-b-ii]

MYTILINEOS markets two grades of alumina products: anhydrous alumina and hydrated alumina. Anhydrous alumina accounts for about 55% of total alumina sales. The product is used for the production of primary cast aluminium, mainly found in Europe. The majority of anhydrous alumina is sold to end customers through off-take agreements with merchants.

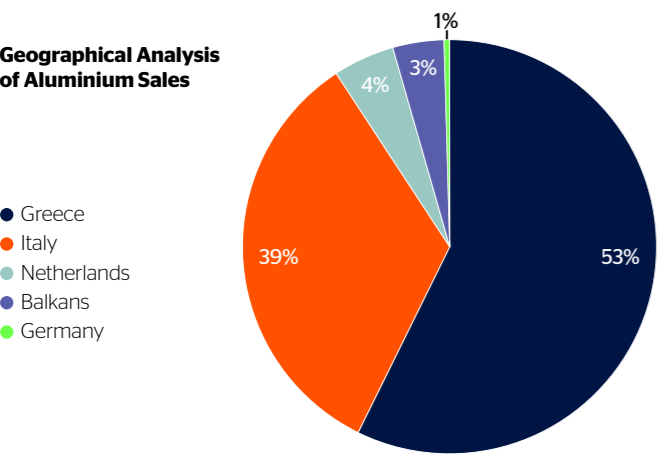
The product is loaded onto ships at the port of MYTILINEOS and sent to the port of final destination for each customer. There is also a smaller amount of alumina anhydrous sold to non-metallurgist customers (chemical industry, refractory materials, etc.), which again is sent via ships. End customers are located in various countries such as France, Germany, Romania, Netherlands, Italy, and Slovenia. Alumina hydrate accounts for approximately 45% of total alumina sales and is used for various industrial applications such as: a) Aluminium fluoride production: 40% of alumina hydrate customers, b) Water treatment coagulants: 25% of alumina hydrate customers, c) Chemical industry (various): 20% of alumina hydrate customers, and d) Adsorbents, catalysts, and flame retardants: 15% of alumina hydrate customers.

Customers are mainly located in the Mediterranean region: (Southern Europe: Italy, France, Spain plus Turkey, and North Africa) and some others in Northern Europe (Germany, Sweden, Finland). MYTILINEOS has a long-term business relationship (over 10 years) with the majority of its customers for both products.

Moreover, MYTILINEOS markets two main categories of aluminium products: columns and aluminium plates. Aluminium columns are used by extrusion companies, and the final products are rods, pipes, and profiles. Aluminium extrusion products are used in various sectors such as construction and

construction, automotive, transport, industrial, electronic, solar/energy applications, etc. Aluminium plates are used rolling companies and the final products are the flat aluminium products, such as sheets, strips, foil etc. Rolled products are usually produced in two stages: hot rolled and cold rolled. Hot rolled products can be either in the form of large plates or coiled in reels while cold rolled products are sheets, strips, and foils. Aluminium extrusion products are used by a variety of industries such as the pharmaceutical industry, The food industry, construction, automotive/transport (marine, airplanes, trucks, trains, etc.) and others.

MYTILINEOS has approximately 30-35 customers, with the majority being manufacturers, but sales are also made to dealers. MYTILINEOS maintains long-term relationships of more than 10 years with the majority of aluminium customers. The geographical breakdown of aluminium sales is as follows: [\[GRI 2-6-b-iii\]](#)



INFRASTRUCTURE & CONCESSIONS

Along with its two main business Divisions, MYTILINEOS – Energy & Metals has created two new subsidiaries, utilizing the know-how and international recognition that the Company has developed in the field of construction. These two companies will gradually claim a large share of the market for Infrastructure, Concessions and PPP projects that will be auctioned in the coming years, with more than €20 billion of capital flowing to Greece, while our Company's goal is to expand its activity in this field abroad.

Specifically:

METKA ATE is a subsidiary of MYTILINEOS – Energy & Metals, created to upgrade the infrastructure and construction sector. Through the recent transformation of MYTILINEOS, and the creation of the subsidiary, the necessary focus of management on these activities is given, its operational efficiency as a separate corporate entity is optimized and transparency in the reporting of financial figures is enhanced. METKA ATE, has a long experience in the infrastructure industry, holding a seventh-class contractor degree and is now specialized in construction activity undertaking infrastructure projects such as roads, buildings, railways, port projects, etc. but also solid and liquid waste management projects. The Company is strategically located, having advantages such as financial strength, high know-how, executives with long experience

and knowledge, in order to play a leading role in the industry, contributing substantially to the development of the country and the wider region.

M CONCESSIONS is a subsidiary company of MYTILINEOS Energy & Metals. The new company has as its sole object the bidding, financing, design, construction, operation, and maintenance of building, environmental, hydraulic and energy infrastructure projects, inter alia, through its participation in Public Private Partnership (PPP) and Concessions tenders, in close cooperation with METKA ATE which is the construction arm of the Company. The business objective of M CONCESSIONS is to consolidate and claim a leading position in the field of co-financed projects, focusing on sustainable investments that promote the development of society and improve the quality of life of its citizens.



Countries of operation 2023

[GRI 2-1-d]

Key Figures (2023)

[GRI 2-6-b-i]

50
Production units

(Industrial units: 11 - Renewable energy units in operation: 39)

6,583
Employees

(Direct & Indirect)

€5,492 million
Turnover

€623 million
Net Profit

714 thousand ton.
Sales of Metallurgy products

(Alumina: 73% - Aluminium: 27%)

14%
of the total revenues derived from sustainable
economic activities¹

€8,209.6 million
Total Capitalization

(Equity - Liabilities)

5.7 TWh
Sale
of Electricity

1. It concerns economic activities that are aligned with the criteria of the European Taxonomy of sustainable investments and provided that these revenues do not cover own needs or intra-group sales.

America

Chile ●

Europe

- Greece ●●●●●
- Austria ●
- Bulgaria ●
- France ●
- Germany ●
- Spain ●●
- Italy ●●
- Netherlands ●
- Romania ●●
- San Marino ●
- Slovakia ●
- Slovenia ●●
- Sweden ●
- United Kingdom ●●
- Albania ●
- Georgia ●
- Poland ●●
- Ireland ●
- Croatia ●
- Serbia ●
- Hungary ●

Africa

- Algeria ●
- Tunisia ●
- Ghana ●
- Nigeria ●
- Libya ●

Asia

- Azerbaijan ●
- Turkey ●
- Korea ●
- Uzbekistan ●
- Saudi Arabia ●

Oceania

Australia ●

- Metallurgy Sector **ASI**
- Energy Sector
- METKA ATE
- M CONCESSIONS
- MYTILINEOS
- Central facilities [GRI 2-1-c]
Artemidos 8,
Maroussi, 15125 Athens

Participation in Initiatives & Organizations

MYTILINEOS actively participates in domestic and international initiatives and organizations aimed at addressing the challenges of Sustainable Development. The cost of participation in both domestic and international initiatives and organizations for 2023 amounted to € 247 thousand. [GRI 2-28]



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



Since 2019, MYTILINEOS has participated in the international Aluminium Stewardship Initiative (ASI), as a member of Production & Manufacturing.



The Metallurgy Sector (Aluminium of Greece and Delphi - Distomon) was **certified within 2022** by the ASI Initiative for all its activities according to the Chain of Custody Standard.



The Metallurgy Sector **has received in October 2021 an ASI Performance Standard** for the project execution standard in all its facilities.



As a founding member of the Council of the Greek Federation of Enterprises (SEV) since 2008, MYTILINEOS is fully committed to the relevant Code of Principles and actively participates in its initiatives to promote and disseminate the principles of Sustainable Development.



Since 2006, MYTILINEOS has been **a principal member** of the CSR HELLAS Network, actively participating in and supporting its various initiatives for the promotion and dissemination of CSR principles and practices.



Since 2010, MYTILINEOS has been a member of the "Hellenic Association of Independent Power Producers", an initiative whose main objective is the promotion and management of issues related to the generation and distribution of reliable, cost-effective, and environmentally friendly electricity, as well as the deregulation of the market for all energy raw materials.



Since 2016, MYTILINEOS has been voluntarily participating in the CDP Water Security global sustainable development initiative and, since 2021, has been participating in the CDP's Climate Change Index, by publishing extensive quantitative and qualitative data regarding the management of water resources and the mitigation of the impacts of climate change in the context of its activities.



MYTILINEOS **participates in European Aluminium**, an initiative that focuses on the role of aluminium (essential for the production of renewable energy plants, electricity cables, electric vehicles, hydrogen electrolysis and so on).



MYTILINEOS **participates in the Hydrogen Europe initiative**, the aim of which is to harness hydrogen, which plays an important role in decarbonizing the economy, especially in terms of the decarbonisation of heavy industry.



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



Since 2012, MYTILINEOS has taken into account the Principles of the International Standard of Corporate Social Responsibility in its operation, disclosing its progress and performance on an annual basis.



MYTILINEOS has been an ambassador of the Greek Sustainability Code **since 2015**, having actively contributed to its development, either by submitting its views and initiatives through the open consultation process in the context of the relevant dialogue or by participating in the relevant working groups.



EcoVadis is the world's leading supplier rating agency for responsible entrepreneurship. MYTILINEOS, with its participation in the EcoVadis rating platform, **responds to the request of its customers**, giving them access to its relevant reports and performance, data that they can use as a purchasing criterion.



Through SEV, MYTILINEOS is part of the Business Europe initiative, which aims to promote growth and competitiveness at European level and to **support European companies** on the issues that most affect their performance.



In 2022, MYTILINEOS' President and CEO Evangelos Mytilineos **was elected President of the Pan-European Association Eurometaux**, which represents the non-ferrous metals industry at European level, including mining, metallurgy, processing and recycling of base metals, precious metals and secondary metals.



MYTILINEOS **participates in COGEN Europe**, an initiative that aims at cogeneration, i.e. the production of low-carbon electricity and heat in the most efficient and sustainable way.

Strategic priorities

MYTILINEOS is strategically positioned at the forefront of the energy transition as a leading and integrated "green" utility, with an international presence, while establishing itself as a benchmark of competitive "green" metallurgy at European level. The main objective of the Company is the continuous and responsible development and improvement of the competitiveness of all its activities, through continuous reinvestment and synergies between them, which unlock multiple value and ensure its viability and stable returns of its shareholders. At the same time, the dynamic business development of the Company is inextricably linked to the principles of Corporate Responsibility and Sustainable Development. The Company's strategy in this field is expressed through the implementation / support of important initiatives that contribute to the achievement of the Sustainable Development Goals, established by the UN, and the corresponding national priorities.



ENERGY SECTOR

MYTILINEOS' Energy Sector, driven by the new opportunities emerging from increased competitiveness and dynamic developments around energy, exploits the synergies between its sectors and sets its strategic priorities based on 5 main Pillars:

Utility Pillar

The largest vertically integrated private company in the field of electricity and natural gas (utility) in Greece, with presence as the leading private producer and supplier in the retail electricity market as well as a leader in imports and trading of natural gas. The Energy Sector aims to further expand its market share in electricity and natural gas supply, increasing the services and products provided with a customer-centric approach as well as expanding power and gas trading in South-Eastern and Central Europe.

Renewable Energy Sources (RES) pillar

Leader in the field of RES implementing a vertically integrated model as an integrated developer and EPC contractor with a global footprint. The development of RES projects is based on an Asset rotation model as well as on the further implementation of a significant portfolio of RES projects, contributing substantially to the effort of the power generation sector to increase the installed capacity of renewable energy sources and gradual activation in electricity storage projects, which is an important factor towards the increasing development of renewable energy production. Particular emphasis is placed on strengthening relationships and strategic partnerships with major investors in Greece and abroad in the RES sector. The strategy to increase the renewable energy portfolio supports the target of reducing specific carbon dioxide (CO₂) emissions per MWh of electricity generation by almost -50% by 2030, with 2019 as the base year.

Electricity Transmission Networks (Grid) Pillar

Dynamic penetration in network upgrade projects in Greece and abroad, both with Substations and Interconnection and Transmission, Distribution & Network (T&D) projects.

New Technologies Pillar

Design and gradual entry into the new developing markets of hydrogen (H₂) production and carbon dioxide retention (CCUS) and maximize the availability of our thermal plants and integrate more and more the possibilities given by the progress of technological tools and especially through the development of in-house customized IT tools for energy production and management.

Power Technologies Pillar

Strengthening our strong position in the EPC market for the construction of natural gas power plants. The market has returned to the design and development of natural gas power plants following the closure of lignite plants to support increased electricity demand needs. The Energy Sector with its long experience in EPC projects of natural gas power plants aims to acquire a significant share of this market, with balanced expansion in new geographical areas that present significant growth prospects and strengthening of presence in countries where we operate today.



METALLURGY SECTOR

- Continuous improvement and dedication in the field of Occupational Health & Safety.
- Continuous improvement of productivity and efficiency of facilities and processes
- Cost control in order to remain in the best possible position in the global aluminium production cost curve.
- Increase of the quantity of aluminium produced through the production of secondary aluminium.
- Reduction of total CO₂ emissions (Scope 1 & 2) by 65% and specific production emissions per ton of aluminium by 75% by 2030, with 2019 as the base year.
- Improvement of the environmental footprint with continuous investments, the development of relevant know-how and innovative solutions.

- Ensuring supply and flexibility in the supply of raw materials.
- Search and integration of digital technologies
- Providing optimal products and solutions to customers, beyond simple merchandise disposal
- Exploitation of opportunities for the expansion of the Metallurgy Sector into new fields of activity
- Reinforcement of vertical integration or enlargement, in order to strengthen the Metallurgy Sector.
- Increase competitiveness through strategic investments and hedging methods.

Value creation

2023 was a pivotal year for MYTILINEOS, setting another record in terms of EBITDA profitability, exceeding the €1 billion level for the first time in the Company's history. Equally important is the fact that this record performance was achieved in a period of lower energy and metals prices, demonstrating, among other things, the advantages of MYTILINEOS' strong synergies, the result of the coexistence of the Energy and Metals Divisions. Specifically, the Company's **turnover**, at **€5,492 million** compared to €6,306 million in 2022, was down 13%, mainly due to the significant de-escalation of energy prices. **Earnings Before Interest, Tax, Depreciation and Amortization (EBITDA)** increased significantly by 23% to **€1,014 m.** for €823 mil. in 2022, benefiting from the steady increase in the profitability of the Energy Sector and especially in the activity of RES. The above led to the substantial increase of the profit margin, at EBITDA level, by 5.4 percentage points to 18.5%, as a result of the synergies offered by the coexistence of the Energy and Metals Sectors, confirming the robustness of MYTILINEOS' business model, which produces consistently high levels of profitability, regardless of the level of energy prices.

Table of Economic Value <small>[GRI 201-1]</small>	2021	2022	2023
Value created			
Turnover (thousand €)	2,664,050	6,306,472	5,491,685
Value distributed			
Cost of sales and administrative/distribution costs (thousand €) ¹	2,249,228	5,252,977	4,427,238
Pension benefits and other employee benefits (thousand €)	114,114	324,785	195,106
Income taxes and other taxes (thousand €)	75,929	42,884	139,170
Payments to capital providers (thousand €) ²	75,322	110,392	256,749
Social Investments (thousand €)	9,179	3,900	3,282
Total (€)	2,523,772	5,734,938	5,021,545
% Economic Value distributed	94.7%	95.0%	91.4%
% Economic value retained	5.3%	5.0%	8.6%

Also, in 2023, the total financial assistance received by the Company from government agencies amounted to €2.7 million, including two main categories: i) tax reliefs and credits amounting to €1.1 million. and ii) investment, research and technology grants and other related types of grants amounting to €1.0 million. [GRI 201-4]

1. Cost of goods sold plus administrative/disposal expenses, excluding retirement and other employee benefits, taxes and fees, and community-based investments, incorporated in this amount.

2. This includes interest paid, dividends paid and leasing principal payments.

Socio-Economic impact

From approaching markets, developing and maintaining relationships with customers, sourcing raw materials, producing, promoting, selling up to the end of the life cycle of its products and generating revenue, MYTILINEOS creates an important value chain with a strong social and economic impact. In all its Business Sectors and subsidiaries, MYTILINEOS supports income, tax revenues and jobs and, correspondingly, the same applies to its suppliers and partners in their own value chain. In this way, the multiple positive impact created beyond the Company, on domestic employment and on the relevant professional sectors of the economy as a whole is produced.

Below, the summary results of the study of the economic and financial footprint of MYTILINEOS in Greece for 2023 are presented. The detailed report of the study results is available in the subsection "How we create value" of the "Sustainable development" section of the Company's [website](#).

The Socio-Economic impact of MYTILINEOS in Greece (2023)

HOW WE SUPPORT THE GREEK ECONOMY

We contribute with



HOW WE CONTRIBUTE TO NATIONAL EMPLOYMENT

We support



1. Greek GDP 2023: 220,302 MEUR. Source: Eurostat

2. Total taxes of Greece in 2023: 66,766 MEUR. Source: Eurostat

3. Total number of people employed in Greece in 2023: 4,071,300. Source: Eurostat

* direct/indirect and induced

The study was conducted by an independent consulting company with expertise in socio-economic impact, according to the Nobel Prize-winning economic "input-output" model.

Business model

1 Resources we use

Financial Capital

Our business activities require financial resources, which are sourced through cash flows from our operations, investments, equity, and loans. We manage our financial resources efficiently, supporting our domestic and international growth.

Industrial Capital

All our industrial units, the operational Renewable Energy Source (RES) units we possess, as well as the construction project sites in Greece and abroad, combined with our supply chain, enable us to offer our products and services, meeting the needs of customers and consumers.

Human Capital

Our direct and indirect employees offer their knowledge, talent, and skills across the entire spectrum of our activities, from enhancing efficiency and developing innovation in production activities to maintaining relationships of mutual trust and cooperation with local communities and our customers.

Natural Capital

Bauxite, natural gas, water, and land use are the key natural resources we utilize in our activities, which we manage responsibly and efficiently.

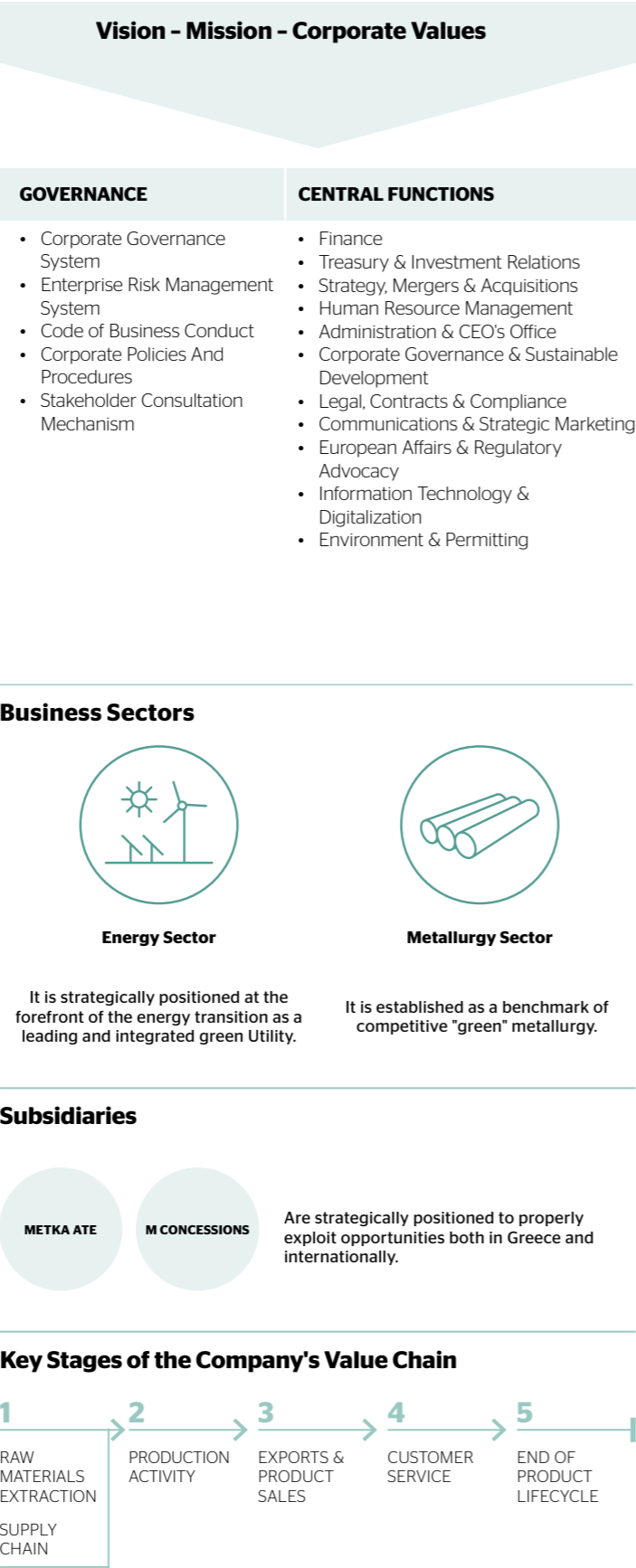
Intangible Capital

Our intangible assets include a range of topics from research & development for new products, the exploitation of bauxite residue, energy efficiency, expertise in the optimal processing of aluminum scrap, to exceptional skills, and high-level know-how that enable the company to implement complex and demanding construction projects, based on the strictest technological standards.

Social Capital

The value of the Social Capital we leverage consists of the social acceptance of our activities, our reputation, transparency in everything we do, our social investments, open dialogue, and the trust of our local communities, our customers, our suppliers, and the rest of our Stakeholder groups.

2 How we operate

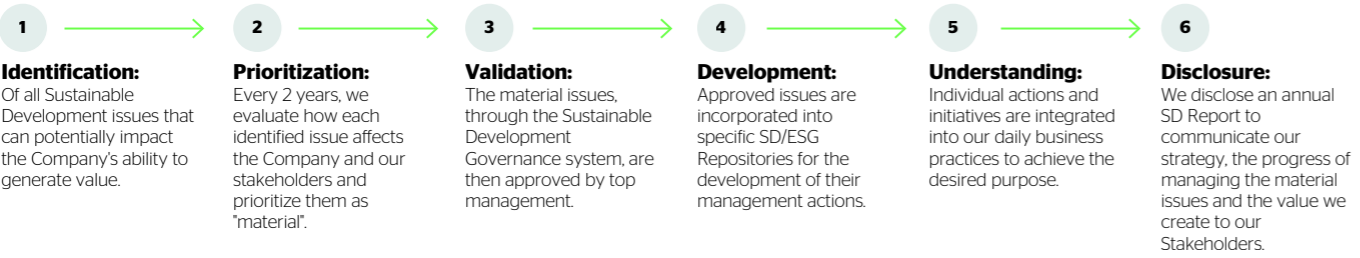


Sustainable Development

Sustainable Development Management

Sustainable Development is part of MYTILINEOS' long-term business strategy, but also the driving force through which it aspires to remain competitive over time, to address modern challenges (climate change, biodiversity loss, social inequalities, etc.) and at the same time to exploit opportunities arising from the energy transition, contributing to a new efficient and socially inclusive growth model. as reflected through the Global Sustainable Development Goals.

Over the years, MYTILINEOS has developed a systematic approach to managing Sustainable Development that aims to identify the most important issues related to its activity and the underlying challenges, as well as to further integrate sustainability into its operations. The following table shows the key elements of this approach.




Sustainable Development Strategy

MYTILINEOS' Sustainability Strategy aims to create long-term and sustainable value for its shareholders and other groups of its Social Partners, through a holistic approach that combines financial stability with social and environmental sustainability. It is implemented through three basic levels, which are inextricably linked to each other, while it is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) throughout its activity.

“We create and distribute sustainable value to all our stakeholders, pursuing our business and economic growth alongside our commitment to the Global Sustainable Development Goals”

Sustainable Development strategic Framework

	Climate Change	We participate substantially in tackling climate change and in the national effort to transition to a low-emission economy by:			
		Decarbonization of all our activity sectors by 2050.	Ambitious targets and initiatives to reduce our carbon footprint by 2030.	The development of new business activities in Sustainable Development projects	
	ESG Approach	We enhance the valuation of our corporate value through:			
		Identifying and managing material ESG risks, as well as growth opportunities	The continuous improvement of our already excellent ESG performance and disclosure.	The integration of ESG criteria into our core operations and investment decisions.	
	Corporate Responsibility	We operate responsibly towards:			
		To our people	The natural environment	The broader society	The markets we operate



- The Principle of Materiality:**
The material issues that represent our significant economic, environmental and social impacts and influence the decisions of our Stakeholders, lay the foundations for the implementation of our Sustainable Development strategy.
- The Principle of the Stakeholders inclusiveness:**
Through an open and systematic consultation process, we seek to build quality relationships of trust and cooperation with our Stakeholders, to jointly contribute to Sustainable Development.
- The Principle of Accountability:**
We are delivering on our commitment to transparency and to the regular provision of information of all our Stakeholders by publishing annually, and for more than 15 years, our Sustainable Development Report, which contains valuable data on our Non-Financial Performance.

Specifically:

The 1st level expresses the Company's commitment to tackling climate change and contributing to a low-carbon economy. MYTILINEOS is fully aware that climate change is one of the most urgent issues facing the planet. The Company, taking into account the high CO₂ intensity of its production processes, has highlighted the adaptation of its activities to the consequences of climate change and the implementation of initiatives to address it, as a key element for its sustainable and responsible development. To this end, it has a timely strategy to tackle climate change that directs its initiatives to reduce carbon dioxide emissions as defined by the Kyoto Protocol, the Paris Agreement on climate change and the corresponding National Plan of Greece, which determines its contribution to the EU Green Deal.

Strategic priorities

- adapting the Company's activities to climate consequences taking into account the relevant risks and opportunities,
- implementation, control and review of CO₂ emission reduction initiatives and the Company's climate goals and commitments.
- integrating climate objectives into strategic planning and decision-making processes
- implementation of a Renewable Energy Sources investment plan of >2.5GW by 2030.
- development of strategic partnerships for the application of new technologies in production activity, with the aim of reducing CO₂ emissions intensity
- further development of business activities in specialized energy projects and Renewable Energy Sources and Storage projects.

The 2nd level focuses on MYTILINEOS' systematic approach to recording, optimally managing and disclosing ESG risks and opportunities that may affect its performance as well as its effort to implement its strategy. Through the ESG approach, MYTILINEOS enhances its ability to create long-term value and manage significant changes in the environment in which it operates. In this way It meets both the modern sustainability requirements of the investment community, capital markets and financial institutions, as well as society's expectations for commitment and transparency on these issues.

Strategic priorities

- determining material ESG issues and linking them to the Company's financial performance
- identification and optimal management of ESG risks and opportunities to create long-term value
- enhancing trust and facilitating the flow of information between the Company and the investment community
- responsible ESG data disclosure in accordance with international standards
- continuous improvement/maintenance of ESG performance
- Integration of ESG criteria into investment decisions and key operational processes of the Company

The 3rd level focuses on the responsible operation of MYTILINEOS, which has been systematically cultivated since 2008, through the implementation of Responsible Entrepreneurship and the Company's commitment to the 10 Principles of the UN Global Compact. Responsible Entrepreneurship for MYTILINEOS is a continuous process of self-improvement and continuous learning, while it also acts as a key mechanism for renewing its "social" license to operate, while contributing

to the improvement of its competitiveness at national and international level.

Strategic priorities

- the firm commitment to its goal to ensure a healthy and safe working environment without accidents, with a view to prevention
- continuous mitigation of environmental impacts
- developing, managing, and retaining a dedicated workforce, with practices that promote an inclusive working environment, promoting equal opportunities and respecting Human Rights
- continuing its operation with a sense of responsibility and consistency towards its people, remaining their first choice throughout their professional career, while investing in education and the development of their skills
- Implementation of actions of high social value through the development of employee volunteerism
- systematic and honest dialogue with the main groups of Social Partners, seeking to maintain mutual trust and a fuller understanding by the Company of the implications of its operation
- contribution to the development of local infrastructure and overall, to the prosperity and respect of the rights of citizens of local communities adjacent to the Company's industrial units
- developing responsible procurement/purchasing by expanding the commitment of the Company's key suppliers and partners to sustainable development
- emphasis on the quality and safety standards of the Company's products as well as on the continuous support, service and satisfaction of customers

Policies and certified management systems

Today, more than ever, shareholders, customers, consumers, and even potential employees and investors are scrutinizing companies' commitment to sustainability. In this direction, the development and adoption of corporate Sustainable Development policies are becoming increasingly necessary. MYTILINEOS has a set of corporate policies that contain the guidelines governing the actions of its Business Sectors and subsidiaries, the actions of its directors, executives, employees as well as suppliers and partners in the context of its responsible operation, covering all its activities and business relationships. [\[GRI 2-23-e\]](#)

The main objective is to maintain the Company's commitment to economic growth, strengthening social cohesion and protecting the natural environment by identifying and managing the main risks and exploiting the corresponding opportunities in all material sustainability issues. Also, for MYTILINEOS, the development and integration of Sustainable Development policies is not just an ethical pursuit, but is considered vital for its long-term success and competitiveness as well as for enhancing its ability to create value at all levels:

On financial level, the Company's policies contribute to its improved operational efficiency and cost savings, such as the adoption of energy saving measures or the reduction of carbon emissions that lead to significant savings in financial resources in the medium and long term.

On social level, the policies improve the Company's relations with its social partners – from employees to local communities, thus attracting and retaining skilled talented

employees and maintaining social acceptance of its operation by its local communities.

On environmental level, the Company through its policies mitigates its environmental footprint, reducing the risk of depletion and contamination of natural resources, and consequently the relevant regulatory sanctions. This not only protects the company from potential future liabilities, but also enhances its reputation among its customers and consumers, who are increasingly aware of the environmental impact of their purchases.

The main policies and codes of MYTILINEOS, aiming at the implementation of its strategy and the identification, prevention and mitigation of the existing and potential adverse impacts of the material Sustainable Development issues described in this Report, are the following:

- Corporate Mission and Corporate Values
- Code of Business Conduct
- Suppliers & Business Partners Code of Conduct
- Corporate Social Responsibility Policy
- Environmental policy
- Quality Policy
- Occupational Health & Safety Policy
- Human Rights Policy
- Responsible Supply Chain Policy
- Major-Accident Prevention Policy (Metallurgy Sector)
- Employee Training and Development Policy
- Human Resources Selection and Recruitment Policy
- Policy for the Prevention and Combating of Violence & Harassment at Work
- Remote Work Policy
- Industrial Relations Procedure
- Anti-Fraud, Corruption, Bribery Policy
- Privacy Policy
- Policy for compliance with free competition law
- Relations with the Stakeholders
- Code of Conduct Violation Reporting Procedure

In addition, the integrated management of key Sustainable Development issues of the Company is carried out, inter alia, through the **certified Management Systems** applied:

- Environmental Management System, according to ISO 14001:2015.
- Occupational Health and Safety Management System, according to ISO 45001:2018.
- Quality Management System, according to ISO 9001:2015, in selected production units.
- Energy Management System, according to ISO 50001:2018
- Information Security Management System in accordance with the ISO27001 standard (M Power Projects of the Energy Sector, and the subsidiary METKA ATE), which was already extended in the first months of 2024 for all the Company's activities, while also within the first months of 2024 it received certification for the Information Security and Privacy Management System, according to standard ISO27701.
- Road Safety Management System, according to ISO 39001:2012, in selected activities and subsidiaries.
- Business Continuity Management System, according to ISO 22301:2019, in selected activities and subsidiaries.
- Also, the laboratory of the Aluminium of Greece S.A. plant is accredited according to the requirements of the standard ELOT EN ISO/IEC 17025:2017 by ESYD (National Accreditation Council) with the scope of analysis of bauxite, alumina

- (hydrated, anhydrous), aluminum and its alloys.
- In addition, in the Metallurgy sector, the Aluminium of Greece plant and DELPHI-DISTOMON have been successfully certified with the Performance standard-version 3 for responsible production, procurement and the Chain of Custody Standard of the Aluminium Stewardship Initiative **ASI**

Finally, MYTILINEOS' commitments in the context of its policies are based on **internationally recognized standards** such as:

- The United Nations Universal Declaration of Human Rights.
- The Basic Conventions of the International Labour Organization (ILO).
- The Principles of the UN Global Compact.
- The recommendations of the international initiative Task Force on Climate Related Financial Disclosures (TCFD)
- The Global Sustainable Development Goals (2030 Agenda).
- The United Nations Guiding Principles on Business and Human Rights.
- The Guidelines of the Organisation for Economic Co-operation and Development (OECD).
- The GRI Sustainability Reporting Standards
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - field of employment).

Remediation of negative impacts

MYTILINEOS' policies aim at the preventive management, but also at addressing the negative effects of its activity and, where feasible and necessary, initiatives are taken, and preventive action plans are created and implemented. Also, several of these policies such as the Codes of Conduct, the Human Rights Policy, the Corporate Social Responsibility Policy, the Prevention and Combating of Violence & Harassment at Work etc. highlight the Company's commitment to remedying any negative impacts, and in particular to the protection and respect of human rights. [\[GRI 2-23-a\]](#) [\[GRI 2-25-a\]](#)

In particular, the Human Rights Policy mentions the Company's commitment to their protection and respect, while it explicitly refers to the implementation of due diligence that includes taking corrective measures and actions in case of serious incidents. It also expresses MYTILINEOS' zero tolerance for the violation of Human Rights that is implemented both through non-participation (direct, passive or silent) of the Company in relevant violations, as well as by avoiding any transaction and contact with third parties that may have caused or there are reasonable grounds to suspect that they may be involved in creating conditions that may cause violations of these rights. The Policy concerns both employees and partners, suppliers, customers as well as local communities. [\[GRI 2-23-b\]](#)

In 2023, MYTILINEOS initiated the process of developing a central Due Diligence Policy, which will continue in 2024, with the aim of mapping out all the principles and rules applied to identify, prevent, mitigate, terminate and minimize the extent of potential and actual adverse impacts on human rights and the environment across the range of activities and established business relationships of the Company.

Complaint reception and management mechanisms

[\[GRI 2-25-b\]](#)

In the Metallurgy Sector, the "Aluminium of Greece" plant has a special internal procedure that activates the mechanism for receiving and managing requests and complaints from third parties on

environmental, social, ethical and general issues related to responsible entrepreneurship. The mechanism is used by all groups of social partners of the Metallurgy Sector and the submission of complaints is implemented in the following ways: 1) through a special contact form of MYTILINEOS or the Aluminium Plant of Greece, 2) by sending an email to info@alhellas.gr, 3) through the institution of the annual consultation of the Sector with its Social Partners and 4) by sending a letter by post or by telephone.

The complaint management process includes a series of stages aimed at:

- Informing the competent authority to which the request or complaint is addressed,
- Further investigation of the need and finding a possible way to satisfy the request or resolve the complaint in cooperation with the competent services of the company,
- Informing the sender about the outcome of the submitted request or complaint,
- The creation of an action plan, where required, in order to improve the Company's operation on ESG and Responsible Entrepreneurship issues,
- The review of filed complaints and the company's responses/ actions on an annual basis,
- The review and revision of the process in the context of the review of quality systems.

The Communication and Public Relations Department of the "Aluminium of Greece" plant is responsible for the management of complaints, while it regularly informs both the Management of the plant and the General Management of the Metallurgy Sector.

Also, the "Aluminium of Greece" plant has a mechanism for receiving and managing complaints concerning products and coming from customers. The receipt / submission of a complaint in the Sales/Cast quality application is done by the team of the Commercial Division and concerns cases where the customer notes the existence of malfunctions or deviations related to the product. [\[GRI 2-25-c\]](#)

In the Energy Sector, depending on the subject of each activity, there are special procedures for receiving complaints. Indicatively, for the activity of Marketing there is the "Retail Complaints Procedure", while for the activity of construction and operation of thermal plants and RES projects there is a procedure for "Handling Complaints of interested parties". Complaints are submitted through the social media of the Sector and MYTILINEOS, through special contact forms but also by sending an e-mail to info@protergia.gr or info@mytilineos.com. In addition, for the areas where construction works of new Power Plants are taking place, relations with local communities are managed and a climate of cooperation is promoted which is supported by the special process "Promotion of relations with local authorities". [\[GRI 2-25-c\]](#)

In RES projects, the assessment, management and monitoring of possible adverse environmental and social impacts or risks of a project is undertaken by the Project Execution Team, which, in cooperation with the local office, creates and maintains a complaints mechanism accessible to interested parties. At the construction sites of the Branch, internal complaints are recorded. The Site Manager or the Resident Project Manager or the Regional/Site Administration Manager is responsible for collecting complaints. Depending on the nature of the complaint (e.g. health, safety, environmental, human resources issues),

complaints are communicated to the relevant department for further management. As for complaints from external factors, it is usually the responsibility of the client as the developer.

Any proposals for improving and enriching the complaint mechanisms, on behalf of the Company's social partners, can be submitted through the various means of communication available in each Sector of activity as well as through the institution of annual consultation at local level. In addition, at the "Aluminium of Greece" plant there is an active Workers' Union with which there is two-way communication with the Human Resources Division of the Sector. [\[GRI 2-25-d\]](#)

Regarding the effectiveness of grievance mechanisms and other remediation procedures, in the Metallurgy Sector, the response measures to requests/complaints, which have been assessed as most important, are presented in the Company's annual Sustainable Development Report, while they may also constitute a specific topic of the annual local consultation of the Sector with its social partners. In the Energy Sector, the Management Systems Manager confirms the implementation of corrective actions, while within a reasonable time (mainly during internal audits), investigate the effectiveness of these actions in eliminating the causes of non-compliance. In case the actions do not bring the desired results, the process of investigation-suggestion of new corrective actions is repeated. [\[GRI 2-25-e\]](#)

Complaints mechanism

Each policy, which is issued concerns a specific topic and has a named responsible person or department for the provision of information, clarifications on the subject and care for such renewals. In case employees wish to seek advice, raise a relevant issue or report a violation of the Code, there are alternative options. In this context, they may contact any of the following persons: the Supervisor, the Director, the General Manager or directly with the Compliance Division. [\[GRI 2-26-b\]](#) [\[GRI 2-26-a\]](#)

In addition, the Company operates a whistleblowing line at central level through which it is possible to submit reports of violations in relation to the policies of personal data protection, bribery and corruption, human rights or the Code of Conduct of the Company to the Director of Compliance by telephone, fax or post, as well as by e-mail (named or anonymous) at compliance@mytilineos.com. More detailed information on this is provided within the material issues chapters of this Report. [\[GRI 2-26-b\]](#)

The above Codes of Conduct and Policies are communicated to all employees of all hierarchical levels, as well as to suppliers and partners of the Company (those that concern them) via e-mail, and are available in Greek and English, on the intranet and most of them and on the official website of the Company. [\[GRI 2-23-c\]](#) [\[GRI 2-23-f\]](#)

Alignment with the Global Sustainable Development Goals

The adoption of the 17 Sustainable Development Goals (SDGs) by all UN member states in 2015 is an important milestone for the international community. The SDGs are a global Roadmap that requires cooperation not only from the governments of developed and developing countries, but also from business, academia, NGOs and civil society organizations. Achieving them requires initiative and cooperation to ensure that no one is left behind and that the SDGs are a catalyst for tackling all forms of inequality. For Greece, as well as for all countries where MYTILINEOS operates, the SDGs offer a significant opportunity to recover from successive crises and transition to a new sustainable growth model, while focusing on all three key sectors of the global ecosystem: environment, society and economy.

Since 2016, MYTILINEOS, applying the UN SDG Compass Tool, has identified their relevance to its business activity and identified ways to contribute to their achievement, to the extent that it deserves. Since then, **it has been steadily contributing to the achievement of 40 sub-targets, focusing on 6 main directions presented below, while more detailed information is provided through the special section "Our contribution the Global Sustainable Development Goals" on the corporate website.**

1. TACKLING CLIMATE CHANGE (SDGs: 7 & 13)

MYTILINEOS' activity is directly linked to Global Goals 7 (affordable and clean energy) and 13 (climate action). The company continues its dynamic penetration in an extensive range of projects that contribute substantially to the implementation of the energy transition, internationally, while implementing specific initiatives to reduce its total CO₂e emissions (Scope 1 & 2) in the context of achieving its ambitious climate Goals and Commitments.

2. SUPPORTING INNOVATION AND SUSTAINABLE INDUSTRIALISATION (SDGs: 9 & 12)

As one of the leading industrial and energy companies, MYTILINEOS invests in the circular economy, the development of innovative waste recovery methods, the application of "clean" industrial methods, but also in blockchain and data marketplace technologies through its participation in 26 European research programs. At the same time, it steadily enhances employability in the domestic industrial sector and creates the conditions for a responsible supply chain throughout its business activity. In this way, it actively contributes, to the extent that it deserves, to Global Goals 9 (industry & innovation) and 12 (responsible consumption and production).

3. PROMOTING SECURE & PRODUCTIVE EMPLOYMENT (SDGs 3 & 8)

MYTILINEOS, in the context of its contribution to Global

1. <https://www.mytilineos.com/sustainability/un-sustainable-development-goals/our-contribution/>

Goals 3 (good health and well-being) and 8 (Decent work and economic growth), promotes and ensures safe and healthy working conditions for its direct and indirect employees with a view to prevention. Almost all its production units have occupational Health & Safety management systems certified by independent bodies (ISO 45001: 2018) while, from the very first moments when the threat of the pandemic was identified, MYTILINEOS implemented a multifaceted action plan that continues to focus on protecting its employees and their families, as well as ensuring its uninterrupted operation. The Company, along with its economic growth, continues to integrate policies & practices to enhance full and productive employment through the creation of decent jobs for all.

4. PROMOTING THE MITIGATION OF INEQUALITIES (SDGs: 5 & 10)

MYTILINEOS, as it grows, promotes in its working environment policies and practices that enhance equal opportunities, respect for Human Rights and the enhancement of gender equality. In this way, it strengthens the participation of women at all hierarchical levels, the inclusion of young workers aged 30< in its workforce as well as its effort to integrate people with disabilities into the labor market, contributing directly to Global Goals 5 (gender equality) and 10 (less inequalities).

5. COMMITMENT TO PROTECTING THE NATURAL ENVIRONMENT (SDGs: 6, 14 & 15)

As part of the Company's commitment to further reduce its environmental footprint, Best International Techniques are applied for the proper management and mitigation of environmental impacts per Business Sector and subsidiary. Investments are made to upgrade the production process utilizing, to the extent possible, new technologies, while almost all production units of the Company have environmental management systems certified with the most modern international standards ISO 14001: 2015 as well as environmental rehabilitation plans of exploitable areas, where required, thus contributing directly to Global Goals 6 (water management), 14 (life at sea) and 15 (life on land).

6. CONSISTENCY IN SOCIAL RESPONSIBILITY (SDGs 1, 2, 4 & 11)

MYTILINEOS contributes indirectly to the other Global Goals through the consistent implementation of its social policy with actions and initiatives that enhance the harmony of coexistence with its local communities and the wider society. Aiming at 550,000 beneficiaries of our social policy for the five-year period 2020-2025 , we continue to invest in the development of local employment and economy by creating jobs (Goal 1) and strengthening local suppliers and infrastructure (Goal 11), reducing food insecurity of vulnerable social groups (Goal 2), implementation of training programmes in the fields of new technologies in schools, as well as programmes for the development of the professional skills of the younger generation (Goal 4).

Moreover, on MYTILINEOS' corporate website, through the

innovative tool Sustainability Actions Map (<https://sdactions-map.mytilineos.gr/en/>) MYTILINEOS presents in a concise and aggregated manner its contribution to the achievement of the Global Sustainable Development Goals and the corresponding National priorities for the period 2016-2023.

Finally, the Company, through its Integrated Value Creation Scorecard (<https://scorecard.mytilineos.gr/index-en.html>), presents to its Stakeholders all the key resources it utilizes during its activity, the results achieved and the value produced, in combination with the 17 Global Sustainable Development Goals.





Stakeholder engagement [GRI 2-29-a-ii]

MYTILINEOS' relationships and cooperation with its Stakeholders teams are building blocks of its Sustainable Development strategy. They contribute to the further understanding of the impact of its activities, as well as to the Company's effort to consistently meet the expectations of its Social Partners by building mutual relationships of trust with them.

Stakeholder Groups and ways of cooperation

MYTILINEOS, due to its multi-level business activity, deals with a wide range of stakeholders. These different groups are recorded and prioritized every 2-3 years and are characterized as "key stakeholder groups" for the Company, based on specific criteria, in accordance with the international AA1000 Stakeholder Engagement – 2015, per business sector. The following table lists results of the internal review exercise of the Company's Social Partner groups implemented in 2022. [GRI 2-29-a-i]

	Stakeholders Groups
Category A: The high-priority Stakeholder Groups (above the average of the assessment on all 5 sub-criteria)	<ul style="list-style-type: none"> • Employees • Shareholders • Customers • Local communities • Suppliers & Financial Institutions
Category B: The medium-priority Stakeholder Groups (above the average of the assessment on specific criteria).	<ul style="list-style-type: none"> • Regulatory Authorities • Financial Analysts • Business & Sustainable Development Agencies • Media
Category C: The low-priority Stakeholder Groups (below the average of the assessment of all 5 sub-criteria).	<ul style="list-style-type: none"> • Non-Governmental Organizations • Academic Community
Note: The process of defining the groups of Social Partners was implemented per Business Sector and the 5 basic criteria (dependence, responsibility, intensity, influence and perspective) were used according to the international standard AA1000 Stakeholder Engagement – 2015, which led to the categorization of Social Partners in the above three basic categories.	

MYTILINEOS has a variety of ways of working with its Stakeholder groups, the frequency of which depends on the type of relationship it has developed with each group. This means that the Company understands and actively responds to the needs of the individuals, organizations and businesses with whom it interacts, enhancing trust and the "social" license to operate.

Stakeholders Groups	Timeless ways Communication & Cooperation
Employees	<ul style="list-style-type: none"> • Annual Stakeholder Consultation Process*. • Process of defining Material Issues of Sustainable Development**. • Annual statutory process for evaluating the performance and skills of employees. • Open daily communication with all human resources through the role of HR-Business Partner. • Continuing education and training. • Disclosure of policies when required. • Regular and extraordinary meetings between management and employees (annual institution of Hierarchy Workshops, annual meetings of the Management with employees in groups of 25 people). • Annual Sustainable Development Report. • Announcements via online platform Intranet. • Telephone line for employee service (HR Call Center). • Conduct employee engagement survey
Investment community (Shareholders – Investors – Financial analysts)	<ul style="list-style-type: none"> • Annual Regular and Extraordinary General Meetings of Shareholders • Financial Results - Annual & Half-Year results (Press Release, presentation, conference call, Company website). Quarterly results (Press Release, Company website). • Conferences, Roadshows, Meetings & Calls of the Investor Relations Division with institutional investors. • Corporate Governance Roadshow: Shareholder engagement with the stewardship teams of investors and proxy advisors. • Process of defining Material Issues of Sustainable Development**. • Announcements of business developments (Press Releases, internet). • Annual meeting with analysts. • Ability to communicate directly with the shareholder service. • Annual Financial Report and Sustainable Development Report

Stakeholders Groups	Timeless ways Communication & Cooperation
Business Partners & Suppliers	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Regular communication (even on a daily basis) through the purchasing departments of the Business Sectors of the Company. Promotion of the "Code of Conduct for Suppliers and Partners" & the "Responsible Supply Chain Policy" of MYTILINEOS. Supply chain assessment on Environmental - Social - Governance issues Assessment of social and environmental impacts. Annual training program for key suppliers (Business Responsibility for Sustainable Development).
Customers	<ul style="list-style-type: none"> Promotion and information on products and services (continuous communication of the relevant departments). Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Daily communication through the Company's Commercial Divisions. Cooperation in the context of the implementation of annual customer satisfaction surveys
Local Authorities (local communities)	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development** Regular and emergency communication (open door policy), meetings, participation in local events or consultations when necessary). Communication on an annual basis in the context of the implementation of MYTILINEOS' Social Policy. Annual Sustainable Development Report. Third Party Requests & Complaints Management Process on ESG & CSR issues by Aluminium of Greece.
Business Organisations	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Communication on an annual basis (provision of data and information, meetings, participation in consultations). Participation in events whenever necessary.
Regulatory Bodies & Sustainable Development Organisations	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Regular and ad hoc communication (provision of data and information through questionnaires, meetings, participation in consultations, whenever requested). Participation in events of the institutions on an annual basis.
Academic community	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Collaborations on an annual basis in the context of the implementation of research programs and the implementation of the Company's social policy. Participation in career events & career days at universities.
Press representatives	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Direct daily communication through the Corporate Affairs & Communication Division of MYTILINEOS for issues related to the Sectors in which the Company operates. Notification of business developments (Press Releases, Internet communication, newsletters, etc.). Organization of briefing meetings with Greek and foreign journalists when necessary. Arrange meetings with analysts
Volunteer organisations	<ul style="list-style-type: none"> Annual Stakeholder Consultation Process * Process of defining Material Issues of Sustainable Development**. Electronic platform for the submission of social requests available throughout the year. Meetings with NGO representatives, whenever necessary, as a result of the evaluation of their requests. Annual Sustainable Development Report.

* The participation of the group in this mode of partnership depends on the theme of the Consultation.

** Participation in the relevant Social Partners survey implemented every two years.

The above clearly illustrate the ways and procedures through which dialogue and the inclusion of proposals is a strategic priority and conscious choice for MYTILINEOS. MYTILINEOS' recognized Social Partner Groups are key co-shapers of integration options aspects of Responsible Entrepreneurship in all material matters, through a framework of honest relations with the Company, which includes open communication, continuous cooperation and feedback of those Social Partners who are recognized as the most suitable for any material sustainability issue. In this way, MYTILINEOS ensures the creation of shared value and puts Sustainable Development into practice both for itself Company as well as for its Social Partners, leaving no one behind, remaining faithful to its commitments to contribute to the achievement of the Sustainable Development Goals insofar as it is concerned. In particular, all the material issues analyzed below present data and information on the ways in which MYTILINEOS receives feedback from its Stakeholders, it integrates it into everyday practice, but also then informs them about the results of its management approach, policies and commitments, constantly enriching its approach with elements of innovation. [GRI 3-3-f]

The above reference is recognized as central and fundamental, covering all the issues of the relevant requirement of the GRI standard, which the Company applies in the development of this report and is placed here to avoid repetition in the material issues that follow.

Consultation Process

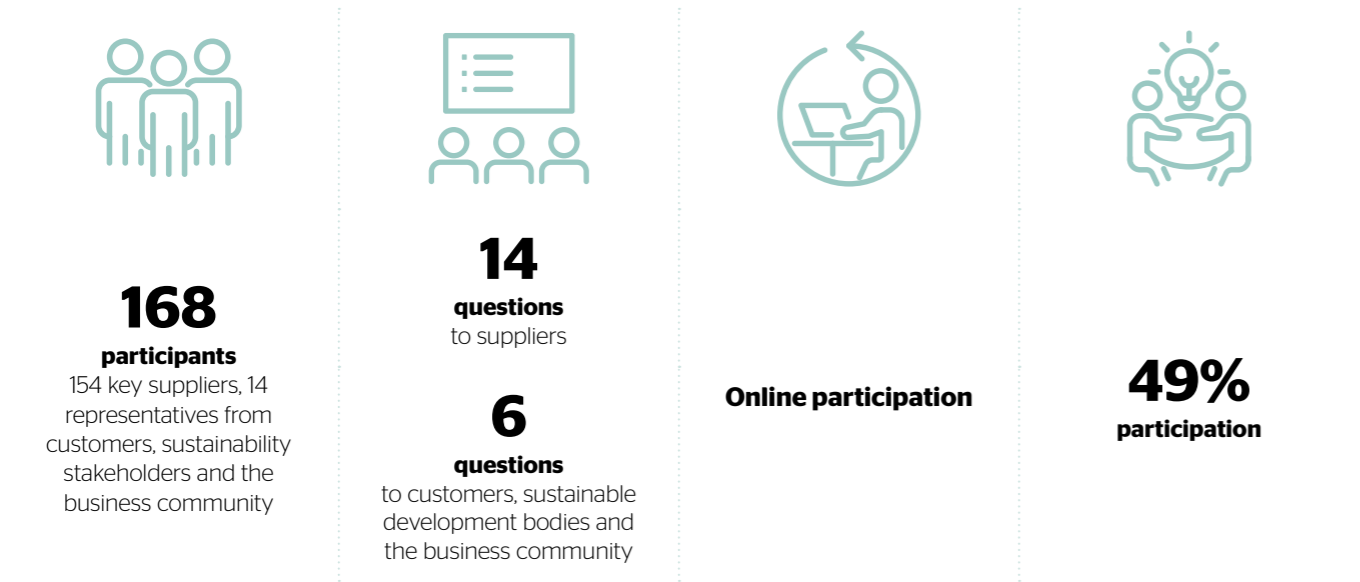
The Consultation of the Stakeholders' groups, as an institution of MYTILINEOS, is governed by specific principles and objectives, while it is carried out on an annual basis with absolute consistency, mainly at local level, addressing contemporary Sustainable Development issues that are primarily linked to its business strategy. The effectiveness and transparency of the process is ensured through the Sustainable Development Governance System of the Company, the individual Sustainability/ESG leaders & owners of MYTILINEOS' business sectors record and evaluate all proposals, ideas and concerns of the Stakeholders. The most important issues are then forwarded to the respective General Divisions in order to make decisions on how to respond to them, but also decisions that allow -where possible- their integration into business functions or strategy.

- The **main long-term objectives of the Consultation Process, as described in the relevant procedure**, are:
- i.** understanding and responding to the expectations of the key groups of Social Partners with whom MYTILINEOS communicates, cooperates and interacts in the context of its activity,
 - ii.** the verification of Material Sustainable Development issues and the dissemination of corporate values and the concept of responsible entrepreneurship,
 - iii.** the continuous effort to enhance transparency and maintain social acceptance of the company's operation,
 - iv.** to identify and bridge, in the most appropriate way, any differences between the company's policies and the perceptions of its Social Partners on Material Sustainable Development issues,
 - v.** to highlight new ways of partnership to improve and strengthen existing relationships, strengthening MYTILINEOS' policy on prevention, as well as the recognition of economic, environmental and social risks and opportunities.

In 2023, within the framework of the annual Consultation Process, the Company:

- A.** Proceeded to the implementation of a thematic dialogue with its Social Partners, at central level, on the subject: "Responsible Supply Chain Policy". The main objectives of the dialogue were:
- reflect participants' views on the new Policy in accordance with international best practices and
 - to investigate the readiness of MYTILINEOS' suppliers to meet specific commitments, as described in the Policy.

The Consultation was implemented electronically, through the sending of a structured questionnaire, in which more than 150 key suppliers of the Company participated. The active participation of the social partners and the receipt of feedback was particularly important for the Company in the context of monitoring the implementation of the Policy.



Through the detailed analysis of the main findings that emerged, it was observed that almost all of MYTILINEOS' key suppliers recognized the importance of the Policy and the completeness of its Principles. This confirms the need to improve their level of maturity, in order to fully comply with the basic requirements, set by this Policy. In addition, the potential of the Policy to contribute to the strengthening of a proactive management, on behalf of suppliers, of the important Sustainable Development issues they recognize, was highlighted. The results of the consultation are presented in detail on the Company's official website in the section "[Our relationship with Stakeholders](#)".

Finally, particularly positive comments were expressed by the participating key suppliers, focusing mainly on the due diligence developed by the Company for the environment and human rights, the continuous development/improvement of the Company and its partners on sustainability issues, the priority shown by MYTILINEOS on circular economy and sustainable development issues. In addition, several suppliers pointed out the great importance the Company places on safeguarding labor and human rights, environmental protection and the practical support it provides to small and medium-sized enterprises-partners as well as the immediate initiation of procedures for the implementation of ESG criteria that the Company aims to incorporate in its business activity.

- B.** At the same time, the Company held for the fourth consecutive year a constructive dialogue with Non-Profit Organizations focusing on:
- the further development of the already successful collaborations that have been developed with collaborating bodies,
 - identifying and reporting any problems and developing new partnership possibilities within existing partnerships,
 - acquaintance with new institutions and the design of new programs.

The dialogue took place online with the participation of 36 Non-Profit Organizations, of which 17 are current and long-term collaborations of the Company, while representatives of 19 Non-Profit Organizations were given the opportunity to present their actions for the first time, to be informed about the implementation of MYTILINEOS' social policy through the implementation of actions and initiatives and to discuss the possibility of cooperation for 2024.

- Specifically, the following issues were discussed:
- evaluating cooperation, continuing an ongoing programme/launching a new one as well as addressing any problems,
 - informing organizations about the Company's social policy goals for 2024 and their connection with the Global Sustainable Development Goals, as well as informing the Company accordingly about new NGO programs that can serve these goals,
 - the discussion on how best to reflect the quantitative and qualitative results of programmes and actions,
 - the applicability of the Social Return on Investment (SROI) methodology, highlighting the social impact of social programs, where feasible and
 - the discussion on the applicability of Corporate Volunteering, aiming at the involvement of employees in actions of organizations.

The results of the initiative were the confirmation of maintaining relations of mutual trust and benefit, easy communication and immediate response to any issue presented, the fullest briefing of organizations on current progress of Sustainable Development, as well as the development of new innovative partnerships to support actions in accordance with the axes of the Company's social policy towards the further development of its positive impact on society.

Materiality Process

Definition of Materiality topics

[GRI 3-1-a] [GRI 3-1-b]

MYTILINEOS has as a key criterion for the disclosure of information on environmental, social, and ethical issues related to its ability to create value and is therefore essential for itself and its stakeholders and sustainable development in general.

The Materiality Process is a key tool of the responsible operation of MYTILINEOS, while it contributes to the enrichment and formulation of its strategy for Sustainable Development. It is a dynamic practice that is constantly evolving. The evaluations of the material issues implemented per Business Sector are used as a basis for their respective determination at central level and vice versa. At the same time, the Company's open dialogue with its stakeholder groups feeds this process with new data annually. The cycle of evaluation of impacts and related material issues is implemented every 2 years with a mid-term review.

According to the Company's sustainable development management system, the evolution of material issues requires periodic updates and, in this context, MYTILINEOS implements relevant reviews every 2 years, taking into account changes in the particularities of its Business Sectors and trends in the needs of its stakeholders.

In addition to the standard sources used in the exercise of identifying Sustainable Development issues, additional sources of information that allow the Company to identify additional material issues include:

- i.** Environmental, social and governance criteria used by institutional investors and asset managers to select their investment portfolios.
- ii.** ESG requirements used by specialized indices and rating agencies for the Company's analysis.
- iii.** Requirements expressed by customers in the context of the Company's day-to-day business relationships and transactions.
- iv.** Publications and recommendations issued by international organizations that exert influence in the scope covered by each recognized topic of Sustainable Development.

In implementing the materiality process for the year 2023, the Company relied on the list of identified sustainability topics that had been created in 2022. Subsequently, the issues were prioritized by the two (2 main) Business Sectors, in terms of the extent that they affect the Company's ability to fulfill its business objectives, as well as in terms of the significance of the impacts that each issue represents on sustainable development.

The findings of this internal exercise were combined with the corresponding findings of a relevant field survey conducted in 2022, in individuals, institutions and organizations from all groups of the Company's stakeholders, as mentioned in the following section, in order to assess how important each issue is, taking into account the effects (existing and potential, negative and positive) it has on the economy, society, environment and human rights.

Below is a detailed presentation of the stages of the process of determining the Material Non-Financial Issues for the year 2023:

Recognition Stage	
PRINCIPLE: Stakeholder Engagement PRINCIPLE: Sustainability Framework	22 topics identified in total
Sources used in the exercise of the recognition of Sustainable Development Issues	
<ul style="list-style-type: none">MYTILINEOS' sustainable development strategy.Relevant laws, regulations, international agreements, or voluntary agreements of strategic importance to the Company (UNGC, SDGs, etc.).Significant risks for the Company.Materiality Map of the ESG disclosure standard SASB (Sustainability Accounting Standards Board).12 different international standards and initiatives for CSR and Sustainable Development (e.g. GRI, ISO26000, TI, etc.).Data from the feedback of the ESG ratings that the Company participated in.Results of the annual Stakeholder Consultation.Study of material issues of similar companies.Publicity (Study of publications to and from the Company as well as general publicity in this field during the last year).	

Prioritization Stage	
PRINCIPLE: Stakeholder Engagement PRINCIPLE: Materiality	14 topics were identified as Material
Synthesis of findings from the process of prioritizing identified issues within & outside the Company	
Within the Company <ul style="list-style-type: none">Use of a digital web application prioritizing the identified issues by reporting their relevance for MYTILINEOS, their impact on sustainable development at local and national level, as well as their correlation with the Global Sustainable Development Goals.Implementation in 2023 of workshops of the Sustainability/ ESG teams of the Business Sectors in order to prioritize the identified issues. – Confirmation and approval of the results by the respective General Directorates of Business Sectors. – Synthesis of the individual results and determination of the final value for each identified topic.	
Outside the Company <ul style="list-style-type: none">Conducting in 2022, a field survey of the Company's Stakeholder groups, by sending an electronic questionnaire for the evaluation of the 22 identified issues, to which a total of 664 individuals, companies, institutions and organizations responded.	

Table of Material Topics [GRI 3-2-a]			
Topic	Limits	Metallurgy Sector* ASI	Alignment with the UN Global Goals
1 Occupational Health & Safety	All Sectors and areas of activity	●	3, 8
2 Water Management		●	6, 12
3 Climate Change, Energy & Air Emissions		●	7, 13
4 Employment & Labor Practices		●	8, 9
5 Human Rights, Equal Opportunities & Diversity		●	5, 8, 10, 16
6 Business model			
7 Regulatory compliance		●	16
8 Sustainability of local communities		●	1, 2, 3, 4, 10, 11
9 Business continuity		●	11
10 Business Ethics		●	16
11 Pollution prevention		●	12, 14, 15
12 Cybersecurity			16
13 Responsible Supply Chain		●	8, 12
14 Circular Economy, Raw Materials & Materials		●	6, 8, 12

ESG PILLARS: ENVIRONMENT SOCIETY GOVERNANCE

We consider as material issues those with a value above the average score in internal (> 8.9) and external (> 8.3) rankings on a scale from 1 (not at all important) to 10 (very important). The 14 material issues underlying this Report include:

- the 3 most important topics for the Stakeholder groups:**
 - Occupational Health & Safety
 - Business Ethics,
 - Climate Change, Energy & Air Emissions.
- the 4 most important in terms of their impact on Sustainable Development:**
 - Occupational Health & Safety
 - Water Management
 - Climate change, energy & air emissions
 - Employment & Labor Practices
- the 9 common topics, i.e. those that are simultaneously presented as important both for the Stakeholders and in terms of their impact on Sustainable Development:**
 - Occupational Health & Safety
 - Water Management
 - Climate change, energy & air emissions
 - Employment & Labor Practices
 - Human Rights, Equal Opportunities & Diversity
 - Regulatory compliance
 - Business Ethics
 - Pollution prevention
 - Cybersecurity

* topics identified as Material by the Metallurgy Business Sector as a result of the prioritization process, in the framework of the international Aluminium Stewardship Initiative (ASI) in which the Business Sector participates.

The conclusion for the year 2023 is that the main body of material issues that emerged in 2022 remains. The main changes of the 2023 Materiality analysis, compared to that of 2022, concern the following:

- Merging the two material topics of 2022, 1) "Adaptation to Climate Change" and 2) "Energy and Air Emissions", in a common material topic for 2023, entitled: **"Climate change, energy & air emissions"**, recognizing that among the topics there are complementary points that can more effectively reflect the care and activity of MYTILINEOS in their integrated management.

- Merging the two material topics of 2022, 1) "Human Rights", and 2) "Equal Opportunities and Diversity", in a common material topic for 2023, entitled: **"Human Rights, Equal Opportunities and Diversity"**, as well as the topic of Equal Opportunities and Diversity, although it was not among those material issues with a score above average, nor in the ranking of materiality in terms of impacts on Sustainable Development, nor does MYTILINEOS recognize its special importance and the need for its integrated management, within the thematic priority of Human Rights.

Also, on two substantive issues, it was decided to enrich their content, by incorporating information that in 2022, referred to in the chapters "Other important issues", both in the pillar Environment and in the pillar Society. Specifically:

- Within the material topic of 2023, "Employment", it was decided to include the social topic "Labor Practices", as the approach to managing Labour Practices falls for MYTILINEOS in the broader management of Employment issues concerning the Company's workforce, constituting an overall social priority, with the title of the material topic for 2023 being **"Employment and Labour Practices"**.
- Within the material topic of 2023, "Circular Economy", it was decided to include the environmental topic "Raw and other materials", as the approach to managing Raw and other materials issues, which mainly concerns the Metallurgy Sector, is recognized by MYTILINEOS as a topic that falls under the broader management of Circular Economy issues, constituting an overall environmental priority, with the title of the material topic for 2023 being **"Circular Economy, Raw & other materials"**.
[GRI 3-2-b]

Validation Stage		
PRINCIPLE: Stakeholder Engagement PRINCIPLE: Completeness		All Material Issues were ratified
Sustainable Development Committee		
The Validation of the Material Topics and the final approval for their disclosure in the Annual Report and the Sustainable Development Report of the company was given by the Sustainable Development Committee to which they were presented. A special meeting of the Committee analyzed the steps of the relevant methodology, its individual results, as well as the relevant list of material issues for the year 2022.		

MYTILINEOS, following a **proactive approach** to the requirements of the new regulatory framework for disclosure of sustainability information created through the new CSRD (Corporate Sustainability Reporting Directive), has already started in 2023, relevant preparations for the implementation of Double Significance analysis, which is expected to be completed within 2024. The new Double Materiality process is necessary for MYTILINEOS to be able to identify its significant impacts on Sustainable Development more accurately, as well as the resulting risks and emerging opportunities, forming the basis for all sustainability disclosures.

For the implementation of the Double Materiality Analysis 2024, MYTILINEOS invested in 2023, with internal resources and know-how, in the development of a special digital application that enhances internal participation, as it is addressed to executives who are responsible for managing issues that affect sustainable development, from all Business Sectors and the entities included within them, but also of the Company's subsidiaries in the identification of impacts, their characterization, as well as their rating in accordance with the applicable ESRS (European Sustainability Reporting Standards). The utilization of the digital application allows the capturing of the impact on the overall scope of the activity, which includes both MYTILINEOS' activities and those in the upstream and downstream value chain. It also allows the mapping of the time horizon of the impact's occurrence, the identification of the associated risks or opportunities, while it provides

the possibility of a detailed scoring of the scale, extent and irreversibility of each impact. Finally, the digitalization of the process enhances transparency in how the results of double materiality are derived, the results of which will form the basis for sustainability disclosures from 2025 (financial year 2024).

Distinctions

Significant, once again in 2023, was the Company's "harvest" of distinctions & awards.

MYTILINEOS' Initiative		Link to a material/important topic
	<ul style="list-style-type: none">• Gold award: Protergia Vehicle to Home (V2H) services• Gold award: Protergia's Demand Response Services• Gold award: Protergia Sun Save - With the power of sun• 2 Gold & 2 Silver awards: QUORA by MYTILINEOS: Artificial Intelligence Platform for the "Green Energy Transition"• Silver award: Protergia Public Charging Network• Silver award: Protergia's AI tools for User's Comfort• Bronze award: EV Fleet Management• Bronze award: Product Family Protergia MVP	<div>E</div> Climate change, energy & air emissions
	<ul style="list-style-type: none">• Silver award: Protergia & Free Now join forces to electrify the taxi fleet• Gold & Bronze award: Chargespot & Protergia Charge together	<div>E</div> Pollution prevention
	<ul style="list-style-type: none">• Silver award: educational program "Safety Pavilion" implemented at the "Aluminum of Greece" plant	<div>S</div> Occupational Health & Safety
	<ul style="list-style-type: none">• Gold & Bronze award: MYTILINEOS Smart cities developing sustainable cities.• Silver award: Educational programme for Disability Awareness & Familiarization in Schools: 'Learning to see the Man'	<div>S</div> Sustainability of local communities
	<ul style="list-style-type: none">• Award for: MYTILINEOS' presence at the ENLIT 2022 Exhibitio	<div>S</div> Communication & Marketing
	<ul style="list-style-type: none">• The best Bauxite Residue Paper Award: Paper BR15-THE HOUSE OF BAYXITE, by Mr. E. Balomenos, P. Davris, G. Paschalis, A. Pateinarelis, N. Patsavos, L. Arnout, E. Francois, T. Lapauw, C. Georgopoulos, K. Sakkas, M. Giels, T. Hertel & Y. Pontikes.	<div>E</div> Circular economy, raw & other materials
	<ul style="list-style-type: none">• MYTILINEOS: The best international company	Socio-economic impact of MYTILINEOS
	<ul style="list-style-type: none">• Supply Chain Assessment & Training	<div>S</div> Responsible supply chain
	<ul style="list-style-type: none">• Watt+Volt: leading pillar of the Greek franchise	<div>S</div> Communication & Marketing
	<ul style="list-style-type: none">• Watt+Volt: its contribution to franchising, in the field of services sales and to the business community as a whole	<div>S</div> Communication & Marketing
	<ul style="list-style-type: none">• Gold Winner Services Franchise: MYTILINEOS honored for its contribution to society (social impact)	Socio-economic impact of MYTILINEOS
	<ul style="list-style-type: none">• MYTILINEOS' contribution to environmental protection	<div>E</div> Climate change, energy & air emissions



Environment



Climate change, energy & air emissions



Management approach and impacts on sustainable development and human rights [\[GRI 3-3-a\]](#) [\[GRI 3-3-b\]](#)

Description of key effects

The following table describes the main impacts, negative and positive, of MYTILINEOS' activities in the context of Sustainable Development related to this issue. These effects are mainly related to aluminium and alumina production units, thermal power plants, as well as the activities of the Energy Sector in the construction of Renewable Energy Sources (RES) and other conventional energy projects. In addition, the Company's main suppliers may have a significant indirect effect.

Key Impacts	Main impact recipient	Impact Type				Impact Horizon
		Actual	Potential	Positive	Negative	
Contribution to the energy transition by supporting the integration of RES into the energy mix of each country in which we operate, through the construction and operation of renewable energy projects, large-scale battery storage solutions, as well as electricity transmission network upgrade projects.	Environment Human Rights	✔		✔		Short, Medium, and Long- Term
Contribution to the mitigation of global warming and climate change, to the extent that corresponds to the Company's activity, through the production of clean energy (mainly solar and wind), the production of secondary aluminium and overall, by reducing its carbon footprint, compared to the base year 2019, in the context of its climate targets and commitments.	Environment Human Rights	✔		✔		Short, Medium, and Long- Term
Release of CO ₂ emissions (scope 1,2 & 3) and other gaseous pollutants such as NO _x emissions (nitrogen oxides) and SO _x (sulphur oxides) and emissions of PFCs (Perfluorocarbons) that affect, to the extent that the Company's activity is proportionate, to the deterioration of air quality, the increase of the average temperature of the planet and consequently contribute to climate change, leading to physical hazards to business operations, such as damage from extreme weather events.	Environment Human Rights	✔			✘	Short, Medium and Long- Term
Monitoring of air emissions, and timely implementation of appropriate technical interventions shall ensure on an annual basis that they are below the regulated levels and at the lowest possible level.	Company Environment	✔		✔		Short, Medium and Long Term

MYTILINEOS' climate initiatives, based on its ambitious climate targets and commitments, reflect the Company's approach to tackling climate change, maximizing the opportunities arising from the energy transition and minimizing the potential risks posed by climate change to the Sectors in which it operates. This chapter describes this in line with the recommendations of the Financial Stability Board Task Force on Climate Related Financial Disclosures (TCFD), for the disclosure of climate-related financial information, while references are also made to the TCFD Report published by the Company.

Governance [\[GRI 3-3-c\]](#)

At MYTILINEOS, the **competent body for overseeing material Sustainable Development issues is the Sustainability Committee of the Board of Directors (BoD)**. The Committee assists the Company's Board of Directors in integrating sustainability considerations into the Company's key decision-making processes and functions, including the potential risks and opportunities related to climate change. The Committee oversees and monitors the implementation of the corporate

Sustainable Development strategy, at all three levels that constitute it (Addressing Climate Change, ESG Approach and Responsible Entrepreneurship) in accordance with domestic and international trends that may affect the Company's business activities and performance.

The Sustainability Committee (SC) convenes at least 3 times a year and on an additional ad hoc basis, when necessary, on issues related to the management of Sustainable Development issues and especially the tackling of climate change, which is a key pillar of its strategy. At the meetings, the SC discusses and defines issues of Sustainable Development strategy, assesses overall progress, approves non-financial reporting, monitors the Company's ESG ratings and performance, validates new policies, approves relevant sustainability measures and initiatives, and submits recommendations for action to the Board of Directors when required. In particular, SC's responsibilities include monitoring progress towards and implementing CO₂ emission reduction targets. The SC is extensively informed about the progress of these initiatives by the Corporate Governance and Sustainable Development General Division, twice a year, informs the Board of Directors and proposes improvement measures where necessary. Further, the Committee monitors the Company's progress in actions or other important climate initiatives that the Company participates in or implements voluntarily, such as:

- EU TAXONOMY Reporting,
- participation in the international initiative CDP Climate Change,
- alignment with TCFD recommendations,
- recording and disclosure of indirect CO₂ emissions (scope 3).

Regarding the role of Management in the assessment and management of risks and opportunities related to climate change, the General Division of Corporate Governance and Sustainable Development, through its critical and coordinating role, works closely with all Business Sectors of the Company **identifying strategic priorities** as regards the management of the relevant issues. It informs the Company's top management and provides information to the Board of Directors, through the Sustainability Committee, on the management of carbon emission reduction initiatives, the progress made towards achieving the relevant targets, the potential risks and opportunities associated with climate change. At the same time, it supports the work of the Sustainability Committee to oversee corporate initiatives for adaptation and response to climate change.

At the same time, **MYTILINEOS continues to align its key operating processes with tackling climate change**. Indicatively, the following are mentioned: **a)** In order to raise funds for the financing of projects that will contribute both to the achievement of its ambitious climate commitments and more generally to the implementation of its strategy for Sustainable Development, the Company proceeded to the creation of the "MYTILINEOS Green Bond Framework", on the basis of which it will be able to proceed with one or more Green Bond issuances, **b)** the alignment of capital allocation and approval processes for major projects with corporate climate targets and ESG criteria, **c)** the linking of top management remuneration to KPIs linked to the evolution of CO₂ emissions, **d)** the introduction of climate data in the evaluation of key suppliers and **e)** regarding disclosures of Sustainable Development information, its correlation with financial data is systematically promoted, through the inclusion of key performance indicators in all major financial reports.

Regarding the Company's operating model, the Corporate Governance and Sustainable Development General Division works closely with the special executives (Sustainability Leaders and Environmental Category Owners) appointed in each Business Sector to monitor the implementation of CO₂ emission reduction initiatives and the achievement of climate targets. Regarding risks and opportunities related to climate change, the Sustainability Leaders of the Business Sectors in cooperation with the Environmental Category Owners are responsible for identifying and initially evaluating them as well as integrating the risks into the Company's Group Enterprise Risk Management System (ERM).

Strategy [\[GRI 2-23-a\]](#) [\[GRI 2-23-c\]](#) [\[GRI 2-23-d\]](#) [\[GRI 2-23-e\]](#) [\[GRI 2-23-f\]](#)

Climate change is a key pillar of MYTILINEOS' broader Sustainable Development strategy and is directly linked to the Global Sustainable Development Goals (7: Clean and affordable energy & 13: Climate Action). The Company, through its recent structural transformation, is strategically positioned at the forefront of the energy transition as a leading and integrated international "green" utility, and as a benchmark of competitive "green" metallurgy at European level, thus contributing substantially to the effort to decarbonize the global economy, which according to scientists must be achieved long before the end of the 21st century.

The Company's approach is characterized by:

- The ambitious **commitments** it has undertaken and the corresponding **targets** it has set to **tackle climate change**, which are directly linked to its business strategy.
- The adoption of the recommendations of the Task Force on Climate-related Financial Disclosures (**TCFD**), as well as the measures to strengthen the resilience of its production units, in the context **of its adaptation to climate change**.
- **Aligning its key administrative functions** with climate change issues.
- The **exploitation of business opportunities** which may emerge that may emerge from the energy transition roadmap.

To this end, MYTILINEOS:

- Committed to reducing its carbon footprint by 2030 and Net-Zero emissions by 2050. (Section Metrics and Targets p. 52) [\[GRI 3-3-e-ii\]](#)
- Has developed a new central [Environmental Policy](#) with special reference to climate change, responsible use of energy and other natural resources, in order to promote its commitments and strengthen the effort to understand and manage its risks and opportunities as well as its climate-related impacts in the context of its activities. [\[GRI 3-3-c\]](#)
- Voluntarily participates in the global initiative Sustainable Development CDP - Climate Change, certifying, based on the results of the annual assessments by the Organization, that it undertakes coordinated actions to manage climate issues and more specifically the potential risks and opportunities related to climate change in its activities. [\[GRI 3-3-c\]](#) [\[GRI 3-3-d-i\]](#)

Identification of climate-related risks and opportunities
MYTILINEOS analyzes and prioritizes risks and opportunities related to climate change that may affect the activities of its two main business sectors, Metallurgy and Energy, aiming at

adapting accordingly to address risks and highlight opportunities. The analysis focuses primarily on the Company's industrial units and projects in Greece, as it was considered essential in these cases to assess climate-related risks and opportunities. The time horizons (more details in **TCFD Report**) that the Company is considering to identify climate risks and opportunities are:

- Short-term (1 to 3 years)
- Medium-term (3 to 10 years)
- Long-term (10 to 30 years)

MYTILINEOS' climate change-related risk categories include:

Transition risks: The company's response to extensive changes in policies, legislation and technologies related to climate change adaptation and mitigation measures, in the broader context of the transition to a lower carbon economy at national, European, and global level. As the Metallurgy and Energy Sectors have technologies and processes that are difficult to wean from fossil fuels (natural gas) immediately, new regulatory requirements relating to climate and energy may have significant implications for the Company, both financial and otherwise. MYTILINEOS closely monitors compliance with regulatory requirements and actively participates in working groups for the development of new regulations, in order to ensure that all relevant risks are included in the corporate risk management system.

Physical risks: These are risks related to intense or longer-term physical changes considered important for the operation of the Company's industrial units including, but not limited to, destruction of infrastructure due to extreme weather conditions, reduction of available water resources due to less rainfall, sea level rise, loss of working days due to extreme temperatures, the need to strengthen measures and actions for the protection and restoration of the environment, etc. At the same time, acute natural hazards such as extreme weather events concern all activities of MYTILINEOS as they could affect the Company's plants, facilities, construction sites and normal operations. Depending on the Business Sector, some of these risks are more significant.

After identifying the overall risks (as presented in the Company's **TCFD Report**), the further analysis process¹ identified the following **most important** impacts on the Company's revenues and/or operating costs.

Potential Transition Risks:

- R1** - Increased carbon allowance prices.
- R2** - Transition to low-carbon technologies in primary aluminium production.
- R3** - Increased electricity and gas prices.
- R4** - Increased selling prices of electricity and natural gas.
- R5** - Increased raw material prices.
- R6** - Shifting consumer preferences towards low carbon footprint products.

Potential Physical Risks:

- R7** - Rising temperatures.
- R8** - Increased frequency of extreme weather events.

Regarding the opportunities, [more information in the Company's **TCFD Report**] MYTILINEOS strategically aims to utilize energy megatrends mainly through the development and operation of Renewable Energy Sources, through network upgrade projects internationally, and by exploiting the growing markets of hydrogen (H2) production and carbon capture and storage (CCUS). At the same time, benefits for the Company's business strategy arise both from the different ways of utilizing natural gas, in the context of the energy transition, and from the increasing integration of secondary aluminium in its product mix, aiming at greener outputs.

Potential opportunities:

- [O1]** - Investment in renewable energy, storage systems and grid solutions.
- [O2]** - Investment in the production of secondary aluminium.
- [O3]** - Investments in energy efficiency and more efficient production processes.
- [O4]** - Increased use of recycled or low-carbon materials.
- [O5]** - Development of new products enabling the transition to a low/zero carbon economy.
- [O6]** - Electrification of final demand.
- [O7]** - Investment in new technologies: battery energy storage systems, forecasting technologies for renewable energy systems, etc.
- [O8]** - Use of more efficient modes of transport.

Key impact of climate-related risks and opportunities

The potential key impact of climate risks and opportunities on MYTILINEOS may include the following:

[O1, O2, O4, O5, O6, O7] - Revenue growth from:

- the sale of low-carbon products (e.g. secondary aluminium) or products necessary for the green transition. MYTILINEOS is active in the development of projects necessary for the energy transition at international level and is expected to play, in the next critical decade, an important role by scaling up its positive impact to become one of the leading companies in the global market in this field.
- the expansion of the market share in electricity supply, increasing the services and products provided with a customer-centric approach, in the context of increasing electricity demand where it will be the main source of energy in the new era due to the rapid electrification of the market (electromobility, installation of heat pumps, etc.).
- strengthening the Company's strong position in the EPC market for the construction of natural gas power plants.
- the design and gradual entry into new growth markets of hydrogen (H₂) production and carbon capture and storage (CCUS) and maximization of the availability of our thermal plants and integrating more and more the possibilities given by the progress of technological tools and especially through the development of in-house customized IT tools for energy production and management.
- the increase in demand for aluminium as a key material for the energy transition. To achieve carbon neutrality by 2050, it is essential to install highly energy efficient infrastructure in buildings, and the aluminium has an important role to play.

[O3, O3] - Reduction of operating costs from:

- making greater use of lower carbon intensive production processes and increasing production to maximum capacity.

[R2] - Increased investment from:

- the transition to low-carbon technologies in the production of primary aluminium, it absolutely needs investments in machinery, and increase at the same time the R&D costs. This impact is likely to increase as emission reduction requirements are maximized.

[R4, R6, R7, R8] - Decrease in revenue from:

- reduced demand for electricity and natural gas due to increased selling prices that may result from the implementation of climate change mitigation policies.
- reduced demand of primary aluminium due to changes in the preferences of final consumers (towards products with a low carbon footprint) and consequently of the Company's customers.
- reduced efficiency of thermal plants due to high temperatures.

[R2, R7, R8] - Reduction of production efficiency:

- in specific periods (possibly in the medium term) with the introduction of new technologies and the gradual optimization of operational parameters in its production processes.
- due to the reduced efficiency of thermal plants as a result of high temperatures.

[R1, R3, R5, R7] - Cost increase due to:

- increased carbon allowance prices that can be cause a deterioration of the Company's position in the global cost curve of aluminium plants vis-à-vis its competitors.
- due to carbon reduction measures, the cost of raw materials may be affected, resulting in increased production costs.
- reduced efficiency of the Company's natural gas power plants due to rising temperatures.
- increased electricity and gas prices that may result from the selection of specific climate mitigation solutions that burden the energy costs of production processes.

Resilience of business strategy to the consequences of climate change

MYTILINEOS monitors and manages the impacts of climate change through the analysis of different climate scenarios. The socio-economic parameters of the climate "scenarios"² are drawn from the **Network for Greening the Financial System (NGFS)**, while the future climate parameters in an area of interest for each of these scenarios are drawn from the European climate service **COPERNICUS**. In particular, the Company proceeded to the elaboration of three different scenarios, each of which describes a different climate future in terms of greenhouse gas (GHG) emissions and their concentration in the atmosphere and ultimately the severity and intensity of climate change as a function of the relevant mitigation policies. These scenarios, designed with input from a consortium of academic research institutions, aim to cover a wide range of physical and transition risks under different future conditions, taking into account the latest economic, climate data and policy commitments as of March 2023. Here are the basic RCP (Representative Concentration Pathway) scenarios and their underlying assumptions, developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) and providing an important scientific basis for the development of NGFS scenarios, allowing the link between climate science and financial analysis:

- **Weak Policies Scenario:** This scenario assumes a world where action to mitigate climate change are delayed. As a result, greenhouse gas emissions continue to rise in the 21st century and the average global temperature rises above 3°C at the end of the century. Climate risks and opportunities are mainly related to physical impacts, as both chronic and acute consequences of climate change are significant. For the quantitative analysis of these risks and opportunities, climate and economic data included in scenarios developed under **RCP8.5 were used**.

1. Taking into account: **a) The criterion of significance of effects that may arise from the climate risks that identified**, in relation to: •The time horizon and •Their economic impact. **(b) The criterion of how possible is the risks which identified will occur**, in relation to: •The extent to which the risk can be quantified; •The variability of operating parameters related to climate risks, based on the different climate scenarios considered. •The direction and/or rate of change of parameters related to climate risks.

2. These scenarios are not predictions, but explorations of possible future developments that help to understand the courses of action leading to each climate future they represent and to assess potential risks and opportunities. They incorporate the latest trends in renewable energy technologies, such as solar and wind, and examine the impact of the war in Ukraine on the energy market. NGFS also improved natural hazard modelling, providing more detailed scenarios of how acute natural hazards, such as heatwaves and droughts, could materialize over time and at the country level.

- **Current/Existing Policies Scenario:** This is an intermediate scenario, assuming a market-driven transition to a lower carbon future, in line with the Paris Agreement. Climate change mitigation policies are stronger than in the previous scenario and lead to increases in global average temperature between 2°C and 3°C at the end of the century. The climate data used for the quantitative analysis risks and opportunities are those derived from scenarios developed under **RCP4.5**.
- **Strong Policies Scenario (Net-Zero):** The Net Zero scenario incorporates robust climate change mitigation policies and indicates a path for the global energy sector to achieve net zero CO₂ emissions by 2050. It goes hand in hand with limiting global warming to 1.5°C by the end of this century, without any or limited temporary excess of the predetermined heating level. The climate data used for the quantitative analysis of risks and opportunities are those derived from scenarios developed under **RCP2.6**.

In conclusion, although the analysis revealed risks with varying degrees of intensity per scenario (details are mentioned in the Company's [TCFD Report](#)), MYTILINEOS' diversified business model can be characterized as resilient to the effects of climate change for the following reasons:

- has strong synergies between the Business Sectors and vertically integrated production with strict cost control, ensuring strong financial performance despite the unprecedented volatility in energy prices,
- has the structures, strategies, and policies in place to adapt and continue to operate effectively despite the increasing challenges caused by climate change,
- is characterized by flexibility in resource management, review of supplies and supply chains, and the ability to adapt to best practices that reduce the environmental footprint and enhance resilience,
- integrates Sustainable Development into its core activities and operations,
- promotes innovation, capitalizes on technological progress, and actively manages risks.

Risk Management

[GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

- In order to adapt to climate change and reduce the impact of related potential risks, the Company follows these steps:
- consider different climate scenarios to identify potential risks,
 - analyze and evaluate these risks to understand their significance and potential financial implications for the Company,
 - It incorporates the issue of climate change adaptation into the business decision-making process to avoid or mitigate damage related to climate change and, where possible, to seize opportunities for adaptation to a volatile economic environment, and
 - implement appropriate measures as a result of those procedures. [\[GRI 3-3-d-i\]](#)
- **MYTILINEOS has a comprehensive strategy to tackle climate change**, which guides its initiatives to reduce carbon dioxide emissions as provided for by the Kyoto Protocol, the Paris Agreement on Climate Change (CoP21) and the corresponding National Energy and Climate Plan (NECP) of Greece, which sets out Greece's contribution to the European Green Deal. MYTILINEOS is the first Greek industrial company to set

- specific, measurable and ambitious targets for the reduction of CO₂ emissions by 2030 and 2050, thus highlighting the reduction of the carbon footprint as a priority of its Sustainable Development Strategy. The strategy for the emission reduction targets for each MYTILINEOS Business Sector was published in February 2021, in accordance with the International Energy Agency (IEA) scenario of limiting the increase in global average temperature to well below 2 degrees Celsius. **Detailed information on climate targets and CO₂ reduction initiatives is presented in the section “Metrics and Targets” below.** [\[GRI 3-3-d-i\]](#)
- The Company's Business Sectors are in close cooperation with the General Division of Regulatory Affairs, **which has a strong presence in the EU, participating in initiatives or associations that take positions on any policy, law or regulation that may affect the climate.** In particular, the Company's General Division of Regulatory Affairs interacts with policy makers by sending relevant documents or occasionally through direct meetings, to ensure that they are aware of and understand the Company's positions as well as proposed improvements to legislation. More information is available in the CDP Climate Change report of MYTILINEOS at the link: https://www.mytilineos.com/media/pdhhfmt2/cdp_climate_change_2023.pdf
 - **MYTILINEOS implements pre-purchase compensation mechanisms** through its Central Finance Division, while enhancing synergies between its Business Sectors, such as the support of the Metallurgy Sector for the formation of an alternative energy “basket” and the transition to green energy from the Energy Sector.
 - **The Company expands its RES portfolio**, through the Energy Sector, with the aim of increasing its share in the electricity market. [\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-d-iii\]](#)
 - **In the context of promoting the utilization of natural gas as a transition fuel** to a low-emission economy, the Company's new natural gas-fired combined cycle gas turbine power plant (CCGT) was incorporated into Greece's energy production capacity, making the Agios Nikolaos Energy Center in Viotia a new national energy center. The new station has a thermal efficiency of 63% in ISO, new and clean conditions, 826MW capacity as well as the possibility of using a fuel mix with hydrogen or biogas reducing the percentage of natural gas, thus constituting a powerful means that can be used in the coming years to achieve MYTILINEOS' climate targets. It is the most efficient power plant with the highest concentration of power in the country and one of the largest power plants in Europe, enhancing and ensuring the country's electricity sufficiency and energy transition. [\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-d-iii\]](#)
 - Finally, the Metallurgy Sector has planned actions to improve energy efficiency as well as process design to reduce direct emissions. Regarding the risk of increased raw material costs, as calculated, it does not significantly affect the financial figures and business planning of the Sector. Although it is under continuous monitoring, no specific actions have been recorded so far.
- In addition, apart from the management and response measures for the significant risks that have arisen, **the following adaptation and protection measures from various natural hazards are implemented in each Sector:**
- **Energy Sector:** Emergency Action Plans have been developed for the Company's thermal power stations to deal with the occurrence of extreme natural phenomena (heat wave,

- frost, storm, flood, etc.) while special flood studies have also been carried out at the locations where there are streams near the Company's stations. With regard to transition risks, the Company participates in an energy exchange through which the increased expenses for the purchase of allowances emissions or other costs related to climate change can be incorporated into the price of electricity sold on the market. Regarding the operation of RES units, wind turbines are equipped with safety systems that in case of very strong winds stop the operation of the generators and drive their blades to a safe position, while the surfaces (panels) of the solar panels are shock resistant by design. In addition, regarding the Company's business activity abroad, appropriate protection measures are established and implemented within the boundaries of facilities and construction sites in order to ensure that all conditions leading to deviations from the smooth operation of the Sector are effectively addressed.
- **Metallurgy Sector:** Studies were carried out on flood, accident and disaster risks, while existing infrastructure **was improved**, and new ones built to deal with the most extreme weather conditions. Emergency action plans have also been developed. In the context of mining activities to date, no particular impacts have been identified on the Company's underground facilities that require the implementation specific adaptation measures. A climate risk study for water was also carried out.
- At the same time, MYTILINEOS **implements the following actions:**
- It systematically monitors relevant **legislative developments** and takes preventive measures to minimize potential negative impacts. [\[GRI 3-3-d-i\]](#)
 - It invests in **renewable energy sources and in the utilization of digital industrial methods** in the production stages, to save energy and reduce air pollutant emissions. It is noted that the 10-year collaboration of the Metallurgy Sector with General Electric is underway for the development of the world's first Digital Smelter, which is the first digital solution in the operation of Electrolysis. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-ii\]](#) **ASI**
 - It expands its know-how in the field of **recycling aluminum products** (scrap) from products whose use has been completed, greatly enhancing its effort to substantially reduce the use of raw materials and save energy. More specifically, in 2023, secondary aluminium production increased compared to 2022, by 11.8%, reaching the 23.4% of total aluminum production. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-ii\]](#) **ASI**
 - It has harmonized with **Best Available Techniques** (BATs) in its production processes, as well as uses fossil fuels with lighter environmental impact such as natural gas, which has been recognized as a transition fuel towards decarbonization, in almost all its industrial units in order to improve energy efficiency and reduce air emissions. [\[GRI 3-3-d-ii\]](#)
 - It ensures the **proper maintenance** and the best possible operation of machinery both in its industrial units and on the sites of energy projects, renewable energy projects and other construction projects within the framework of its activities, while investing in their modernization, where possible, with new technology equipment. In 2023, the subsidiary company EPALME that is active in the production of secondary cast aluminum, normalized the operation of the furnace of new anti-pollution technology, to ensure that the strict limits of environmental conditions are not exceeded. [\[GRI 3-3-d-i\]](#)
 - **It monitors** CO₂, fluorine and PFCs (Perfluorocarbons) emissions **on a monthly basis**, while timely implementation of

- corrective actions and appropriate technical interventions are foreseen to ensure that annual emissions are lower than the regulated ones and at the lowest possible level. [\[GRI 3-3-d-i\]](#)
- **It carries out controls of other gaseous pollutants** (NO_x, SO_x and particulate matter) with continuous and periodic sample measurements. The Alumina and Aluminium production plant has installed equipment for monitoring and recording dust emissions from chimneys to carry out measurements in accordance with environmental legislation and the Company's standards. In power plants (CHP and IPP1) there is a **system for continuous measurement of NO_x emissions and automatic activation of alarms** when predetermined values are exceeded, but in any case below the limits set by the Greek Environmental legislation. [\[GRI 3-3-d-i\]](#)
 - Also, measures such as wetting roads, raw materials and tree planting are taken to **suppress diffuse dust**. [\[GRI 3-3-d-iii\]](#)
 - In the Metallurgy Sector, emissions of air pollutants other than greenhouse gases are systematically calculated, while for 2023, specific targets have been set for the further reduction of these emissions. The main actions concern:
 - Operation of the new filter in the anode production process and effective retention and recycling of fluorinated emissions. [\[GRI 3-3-d-iii\]](#)
 - Continuous effort to supply raw materials with a low environmental footprint. [\[GRI 3-3-d-iii\]](#)
 - It holds the required greenhouse **gas emission permits**, while appropriate infrastructure for monitoring emissions and reporting has been developed and implemented. [\[GRI 3-3-d-i\]](#)
 - In electricity generation, due to the nature of the activity, the Company focuses on **running the operation of thermal power plants at the highest efficiency rates** in Greece by making the best use of natural gas as a primary fuel. MYTILINEOS' thermal power stations use natural gas to generate electricity. It is a fossil fuel with a lower carbon content compared to other minerals fuels, without the release of SO₂ and particulates, with lower NO_x emissions (mainly NO₂) compared to the limits allowed by current legislation and low CO₂ production (by 70%) compared to lignite plants. [\[GRI 3-3-d-ii\]](#)
 - It participates in the **Emissions Trading System** (EU ETS), through its Metallurgy Sector since 2005, and Energy since 2011. Since 2020, the new permits have been issued and all procedures for calculating and verifying gaseous emissions are followed in accordance with the regulations of the fourth phase 2021-2030. [\[GRI 3-3-d-ii\]](#) **ASI**
 - At the end of 2023, the preliminary study for the installation **of carbon dioxide emission capture systems** at the facilities of the Aluminium of Greece plant was completed in the Metallurgy Sector, in collaboration with a leading company in this field. In 2024, the results are expected to decide whether to proceed with this investment. [\[GRI 3-3-d-ii\]](#)
 - By actively implementing CO₂ reduction actions, MYTILINEOS is also actively participating in the HyInHeat research program **to test hydrogen/oxygen burner technology in the absence of CO₂ pollutants** in the foundry department of the Aluminium plant. The pilot trial is being carried out in close cooperation with Linde, a partner of the research programme.

Regarding actions for the electrification of production processes to reduce CO₂ emissions, in 2024, two new co-funded research programs will be launched in the Research and Sustainable Development department. These two new projects aim to explore electrification technologies for key alumina and aluminium production processes and have a duration of 4 years.

More specifically:

- The research program “Elithe” concerns the development of technology for the production of metallurgical alumina with a new electric type of smelting furnace. The project investigates the use of microwaves as a means of calcining hydrated alumina, something that will be piloted in the plant’s facilities.
- The research program “Metawave” aims to develop technology for smelting anode blockades using a hybrid microwave system and induction currents, to replace natural gas burners. This technology will be implemented on a small pilot scale with project partners at the University of Genoa.

MYTILINEOS implements ISO 50001 Energy Management Systems and ISO 14001 Environmental Management Systems, which it certifies by accredited bodies, to monitor and reduce its energy footprint both at its facilities and at construction sites, in the context of the projects it has undertaken.

Metrics and Targets [GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv] [SASB EM-CM-110a.1] [SASB EM-MM-110a.1] [SASB IF-EU-110a.1] [SASB EM-CM-120a.1] [SASB EM-MM-120a.1] [SASB IF-EU-120a.1] [SASB EM-CM-130a.1] [SASB EM-MM-130a.1]

A. Climate Pledges and Targets

A1. Climate Pledges and Targets



MYTILINEOS has set a Group target to reduce its carbon footprint by 2030 (base year 2019), the **reduction by -30% of total direct and indirect CO₂t-eq emissions (scope 1 & 2) from all its activities**, as a first milestone to achieve its commitment to Net-Zero emissions in 2050.

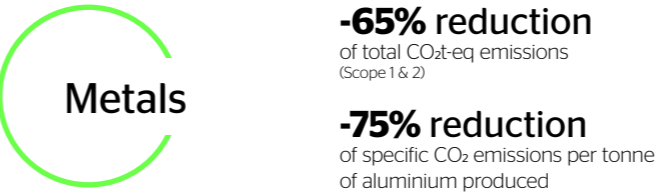
To achieve the above target, the Company developed corresponding individual overall and specific targets, implementing specialized action plans per Sector of activity. These plans focus on the utilization of existing technology, innovation and the development of innovative solutions, taking into account the specific characteristics of each activity, but also the existing composition of the country’s energy mix, while they are renewed on an annual basis according to developments. More specifically, the individual categories of actions of the main initiatives include, but are not limited to:

- the implementation of strategic partnerships in the field of RES,
- the implementation of best practices and energy saving initiatives,
- the implementation of pilot projects and specific technical actions in production processes,
- optimizing existing processes by introducing technological upgrades where feasible,
- participation in European programs in the context of the Company’s R&D activities,
- monitoring new technologies for future application.

In the **Metallurgy Sector**, where the production process of primary aluminium is an energy intensive activity, the main

target is to significantly reduce indirect CO₂ emissions (scope 2), through the use of renewable energy, by 2030. At the same time, the Company invests in the production of secondary aluminium, an activity fully aligned with the European Taxonomy, contributing significantly to tackling climate change. The production of secondary aluminum reduces the need to extract bauxite, a key natural resource, while requiring significantly less energy compared to primary production and therefore reduced greenhouse gas emissions per ton of aluminium produced, thus contributing positively to the reduction of global warming.

The targets of the Metallurgy Sector until 2030 (with base year 2019) are:



The action plan to achieve these targets by 2030 includes six emission reduction initiatives:

- Application of cutting-edge technologies and utilization of digital industrial methods in the stages of aluminum production.
- Electrification of the Sector from Renewable Energy Sources.
- Increase of secondary aluminium production.
- Increase in sales of alumina hydrates.
- Application study of new technologies (CO₂ capture, pilot use of hydrogen, etc.)
- Use of low-carbon fuels.

In the **Energy Sector**, MYTILINEOS does not have, compared to other power companies, coal-fired power plants which can decommission; therefore, it is difficult to reduce its direct emissions very aggressively. At the same time, the setting of an intermediate target for the absolute reduction of total CO₂ emissions (scope 1 & 2) of the Sector was not feasible, taking into account the imminent operation of the new state-of-the-art gas-fired combined cycle power plant (CCGT) with a capacity of 826MW of high efficiency. Thus, the Company aims to reduce its carbon emissions per MWh produced. MYTILINEOS recognizes that the combustion of natural gas, for the production of electricity, emits emissions such as CO₂ and nitrogen oxides into the air, however, recognizes the important role of natural gas, which is considered a transitional fuel (COP28 UAE), in the energy transition as it is a less polluting alternative that can displace other fossil fuels. such as coal and oil, while ensuring a continuous supply of electricity. In addition, the war in Ukraine has raised significant concerns about energy independence and energy security. The most accessible path to reducing emissions in many countries has been to switch from coal to natural gas as a fuel source for electricity generation, and this will continue to be the case in many markets.

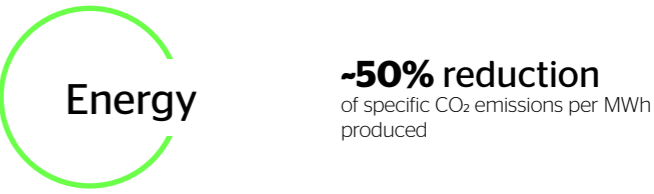
To this end:

- The Company uses natural gas as a more environmentally friendly option in both the short and medium term to support the gradual transition from coal and oil to renewable energy, the technologies of which continue to evolve and gradually become more economically viable.
- The Company’s gas-fired power plants can quickly adjust their production capacity, ensuring a stable energy supply to the domestic grid when renewable sources, such as wind and solar are not available due to weather events, while this flexibility supports the integration of more renewable energy sources into the energy mix.
- The use of natural gas in liquefied form by the Company, with its transportability, enhances domestic and European energy security.

At the same time, the Company **continues the completion of the construction of the first part (180MW) of the Greek portfolio of -1.5GW of photovoltaics**, which began to

gradually enter into operation, while in 2024 the construction of the second part of the Greek portfolio with a capacity of ~700 MW begins. Regarding **the international portfolio, MYTILINEOS currently constructs more than 2GW of photovoltaic projects** outside Greece, which are expected to become operational in the near future.

The target of the Energy Sector until 2030 (base year 2019) is:



The action plan to achieve this target by 2030 includes five¹ emission reduction initiatives:

- Continuous development of RES portfolio.
- Use of electricity from RES in the buildings of the Sector, either by forming PPAs with RES suppliers and / or by directly installing RES & storage capabilities.
- Replacement of diesel generators, renewable energy, and energy storage batteries at the construction sites of the Company’s construction projects.
- Replacement of all company vehicles of the Sector with electric ones, in order to reduce emissions from fuel consumption.
- Use of electric heat pumps to replace the heating installations of the Sector’s office spaces, based on natural gas.

A2. Net-Zero emissions by 2050

Aiming to achieve net-zero carbon emissions by 2050, MYTILINEOS has included in its Action Plan the feasibility of implementing the following key initiatives, subject to the further maturation of new technologies, aiming at drastically reducing CO₂ emissions (Scope 1) in all its activities:

- Use of zero- or low-carbon hydrogen.
- Use of zero- or low-carbon fuels.
- Application of carbon capture and storage technologies.
- Application of Inert Anode technology in aluminum production.
- Further increase of secondary aluminium production.
- Electrification of mining to eliminate emissions of related equipment.
- Offsetting residual emissions.

1. The Company’s 2023 Sustainable Development Report presents in detail the stage of development and implementation of these initiatives.

A3. Evolution of key initiatives to achieve climate targets

METALLURGY SECTOR	
Initiatives	Key comments
Application of cutting-edge technologies and the utilization of digital industrial methods in the stages of aluminum production. (In progress)	<p>More than 30% of the Electrolysis basins have been constructed with a low electric-ity consumption design, while a new construction plan is being tested in 29 additional basins with the aim of reducing electricity consumption per ton of aluminium produced. At the same time, based on the contract with General Electric (GE), the digitization of the Electrolysis process at the "Aluminium of Greece" plant is in progress. The imple-mentation of actions to reduce energy consumption outside production process is also in progress.</p> <p>The target for 2024 is to implement ready-made digital solutions in 100% of basins, expand the construction plan to another 55 electrolysis basins and implement all invest-ments and actions to save -8,000 MWh on an annual basis compared to 2023.</p>
Electrification of the Sector from RES. (In progress)	<p>The exploration of the supply from alternative energy sources has begun in conjunction with the development of the Company's Renewable Energy Sources investment plan from the Energy Sector in Greece. In 2024, the supply of electricity from RES is expected to exceed 500,000 MWh, covering 18% of total needs.</p>
Increase of secondary aluminium production. (In progress)	<p>In 2023, the production of secondary aluminium increased by approximately 6,000 t. A further increase in production by an additional 1,000 t in 2024 and more investments are planned with the ultimate target of achieving a total of >100,000t of secondary alu-minium production in 2030.</p>
Increase in sales of hydrated alumina. (In progress)	<p>Optimization of the operation of alumina smelting furnaces due to change of the hydrated - anhydrous alumina product mix and avoidance of smelting of at least 20,000t of alumina per year. In 2023, sales of hydrated alumina increased by 23 thou-sand tonnes, compared to 2022, which is equivalent to a reduction of 11,000t of CO₂ emissions (scope 1). This reduction is projected to be achieved in 2024, as well.</p>
Study on the application of new technologies (carbon dioxide capture, pilot use of hydro-gen, etc.) (In progress)	<p>In 2023, the second stage of the CCUS technology installation study on alumina produc-tion smelting furnaces was completed. The data produced are already under evaluation as to the viability of the project and the decision on whether to proceed with the applica-tion of the technology to the next phase. Also, the target in 2024 is the practical applica-tion of CO₂ emission reduction technologies using Hydrogen on a pilot basis in foundry furnace burners in the framework of a Hylnheat research program. In addition, in 2024, 2 new research co-funded programs for the reduction of CO₂ pollutants will begin. The 1st program is called Elithe, it concerns smelting and production of metallurgical alumina with a new type of microwave smelting furnace. The 2nd program is called Metawave, it concerns the calcination of anode blocks using a hybrid microwave system and induc-tive currents.</p>
Use of low-carbon fuels in the activities of the Sector. (In progress)	<p>The Research and Sustainable Development Department of the Metallurgy Sector, through the European program Re4Industry, studies practices for reducing total and specific CO₂ pollutants in the production of alumina and aluminium, such as the use of alternative fuels with zero emissions such as biofuels and hydrogen (actively participates in a preliminary study for the addition of a new pilot hydrogen burner to the plant's foundry). The Re4Industry research project was completed in 2023, with the relevant study of the use of CO₂ reduction technologies of the Agios Nikolaos plant.</p>

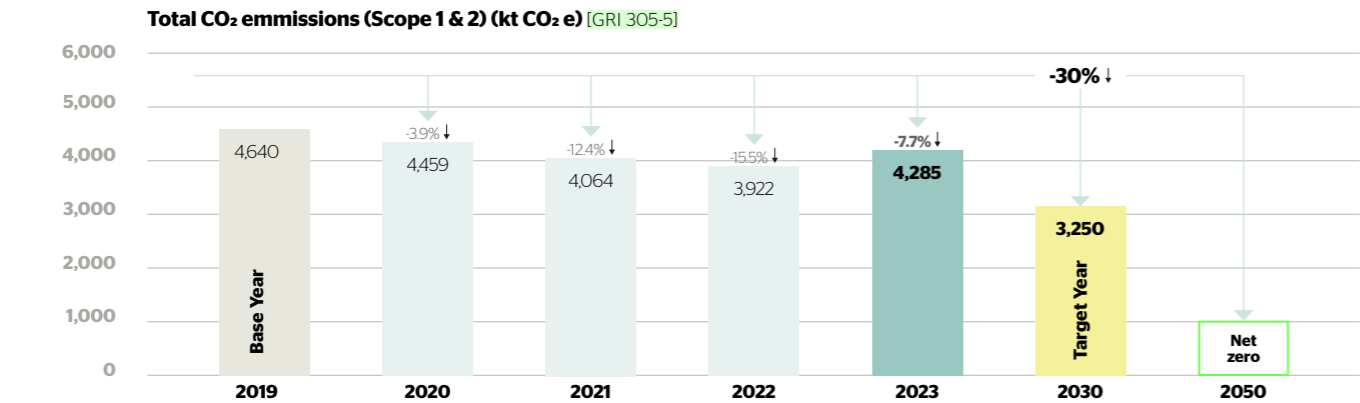
ENERGY SECTOR	
Initiatives	Key comments
Continuous development of RES portfolio (In Progress)	<p>MYTILINEOS, committed to its target of further growth in the field of RES, is steadily strengthening its potential, where the installed capacity in RES at the end of 2023 amounts to 845 MW. Total energy production from RES in 2023 reached 1,112 GWh, of which 596 GWhs were produced from RES in Greece and the remaining 516 GWhs from RES worldwide. In 2024, the construction of the second part of the Greek portfolio with a capacity of ~700 MW begins. Regarding the international portfolio, MYTILINEOS is cur-rently constructing more than 2GW of photovoltaic projects outside Greece, which are expected to be put into operation in the near future.</p>
Use of electricity from RES in the buildings of the Sector (in Greece and abroad), either by forming PPAs with RES suppliers and/or by directly installing RES & storage capabilities. (In progress)	<p>The use of electricity from RES in the housing buildings of the Sector in Greece has begun, while in 2023 the use of electricity from RES has expanded to the buildings that house the company's offices in Italy, Chile and UK.</p>
Replacement of diesel generators with energy from renewable sources, and with energy storage batteries at the construction sites of the Company. (In progress)	<p>The relevant market research in countries where the Company operates and the pro-cess of recording energy consumption at active construction sites have been com-pleted. Also, a pilot installation of a PV system was carried out to partially meet the needs of the construction site and the results of this action are taken into account in parallel with the implementation of a special study and research for the selection of the most appropriate technology to be used on construction sites gradually with the aim of becoming independent of conventional generators by 2030.</p>
Replacement of all company conventional vehicles of the Sector with electrics, to reduce emissions from fuel consumption. (In progress)	<p>The Sector follows the strategy of supplying own and leased hybrid and electric cars to replace cars with conventional engines. Shortages of raw materials and rising prices are making it difficult to plan supplies of hybrid and electric cars. However, the target is that by 2026 all cars will be hybrid or electric, and from 2026, and gradually until 2030, all vehicles will be electric.</p>
Use of electric heat pumps to replace the heating installations of the Company's office space, based on natural gas. (In progress)	<p>The recording of infrastructure, which was completed in 2022, is being implemented again after the lease of new buildings in Athens and Thessaloniki. The purpose of the recording is to identify the needs and proceed with the basic studies on whether it is fea-sible to use heat pumps in these new buildings as well. The needs for heating/cooling both in the offices of Thessaloniki and in the majority of facilities abroad, are already cov-ered by the use of electricity and not energy from fossil fuels.</p>

A4. Evolution of the Main Climate Target [GRI 305-5]

Regarding the evolution of total CO₂ emissions (scope 1 &2), the Company:

- **In the period 2019 - 2023**, it recorded an overall decrease of -7.7%, mainly due to i) the reduction of scope 2 emissions, taking advan-tage of the ongoing decarbonization of Greece's energy mix, combined with the increase in direct emissions as a result of the opera-tion of the new CCGT in 2023, and ii) the positive results of specific initiatives to reduce the respective emissions in the production pro-cess of the Metallurgy Sector.
- **During 2024-2025**, the Company expects its total emissions to be higher than those of 2023. The increase is mainly in direct emissions due to the full operation of the new gas-fired thermal power plant and the undertaking of new conventional power generation and infra-structure projects, covering the expected individual reduction in scope 2 emissions. It is noted that the estimate of the increase in these direct emissions have already been budgeted in the initial target setting exercise, while for further assurance the Climate Initiatives and Targets Review exercise will be implemented, for which more information is given below.
- **From 2026 onwards**, the Company's RES investment plan is expected to gradually pay off, which will substantially support the dras-tic reduction of indirect scope 2 emissions by 2030, in combination with the implementation of special actions to reduce direct emis-sions, which will be at an advanced stage, such as the implementation of Carbon Capture technology in the Metallurgy Sector, which is already at a design stage.

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However, the Company's business growth over the last 2 years, combined with its recent transformation, adds to its range of activities new production units and services, which should be integrated into the boundaries of setting climate targets, to assess whether and how much they can affect them. In addition, after 4 years of continuous recording of indirect emissions, scope 3, the Company intends to examine the possibility of setting targets in this category of emissions as well. For these reasons, MYTILINEOS has scheduled the 1st official review of its climate initiatives and targets, within 2025, in accordance with best practices. The review exercise will address, among other issues, the following:

- the study of the new business structure and their impact on climate targets,
- assessing existing CO₂ reduction initiatives, together with the extent to which available technologies are used, to identify positive and negative elements,
- the assessment of the maturation of new technologies and their application possibilities,
- the integration of new activities (acquisitions of the Company),
- the change of base year of targets (from 2019 to 2020),
- the alignability assessment from the WB 2°C scenario currently in the 1.5°C scenario,
- confirming existing or defining new targets concerning scope 1 & 2,
- exploring the possibility of setting Scope 3 Reduction Targets.

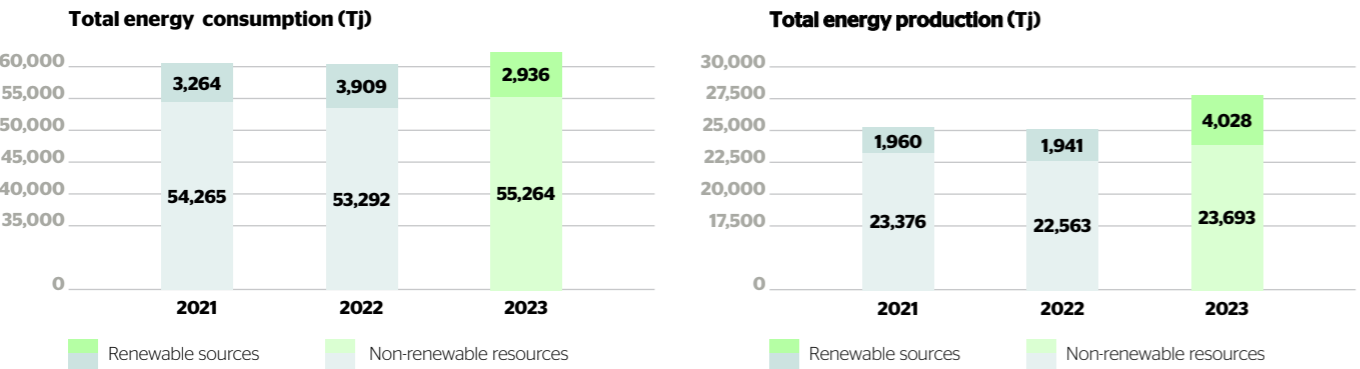
B. Metrics

B1. Energy consumption

Energy consumption within the Company is systematically monitored in all production units, office buildings and construction sites of the Company. [GRI 3-3-e-i]

In 2023, **total energy consumption amounted to 58,200 TJ**, showing a stabilizing trend (a slight increase of 1.7%), compared to 2022. The 73% concerns the consumption of primary energy from fuels (with 99% being natural gas) and 27%, the consumption of electricity and superheated steam. Total energy consumption from conventional energy sources (natural gas, fuel oil, diesel, gasoline) increased by -2%, mainly due to the commissioning of the new gas-fired combined cycle power plant (CCGT). The electricity market for consumption was almost stable (a slight decrease of 0.7%), with almost 28% of it coming from renewable sources. [GRI 3-3-e-i] [GRI 3-3-e-iii]

Total energy production from **i)** the gas-fired thermal plants, **ii)** the renewable energy plants (wind & photovoltaic parks) in all countries of operation and **iii)** the Company's hydroelectric plant amounted to 27,721.4 TJ. More specifically, in Greece, the energy produced in the grid reached approximately 5.7TWh, which corresponds to 11.6% of total domestic demand. **Electricity production from renewable energy sources increased significantly**, compared to 2022 (9.8%), constituting 17.5% of the total electricity produced by the Company in 2023. The increase comes from the Company's increased energy production from RES abroad. [GRI 3-3-e-i] [GRI 3-3-e-iii]



Total energy consumption (TJ)* [GRI 302-1]			
	2021	2022	2023
Energy consumption (Non-Renewable sources)	41,940.6	41,583.7	42,387.1
Natural Gas	41,431.0	38,914.8	42,106.3
Mazut (Fuel oil)	332.1	2,509.3	71.8
Gas oil (Diesel)	156.8	141.2	184.1
Heating oil	11.5	8.0	7.2
Gasoline	8.7	9.8	17.3
Other	0.5	0.6	0.5
Energy Purchased (Electric Power)	10,483.1	10,565.3	10,487.1
Non-Renewable Sources	7,219.4	6,656.2	7,550.8
RES (Renewable Energy Sources)	3,263.7	3,909.1	2,936.3
Quantity of energy produced)	25,336.0	24,504.4	27,721.4
IPP (Thermal Plants)	14,117.0	13,103.1	14,984.6
CHP (Combined Heat and Power Plant)	9,259.3	9,460.0	8,708.8
RES (Renewable Energy Sources)	1,959.7	1,941.3	4,028.0
Quantity of energy exported (sold)	20,230.6	19,452.3	22,395.3
IPP (Thermal Plants)	13,757.6	12,757.6	14,519.6
CHP (Combined Heat and Power Plant)	4,513.3	4,753.4	3,847.8
RES (Renewable Energy Sources)	1,959.7	1,941.3	4,027.9
Total energy consumption	57,529.1	57,201.1	58,200.3

* Total energy consumption = Non-renewable energy consumption + Energy purchased for consumption + Energy produced - Energy sold.

B2. Energy intensity based on the Company's net profit¹

The decreasing trend of this index over time shows how efficiently the Company converts the energy it consumes into net profits, offering a holistic view of its energy and economic efficiency and environmental performance.

Energy intensity index			
	2021	2022	2023
Total Energy Consumption TJ/ € million net profits	355.1	122.7	93.4

B3. Energy intensity based on the Company's main products

At the level of energy intensities in the Metallurgy Sector, the specific consumption of bauxite production increased by 11.9% due to reduced gross bauxite production. The corresponding decrease in the specific energy consumption of anhydrous alumina (-6.4%) was the result of the substitution of the use of fuel oil by natural gas in 2023. In 2022, due to the energy crisis, fuel oil was used for the production of anhydrous alumina, which led to the operation of special mechanical equipment (rotary kiln), which is about 25%, more energy-intensive, compared to alternative mechanical equipment (static kilns), which was used to maintain production levels, as the static kiln can only burn fuel oil for its operation. Changes in specific consumption of alumina hydrate, aluminium electrolysis, aluminium foundry, and anode production did not change significantly. [GRI 3-3-e-i] **ASI**

1. The denominator in the calculation of greenhouse gas intensity is consistent with the calculation of net profit as calculated in the Company's financial statements.

In Energy Sector, specific production consumption (TJ Natural Gas consumption / TJ Power & Steam production) showed a slight increase of 2.5% compared to the previous year. [\[GRI 3-3-e-i\]](#)

Basic energy intensities [GRI 302-3]			
	2021	2022	2023
Metallurgy Sector			
Specific consumption in bauxite production (production GJ/t) ¹	0.143	0.151	0.169
Specific consumption in anhydrous alumina production (Gj/t of production) ²	3.15	3.28	3.07
Specific consumption in hydrated alumina production (Gj/t of production) ³	5.92	5.94	6.09
Specific consumption in primary electrolysis aluminium production (Gj/t of production) ¹	50.40	50.67	51.55
Specific consumption in primary smelter aluminium production (Gj/t of production) ²	2.16	2.13	2.35
Specific consumption in anodes production (Gj/t of production) ⁴	4.01	4.35	4.50
Energy Sector			
Specific production consumption (Tj) of natural gas consumption/ Tj electricity production) ⁵	1.64	1.62	1.66
<div>1. Combined consumption of electric power, gas oil & heating oil.</div> <div>2. Combined consumption of natural gas, electric power, gas oil & heating oil.</div> <div>3. Combined consumption of steam, electric power, diesel DFB, gas oil & heating oil.</div> <div>4. Combined consumption of natural gas, electric power, mazut, gas oil & heating oil.</div> <div>5. This calculation concerns the 4 thermal power plants of MYTILINEOS. The 3 thermal power plants produce electricity which is supplied into the national grid, by burning natural gas, while the fourth thermal cogeneration plant (CHP) produces electricity in the national grid and superheated steam for the needs of the Aluminium of Greece (ATG) plant with which it borders.</div>			

B4. Greenhouse Gas (GHG) Emission Inventory

The Company's total air emission inventory for 2023 is presented in the following table. It is noteworthy that 99.9% of total scope 1 and scope 2 CO₂ emissions come from the Company's activities in Greece.

Gaseous emissions in metric tons of CO ₂ equivalent	2021	2022	2023
Scope 1: Direct emissions	2,726,024.0	2,640,850.3	2,729,731.8
Scope 2: Indirect emissions	1,337,935.2	1,281,939.2	1,555,613.5
Scope 3: Other indirect emissions	5,625,346.0	8,722,309.3	7,942,217.1
Total (Scope 1+2)	4,063,959.2	3,922,789.5	4,285,345.3
Total (Scope 1+2+3)	9,689,305.2	12,645,098.8	12,227,562.4

B5. CO₂ Emissions Intensity based on the Company's net profits¹

The greenhouse gas intensity per net profit ratio reflects MYYILINEOS' effort to align its economic growth with environmental responsibility and sustainability. The decreasing trend of these indices over time indicates that the increase in the value of the Company's financial capital (increase in net profits) is implemented with an increasingly steady or smaller impact in the environment.

CO ₂ Emission Intensity Indicators	2021	2022	2023
Total tCO ₂ eq Emissions (scope 1+2) / € million net profit	25.086	8.418	6,879
Total tCO ₂ eq Emissions (scope 1+2+3) / € million net profit	59,811	27,135	19,627

1. The denominator in the calculation of greenhouse gas intensity is consistent with the calculation of net profit as calculated in the Company's financial statements.

B6. CO₂ Emissions Intensity based on the Company's main products

At the level of specific CO₂ emissions (direct and indirect) and with regard to scope 1 CO₂ emissions / tonne of product, we observe that the changes where they exist are not significant and result from the complete substitution of the use of fuel oil by natural gas in 2023 for the production of anhydrous alumina. On the other hand, significant changes in Scope 2 CO₂ emissions / ton of product come from the increase in the emission index (kg CO₂ / kWh) of Greece's Residual Energy Mix for 2022. The emission index as analyzed in the corresponding report of the Operator of RES & Guarantees of Origin S.A. (DAPEEP) for 2022 was used (<https://www.dapeep.gr/wp-content/uploads/2023/07/%CE%95%CE%9D%CE%95%CE%A1%CE%93%CE%95%CE%99%CE%91%CE%9A%CE%9F-%CE%9C%CE%95%CE%99%CE%93%CE%9C%CE%91-2022.pdf>).[\[GRI 3-3-e-i\]](#) **ASI**

Metallurgy Sector - Specific Gaseous Pollutant Emissions (t CO ₂ eq) [GRI 305-4]	2021	2022	2023
t CO ₂ (scope 1 & 2) / t of hydrated alumina production	0.410	0.409	0.428
t CO ₂ (scope 1) / t of hydrated alumina production	0.002	0.002	0.002
t CO ₂ (scope 2) / t of hydrated alumina production	0.408	0.407	0.426
t CO ₂ (scope 1 & 2) / t of anhydrous alumina production	0.173	0.224	0.183
t CO ₂ (scope 1) / t of anhydrous alumina production	0.160	0.212	0.168
t CO ₂ (scope 2) / t of anhydrous alumina production	0.013	0.012	0.015
t CO ₂ (scope 1 & 2) / t of primary aluminium production 1	8.43	8.07	9.43
t CO ₂ (scope 1) / t of primary aluminium production	2.16	2.07	2.07
t CO ₂ (scope 2) / t of primary aluminium production	6.27	6.00	7.36
t CO ₂ (scope 1 & 2) / t of secondary aluminium production	0.33	0.35	0.36
t CO ₂ (scope 1) / t of secondary aluminium production	0.26	0.29	0.28
t CO ₂ (scope 2) / t of secondary aluminium production	0.06	0.06	0.08
<div>1. Specific emissions of primary aluminium are calculated in the context of the participation of MYTILINEOS' Metallurgy Sector in the International Aluminium Stewardship Initiative (ASI) and in accordance with the provisions of the Aluminium Carbon Footprint Technical Support Document (WA, Feb-2018) of the International Aluminium Institute, for the LEVEL 1 approach. This includes electrolysis aluminium, smelter aluminium and anode production activities.</div>			

B7. Direct CO₂ emissions (scope 1)²

Direct CO₂ emissions (scope 1) come from sources (physical units or processes that release greenhouse gas emissions into the atmosphere) owned or controlled by the Company. In this respect, >95% of these emissions are generated by the alumina and aluminium production process (fuel consumption and chemical reactions as part of the production process) and as well as by the power generation process (through natural gas consumption). The emission factors used to calculate direct emissions shall be taken from official sources. **The Company's direct emissions in 2023 amounted to 2,729.7 ktCO₂-eq**, an increase of 3.3% compared to 2022, with 80% of these emissions regulated under the Emissions Trading System (EUTS). [\[GRI 3-3-e-i\]](#)

Table of Direct Emissions (Scope 1) in metric tons of CO ₂ equivalent [GRI 305-1]	2021	2022	2023
Total Direct Emissions	2,726,024.0	2,640,850.3	2,729,731.8
Fuel (CO ₂ :100%)	2,336,038.2	2,269,019.6	2,359,152.9
Processes (CO ₂ :82% - PFCs:18%)	383,734.0	364,740.1	362,300.0
Transport (CO ₂ :100%)	6,251.8	7,090.6	8,278.9

2. KPI according to the "European Commission Guidelines on reporting climate-related information". The calculation of direct greenhouse gas emissions (scope 1) shall be carried out using conversion factors for energy from fuel consumption (in TJ) into carbon dioxide equivalents (CO₂eq). The numbers applicable at the end of the reporting period (year 2023) shall be used. The NIR 2023 methodology has been used for conversion factor values.

B8. Indirect CO₂ emissions (Scope 2)¹

Energy indirect CO₂ emissions (scope 2) are emissions derived from the Company's activity but produced by other entities, including emissions from the production of electricity acquired for consumption by the Company. These emissions result in -98% from the Metal-lurgy Sector during the alumina and aluminium production process (alumina electrolysis) and in particular 99.9% of the total scope 2 CO₂ emissions, derive from the Company's activities in Greece. For the calculation of these emissions, MYTILINEOS uses a **market-based** approach, where emissions are calculated based on the average emission intensity of the network from the Residual Energy Mix in each country where electricity is consumed. In total, **the Company's indirect emissions (scope 2) amounted to -1,556 ktCO₂-eq in 2023**, an increase of 21.3% from 2022, mainly due to the increased conversion rate of electricity consumed into CO₂ equivalent (<https://www.dapeep.gr/wp-content/uploads/2023/07/%CE%95%CE%9D%CE%95%CE%A1%CE%93%CE%95%CE%99%CE%91%CE%9A%CE%9F-%CE%9C%CE%95%CE%99%CE%93%CE%9C%CE%91-2022.pdf>), as a result of the increased participation of lignite and oil in the country's remaining energy mix and the simultaneous reduced participation of Renewable Energy Sources, following the sale of Guarantees of Ori-gin (GOs). [\[GRI 3-3-e-i\]](#)

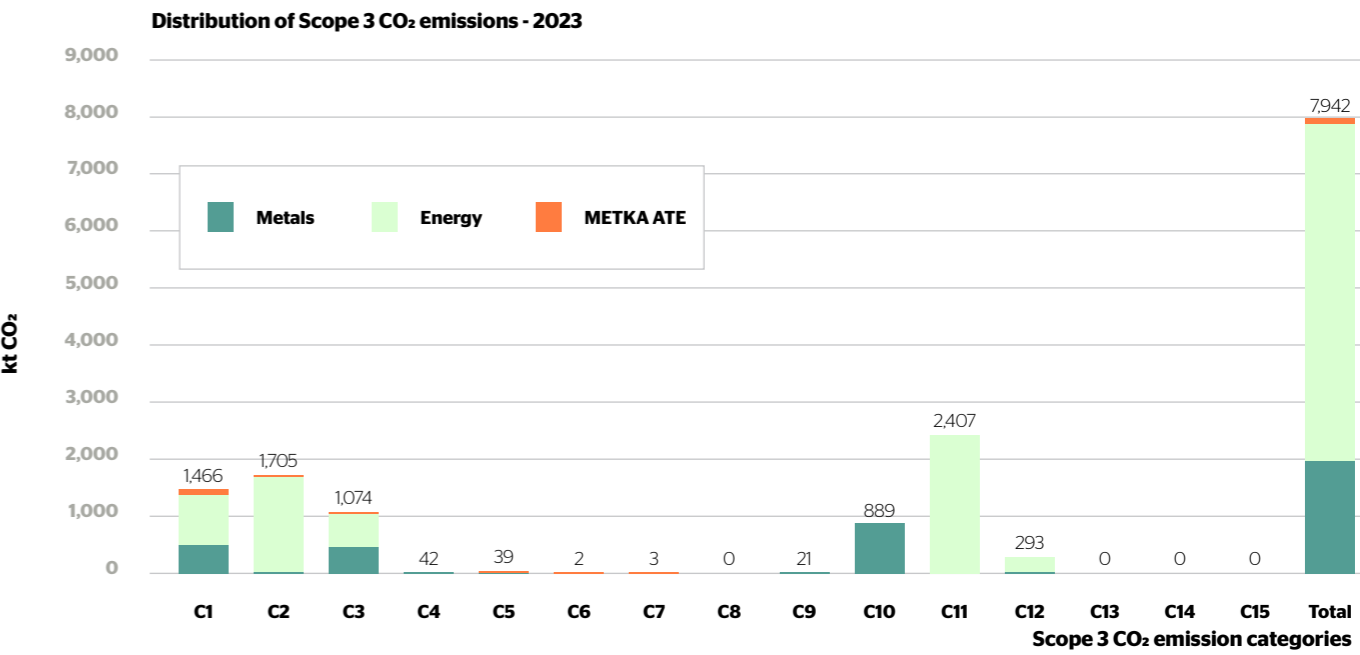
Table of Indirect Emissions (Scope 2) in metric tons of CO ₂ equivalent [GRI 305-2]	2021	2022	2023
Total Indirect Emissions	1,337,935.2	1,281,939.2	1,555,613.5
Electric power (CO ₂ 100%)	100%	100%	100%

B9. Indirect CO₂ emissions (Scope 3)

CO₂ emissions (Scope 3) are all indirect emissions (not included in Scope 2) arising in the value chain of MYTILINEOS, including both upstream and downstream emissions. This includes purchased goods and services, transportation and distribution, waste generated during operation, business trips, employee commutes, the use of products sold, and the processing of products sold at end-of-life. Total scope 3 emissions is -7,942 kt CO₂eq in 2023, down 8.9% from 2022. This year-on-year decrease (by 28% in GJ, compared to 2022) is mainly due to reduced gas sales to industrial customers. MYTILINEOS, in the context of the scheduled review of its climate initiatives and targets in 2025, will elaborate scenarios for reducing these emissions in the most important categories. [\[GRI 3-3-e-i\]](#).

Table of Indirect Emissions (Scope 3) [GRI 305-3]	2021	2022	2023
Total Other Indirect Emissions	5,625,346.0	8,722,309.3	7,942,217.1
C1: Purchased goods and services	1,074,601.8	1,688,761.3	1,465,664.3
C2: Capital goods	819,923.4	1,281,625.2	1,705,297.6
C3: Fuel and energy-related activities	1,231,685.0	1,106,925.3	1,074,179.8
C4: Upstream transportation and distribution	13,229.7	12,471.2	42,439.0
C5: Waste generated in operation	47,239.6	59,545.1	38,931.2
C6: Business travel	803.1	718.5	2,084.6
C7: Employee commuting	1,914.3	2,127.0	3,486.8
C8: Upstream leased assets	1,155.8	0.0	0.0
C9: Downstream transportation and distribution	17,507.9	15,913.0	21,185.8
C10: Processing of sold products	1,153,014.0	1,071,653.4	888,822.9
C11: Use of sold products	1,190,582.1	3,331,599.4	2,407,162.5
C12: End-of-life treatment of sold products	61,892.0	150,969.9	292,962.6
C13: Downstream leased assets	0.0	0.0	0.0
C14: Franchises	0.0	0.0	0.0
C15: Investments	0.0	0.0	0.0

1. KPI according to the "European Commission Guidelines on reporting climate-related information". The calculation of indirect greenhouse gas emissions (Scope 2) shall be carried out using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) into carbon dioxide equivalents (CO₂eq). For the conversion factor values, the available Residual Energy Mix in each country where the Company operates has been used. For Greece, where 99.9% of Scope 2 CO₂ emissions are emitted, the emission index (kg CO₂ / kWh) of the RES & GUARANTEES OF ORIGIN OPERATOR (DAPEEP) of 2022 has been used.



B10. Other Air Emissions

As far as the remaining significant air emissions are concerned, they **decreased overall compared to 2022 levels**. The total amount of nitrogen oxide (NOx) and sulphur dioxide (SOx) emissions recorded a decrease of 11.1%. The amount of fluoride also recorded a decrease of 9.2%, while a further 15.2% reduction in the amount of particulate matter (PM) was achieved. On the other hand, total CF₄ and C₂F₆ emis-sions remained almost stable (a slight increase of 1.1%). [\[GRI 3-3-e-i\]](#)

The main reason for the reduction of the majority of the remaining significant air emissions is due to the complete substitution of the use of fuel oil by natural gas in 2023 for the production of anhydrous alumina. In particular, as regards the reduction of fluoride emissions, this is due to the intensified cleaning of the networks in the gas electrolysis treatment facility. [\[GRI 3-3-e-i\]](#)

Table of other significant air emissions (t) [GRI 305-7]	2021	2022	2023
Total of other significant air emissions (t)	4,858.5	4,964.6	4,420.7
SOx	3,214.3	3,273.6	2,892.2
NOx	1,363.4	1,413.8	1,276.2
CF ₄	10.8	7.9	8.0
C ₂ F ₆	1.3	1.0	1.0
Fluorine	210.8	214.5	194.8
Particulates	41.8	38.9	33.0
VOC - Volatile Organic Compounds	3.9	7.0	6.6
Perfluorocarbon (PFC)	12.1	7.9	8.9
Persistent Organic Pollutants (POPs)	0	0	0
Hazardous Air Pollutants (HAP)	0	0	0
Hydrofluorocarbon (HFC)	0	0	0
Sulphur hexafluoride (SF ₆)	0	0	0
Nitrogen trifluoride (NF ₃)	0	0	0
Dioxins / Furans	0	0	0
Polycyclic Aromatic Hydrocarbons (PAHs)	0	0	0
Heavy Metals (E.g. Mercury (Hg), Lead (Pb), etc.)	0	0	0

At the same time, within 2023, the **Environmental Management Systems** were inspected both in the context of internal audits in coop-eration with company consultants (internal audit/second party), as well as by an independent official Certification Body (external audit/ third party) and no non-compliance occurred (main or secondary). All suggestions for improvement identified in internal and external audits are evaluated during the Management Review, relevant actions are planned and their implementation is arranged. [\[GRI 3-3-e-iv\]](#)

Water Management



Management approach and impacts on sustainable development and human rights [GRI 3-3-a] [GRI 3-3-b]

The water is a key and irreplaceable natural resource for MYTILINEOS’ core activities. The Company manages water resources with a high sense of responsibility towards both the natural environment and the human rights of the local populations adjacent to its facilities. The Metallurgy and Energy Sectors of MYTILINEOS account for **99% of water consumption** (sea, underground and potable water) for bauxite mining, alumina, aluminium and electricity production, with steam production and cooling processes identified as the main water-intensive functions. At the same time, in addition to MYTILINEOS’ business activities that require the withdrawal and consumption of significant quantities of water, the Company, recognizing the importance of this natural resource, undertakes **initiatives aimed at responsible withdrawal, efficient use and savings**, as well as **controlled management of water discharges**. Also, the issue of responsible water management is included in both the [Environmental Policy](#) and the [Human Rights Policy](#) of the Company. [GRI 303-3] [GRI 303-4]

Key Impacts Description

Potential impact on marine organisms from the discharge of seawater, used to cool the towers of the Company’s thermal power plants, to a temperature higher than the withdrawal temperature.

Key Impacts	Impact Type				Impact horizon
	Actual	Potential	Positive	Negative	
Potential impact on marine organisms from the discharge of seawater used to cool the Company’s thermal power plant towers, at a temperature higher than the withdrawal temperature.		✔		✔	Long-term
Access for employees and citizens of local communities to safe and potable water and sanitation facilities to meet their needs.	✔		✔		Short, Medium and Long-term
Change in the ratio of potable to saline water in the aquifer (groundwater) utilized by the Company for both its production activities and to meet the needs of local community settlements, due to salinization.		✔		✔	Long-term

The Company’s contribution to the impacts

The impacts occur in the areas of the industrial units, the Business Sectors, and subsidiaries of MYTILINEOS. The impacts are caused by the Metallurgy and Energy Sectors of MYTILINEOS, while the subsidiary company DELPHI-DISTOMON may be indirectly involved.

Major risks

- **Possible future changes in the withdrawal limits and discharge parameters** in the Environmental Terms Approval Decisions of the Company’s industrial plants, particularly in the Metallurgy and Energy Sectors. It refers to a potential risk that may result in increased capital and operational maintenance costs associated with the development of alternative water supplies.

Company policies and commitments [GRI 2-23-a]

[GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

- Responsible management of water withdrawal, use and discharge, in accordance with [MYTILINEOS’ Environmental Policy](#). [GRI 3-3-c]
- MYTILINEOS’ voluntary participation in the **Global Sustainable Development initiative CDP - Water Security**, through which it expresses its commitment to responsibly manage the potential risks associated with water resources management from its activity, by receiving an annual assessment, which is available in the “[ESG Ratings](#)” section of the Company’s website, which is constantly updated, presenting the most up-to-date results of all sustainability criteria assessments received by the Company. [GRI 3-3-d-ii]

Impact management and response tactics

[GRI 303-1] [GRI 303-2] [SASB IF-EU-140a.3]

To manage water more efficiently, MYTILINEOS implements continuous improvement practices and programs in all its main production units. More specifically:

In all Company’s Business Sectors:

- **Regulatory compliance** regarding water management is ensured by strictly following the Environmental Terms Approval Decisions and Water Use Licenses in all industrial plants of the Company. [GRI 303-2] [GRI 3-3-d-i]
- The Company **communicates regularly** with competent authorities and regulatory bodies to identify and assess the future potential of regulatory changes to sustainability issues, including water. [GRI 3-3-d-i]
- Internal targets are set annually for water consumption.
 - Specifically, the main objective that concerns all Business Sectors and subsidiaries of the Company concerns **“Zero incidents of water pollution”**.
 - Especially in the Metallurgy Sector, two sub-key targets are set concerning:
 - “Total withdrawal of water from boreholes (industrial & water supply use) <13.5 megalitres/day (ML)” and
 - “Total water withdrawal from boreholes (industrial use for primary aluminium production) <7 megaliters/day (ML) & potable water for the plant <0.35 megaliters/day (ML)”. [GRI 3-3-e-ii]
- Care is assigned for the **monitoring of targets** and the responsible management of water resources from the activity of all industrial units to those responsible for the environment, in each Branch of the Company. [GRI 3-3-e-ii]
- An **Environmental Management System** certified according to ISO 14001 is implemented, through which possible incidents are managed and dealt with, by drawing up plans to minimize leakage risks, by implementing predictive, preventive, and corrective measures that ensure the good condition of water. [GRI 3-3-e-i]
- Every Business Sector of the company monitors the objectives and the responsible management of water resources through the environmental managers of all industrial units. [GRI 3-3-e-iii]
- **Continuous improvement and enrichment of** the Company’s practices in this field is pursued, through voluntary participation in the global Sustainable Development initiative CDP - Water Security. [GRI 3-3-e-iv]

In **MYTILINEOS Energy Sector**, and especially in the M Energy Generation & Management Business Activity it is ensured that the effective management of water has been taken into account from the design phase of the thermal plants, aiming at its maximum savings.

In **MYTILINEOS Metallurgy Sector**:

A. Responsible water withdrawals:

- The **needs of alumina and aluminium production plant facilities**, including those of the Combined Heat and Power (CHP) plant and the Independent Power Plants (IPP1 & IPP2), **are covered by**:
 - a network of seventeen (17) boreholes, from which the water withdrawn is consumed for industrial - energy use, as well as the water supply of neighboring settlements. [GRI 3-3-d-ii] & [GRI 3-3-d-iii]

- two (2) boreholes for the withdrawal of brackish water, which belong to the network of seventeen (17) boreholes and are used exclusively for the closed-circuit cooling of the smelter and the anodes, while the brackish water, after being used for cooling the above facilities, is returned to the sea. [GRI 3-3-d-ii]
- seawater withdrawal for the cooling needs of the CHP and the IPP plants, which is returned to the sea through a closed pipeline [GRI 3-3-d-ii]
- groundwater withdrawal carried out at the DELPHI - DISTOMON construction sites when required due to flooding, and the water is discharged to the surface in an adjacent stream. [GRI 3-3-d-ii]

In the context of the above, the Company is diligent and ensures that:

- **the amount of seawater withdrawn** for the cooling needs of the CHP plant is **lower than the strict withdrawal limits** set in the Environmental Terms Approval Decisions and Water Use Permits. [GRI 3-3-e-ii]
- groundwater withdrawal is carried out through **a controlled network of boreholes**, which **allows the water to be renewed in a short period of time**, after withdrawal, in a natural way through rainfall, snowfall, etc. (renewable sources). The **water level of the wells in the borehole network is constantly monitored** to ensure that the withdrawal is compatible with the limits set by the Water Use Permits. [GRI 3-3-e-ii]
 - In particular, a **special study** carried out in 2021 by the Company’s Metallurgy Sector, regarding **the management of withdrawals from the borehole network** in relation to the total potential of the wider region’s aquifer, showed that the average drawdown of the region’s hydrological basin is in the order of 51.36 million m³ (rainfall, snowfall, etc.).
 - According to the Water Use Permits, the Company has the right to pump 10% of this quantity, while the actual pumping rate is even lower, **which ensures the preservation of the water level in the aquifer** and consequently in the boreholes, while the above is confirmed by the continuous measurements made on the levels of the wells. [GRI 3-3-e-iii]

B. Risk and impact analyses:

- Most of MYTILINEOS’ activity that interacts with water takes place in Greece, which as a country is among the regions of the world recognized as high risk of water scarcity. However, it is noted that according to the methodology of the **World Resources Institute**, [Aqueduct](#)¹, Greece shows an insignificant tendency to change the dynamic volume of its groundwater. The Company, in the context of responsible water pumping, conducts analyses in the underground aquifer of the alumina and aluminium plant area on the basis of hydrogeological studies. [GRI 3-3-d-ii]
- In particular, the Metallurgy Sector has completed **a special Risk & Impact Assessment** on the underground aquifer of the area, as well as a **series of hydrogeological studies**, which led to the creation of an appropriate corrective preventive action plan. [GRI 3-3-d-iii] **ASI**

C. Water recycling and reuse programs:

- **Water recycling and reuse programs are implemented** in production processes or secondary uses of the Metallurgy Sector, to the maximum extent possible, as well as rainwater collection and utilization practices. [GRI 3-3-d-iii] **ASI**

1. <https://www.wri.org/aqueduct>

- The **method of utilizing discarded seawater from another unit of the Company**, in the energy complex of Agios Nikolaos, Boeotia, is systematically applied for the cooling of the towers of the thermoelectric production unit, thus avoiding the pumping of a significant amount of seawater estimated at **>6,200ML** on average on an annual basis. [\[GRI 3-3-d-iii\]](#)
- **The method of utilizing discharged seawater from an adjacent fuel refining unit of another company** for cooling processes at the Company's thermal plant in Corinth is systematically applied, **thus avoiding** the pumping of an additional amount of sea water estimated at **>250 ML** on an average annual basis. [\[GRI 3-3-d-iii\]](#)
- The largest percentage of liquid waste produced by the Metallurgy Sector is recycled within the production process itself. [\[GRI 3-3-d-iii\]](#)
- The **technological upgrading works of the infrastructure**, related to the use of discarded brackish water in order to replace quality water for industrial use, and the reduction of industrial water consumption were completed in the 3rd quarter of 2023. The total industrial water savings for 2023 are estimated at approximately 297,000 m³. [\[GRI 3-3-d-iii\]](#) **ASI**
- Also, during the mining activity of the subsidiary company DELPHI-DISTOMON, the water used in the process of washing machines in the workshops, through a sedimentation-filtration system, **is fully recycled and utilized for irrigation**. At the same time, **liquid waste is filtered** from washes and biological cleaning of offices (small quantities) which is subject to regular control of chemical analyses. [\[GRI 3-3-d-ii\]](#)

D. Water consumption reduction programs

- **Leakage controls** are carried out at the aluminium plant and neighboring settlements in cooperation with the respective technical services. From these audits, the decrease that occurred in 2023, was approximately 10% compared to the consumption of potable water of the plant for the year 2022 and 35% compared to 2021. [\[GRI 3-3-d-ii\]](#) [\[GRI 3-3-f\]](#)
- For 2024, a detailed mapping of the plant's industrial water network is planned, with the aim of installing flow meters and isolation valves for monitoring and effective management of water consumption.
- An **employee awareness campaign** was conducted with an appropriate message **to save water, among other environmental issues**, which was screensaver on the computers of the alumina and aluminum plant in the framework of World Environment Day A continuation of this action is the creation of a cloth bag bearing a printed environmental message and which was distributed to employees. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-f\]](#)

E. Responsible water discharge:

- **Water discharges** in all production units and subsidiaries are monitored and controlled, in order to **ensure the quality of the discharged water** through parameters defined by the environmental regulations and terms, according to which the environmental permits of the facilities have been obtained. In particular, the specifications and limits of the wastewater resulting from each activity are determined by the Decisions Environmental Terms Approval and Water Use Permits. [\[GRI 3-3-d-i\]](#)
- Measurements are carried out to **control the quality of disposal of treated industrial wastewater** on a continuous basis of pH and temperature flow, while once a month analyses are carried out at the outlet of the treatment plant, concerning temperature, suspended solids, total dissolved solids, COD, BOD5, pH, sulphides and fluorides. As to the characteristics of

the marine receiver where the discharge takes place, **its physico-chemical characteristics are monitored** in terms of compliance with Environmental Quality Standards (EQS). [\[GRI 303-2\]](#) [\[GRI 306-1\]](#)

- Priority substances are defined, and **discharge limits are set** for these substances as regulated by the EPPO of each plant, In particular, **no incidents of exceeding the limits or incidents of non-compliance with the legislation were observed in 2023**. [\[GRI 3-3-d-ii\]](#) [\[GRI 303-4d\]](#) **ASI**
- In particular, the **water used during the mining activity** of the subsidiary company DELPHI-DISTOMON in the drilling process **is discharged into the subsoil without changing the water quality**. [\[GRI 3-3-d-i\]](#)

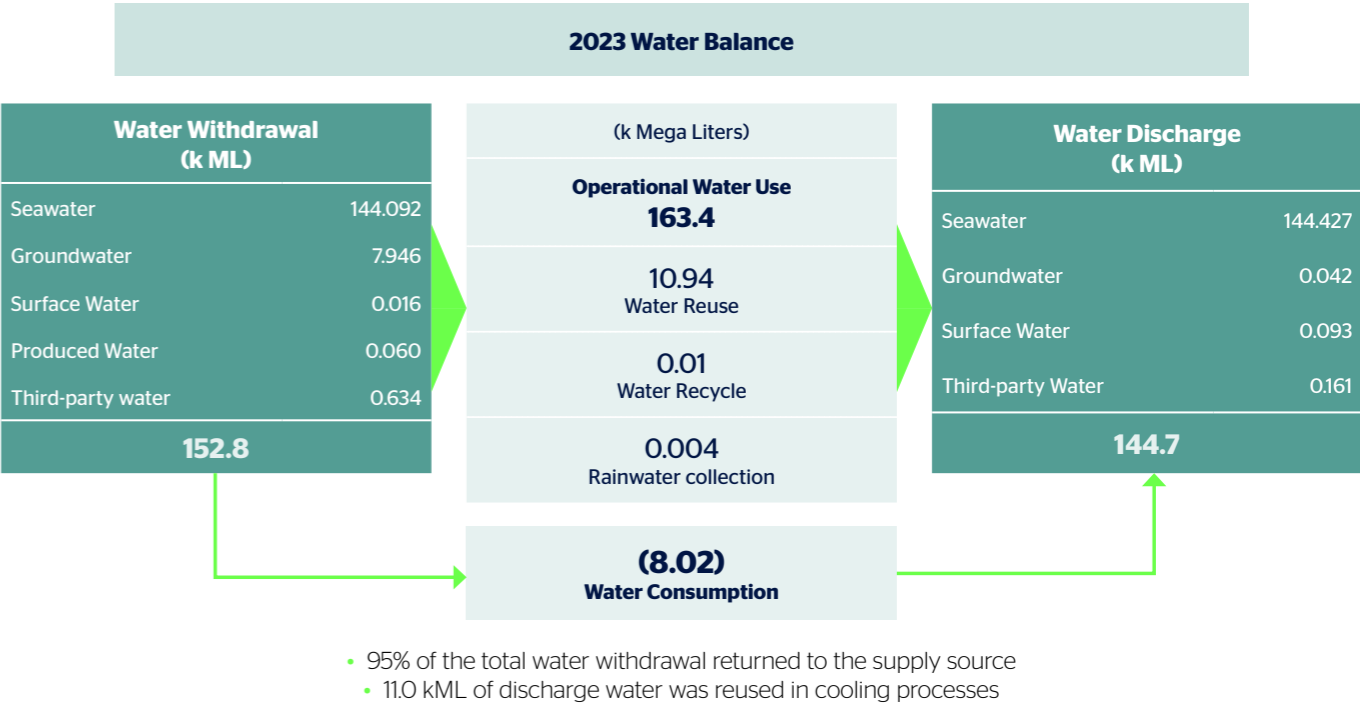
Effectiveness of the actions

[\[SASB EM-CM-140a.1\]](#) [\[SASB EM-M-140a.1\]](#) [\[SASB EM-MM-140a.2\]](#)
[\[SASB IF-EU-140a.1\]](#) [\[SASB IF-EU-140a.2\]](#)

The Company's water withdrawal activities **do not limit or threaten the adequacy of the available water** in the aquifer, nor any water source that is of high value for biodiversity conservation or important to local communities.

Specifically, in 2023:

- **No incidents of non-compliance** with permits, standards and regulations on water quantity, availability or quality were reported. [\[GRI 3-3-e-iii\]](#)
- The only amount of water withdrawn from **environmentally sensitive areas** amounted to 31.2 ML and came from groundwater due to the **lack of connection of the construction site areas to water supply networks**. All the withdrawn quantity was discharged into the subsoil through moistening of the soil of the construction sites for the installation of renewable energy sources to reduce dust, as well as the cleaning of solar panels for more efficient operation Plant. [\[GRI 3-3-e-iii\]](#)
- A total of 152.748 thousand ML of water was withdrawn for use, 13,060 ML less than in 2022, **achieving a reduction of -8%**, while the amount of used water returned to water recipients after quality treatment and in accordance with the approved environmental terms per Sector of Activity, was 144.723 thousand. ML. **As a result, total water consumption amounted to 8.02 thousand ML**, recording an increase of almost 23.3%, which is mainly due to the start of operation of the new CCGT station, with a capacity of 826MW, at the Energy Center of MYTILINEOS in Ag. Nikolaos, Boeotia. In contrast, **freshwater consumption decreased by 12.6% compared to 2022**. [\[GRI 3-3-e-iii\]](#)
- Regarding wastewater discharges, efforts continued in 2023 to manage them in the best possible way, both for the protection of the natural environment and for the benefit of human health. **The data on the quality of discharged water are noted to be lower and, in many cases, much lower than those**



Sources and quantities of water withdrawal 2023 [GRI 303-3]		All regions¹	Environmentally sensitive areas
1.Sea (ML)			
Volume of seawater is used to cool the CHP unit of the Metallurgy Sector. The limit of the amount of water withdrawn on an annual basis has been precisely defined according to a decision of the Water Resources Management Directorate of the Region of Central Greece. The needs of construction sites are also included.	Subtotal	144,091.8	1.7
	Fresh water²	0.0	0.0
	Other water types³	144,091.8	1.7
2. Groundwater (ML)			
It refers to the amount of industrial, brackish, and drinking water used primarily to meet the industrial, energy and water supply needs of industrial facilities. This quantity comes mainly from a network of 17 boreholes, owned by the Metallurgy Sector, which the Company exploits in the wider area of its plant facilities, in strict compliance with the decision of the Water Resources Management Directorate of the Region of Central Greece. The needs of construction sites are also included.	Subtotal	7,946.4	0.2
	Fresh water	4,614.1	0.0
	Other water types	3,332.3	0.2
3. Surface water (ML)			
It refers to the amount of water withdrawn from an adjacent stream by the DELPHI-DISTOMON and rainwater that is collected. The needs of construction sites are also included.	Subtotal	15.6	4.3
	Fresh water	11.3	0.0
	Other water types	4.3	4.3
4. Water produced (ML)			
It concerns the quantity of groundwater resulting from the bauxite mining process of the DELPHI-DISTOMON, subsidiary of MYTILINEOS, which is withdrawn and transported for treatment before its final disposal.	Subtotal	60.0	0.0
	Fresh water	60.0	0.0
	Other water types	0.0	0.0
5. Third Parties (ML)			
It concerns the quantity of water from municipal reserves and public supply services that covers the needs of MYTILINEOS' buildings and mainly its industrial facilities, as well as seawater returns from an adjacent refinery of another company and used in the desalination process, for the production of industrial water in a thermal power plant of the Energy Sector.	Subtotal	634.4	25.0
	Fresh water	445.9	6.0
	Other water types	169.5	19.0
Total water withdrawal (Subtotals 1+2+3+4+5)		152,748.2	31.2
Fresh water		5,131.3	6.0
Other water types		147,616.9	25.2

Water discharge by destination 2023 [GRI 303-4]		All regions¹	Environmentally sensitive areas
1. Sea (ML)			
• Metallurgy Sector It concerns the amount of seawater and brackish water from the cooling process of the CHP plant, the amount of brackish water from boreholes used for cooling the alternators of the smelter in the AoG's aluminium plant as well as wastewater and rainwater at the outlet of the primary treatment plant. • Energy Sector Amount of water discharged from the desalination process.	Subtotal	144,427.3	0.0
	Fresh water	377.1	0.0
	Other water types	144,050.2	0.0
2. Groundwater (ML)			
It concerns the amount of water used for drilling the subsoil during the bauxite mining process of DELPHI-DISTOMON.	Subtotal	42.4	15.7
	Fresh water	12.9	0.0
	Other water types	29.5	15.7
3. Surface water (ML)			
It relates to the discharge of water produced from the bauxite mining plant, wetting of dirt haul roads and watering of greenery used for the restoration of the natural environment and the water discharge from the secondary aluminium processing plant, after primary treatment	Subtotal	93.2	0.0
	Fresh water	91.6	0.0
	Other water types	1.6	0.0
4. Third parties (ML)			
It refers to the quantity of municipal liquid waste to public water supply and sewerage services and the quantity of industrial water used in the electric power generation process which is disposed of in a waste treatment plant of Motor Oil after its pH and temperature have been adjusted.	Subtotal	160.5	25.8
	Fresh water	11.7	0.0
	Other water types	148.8	25.8
Total water discharge (Subtotals 1+2+3+4)		144,723.4	41.5
Fresh water		493.3	0.0
Other water types		144,230.1	41.5

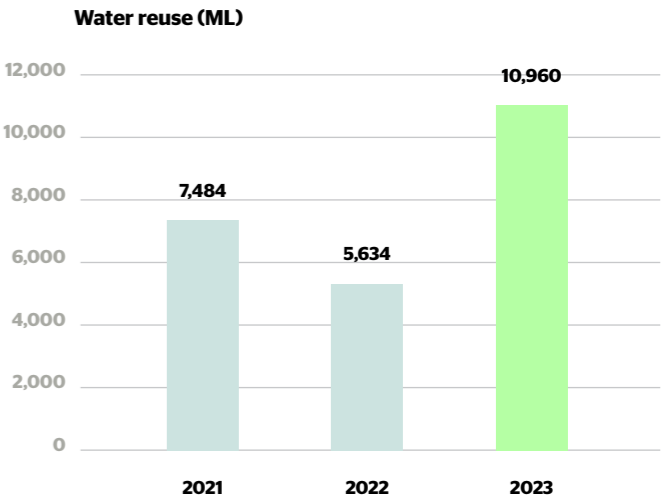
1. They also include environmentally sensitive areas (water stress areas).
2. Fresh water (water with a total dissolved solids concentration equal to or less than 1,000 mg/L).
3. Other water (water with a total dissolved solids concentration greater than 1,000 mg/L).

Total water consumption (all activities)	2021	2022	2023
Total water withdrawal (ML)	169,080.5	165,808.0	152,748.2
Total water discharge (ML)	162,130.0	159,298.1	144,723.4
Total water consumption (ML)	6,950.5	6,509.9	8,024.8
Total water consumption by category 2023 [GRI 303-5]	6,950.5	6,509.9	8,024.8
Fresh water (ML)	5,301.4	5,309.0	4,638.0
Other water (ML)	1,649.1	1,200.9	3,386.8
Total water consumption from Sources/Areas sensitive in terms of water resources	0.3	0.3	0.0
Fresh water (ML)	0.0	0.0	0.0
Other water (ML)	0.3	0.3	0.0

- **The total water consumption withdrawn by the public water utility** amounted to 445.9 ML for 2023 (2022: 335.6 ML). The main reason of this increase of 32.9% is the decrease in boreholes levels due to less rainfalls in 2023. [GRI 3-3-e-ii]
- At the same time, **14.9% of total consumption concerned the supply of** potable water to neighboring settlements to meet their needs. The consumption of drinking water in the settlements compared to 2022 remained almost unchanged, while the percentage of the Company's total consumption decreased by 5.4% due to the commissioning of the new CCGT station, with a capacity of 826MW, at the MYTILINEOS Energy Center in Ag. Nikolaos, Boeotia. [GRI 3-3-e-iii]
- Regarding the Company's efforts for the efficient management of water in the production process, particularly in the **Metallurgy Sector, which manages 99.8% of the total amount of water withdrawn**, the specific water consumption per tonne of hydrated alumina production decreased by 14%, while the reduction in specific water consumption per tonne of primary aluminium production reached 12% compared to 2022. The reductions in water consumption in both cases were achieved due to technological upgrades in the production process. [GRI 3-3-e-iii]

Metallurgy sector - specific water consumption⁴ ASI	2021	2022	2023
Water consumption / tonne of hydrated alumina production (m³)	3.37	3.38	2.90
Water consumption / tonne of primary aluminium production (m³)	1.29	1.28	1.13

- The amount of water reused in other units of the Company, preventing an additional amount of water withdrawal, amounted for 2023 **to 10,959.9 ML** (2022: 5,634.3 ML), corresponding to 7.2% of the total withdrawn water volume, presenting a significant increase of 94.5% compared to 2022, mainly due to the commissioning of the new CCGT plant, with a capacity of 826MW, located in the energy center of Ag. Nikolaou, Boeotia. This quantity concerns 99.9% in the Energy Sector and specifically: a) **the utilization of 10,942.6 ML of discharged seawater** from the cooling network of the Combined Heat and Power plant for the cooling of the thermal power plant in Agios Nikolaos, Boeotia and b) **the recycling of 13.0 ML of wastewater** from the Heat Recovery Boiler of the Combined Cycle Power Plant, in Agioi Theodoroi, Korinthia. The remainder is related to the **use of 4.3 ML rainwater** collected, as a good practice, in the activity of bauxite mining. [GRI 3-3-e-iii]
- The achievement of the above results for the responsible management of the impact of MYTILINEOS' business activity, in relation to water, requires **continuous investments. At the same time, in 2023, total operating costs (OpEx) totaled €811,350**, while the cost of studies carried out by the Hellenic Centre for Marine Research (HCMR) to assess the ecological status of Antikyra Bay amounted to €81,113.



Circular economy & raw and other materials



Management approach and impacts on sustainable development and human rights [GRI 3-3] [GRI 3-3-b]

One of **MYTILINEOS’ main Business Sectors is Metallurgy**, which is a vertically integrated unit that includes bauxite mining, alumina production, as well as aluminium processing and production. The main characteristic of aluminium is its **long life** and its **complete and unlimited recyclability**. The properties of aluminium remain unchanged during its use and can therefore be recycled numerous times without losing its original properties. **The production of secondary aluminium requires only 5% of the energy needed to produce primary aluminium** per kilogram of product, resulting in much lower greenhouse gas emissions in secondary production.

According to the **International Aluminium Institute’s Material Flow Model** (International Aluminium Institute’s Material Flow Model), **the availability of used aluminium worldwide has increased at an average annual rate of 6%**, from 18 million tonnes in 2009 to 33 million tonnes in 2019, and according to a study by the [European Commission](#), the amount of aluminium produced from used aluminium (scrap) increased from one million tonnes in 1980 to more than 20 million tonnes in 2019. **MYTILINEOS applies the principles and available practices of the circular economy in practice in the production of secondary aluminium from the recycling of used aluminium**, through its subsidiary EPALME.

The circular economy approach is also applied to the Company’s initiatives to **reduce waste**, through rational **collection, treatment, and management of all waste-generating activities**, as a key element of MYTILINEOS’ **environmental policy**. The bauxite residues resulting from the production process in the Metallurgy Sector constitute the largest volume of the Company’s solid waste. The **implementation of sound management practices of waste** resulting from its primary aluminium production process **contributes to its efficient operation** and its **compliance with environmental legislation**, while at the same time **minimizing the environmental impact** on all recipients.

Through the sound management of waste, MYTILINEOS **aims to:**

- Reduce waste generation through prevention, recycling, and reuse.
- Reuse materials, extending the life cycle of products for them to be reused and creating additional economic value.
- Increase water recycling and reuse at national level.

Key Impacts	Main impact recipient	Impact Type				Impact Horizon
		Actual	Potential	Positive	Negative	
Production of secondary aluminium that helps to minimize the environmental impact compared to primary aluminium production, while providing an alternative raw material for aluminium production.	Environment	✔		✔		Short, Medium, and Long-Term
Enhancement of innovation in the utilization of bauxite residues resulting from the production of primary aluminium as a raw material for other activities, as well as for the extraction of rare earth elements, through the Company’s participation in research projects.	Company Environment		✔	✔		Medium and Long-Term
Responsible management of all hazardous and non-hazardous waste from all production activities, with emphasis on methods of rational collection, treatment, as well as reuse and recycling where feasible.	Environment	✔		✔		Short, Medium, and Long-Term

The Company’s contribution to the impacts

MYTILINEOS’ improvement regarding the **integration of the Circular Economy Principles is a commitment as stated in the Company’s Strategic Priorities, but also a key challenge, especially in the Metallurgy Sector**, which depends to a large extent on the utilization of specific waste from the production process, either through solutions developed, examined and analysed in the framework of European pilot projects in which the Company participates, or by making it available as a raw material for the production of other industrial materials.

The company’s initiatives that incorporate the Principles of the Circular Economy through waste **minimization, reuse, recycling and recovery of materials and energy, have direct positive environmental impacts on the conservation of natural resources, the reduction of CO₂, the reuse of materials** by extending the life cycle of products (secondary aluminium) so that they can be reused, leading to a reduction in **untreated wastewater**, as well as a substantial increase in water reuse, while creating additional **economic value for the Company** and actively protecting the human rights of local communities that may be affected

Major risks

A key environmental risk for the Company is the gradual reduction of available bauxite residue disposal sites, which may have social and economic negative effects on the Company.

Regarding the Company’s secondary aluminium business, a non-functional supply chain of aluminium for recycling (scrap aluminium), including the search, collection, transport and disposal stages, is a risk, as they play a key role and are a prerequisite for achieving the Corporate target of increasing secondary aluminium production and contributing to the targets for enhancing the circularity of the materials set in the as part of the European Green Deal.

Company policies and commitments [GRI 2-23]

[GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f] [GRI 3-3-c] [GRI 3-3-d-i]

The main axis of MYTILINEOS’ [Environmental Policy](#) is the application **of Best Available Techniques in the production process** regarding the control, continuous reduction and proper management of solid and liquid waste with **recovery, reuse and recycling techniques**, where feasible.

MYTILINEOS **fully complies and operates in accordance with the licensing acts** of the Region of Central Greece, the Regional Unit of Boeotia and the Environmental Terms Approval Decision regarding the management of specific types of waste, which is deposited in a special Bauxite Residues Disposal Site, which is calculated in the context of measuring the Company’s environmental footprint.

Also, the Company **seeks the continuous improvement of certified** Environmental Management systems ISO14001 and the implementation of ISO 14040 and 14044 guidelines as necessary for the Life Cycle Assessment (LCA) study as a factor that can effectively contribute to enhancing its competitiveness. Also, within 2023, the “Aluminium of Greece” plant proceeded with the preparation for the issuance Environmental Product Declaration (EPD) for hydrated and anhydrous alumina, as well as aluminium.

Impact management and response tactics

[GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

The Metallurgy Sector of MYTILINEOS is responsible for 78% of the Company’s total waste, but the Company seeks the proper management of all solid and liquid waste. To this end, the actions undertaken are the following:

- In each production unit, a **wastewater collection network** has been designed and operates, for processing and recycling, in accordance with the Company’s Environmental Policy, while an effort is made to separate waste at source. [GRI 3-3-d-i]
- Regarding the **management of wastewater discharges** resulting from MYTILINEOS’ activity, this is fully controlled and is done through parameters defined by the environmental regulations and terms, according to which the environmental licenses of its industrial units (AEPO) have been obtained. [GRI 3-3-d-i]
- Regarding the **management of solid waste**, as well as waste **falling under alternative management systems**, the company has a sorting system at source to achieve their reuse and recycling by third parties. The Company cooperates with operators of alternative management systems, which have the approvals provided by law of the National Recycling Organization, as well as with licensed (per waste category) waste collection, transport, disposal/recovery companies in Greece and abroad. [GRI 3-3-d-i]

More specifically, in the **Metallurgy Sector**, the Company:

- In its effort to reduce the consumption of natural resources, but also to reduce the energy required in aluminum production, it has adopted in its production process the practice of **recasting aluminum scrap that replaces the use of raw materials**, while it is in the process of examining an investment to increase the production of secondary aluminum from scrap.
- **Has set specific targets** regarding the production of secondary aluminium and the amount of recycled (scrap) aluminium used. For 2024, the **target** is the use of 50,113t of recycled aluminium and the production of 51,222t of secondary aluminium, while over a five-year horizon (meaning 2028) the **target** is the use of 97,343t of recycled aluminium and the production of 102,998t of secondary aluminium. Via the **aluminium recycling plant** (subsidiary company EPALME) applies in practice the principles of **circular economy**, along with the utilization of long-term know-how in the optimal processing of recycled aluminum that produces new raw materials, consuming significantly less energy, while contributing to the reduction of operating costs and environmental impact. **The main waste of the plant, which is ash, ends up entirely in the cement industry** as an alternative raw material, while **consuming per ton of secondary aluminium produced, 20 times less energy** than required for the production of primary aluminium. [GRI 3-3-d-iii] [GRI 3-3-d-iii]
- **It invests in the installation of pilot plants** for the development of research in the utilization of bauxite residues, participating in European programs **of efficient green technologies** for the production of useful products and materials, as well as in the development of technology for the extraction of rare earths. [GRI 3-3-d-i] [GRI 3-3-d-iii]
- It has also proceeded with the construction - through the subsidiary company **Zeologic S.A.** and its globally patented innovative technologies - Filtration Treatment Plant, where all Wastewater resulting from the production process of Alumina and specifically from red sludge dewatering presses is successfully treated, where the now treated waste meets the specifications

- for disposal in the marine environment. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)
- **It established** -within 2022- a **new innovation division** at the Agios Nikolaos plant, which consists of **3 new departments, Research and Sustainable Development (R&SD), Digital Transformation and Continuous Progress**. In particular, in 2023, the R&SD department participated in 24 research projects co-funded by the EU or the Greek state through the funding agencies H2020/Horizon Europe, EIT Raw Materials, EIT Manufacturing, ERA-MIN 2 and GSRT. These projects explore topics such as:
 - Utilization of bauxite residues focused on 11 out of 24 European projects for the production of scandium, iron, alumina, cement additives and construction products. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) **ASI**
 - **Treatment and continuous recovery of hazardous waste** resulting from the dismantling **of electrolysis basins at the end of their life (carbon and refractory materials)** through a European program from the above-mentioned set. Through the REMOVAL program, the utilization of the carbon part of the waste resulting from the dismantling of electrolysis basins, as a reducing agent in the metallurgical process.
 - Production of alumina from alternative (secondary) sources.
 - Heat recovery - use of RES in aluminium production.
 - New aluminium recycling technologies & digitization of processes in alumina production.
 - New **tools/training courses** for engineers and craftsmen working in the raw materials and metallurgy sector. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) **ASI**
 - **It is noted that the total funding** of the programs, during the period 2017-2027, **exceeds €12 million, as financing of the Metallurgy Sector of MYTILINEOS**. The Company, through the R&SD activity of the Metallurgy Sector, is placed among the leading companies in the aluminium sector worldwide in the field of research for the utilization of bauxite residues, as well as the **recovery of rare earths**. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) **ASI**
 - **It completed 2023**, through its subsidiary **Zeologic S.A.- a study on the treatment of sodium waste in order to classify them as non-hazardous streams**. These waste streams result from the production process of alumina, within the facilities of the “Aluminium of Greece” plant. This unit will process all sludge resulting from the cleaning of the settlers in the alumina production process and will make them non-hazardous, stabilized and manageable with clear environmental benefits such as the possibility of their use as raw material for other industries without further elaboration. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)
 - **It implements actions to further improve waste sorting processes at source**, with the aim of separating possible non-hazardous flows, which due to existing production and collection processes is not possible. Specifically, in 2023, an employee awareness campaign was conducted in the framework of World Environment Day with an appropriate message on the importance of sorting at source. The campaign included the sharing of screensavers on employees’ computers and the distribution of a cloth bag with the relevant message to the staff of AoG. [\[GRI 3-3-d-i\]](#).
 - **It maintains and uses specially designed landfill areas** (hazardous – landfill and inert – landfill), while the deposition of bauxite residues (non-hazardous waste that constitutes almost 68% of the Company’s total waste) is carried out in a special way, based on geotechnical studies, following the natural relief of the area. [\[GRI 3-3-d-i\]](#) **ASI**
 - **It deposits entirely underground, the mining sterile**

- bauxite** (limestone / chemically inert material) produced by bauxite mining, in the payment gaps of the mines without affecting the quality of the storage area either in the short or long term. [\[GRI 3-3-d-i\]](#)
- The implementation of an updated **Life Cycle Assessment (LCA) study** for the assessment of the potential environmental impacts associated with bauxite mining and the production of alumina and alumina from the Metallurgy Sector was completed in 2023. This is a process of assessing the impact of a product on the environment, throughout its life (cradle-to-grave), thus increasing resource efficiency. The LCA study shows the stages of the life cycle that cause the greatest impact on the environment and the predominant type of impact. **The study was conducted in accordance with the principles of ISO 14040 and ISO 14044**, with the aim of providing all the data required in the context of **certification with the Aluminium Stewardship Initiative (ASI)** with the Performance Standard. [\[GRI 3-3-d-i\]](#) **ASI**
 - **It recycles within the production process itself a large percentage of the liquid waste** of the **Metallurgy Sector**, which produces the largest amount of liquid waste, of the Company. Waste that is not recycled in the production process is led through an underground system of **effluent collection pipes** to an **industrial wastewater treatment plant**, which **consists of tanks** sedimentation, oil separator and multilayer activated carbon filters. There is **continuous measurement and online monitoring** of pH, temperature and flow, while there is also a safety tank of 1,330 m³, to which waste is driven, when required, through automatic diversion. [\[GRI 3-3-d-i\]](#) **ASI**
 - At the same time, **three Biological Treatment Stations for the purification of urban wastewater** operate for the needs of the aluminum production plant and local settlements. Specifically, these are **1)** the Biological Treatment Station of Aspra Spitia & Antikyra with a capacity of 10,000 inhabitants, **2)** the Biological Station of Ag. Nikolaos with a capacity of 200 inhabitants that serves the homonymous settlement and **3)** the Biological Treatment Station of the plant with a capacity of 2,000 people, serving the population of the plant and the power stations. The Biological Treatment Station of Aspra Spitia & Antikyra is the first biological treatment station for urban wastewater in Greece and was constructed simultaneously with the settlement, by Degremont-France. According to the Decision for the Approval of Environmental Terms, **monthly analyses are carried out on the effluent of treated wastewater by a quality control laboratory accredited according to ELOT EN ISO - 17025**. During the summer season (May – September) sampling is carried out **in bathing waters** at 8 points of Antikyra Bay, as well as **an annual evaluation by an independent body**. These points include the exit to the sea of the treated water pipeline of the Aspra Spitia & Antikyra Biological Station. The results for this point have shown that they meet the maximum levels laid down by legislation for coastal waters of excellent quality and good quality. [\[GRI 3-3-d-i\]](#) **ASI**

The rate of waste sorting at source increased from 81.8% in 2022 to 85.5% in 2023, while the quantities of non-hazardous waste excluding bauxite residues and sterile decalcification that were led for recovery to third parties remained at the high levels of 2022 (7,500t).

In the **Energy Sector**, and in the **construction of specialized Energy Projects (M Power Projects) as well as in the subsidiary METKA ATE**, there is no management of primary natural resources, but management of semi-finished or finished products

according to project-specific plans and procedures that specify exactly the use of each material, the way of processing and its exact location and operation. Also, during **the design phase of the projects carried out by the sector, the criterion is the use of recyclable materials**. In requests for tenders and contracts with suppliers of materials and equipment there is a special condition for their compliance with the requirements of ISO 14001 and in particular for the non-use of environmentally hazardous materials as well as for the use of recyclable materials to the maximum extent.

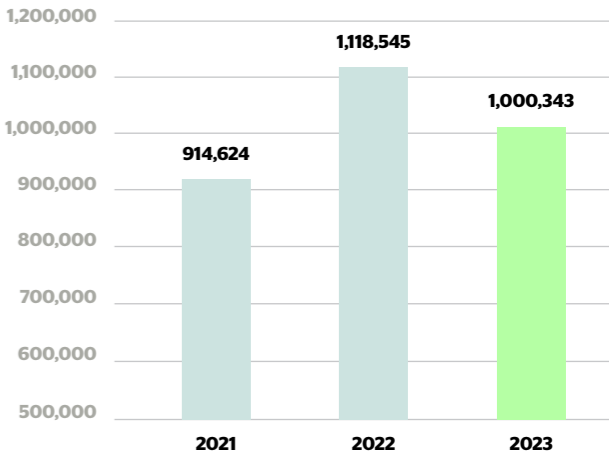
Effectiveness of the actions [\[GRI 306-3\]](#) [\[GRI 306-4\]](#)
[\[GRI 306-5\]](#) [\[SASB EM-CM-150A.1\]](#)

The total quantity of solid waste of the Company for 2023, **amounted to 1,023,052t** (2022: 1,139,702t), recording a decrease of **10%**, which was mainly due to the decrease in the production of Excavation, Construction and Demolition Waste (ECDW), almost 34,000t, because of reduced construction activity in 2023. It is noted that the entire waste category was recycled.

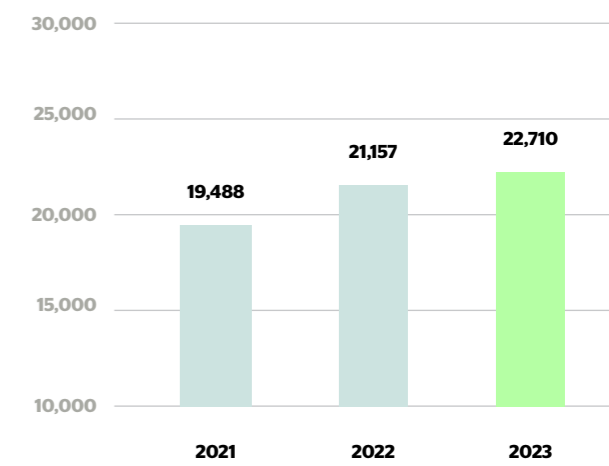
- The bulk of the waste generated results from the production process and processing of raw materials** (e.g. bauxite residues, sterile decalcification), maintenance **operations** (e.g. electrolysis basin waste) and the **processing of the metal to be cast** (e.g. foundry foaming). The management of this waste includes processes of collection, sorting at source, transport, recovery/disposal of all waste streams depending on the nature of each waste and the requirements of the applicable legislation. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-iii\]](#)
- Approximately 150,000 t of waste was recovered through cooperating licensed companies. Of these, approximately 85,000t are bauxite residues and sterile decalcification, approximately 35,000t concern excavation, construction & demolition waste, and the remaining quantity includes waste such as foundry foaming (100% quantity utilization), packaging, waste lubricating oils, etc. [\[GRI 3-3-e-i\]](#)
 - 75% of the total amount of waste concerned bauxite residues and sterile decalcification, while the remaining 25% included aluminium, industrial and municipal waste as well as materials collected and include, among others, used metals (e.g. iron and steel), vehicle batteries, tires, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, vehicle batteries, lamps and consumables from photocopiers. [\[GRI 3-3-e-i\]](#) **ASI**
 - The percentage of solid waste reused, recycled and recovered in various ways either by the Company itself or through third parties decreased by -7 percentage points and amounted to 30.1% (2022: 36.9%) of total waste (including bauxite residues). In this direction, approximately 85,000 tons of bauxite residues and sterile decalcification were disposed of in the cement industry and other industrial uses. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-e-iv\]](#) **ASI**
 - The amount of solid waste sent to landfill, as a percentage of total non-hazardous solid waste generated (excluding bauxite residues under special treatment), increased in 2023 to 3.4% (2022: 1.3%). The increase comes from the increase in waste sent to landfill and from the parallel decrease in total non-hazardous solid waste produced. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#)
 - As regards hazardous waste, an increase of 7.3% was observed, mainly due to an increase in waste lubricating oils (ALE) and dust collected from exhaust gas treatment. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-iv\]](#)
 - Achieving the above results for the responsible management of the effects of MYTILINEOS’ business activity, in relation to the circular economy and waste management, requires

ongoing investments and corresponding operating costs which for 2023, amounted to a total of €10,411,469 (OpEx). The cost of treating and disposing of waste increased in 2023, by approximately 140%.

Quantities of non-hazardous waste (t)



Quantities of hazardous waste (t)



Non-hazardous waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2023
Recycling	619.5	54,032.8	54,652.3
Reuse	13,292.9	155,404.2	168,697.1
Recovery by third parties	0	76,946.1	76,946.1
Controlled Landfill (Accumulation site for Bauxite Residues)	677,962.6	0	677,962.6
Controlled Landfills for Non-Hazardous Waste	3,331.2	7,567.5	10,898.7
Storage for recovery	11,064.3	0	11,064.3
Storage in third-party facilities	0	118.8	118.8
Recovery/Exchange	0	2.7	2.7
Incineration	0	0	0
Total	706,313.6	294,029.0	1,000,342.6

Hazardous waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2023
Recycling	0	2,207.2	2,207.2
Reuse	0	241.7	241.7
Recovery by third parties	0	5,297.9	5,297.9
Controlled Landfills for Hazardous Waste	14,583.7	126.5	14,710.,2
Storage for recovery	175.3	0	175.3
Storage in third-party facilities	0	14.2	14.2
Recovery/Exchange	0	30.5	30.5
Incineration	0	32.6	32.6
Total	14,759.0	7,950.6	22,709.6

Waste generation by waste category [GRI 306-3] [GRI 306-4] [GRI 306-5]	Quantity diverted from disposal	Quantity directed to disposal	2023
Waste resulting from exploration, mining, quarrying and physical and chemical processing of minerals	85,237.2	681,597.7	766,834.9
Waste from inorganic chemical processes	0.1	0.0	0.1
Waste from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), sealants and printing inks	5.6	0.0	5.6
Waste from thermal processes	11,468.1	2,237.4	13,705.5
Waste from the shaping and physical and mechanical surface treatment of metals and plastics	4,207.2	0.0	4,207.2
Oil waste and liquid fuels waste (except edible oils)	846.1	0.0	846.1
Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	6,272.9	0.0	6,272.9

Waste generation by waste category [GRI 306-3] [GRI 306-4] [GRI 306-5]	Quantity diverted from disposal	Quantity directed to disposal	2023
Waste not otherwise specified in the list	4,249.5	11,693.2	15,942.7
Construction and demolition waste (including excavation soil from contaminated sites)	205,830.7	298.6	206,129.3
Waste from human or animal health care and/or related research	0.8	0.0	0.8
Waste from waste treatment facilities, off-site wastewater treatment plants and water industry facilities for the preparation of water intended for human consumption and water for industrial use	855.2	177.3	1,032.5
Municipal waste (household waste and similar waste from commercial, industrial and institutional activities), including separately collected fractions	507.1	7,567.5	8,074.6
Total	319,480.5	703,571.7	1,023,052.2

1. The classification has been made according to the categories of the European Waste Catalogue.

Regarding the **use of key natural resources** utilized in the production of MYTILINEOS' basic products, in 2023, the quantity of bauxite used in the Metallurgy Sector for the production of alumina and aluminium remained almost unchanged compared to 2022 **(-0.04%)**, while the total quantity of natural gas consumption used in the Energy Sector increased by **16.2%**. It is noted that in the activities of the Energy Sector and especially in the field of **construction of specialized Energy Projects (M Power Projects)**, there is no management of primary natural resources, but management of semi-finished or finished products. More specifically:

In the **Metallurgy Sector** in 2023, approximately 2.56 million. tons of raw materials were used for the production of alumina, primary and secondary aluminium products, a quantity almost constant compared to 2022 (+0.6%). 74% of this quantity was bauxite, while the remaining 26% concerned the use of other raw materials from non-renewable sources, such as soda, packaging materials, etc.

Also, in this direction, the Company proceeded to the expansion of its activities in the industrial production, processing and trading of metals and especially aluminum alloys and their products, investing in **the know-how of optimal processing of aluminum scrap**, in order to be able in the coming years to produce raw material again, consuming a much smaller amount of energy, thus significantly reducing costs, but also the impact on the environment. **Production of secondary aluminium from scrap in 2023 increased** to 55,878 t, or 11.8% compared to 2022. **ASI**

In the **Energy Sector** and especially in the M Energy Generation & Management Business Activity, the raw material in power plants is natural gas, which is the transition fuel towards a lower greenhouse gas emissions economy. In 2023, the new Natural Gas-fired Combined Cycle power plant (CCGT) with a capacity of 826MW participated in the power generation potential of Greece, resulting in an increase in natural gas consumption by 16.2% compared to 2022, making the Agios Nikolaos Energy Center in Boeotia a new national energy center. It is noted that the annual consumption of natural gas in the Company's thermal units is associated with fluctuations in electricity production on an annual basis.

As for materials used in the production process but not included in the final product, such as lubricating oils and chemicals, their usage increased by approximately 7% by mass in 2023 compared to 2022. The increase in the consumption of these materials arises from the overall increase in primary and secondary aluminum.

Weight (in tonnes) of materials used in the production and packaging of the Company's main products [GRI 301-1]				
	2021	2022	2023	Basic Materials
Metallurgy Sector ASI				
(Primary & Secondary Aluminium Production Units)				
Raw materials	2,373,121	2,293,925	2,290,892	Bauxite, Alumina, Aluminium Scrap
Materials (not incorporated in the end product)	264,995	248,996	267,337	Anodes, Lime, Soda, Coke, Tar
Packaging materials	1,125	1,629	1,436	Pine planks , packaging strapping
Total	2,639,241	2,544,550	2,559,665	
Recycled materials	50,181	54,527	55,302	Aluminium scrap
Percentage of recycled materials [GRI 301-2]	1.90%	2.14%	2.16%	
Secondary Aluminium Production Units				
Raw materials	40,473.7	45,201.7	50,232.0	Primary Aluminium, Aluminium Scrap, Pre-Alloys
Materials (not incorporated in the end product)	61.0	106.2	47.4	Flux, exhaust gas treatment materials, kaolin, lubricants
Packaging materials	174.8	267.8	326.2	Wooden beams, strapping, cardboard
Total	40,709.5	45,575.7	50,605.6	
Recycled materials	36,353.9	40,027.6	44,381.0	Aluminium scrap
Percentage of recycled materials [GRI 301-2]	89.3%	87.8%	87.7%	
Composite Construction and Steel Treatment Units				
Materials (used in the production process but not incorporated in the end product)	313.3	310.4	218.0	Oxygen, Argon, Nitrogen
Semi-finished products	1,301.1	1,164.9	1,357.5	Steel
Packaging materials	8.1	13.0	4.7	Nylon
Total	1,622.5	1,488.3	1,580.2	
Recycled materials	440.8	393.4	473.8	Recycled steel
Percentage of recycled materials [GRI 301-2]	27.2% ¹	26.4% ²	30.0% ³	

1

Of the 1,301.1 t of the total weight of the materials used that are part of the final product, approximately 1,102.0 t were steel materials (in the form of sheet metal, section iron or other construction materials). Around 40% of steel production in the EU comes from electric arc furnaces that allow steel to be produced from 100% recycled scrap raw material (Source: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EN:PDF> , Strasbourg, 11.6.2013, COM(2013) 407 final, p.11). Therefore, 440.8 t (40% of 1,102.0 t steel materials) corresponds to recycled steel.

2

Of the 1,164.9 t of the total weight of materials used forming part of the final product, approximately 983.6 t were steel materials (in the form of sheet metal, section iron or other construction materials). Around 40% of steel production in the EU comes from electric arc furnaces that allow steel to be produced from 100% recycled scrap raw material (Source: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EN:PDF> , Strasbourg, 11.6.2013, COM(2013) 407 final, p.11). Therefore, 393.4 t (40% of 983.6 t of steel materials) corresponds to recycled steel.

3

Of the 1,357.5 t of the total weight of the materials used forming part of the final product, approximately 1,184.4 t were steel materials (in the form of sheet metal, section iron or other construction materials). Around 40% of steel production in the EU comes from electric arc furnaces that allow steel to be produced from 100% recycled scrap raw material (Source: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EN:PDF> , Strasbourg, 11.6.2013, COM(2013) 407 final, p.11). Therefore, 473.8 t (40% of 1,184.4 t steel materials) corresponds to recycled steel.



Pollution prevention



Management approach and impacts on sustainable development and human rights [GRI 3-3] [GRI 3-3-b]

Managing the risks of pollution and spills is directly linked to the **safe, socially and environmentally responsible operation** of MYTILINEOS. In its activity, the Company prioritizes the prevention of any land and marine pollution, the environmentally sound management of all emissions in accordance with the legislation and the internationally agreed frameworks, and the reduction of such emissions into the air, the water and the soil to reduce their impact on human health and the environment. In addition, the Company aims at a reduction of waste production through prevention, recycling and reuse.

The challenge in the framework of Sustainable Development

The key challenge for the Company is to effectively prevent any form of pollution of the natural environment from its production activity (gaseous emissions, solid and liquid waste, use of chemicals) and from any major industrial accidents.

Key Impacts	Primary Impact Recipient	Type of Impact				Impact Horizon
		Actual	Potential	Positive	Negative	
Failure to prevent and manage the relevant risks could have a significant impact on the Company's economic, industrial and natural capital, leading to reduced value generated either through increased costs for addressing these incidents, or through possible administrative sanctions that may be imposed or the Company's possible inability to continue to conduct its activities.	Environment Human Rights		✔		✘	Short, Medium, and Long-Term
The proactive management of pollution risks is directly linked to the safe and socially and environmentally responsible operation of all the Company's facilities, as well as to actual positive impacts such as: the prevention of any land and marine pollution and the proper management (recycling, reuse) of waste and spills of hazardous materials into the soil, in accordance with the internationally agreed frameworks, reducing risks to human health and the environment.	Environment Human Rights	✔		✔		Short, Medium, and Long-Term

The Company's contribution to the impacts

The impacts occur in the areas of operation of MYTILINEOS' industrial plants, BUs, subsidiaries and main suppliers. The Metallurgy and Energy sectors of MYTILINEOS and its subsidiaries DELPHI-DISTOMON and KORINTHOS Power are directly involved in these impacts, while key Company suppliers may be indirectly involved.

Major risks

The possible deterioration of air quality, of surface and ground waters and of the marine environment, as well as pollution of the soil from industrial accidents are permanent potential risks for the Company, which can lead to outages, affect its financial position, strategy and reputation.

Company policies and commitments

[GRI 2-23] [GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

Active prevention of any identified pollution risk from the Company's activities is at the heart of its approach, in line with the key pillars of the MYTILINEOS [Environmental Policy](#). [GRI 3-3-c]

The Company fully embraces and incorporates the internationally accepted **Principles of Responsible Entrepreneurship of the UN Global Compact**, which highlight **environmental protection** as a special area of commitment. Specifically, through:

- Principle 7, the Company supports a precautionary approach to environmental challenges,
- Principle 8, undertakes initiatives to promote greater environmental responsibility,
- Principle 9, encourages the development and diffusion of environmentally friendly technologies.

Through its business practices and overall approach to environmental issues, MYTILINEOS is committed to promoting a work and social **environment that demonstrates respect for Human Rights, and its ongoing concern to preventing environmental incidents that could call into question the protection of Human Rights** directly related to the natural environment, in line with the key pillars of MYTILINEOS [Corporate Social Responsibility Policy](#) and the Human Rights Policy which sets out the basic principles relating to the respect for human rights and sets the framework for managing employment. [GRI 3-3-c]

Impact management and response tactics

Managing pollution risks is directly linked to the safe and socially and environmentally responsible operation of all the Company's facilities. The Company's **annual target is to avoid any incidents and industrial accidents that could cause pollution of the natural environment, across all its business activities**. [GRI 3-3-e-i]

To address this risk, preventive and suppressive response measures are implemented in all MYTILINEOS Business Sectors. [GRI 3-3-d-i]

In the **Metallurgy Sector**, a dedicated **Major Accident Prevention Policy** is in place for preventing and responding to large-scale industrial accidents. The policy addresses risks associated with the use of hazardous substances in the Business Unit's activities and, through a set of concrete measures, ensures risk prevention and the avoidance of any incident involving deterioration of the environment. [GRI 3-3-c] [GRI 3-3-d-i] **ASI**

The **main pollution risk prevention measures** applied in the Metallurgy Sector concern:

- **strict adherence to the Environmental Terms** of Metallurgy's activities, [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-e-i]
- **continuous measurement and monitoring of gaseous emissions** and particulate matter, [GRI 3-3-d-i] [GRI 3-3-e-i]
- **measurement and monitoring of water** discharges from point sources, [GRI 3-3-d-i] [GRI 3-3-e-i]
- **compliance with the measures provided for in the Safety Study** (SEVESO III - implementation of JMD 172058/2016), [GRI 3-3-c] [GRI 3-3-d-i]
- **conducting exercises to deal with industrial accidents** provided for in the Safety Study (SEVESO III - implementation of Joint Ministerial Decision 172058/2016) which in some cases is carried out in cooperation with external bodies (Fire Brigade, Civil Protection, etc.), [GRI 3-3-c] [GRI 3-3-d-i]
- **final disposal of inert and non-hazardous waste in insulated areas** with the construction of a geological barrier of low water permeability, as well as the corresponding disposal of hazardous waste in specially constructed and insulated with geomembrane and geotextile cells, [GRI 3-3-d-i]
- **application of Best Available Techniques** in infrastructure and industrial waste management (electro filters, bag filters, primary industrial waste treatment, biological wastewater treatment, olive oil tanks and safety basins, sewerage traps, tank level meters, waste quality meters, specially designed waste disposal sites, etc.), [GRI 3-3-d-i] [GRI 3-3-d-iii]
- **carrying out chemical analyses of wastewater** in workshops-installations as well as specific analyses for wastewater discharged against various chemical parameters (e.g. Al, Cr,

Cr+6, Fe, BOD₅, COD, etc.), [GRI 3-3-d-i]

- **good knowledge and practice of Emergency Plans** (EPs), [GRI 3-3-d-i] [GRI 3-3-d-iii]
- **Operation of a fire protection department** which has 3 fire trucks, a permanent properly trained firefighting team of 18 employees and coordinates and trains a team of volunteer firefighters. [GRI 3-3-d-i]
- **appropriate storage and use of chemicals** in accordance with the instructions of the Safety Data Sheets, [GRI 3-3-d-i]
- **systematic visual inspections** of installations, [GRI 3-3-d-i]
- **preventive use of a floating anti-pollution barrier** when unloading fuel oil from tankers, [GRI 3-3-d-i]
- **Continuous quality control of natural recipients** (aquifer - sea) and comparison with standard quality values. An example is the discharge of seawater cooling water from the combined heat and power unit of the Metallurgy Sector, where, in addition to strict compliance with the relevant legislative provisions that define the framework of avoiding any environmental impact, the Company assigns to a valid organization (HCMR) the elaboration research study for the monitoring of the condition of animal organisms at the bottom of Antikyra Bay. The studies are carried out on the basis of the applicable environmental conditions and their results are communicated annually as provided to the competent authorities (RIS and Environmental Directorate of the Decentralized Administration of Thessaly - Central Greece). The conclusions of the studies from 2019 to 2022, as well as the recent one of 2023, show a stable ecological situation with improvement trends at several observation stations. **These studies will be repeated in the coming years in order to closely monitor the water quality of the Antikyra Bay**. [GRI 3-3-d-i] [GRI 3-3-e-i]

In addition, regarding incidents of small and local lubricant leaks in the context of mining activity within underground galleries, which are very small and superficial and mainly due to equipment wear (hoses) and damage to machinery from falling stones or rocks, the **subsidiary company DELPHI - DISTOMON** in the context of preventing and reducing incidents on an annual basis applies the following practices:

1. **supply of materials in the best possible market quality** ensuring their greatest possible durability, [GRI 3-3-d-i] [GRI 3-3-d-iii]
2. **implementation of special seminars**, on a regular basis, to raise staff awareness both for the reporting and recording of the incident, in the context of environmental protection, and specific methods to limit the extent of leaks into the soil, [GRI 3-3-d-i] [GRI 3-3-d-iii]
3. **immediate response to incidents**, collecting the amount of soil in the area of the spill and forwarding it to the hazardous waste site for its appropriate management, [GRI 3-3-d-i]
4. **regular and preventive maintenance** of equipment and its components; [GRI 3-3-d-i]

In the Energy Sector, in all production units (thermal stations, RES, and construction sites) intensive efforts are made to identify potential risks, to deal promptly and minimize the consequences of unforeseen malfunctions and accidents. Specifically, the following are applied:

- all procedures provided for in Environmental Management Systems and Emergency Plans, as well as instructions for operation and maintenance of facilities, [GRI 3-3-c] [GRI 3-3-d-i]
- monitoring of air pollutant emissions, [GRI 3-3-d-i]
- the best options available for the reuse, recycling and disposal of the various wastes generated, [GRI 3-3-d-i] [GRI 3-3-d-iii]

- personnel training and leak preparedness exercises, [GRI 3-3-d-i]
- preventive maintenance programs, [GRI 3-3-d-i]
- selection of state-of-the-art equipment (e.g. safety olive oil tanks, [GRI 3-3-d-i] [GRI 3-3-d-iii])
- systematic environmental visual inspections of installations, [GRI 3-3-d-i]
- annual external audits for certification of Environmental Management Systems. [GRI 3-3-d-i] [GRI 3-3-e-i]

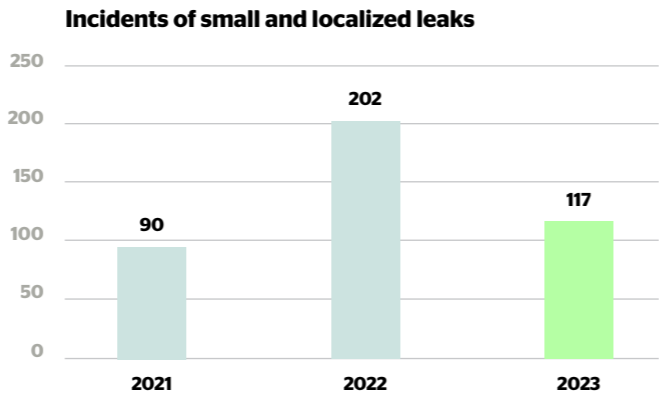
Effectiveness of the actions

[GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv] [GRI 306-3b]

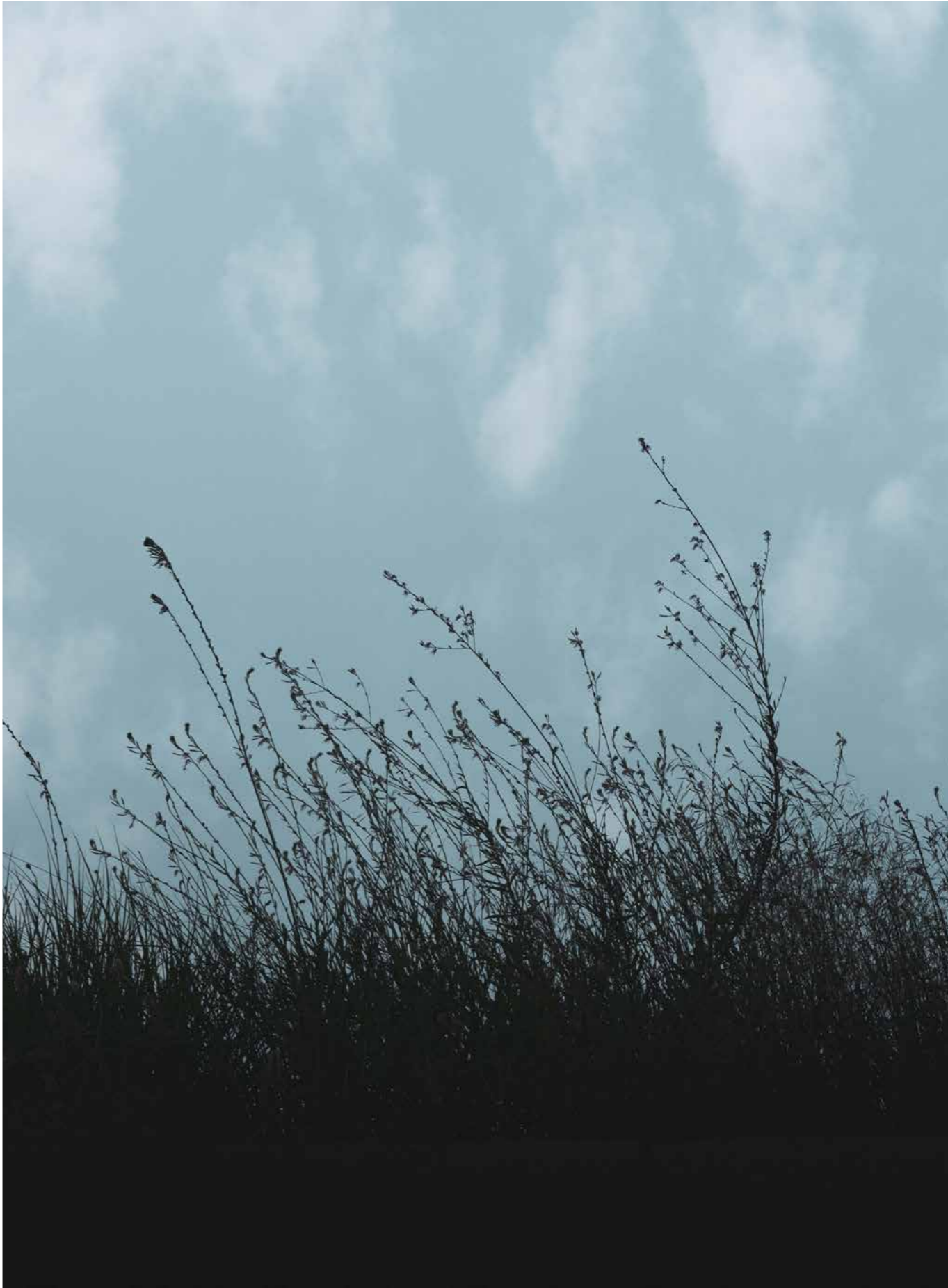
During 2023, **there were no incidents of pollution of the natural environment** from the production activity, **nor industrial accidents in the overall activity of the Company**. Regarding air emissions, in the Metallurgy Sector, they remained below the statutory levels for yet another year, while more information is provided in the Energy & Air Emissions section of this Sustainable Development Report. [GRI 3-3-d-i] [GRI 3-3-e-i]

Regarding the incidents of small and local lubricant leaks from machinery failures in the context of the mining process of the subsidiary company DELPHI-DISTOMON, in 2023 a total of 117 incidents occurred, 42% less than the corresponding number of 2022 (202 incidents), with the total volume of leaks amounting to 27,641lt¹, reduced by 4% compared to 2022 (28,813lt). [GRI 306-3-b]

They are an inevitable occurrence of the mining process since they are mainly caused by the failure of hoses and the damage of machinery from falling stones or rocks. They do not constitute serious leaks, while **their treatment is immediate**, collecting in detail the amount of soil that has been polluted and forwarding it for **management to properly licensed** hazardous waste management companies. [GRI 3-3-d-ii] [GRI 3-3-e-i]



1. The quantity of 27,641 lt corresponds to 0.175 kbbls.



Other significant Environmental topics

Ecological Impacts

[SASB EM-MM-160a.1] [SASB EM-CM-160a.1]



MYTILINEOS' approach to managing **the ecological impacts resulting from its activity** includes a combination of elements related to the **prevention, management, and restoration** of exploitable land from its activity, minimizing the impact on biodiversity.

The **protection of biodiversity** and the **restoration of the natural landscape** of exploitable areas related to business activities are **a substantial challenge for MYTILINEOS** in the context of reducing its ecological impact and contributing to sustainable development.

MYTILINEOS' management of biodiversity protection contributes more broadly to Sustainable Development and specifically:

- preserving **mountain ecosystems**, including biodiversity.
- the **restoration of exploitable land** affected by business activity.
- **increasing afforestation and reforestation** at local and national level.

The impacts are caused by the Metallurgy Sector and specifically by the company DELPHI-DISTOMON, a subsidiary of MYTILINEOS and concern the area where the mining activity of the company DELPHI-DISTOMON takes place, but also by the Energy Sector and specifically by the wind power production subsidiaries **(RES)**. [GRI 304-1-a-iv]

Failure to effectively prevent any negative impact on the flora and fauna of the wider area of the Company's activities would lead to environmental degradation, raising issues of non-compliance with applicable legislation. In this case, the consequences for the company would include disruption of business development and development planning, due to effects on its reputation and financial position. MYTILINEOS is committed to protecting biodiversity and ecosystems during mining activity and the development and operation of RES, in accordance with the main axes of MYTILINEOS' Environmental Policy. [GRI 304-2-b-iv]

Management of impacts in MYTILINEOS:

In the **Metallurgy Sector**, the Aluminium of Greece (AoG) plant, in compliance with the applicable legislation (including the Environmental Terms Approval Decisions - AEPO), implements a series **of prevention and control measures to limit emissions to natural recipients**, thus preserving their quality and consequently the conditions for the conservation and development of local flora and fauna. Prevention measures include **investments in anti-pollution equipment** such as **technologically advanced filters** in chimneys and discharge of wastewater treatment plants, process gas treatment plants, etc. Also, the Aluminium plant of Greece carries out restorations of the inactive surfaces of the Bauxite Residues Disposal Sites and Inert Waste Disposal Sites, while it has assigned to a specialized external partner the maintenance of the new ones and old rehabilitated waste disposal sites (e.g. old, rehabilitated landfill, inactive slopes of landfills and limestone quarry). [GRI 304-2-a-ii] **ASI**

Control measures include:

- **Regular inspections in groundwater and marine water**, the results of which are confirmed by sampling and analysis by independent bodies.

- The **operation of an air quality measuring station** installed in the Holy Monastery of Saint Loukas Steiriou.
- The **assessment and ecological evaluation of the wider area** of the AoG plant, a study that took place, taking into account additionally that the plant is developed purely on land, but which is in direct contact with a marine area of the NATURA 2000 network (SCI: GR2530007 - CORINTHIAN GULF), which is a proposed Site of Community Importance (SCI).
- The **assessment of the ecological status of the Gulf of Antikyra** in collaboration with the Hellenic Centre for Marine Research (HCMR).
- The responsible **management of all kinds of hazardous and non-hazardous solid waste** following the provisions of the applicable legislation and their disposal, either in the appropriately licensed premises of the Company or by appropriately licensed and certified bodies/contractors.

The operational level of the **critical operating equipment** (filters, etc.) and measurement (continuous measurement analyzers, etc.), as well as the results of studies and controls on the physical recipients of the wider area of the plant by the factory itself and / or independent bodies, are the subject of regular documented information required by the Competent Authorities.

The mining activity, carried out by the **Company DELPHI-DISTOMON**, concerns underground exploitations in the area of Fokida, with respect to the biodiversity of the area. [GRI 304-1-a-i] [GRI 304-1-a-iv]

Before the commencement of each new mining activity, **Environmental Impact and Environmental Restoration Studies are** carried out, based on which the phases of both mining and rehabilitation are implemented. The extraction and rehabilitation points are precisely defined, while the design of each exploitation is based **on the criterion of the least possible alteration to the natural environment and landscape**. **ASI**

Measures taken to avoid significant environmental impacts and to avoid alteration of the natural landscape:

- Use of existing road network and **prohibition of opening new roads**.
- **Use of existing** accessible projects and outdoor facilities.
- **Prohibition of surface deposition** or management of the produced sterile limestone materials of the mines.
- **Systematic wetting of outdoor bulk material storage areas** to suppress dust emission.
- **Management of any kind of non-hazardous solid waste** in accordance with the provisions of the current legislation and their disposal through specialized properly licensed and certified bodies-contractors.

Also, **accurate mapping of the form and type of vegetation is carried out**, so that the restoration can be done with the data of the local ecosystem. The Environmental Policy of DELPHI-DISTOMON highlights its commitment to the protection of biodiversity both in the preparatory phase of the construction works of the project and in the phase of restoration, limiting the already very small and temporary negative impacts. In this context, **an annual monitoring of risks and impacts on biodiversity** in EEPOs falling within Natura sites is carried out. [GRI 304-1-a-vi] **ASI**

DELPHI-DISTOMON has been systematically involved in restorations for almost 50 years, while **there is no complete exploitation that has not been restored**. The restoration of the

environment is done by **systematically planting trees of about 10-15,000 plants / year**, while during 2023, **14,549 forest species** were planted. [GRI 304-2-b-iii] **ASI**

DELPHI-DISTOMON, to date, has planted approximately 1,230,167 trees in a total reforested area exceeding 1.83 km2. At the same time, 100 km of fencing have been installed (to protect tree planting) as well as a network of watering pipes - irrigation of these trees with a length of 777 km. [GRI 304-2-b-ii] **ASI**

It is also worth mentioning that in the last 5 years, on average, 274,000 tons of sterile limestone are produced during the mining process. This quantity is deposited in existing cavities of surface and underground **construction sites, so that there is no need to capture even one additional square meter of surface**.

During 2023, there were no incidents of biodiversity degradation from the Company's activities, while the planned restoration activities of the exploitable areas were implemented as planned. [GRI 304-2-b-iv]

In addition, MYTILINEOS' bauxite mining subsidiary DELPHI-DISTOMON, continued to implement the **digital ventilation monitoring program at two underground construction sites**. The solution used (Ventilation-on-Demand) is designed to ensure air quality in underground mining farms and reduce the energy consumption of the ventilation system. **It combines cutting-edge technologies such as Internet of Things, Cloud big data.**

In the **Energy Sector**, regarding the construction of wind and photovoltaic parks, a prerequisite is their proper environmental licensing. Especially for parks located near or within areas designated as Natura areas (either Special Management Areas (EMA or SCI) or Special Protection Areas (SPA)) but also Important Bird Areas (IBAs), a prerequisite is the **Elaboration of the corresponding specific studies** foreseen (special ecological assessment, annual monitoring of a protected area for 2 to 5 years) and confirmation of either the absence of impacts or, in the case of impacts, the possibility of taking measures to reduce or avoid them. In case of no action, the project is redesigned, but no such need occurred in 2023. [GRI 304-1-a-vi] [GRI 304-1-a-vii] [GRI 304-2-b-iv]

In areas where wind farms of the Company exist, **the movement of animals is not hindered**, because there is no fencing and the disturbance to birds has been studied and is negligible, while where necessary technical systems for the protection of birds are installed. Regarding the restoration of the environment in the context of new wind farms, **the Company applies the obligation to reforest areas equal to the intervention** area and, where possible, the rehabilitation of illegal or inactive quarries after relevant licensing by the competent Forest Services, in accordance with the applicable legislation and the instructions of the respective Forestry Authorities. In this context, the reforestation of a total of 706.9 acres has already been completed, while within the two-year period 2022-2023 another 37 forestry projects of equivalent reforestation area of 371.09 acres have been completed. [GRI 304-1-a-iv] [GRI 304-1-a-vii] [GRI 304-2-b-i]

Regarding the construction project of the new thermal power station (CCGT II) and its accompanying interconnection works, in Agios Nikolaos, Boeotia, the reforestation of areas of 891 acres has already been completed. Within the two-year period 2024-2025, an additional 80.9 acres are expected to be reforested. [GRI 304-1-a-i]

[GRI 304-2-b-iv]

For all implemented reforestation projects there is an obligation of maintenance and irrigation for 3 to 5 years, depending on the project, which is constantly observed. [GRI 304-1-a-vii] [GRI 304-2-b-iii]

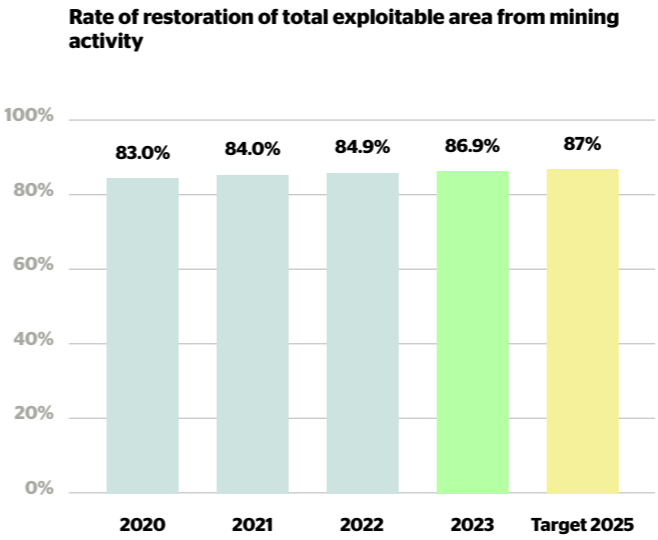
Finally, MYTILINEOS is a member of the Sustainable Development Council of SEV (Hellenic Federation of Enterprises), which **participates in the international business for nature alliance for the protection of biodiversity and ecosystems**. The SEV Council for Sustainable Development, as a member of the World Business Council for Sustainable Development WBCSD, after co-signing **the Lisbon Declaration** It paved the way for Greek businesses to contribute to addressing the global challenge of environmental balance and sustainability, but also to highlight the strategies they implement, the commitments they have undertaken and the good practices they implement. [GRI 304-1-a-vii]

The following table lists the rather **limited impacts in the context of the construction and operation of the Company's wind farms, located in protected areas** (e.g. NATURA 2000 Network). [GRI 304-1-a-i] [GRI 304-1-a-iv] [GRI 304-1-a-v] [GRI 304-2-b-i] [GRI 304-2-b-ii] [GRI 304-2-b-iv]

Results [SASB EM-CM-160a.2] [SASB IF-EN-160a.1]

Operational facilities leased by MYTILINEOS in protected areas [GRI 304-1]	Biodiversity value of protected area [GRI 304-2]
<p>Wind Farm in the locality "Korifi" of the Municipality of Sintiki, Regional Unit of Serres, 17.0MW in operation, owned by the company Aeoliki Sidirokastrou S.A., located at an average distance of 1.5 km from the outer boundaries of the NATURA 2000 site, code "GR 1260001" and more than 7.0 km from "GR 1260008".</p> <p>It concerns a lease of 80,2 acres from the Public Properties Company S.A.</p> <p>The size of the operational facility is 0,12 km2.</p>	<p>The area "GR 1260001" includes wetlands and mountain ecosystems of great national and international importance. It supports rich bird populations both in number and diversity, including rare and endangered species. The wetland is very important as a feeding area for birds of prey nesting in the nearby forests, as a wintering area and stopover for migratory birds, as well as a breeding area for a large number of birds. The increased biological productivity and the existence of rare plant species and rare and diverse fauna (fish, mammals, amphibians, reptiles) further increase the ecological value of the area.</p> <p>In the year 2023, as in the years 2018 to 2022, an annual monitoring study of the avifauna in the area of the wind farm was carried out and subsequently submitted (usually within the first half of the following year) to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management, of the Ministry of Environment and Energy. There are no impacts on the protected area, as the wind farm sites are located in the peripheral zone, away from the Priority Habitats.</p> <p>The annual avifauna observation programme will continue in 2024.</p> <p>In this 2nd wind farm, an automated bird collision avoidance system has been installed.</p> <p>No bird killing has been observed.</p>
<p>Wind Farm in the locality "Korifi" of the Municipality of Sintiki, Regional Unit of Serres, 15.0 MW in operation, owned by the company Aeoliki Sidirokastrou S.A., located at an average distance of 1.0 km from the outer boundaries of the NATURA 2000 site, code "GR 1260001" and more than 7.5 km from "GR 1260008".</p> <p>It concerns a lease of 27,182 acres from the Municipality of Sintiki. The size of the operational facility is 0.035 km2.</p>	<p>In Natura "GR2420012" (Mount Ochi, Coastal Zone and Islets) 55 species of avifauna of Annex I of Directive 79/409/EC have been recorded, as well as 38 important species of migratory avifauna. The protected area "GR2420001" (Mount Ochi, Campos Karystos, Potami, Cape Kafirefs, Coastal Sea Zone) is mainly a mountainous area with a relatively wild and inaccessible coastline at the northeastern foothills of Mount Ochi. In the area 16 habitats belong to Annex I of Directive 92/43/EEC of which habitat 1120* - Areas of sea vegetation with Posidonia (Posidonion oceanicae), is a priority habitat. Four species of reptiles, 2 invertebrates and 2 mammals belong to Annex II of Directive 92/43/EEC and Article 4 of Community Directive 2009/147/EEC. The two species of mammals (Mediterranean monk seal and otter) are priority species. In the years 2018 to 2021, an annual bird monitoring study was carried out, assessing the limited effects of the trial operation of wind farm on the avifauna of the area.</p> <p>Following the Company's own initiative, the annual avifauna watching program will be restarted in 2023 and for another 4 years.</p> <p>Limited impacts on the avifauna of the area due to the operation of the Wind Farm.</p> <p>No bird killing has been observed.</p>
<p>Wind Farm in the locality "Pyrgos" of the Municipality of Karystos, Regional Unit of Evia, with a total capacity of 15.3MW, in trial operation since April 2019, owned by the company Aeoliki Evia Pyrgos S.A., located: a) within a maximum distance of 1,000m from the outer boundaries of the area with the code "GR 2420012", which is the Special Protection Area for Birds (SPA) "Mount Ohi, Coastal Zone and Islands". Within this zone there are 7 wind turbines and b) at a maximum distance of 200m from the outer boundaries of the area with code "GR2420001", which is the Special Management Zone (SEMZ) "Mount Ochi - Karystos Campos - Potami - Cape Kafireas - Coastal Marine Zone" of the Natura 2000 Network. Within this zone there are 2 wind turbines</p> <p>It concerns a lease of 57.9 acres from individuals holding ownership rights of a private forest.</p> <p>The size of the operational facility is 0.103 km2.</p>	<p>In Natura site GR2420012 "Mount Ochi, Coastal Zone and Islands" is a mainly mountainous area with a relatively rugged and inaccessible coastline on the steep northern and eastern foothills of Ochi. 55 species of Annex I of Directive 79/409/EC have been recorded, as well as 38 important migratory bird species. The species that characterise the SPA are Puffinus yelkouan (Yelkouan Shearwater), Larus audouinii (Audouin's gull), Hieraaetus fasciatus (Spotted Eagle), Bubo bubo (Eurasian eagle-owl) and Emberiza caesia (Wrenshank), while its demarcation species are Phalacrocorax aristotelis (Sea Crow), Circaetus gallicus (Snake Eagle), Falco peregrinus (Peregrine Falcon), Apus melba (Mountain Eagle), Lullula arborea (Tree Starling), Anthus campestris (Pale Starling).</p> <p>In 2023, as well as the years 2018 to 2022, an annual monitoring study of avifauna was carried out and subsequently submitted (usually within the first half of the following year) to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management, of the Ministry of Environment and Energy.</p> <p>The program of annual bird observations will continue in 2024.</p> <p>Limited impacts on the avifauna of the area due to the operation of the Wind Farm An automated bird collision avoidance system has been installed in this Wind Farm. The reports from the above system are sent to the service of the Ministry of Environment and Energy at the beginning of each year's six-month period.</p> <p>No bird killing has been observed.</p>
<p>Wind Farm at the locality "Chelona" of the Municipality of Karystos, Regional Unit of Evia, with a capacity of 8.1MW, in trial operation since October 2019, owned by the company Aeoliki Evia Chelona S.A., located at a maximum distance of 200m. from the outer boundaries of the Special Protection Area for Birds (SPA) "Mount Ochi, Coastal Zone and Islands" with code GR 2420012, which belongs to the NATURE 2000 network. Within this zone there are 7 wind turbines.</p> <p>Size of the operational facility 0.130 km2.</p>	

- During 2023, **there were no incidents related to impacts on the biodiversity of the areas from the Company's activities**, while the planned restoration actions of the exploitable areas were implemented normally.
- Regarding mining activity at the end of 2023: **a)** the total area used for exploitation was 100 acres, **b)** the land area in the process of restoration amounts to 140 acres (**reduced by 11.4% compared to 2022**), **c)** the percentage of land that has been rehabilitated since the beginning of the Company's mining activity, in the total exploitable area, amounts to 86.9%, a percentage (**increased by only 2.0% compared to 2022**). [GRI 304-2-a-v] [GRI 3-3-e-iii] **ASI**
- In the context of the construction and operation of the wind farms and the new thermal power station, the **total area completed by the reforestation process exceeds 1,167.09 acres** (706.9 and 371.09 and 89.1 respectively, as mentioned above), while three bird monitoring studies were carried out. [GRI 3-3-e-iii]



Research & Development



Research and Development for MYTILINEOS is a **deliberate business choice** as well as a **contemporary necessity**, in the context of the 2030 Agenda and the Global Sustainable Development Goals (SDGs). The Company invests in research and development to contribute its fair share to the **enhancement of scientific research**, the **upgrading of technological capabilities** of the country's industrial sector, the **encouragement of innovation**, ensuring **industrial diversification** and the **added value of its products and services**.

In the **Metallurgy Sector**, the Company continues to consistently invest in the **installation of pilot units** and the development of know-how in the areas of:

- Utilization of bauxite residues, participating and conducting **pilot tests** in the framework of European programs of efficient environmentally friendly technologies for the **production of useful products and materials** (iron, alumina, cement additives and construction products) as well as in **the development of technology for the extraction of rare earths**.
- New aluminium recycling technologies, participating in research programs for **the design and control of the production of recycled aluminum products with a low energy and environmental footprint**.
- **Utilization of carbonated alumina electrolysis by-products**, exploring recycling technology within the aluminium production cycle.
- **Recovery and utilization of heat from exhaust gas flows** of the aluminium production process.
- **Use of RES in the production of alumina / aluminum**, with participation in a Network for the study of the possibilities of direct application of RES in industry.
- **Digitization of processes in the production of alumina and aluminium**.
- **Training and lifelong learning, through programs aimed at shaping new tools** and training courses for engineers and craftsmen working in the raw materials and metallurgy sector.

In this direction, the Research and Sustainable Development (R&SD) activity has been established under the **Innovation Division** of the Company's Metallurgy Sector. The Company participates in approximately **24 research projects** co-funded by the EU or the Greek state, through Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET Cofund on Raw Materials (ERA-MIN 2) and programs of the General Secretariat for Research and Technology (GSRT). MYTILINEOS' participation in these programs is based on increasing competitiveness, but also exploring the implementation of industrial circular economy.

The total funding of MYTILINEOS' Metallurgy Sector from research programs, during the period 2017-2026, exceeds €11 million. Also, the Company, through the R&SD activity, is placed among **the leading companies in the aluminum sector worldwide in the field of research** for the utilization of bauxite residues and the recovery of rare earths.

In 2023, the operation of the two pilot units 'HYDRO' and 'PYRO' continued for the testing of new metallurgical processes by the Research and Sustainable Development (R&SD) activity of the Metallurgy Sector. At the same time, extensions are being implemented with new equipment of the pilot units amounting to 470,000 euros. In summary, in 2023, the R&SD activity announced

the following key results in selected research programs:

- **REmoval project:** Multiple technologies for the treatment of bauxite residues were successfully completed in the pilot units of R&SD. The technologies concern the processing of BRs for soda recovery, processing to produce cast iron and slag from bauxite residues, the use of the produced slag in applications of building materials such as lightweight materials, mineral wool and special type of cements and also the use of slag for the extraction of alumina and trace elements of high added value. In order to apply the technologies of using BR in building materials, a new complex construction was designed and started in the Aspra Spitia settlement called "Environmental Information Pavilion", which aims to highlight the behavior of the final products produced in the REmoval project in real conditions. The construction of the pavilion with a project budget of 200k euros was successfully completed.
- **Scale UP project:** It concerns the extraction of scandium from the BRs and the continuous optimization of the process. The 1st scandium production campaign took place in 2022, confirming the effective production of concentrated scandium, while the 2nd scandium production campaign that took place in 2023 aimed to improve process control and consequently reduce production costs by at least 30% by recycling the process's wastewater. The reduction campaign cost was supported by the Engineers in Action VI program.
- **Sisal pilot project:** In the context of alumina production from alternative (secondary) sources, the R&SD pilot units processed new types of slags from the silicon industry for the production of metallurgical alumina, while at the same time new equipment was designed to implement new production processes of ultra-pure alumina 99.99% that requires high added value material. Already the first pilot results show the quality of alumina that can be achieved by the processing of alternative sources of alumina.
- **Valore project:** The project started in early 2022 and concerns the treatment of liquid solutions for the production of Vanadium and Gallium from the production of alumina. Within the framework of the project, pilot tests of gallium production from liquid solutions of alumina production are running. The pilot trials concern the investigation of at least 5 technologies to search for the most economical method of extracting gallium from alumina production.
- **Reactive project:** The project explores ways to convert BRs into cement additive in collaboration with the Cement Industry. The R&SD pilot units are already running from 2022, tests on BR firing and their conversion to SCM, while at the same time the first slag granulation plant study was completed. The implementation of a BR melting test with granulated slag is underway within 2024.
- In addition, the R&SD Department through the **Re4Industry project** studies ways to reduce CO₂ emissions at the Agios Nikolaos plant. The study includes the use of renewable energy sources for electricity consumption as well as the use of alternative zero-emission fuels, such as biofuels and hydrogen, aiming at the upcoming reduction of total and specific CO₂ emissions in alumina and aluminium production.
- At the same time, by actively implementing CO₂ **reduction actions**, MYTILINEOS actively participates, on the one hand, in a preliminary study for the installation of CCUS (Carbon Capture, Utilization & Storage) technology, regarding CO₂ capture in alumina production chimneys and analysis of available technologies, and, on the other hand, in the addition of a new pilot **hydrogen burner to the foundry** through the HyinHeat research project.

Regarding actions for the electrification of production processes, 2 new programs were selected in the R&SD Division, the 1st is called Elithe and concerns calcination and production of metallurgical alumina with a new type of microwave calcination oven, and the 2nd is called Metawave which concerns the calcination of anode blockades using a hybrid microwave system and inductive currents. These 2 new projects aim to explore electrification technologies for key aluminium production processes. The above-mentioned technologies aim to develop the Metallurgy Sector's know-how for the production of new products, the exploration of technical solutions to sustainability problems, as well as the possible future activity of MYTILINEOS in new markets, if and when they are deemed profitable. In addition, in the bauxite mining subsidiary company DELPHI-DISTOMON, of MYTILINEOS, **pilot implementation of a digital ventilation monitoring program on an underground construction site has been successful and is already being extended to other construction sites**. The solution used (Ventilation-on-Demand) is designed to ensure air quality in underground mining farms and reduce the energy consumption of the ventilation system. It combines cutting-edge technologies such as Internet of Things, Cloud big data, Sensors.

Total R&D investments by the Metallurgy Sector were almost €2.8 million in 2023. In total, the number of employees involved in the Company's R&D departments amounts to 17 people.

In the **Energy Sector**, there is an **Applied Research & Development and Innovation department, which evolved into the new innovative spin off technology company Avokado** (<https://avokado.energy/>) that acts as a strategic Technology arm of MYTILINEOS in matters of Artificial Intelligence (AI), Technology and Digital Innovation, while more information about this collaboration is reflected on the corporate website at the following link: <https://www.mytilineos.com/news/press-releases/a-young-at-heart-innovation-start-up-by-mytilineos/>

The adoption of new technological solutions, especially Artificial Intelligence (AI), is a necessary condition for the implementation of the "green" energy transition. However, global supply is limited relative to demand, so Avokado aims to fill this gap with solutions tailored to **the needs of the global smart energy market**.

AVOKADO is the only specialized company-producer of integrated artificial intelligence solutions for energy and "Smart Cities" in Greece, with MYTILINEOS as sole shareholder. In particular, AVOKADO has a deep knowledge of the electricity market, in Greece and abroad, having invested in **the development and standardization of algorithms and machine learning** models, which cover the range of needs of energy producers and consumers (producers of electricity from conventional and renewable sources, electricity providers in wholesale and retail markets, household consumers, businesses of all sectors of the economy, public sector bodies, local and regional authorities, as well as central government bodies/bodies) for their green energy transition with a particular focus on **Artificial Intelligence operating systems** to optimize the lifecycle of home battery systems and professional energy storage systems (BESS).

AVOKADO's innovative Artificial Intelligence operating system for home battery systems and professional energy storage systems (BESS) is **commercially available under the AVOS™ brand**. AVOKADO's comparative advantage is that it has the most comprehensive portfolio of Artificial Intelligence (AI) software and

solutions for Energy and Smart Cities, because it combines Energy Machine Learning Models, Location AI and Generative AI. Specifically, AVOKADO offers:

- AI platform under the brand name AVOX™ for the green energy transition of businesses, organizations and bodies of Central Government, Municipalities, Local Authorities and Regions,
- an AI operating system branded AVOS™ to enhance functionalities and extend the lifetime of home battery systems as well as larger energy storage systems (BESS), and
- digital AI toolkit branded AVOKADO AI™ to meet the specific needs of the energy industry.

During 2023, the following projects/new products and services were underway:

- **Project Aspra Spitia Smart City - Smart Cities:** creation of an interactive AI-IoT prosumer and energy data management platform (AOX product) for the smart management and analysis of energy indicators and Green KPIs Net Zero, from the pilot project of Aspra Spitia (smart cities)



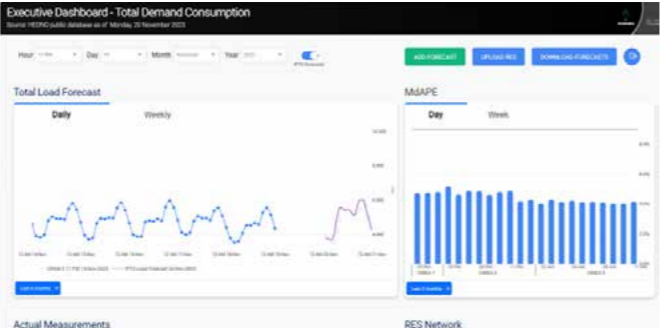
- **AVOS™** AI operating system for home battery systems and larger energy storage systems (BESS).
- **AVOX™** platform for integrated AI solutions for the green energy transition and Net Zero management/calculation
- **AVOKADO AI™** “smart engine” of AI algorithms to meet specialized needs of Energy companies, such as short-term price prediction in the wholesale energy market.



- **Generative AI Energy LLM:** Creation of a corporate energy LLM (large Language Model) for Avokado to provide energy consulting service to B2B customers
- **AI Factory @ Avokado:** creation of processes, know-how and

organization of internal AI structure and Data Factory to introduce AI strategy. Development of AI and Generative AI platform and models

- **Demand forecasting projects on ADMIE curve, demand to customers 5,6,7, and MT and PV/Solar generation forecasting:** creation of algorithms (AvokadoAI) and procedures for 15-minute demand forecasting to Protergia customers.



- **Participation in the new Greek Energy Competence Centre** with the CN HESS (<https://cn-hess.hecc.gr/>) project, which is a decision-making tool (AI) for hybrid energy interconnected systems with battery and hydrogen
- **Blockchain Energy Smart Contracts:** creation and execution of blockchain smart contracts for demand response and Green PPA services between prosumers and Aggregators and integration into the AVOX platform
- **Project Demand Response to customers 5,6,7 benefits with smart battery/inverter control:** Execution of demand management scenarios to Protergia customers with a household battery for the purpose of dynamic smart charging and battery discharge in low DAM zones.
- **Project Energy Disaggregation of residential consumers and prosumers:** creation of energy disaggregation algorithms and services for detecting consumption of household appliances in Protergia customers.
- **European project SEDIMARK:** European H2020 project on data marketplaces in the field of energy for data and AI services.
- **European Project TRINEFLEX:** European H2020 project on Demand Response issues with blockchain technologies.

The total budget managed by Avokado in 2023 was **€1.2 million**, while the total funding received under the co-funded programs it participates in reaches **€500 thousand**, employing **10 people**.

Finally, through MYTILINEOS' subsidiary, **Zeologic S.A.**, research and innovation in the sensitive waste treatment sector **is promoted**. Through the internationally patented by Zeologic S.A., GACS technology, it is possible to treat the widest range of liquid and solid waste, hazardous or not, with a different approach to existing methods, which does not have as a basic parameter the biological factor but is based on the principles of Nanotechnology. Thus, excellent results are achieved in much less processing time and space, with lower operating costs and minimal environmental footprint.



ESG KPIs

EEnvironmental KPIs	2021	2022	2023
Environmental management			
Percentage of industrial units & RES units with ISO 14001:2015 certification	89.3%	92.9%	88.0%
Environmental expenditures (m €) ¹	82.8	119.7	106.9
Incidents of non-compliance with environmental laws and regulations and relevant fines	0	0	0
Energy & Air emissions			
Direct GHG emissions (scope 1 – CO ₂ thousand tons)	2,276.0	2,640.9	2,729.7
Indirect GHG emissions (scope 2 - CO ₂ thousand tons)	1,337.9	1,281.9	1,555.6
Other emissions (scope 3 - CO ₂ thousand tons) ²	5,612.4	8,722.3	7,942.2
Total NO _x emissions (t)	1,363.4	1,413.8	1,276.2
Total SO _x emissions (t)	3,214.3	3,273.6	2,892.2
Particulate emissions (t)	41.8	38.9	33.0
Fluorine emissions (t)	210.8	214.5	194.8
CF ₄ emissions (t)	10.8	7.9	8.0
C ₂ F ₆ emissions (t)	1.3	1.0	1.0
Specific NO _x emissions (kg/TJ electricity production) ³	42	39	44
Specific SO _x emissions (kg/TJ electricity production) ³	0	0	0
Total energy production (TJ)	25,336.0	24,504.4	27,721.4
Energy production from RES (% of total energy production)	9.7%	9.8%	17.5%
Total energy consumption (TJ)	57,529.1	57,201.1	58,200.3
Electricity consumption (% of total energy consumption)	20.0%	20.1%	19.1%
Specific energy consumption in secondary aluminium production (GJ/t of production)	5.02	5.78	5.42
Specific product consumption (TJ Natural gas consumption/TJ Electricity & Steam production) ⁶	1.64	1.62	1.66

EEnvironmental KPIs	2021	2022	2023
Water Management			
Total water consumption (ML) ⁴	6,950.5	6,509.9	8,024.8
Total water withdrawal (ML)	169,080.5	165,808.0	152,748.2
Total water withdrawal from surface waters (ML)	159,838.4	156,494.7	144,091.8
Total water withdrawal from groundwater (ML)	8,599.2	8,591.6	7,946.4
Total water withdrawal from public water supply companies (ML)	194.7	335.6	445.9
Water savings in the production process (% of total water withdrawals)	4.4%	3.4%	7.2%
Water consumption / ton of hydrated alumina production (m³) ASI	3.37	3.38	2.90
Water consumption / ton of primary aluminium production (m³) ASI	1.29	1.28	1.13
Circular Economy			
Total solid waste generation (thousand tons)	934.1	1,139.7	1,023.1
Total hazardous waste (thousand tons)	19.5	21.2	22.7
Total non-hazardous waste (thousand tons)	914.6	1,118.5	1,000.3
Solid waste reused or recycled (% of total solid waste generated)	25.0%	36.9%	30.1%
Solid waste landfilled ⁵ (% of total non-hazardous solid waste generated)	2.0%	1.3%	3.4%
Ecological Impacts			
Rehabilitation percentage of total land areas used in the mining process ASI	84.3%	84.9%	86.9%
Raw & Other Materials			
Total bauxite consumption (t) ASI	1,912,028	1,927,130	1,955,399
Total natural gas consumption (m. Nm³)	1,106.8	994.9	1,115.6

1. Environmental Expenditures: Costs for waste disposal, emissions management, purchase of CO₂ rights, environmental remediation and costs for overall prevention and environmental management.

2. The calculation of scope 3 emissions is based on the GHG Protocol.

3. Includes emissions and total gross electricity production of the thermal power plants of the Energy Sector.

4. The difference between the total quantity of water withdrawals and the total quantity of water discharges.

5. The landfill rate for solid waste is calculated as a percentage of the total non-hazardous solid waste generated, excluding bauxite residues that undergo special treatment.

6. This calculation concerns the 4 thermal power plants of MYTILINEOS. The 3 thermal power stations produce electricity which is fed into the Greek national grid, burning natural gas, while the fourth thermal power plant (CHP) produces electricity for the Greek national grid and superheated steam for the needs of the Aluminum of Greece (AoG) plant with which it is adjacent.



Society

Occupational Health & Safety



Management approach and impacts on sustainable development and human rights [GRI 3-3-a] [GRI 3-3-b]

The Health and Safety of employees is a fundamental factor of MYTILINEOS' activity and **a primary business objective**. As a responsible company, MYTILINEOS recognizes both its responsibility for the continuous improvement of Health & Safety conditions in its workplace, and the right of its employees, as well as the employees of independent contractors carrying out work on its premises, to work without being exposed to risks that could cause injury or occupational disease.

Key Impacts	Impact Type				Impact horizon
	Actual	Potential	Positive	Negative	
Accidents in the workplace, despite the strict framework of rules it applies, to prevent accidents and / or accidents.	🟡			🔴	Short-term
Increase in frequency and / or severity of fatalities, accidents, incidents of occupational diseases, due to the inability to establish a Health & Safety philosophy in new activities of the Company and / or in existing ones that take place in new areas, due to existing negative stereotypes and inappropriate working practices that pre-exist the Company's operations.		🟡		🔴	Medium and Long-Term
Improvement of the morale and productivity of human capital and enhancement of decent and quality work, due to the continuous promotion of health throughout the range of production activities, resulting in the maintenance, over time, of a low rate of accidents and absenteeism and zero rates of occupational diseases	🟡		🟢		Short, Medium, and Long-Term
Continuous improvement of certified accident prevention and health promotion systems throughout the range of production activities, thus ensuring the social acceptance of the Company's operation by its local communities, effectively contributing to the enhancement of the Company's competitiveness.		🟡	🟢		Medium and Long-Term

The Company's contribution to the impacts

MYTILINEOS focuses on the effective management of all relevant impacts caused to employees, their families and third parties working or visiting the workplaces of the Company's Sectors, subsidiaries and permanent contractors and suppliers. The **elimination of fatalities, accidents, and incidents of occupational diseases in the workplace**, especially in MYTILINEOS' production units, promotes **sustainable, productive employment and decent work**, while effectively contributing to the enhancement of the Company's competitiveness. At the same time, by protecting the health and safety of its direct and indirect employees, MYTILINEOS' positive contribution to the well-being of the local communities in which it operates is enhanced. The **prevention and mitigation of identified risks** is a matter of critical importance in the context of the Company's management of this issue, having as its constant goal the elimination of negative effects and the corresponding reinforcement of positive ones.

Major risks

MYTILINEOS, as a company operating in heavy industry, is faced with **specific categories of risks** in the field of Occupational Health and Safety. The categories of risks faced by the Company are:

1) Indirect or direct accidental risks that either create the conditions leading to an accident including configuration, functionality, access - evacuation, weather conditions, lighting, air quality, vibration or increased noise and the temperature environment of workplaces or lead to an accident or occupational disease due to physical, chemical and biological factors.

2) Non-accidental risks related to organizational, psychological and ergonomic factors, which do not lead to an accident but affect in the short or long term the mental and physical health of employees.

Company policies and commitments [GRI 2-23-a] [GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f] [GRI 3-3-c] [GRI 3-3-d-i]

MYTILINEOS recognizes that **the health and safety of employees must be constantly** protected at all times at work. For this reason, **it is committed to developing and promoting a strong health and safety culture** in order to be able to guarantee and offer risk-free workplaces for all who work with and for the Company. To this end, The Company has already developed in 2022, a central **“Occupational Health and Safety Policy”** that covers all its professional relationships and is aligned with its contribution to the achievement of specific sub-targets of the Global Sustainable Development Goals (SDG3 & SDG8), which are relevant to its activity. [GRI 3-3-c]

MYTILINEOS continuously pursues, in all its Business Sectors, the fulfillment of its commitment to “No accidents and no occupational diseases at work”, which **is its central objective**, while at the same time it is recognized as one of the dominant challenges in the industry. More specifically, the actions undertaken by the Company, and which are fundamental elements of its commitment to health and safety in Work include:

- integration of safety in production processes and internal training programs,
- reporting and analysis of accidents, near misses and occupational diseases,
- linkingsafetyresultstotheremunerationofseniormanagement,
- strict selection and management of contractors,
- continuous quality controls,
- exchange of experience and benchmarking with leading companies in its related fields of activity. [GRI 3-3-c].

As of December 2022, in the context of the reorganization of MYTILINEOS, the General Division of Corporate Governance and Sustainable Development has assumed responsibility for Health and Safety.

Impact management and response tactics [GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i]

The Health and Safety of employees is a fundamental and primary business objective of MYTILINEOS' activity. It is a **line of responsibility that starts with the Management and the General Divisions** and reaches the production areas of all Business Sectors.

In order to **manage Occupational Health & Safety more effectively**, MYTILINEOS adopts **objectives** and implements **a strategic approach, procedures** and **continuous improvement programs** that include:

- **Establishment of central corporate targets** for Health & Safety, which are the result of successive working meetings in all Business Sectors, along with the analysis of historical data kept at head office level, **on an annual basis** until their revision. [GRI 3-3-e-ii]
- **Continuous and long-term monitoring of the objectives of** achieving zero fatalities, accidents and occupational diseases with serious consequences on the lives of employees, as well as maintaining at the lowest possible levels the frequency index of total recorded accidents.

Central annual corporate health & safety goals 2023				
0	0	0	LTIR	TRIR
FATALITIES	SERIOUS ACCIDENTS	OCCUPATIONAL DISEASES	<0.3/200,000 working hours	<0.6/200,000 working hours

LTIR - Lost Time Injury Rate: Accidents with loss of working time ≥ 3 days
TRIR - Total Recorder Injury Rate. This includes accidents, serious accidents and all accidents that resulted in days away from work, restricted work or transfer to another workplace, medical care other than first aid or loss of consciousness or significant injury or ill health diagnosed by a physician or other authorized health professional. This includes cases of fatalities and accidents that occurred during the movement of the employee from the place of his/her private activity (e.g. residence) and the place of work or workplace and only when such movement has been organized by the Company.

- **Strict compliance and implementation of the applicable national and European legislative framework** and other regulatory provisions related to Health & Safety at Work in all Business Sectors). Ensuring the harmonization of the operation of the Business Sectors with the relevant legislation is achieved within the framework of much stricter limits set by the Company, through the relevant programs and Management systems it implements. [GRI 3-3-d-i]
- **Regular information on regulatory and legislative updates** through a permanent information subscription with an external body, through the official EU websites and portals, as well as through participations in business organisations (e.g. SEV/OHS). [GRI 3-3-d-i]
- **Implementation of an integrated and certified management system for Occupational Health & Safety** (international standard ISO 45001:2018), which is designed with a view to minimise risks, to continuously take measures to prevent accidents and occupational diseases, to provide ongoing training for employees, as well as to strengthen the work culture. The H&S system, **at the end of 2023, it covers 99% of the Company's total industrial and RES units that are in normal operation**, while each unit of the Company has an H&S Coordinator who is a direct employee of the company responsible for the proper operation of the system. At the same time, the guidelines provided by expert external consultants specializing in H&S systems (ISO45001), contribute to the continuous improvement of systems. **The processes of the Health & Safety system covers all direct and indirect employees** of the Business Sectors and subsidiaries where a certified system according to ISO 45001: 2018 is applied. In addition, **all employees are covered by a Health & Safety system, which is subject to internal control**. The Health & Safety system is controlled externally and certified by independent accredited bodies. [GRI 3-3-e-i] [GRI 403-1] [GRI 403-8]
- **Systematic and continuous effort** to promote and shape a **universal corporate Health and Safety culture**, which encourages all employees to behave responsibly for their personal safety, as well as the safety of their colleagues, through clear instructions, specifications, plans, procedures, and the provision of comprehensive training to both employees (direct employees of the Company) and indirect employees (employees of contractors working within the Company's premises). [GRI 3-3-c] [GRI 403-5]
- **A clear and unambiguous line** of responsibility that starts from the Top Management and General Divisions of MYTILINEOS and reaches the production stages of the Business Sectors, aiming at the continuous improvement of performance on an annual basis, the monitoring of progress

based on the set targets using internationally accepted qualitative and quantitative performance indicators. [GRI 3-3-d]

- **Strict implementation of safety systems and measurements** to address these related risks, in order to assess their impact on employees and to identify the needs for interventions in all workplaces (offices and industrial units). [GRI 3-3-e-ii] [GRI 403-2]
- **Adoption of internationally accepted industry standards** such as the Aluminium Stewardship Initiative (**ASI**) and guidelines of the European Aluminium Association and the International Aluminium Institute – of which MYTILINEOS is a member – regarding the promotion of Occupational Health & Safety in the Metallurgy Sector, along with the study of good practices related to the Company’s other Business Sectors.
- **Taking preventive actions** as a prerequisite for achieving continuous progress and improvement, in line with the broader experiences gained by the Company from each incident and near miss that it analyzes, along with continuous education and training of staff as a decisive factor for maintaining and further developing the accident prevention culture. [GRI 3-3-d-i] [GRI 403-2]
- **Identification of hazards** using safety tools, which aim to prevent dangerous actions and situations that could lead to accidents or occupational diseases, which are described in a series of internal procedures in each Business Sector for both direct and indirect employees and partners. Indicatively, the following are mentioned: Hierarchy Safety Visits, Hazard Identification, and Inspections of indirect workers (Health and Environmental Safety Plans), a Written Occupational Risk Assessment (WORA) prepared in accordance with the corresponding procedure and available for each job, the Energy Center Risk Management and the RES Plants Work Instructions. [GRI 3-3-d-i] [GRI 403-2]
- **Reporting of risks and hazardous situations** is carried out through the risk reporting process and the risk identification process, as well as through the reporting system of the Company’s Code of Business Conduct. [GRI 3-3-d-i] [GRI 403-2]
- **Investigation of work-related accidents**, where procedures are followed to record them in the accident book, procedures for announcing and analyzing incidents, procedures for characterization and investigation of incidents, as well as at a higher-level, incidents are selected that are analyzed using a “Causal Factor Tree Analysis” method. [GRI 3-3-d-ii] [GRI 403-2]
- **Determination of appropriate corrective actions** based on the above investigation process in order to identify the required improvements to the OSH management system. [GRI 3-3-d-ii] [GRI 403-2]
- **Internal and external audits** through which the quality of procedures and the continuous improvement of the Health & Safety system are ensured. [GRI 3-3-d-i] [GRI 403-2]
- **Ability to remove employees from working conditions they believe could cause injury or illness**, with simultaneous protection from potential retaliation, in accordance with the relevant provisions of the Code of Business Conduct. Additionally, Health and Safety officers are authorized to recommend the temporary removal of employees if there is a reason for their protection. [GRI 3-3-d-ii] [GRI 403-2]
- **Identify, analyze, and evaluate the key risk factors of Health and Safety within the enterprise risk management (ERM) framework**, in order to limit the chances and impacts of risks that affect the Company’s strategy, activities and business objectives. [GRI 3-3-e-i] [GRI 403-2] [GRI 403-7]
- **Occupational health practices** that contribute to the

identification and minimization of Health & Safety risks and include, among others, the operation of a Clinic with constant presence of nurses and regular presence of doctors. Also, regular visits and inspections of workplaces by an Occupational Doctors, medical services provided on a daily basis during working hours in the Office Clinic at no cost for all employees. In 2023, due to the SARS-CoV-2 pandemic, additional occupational health practices were implemented, the most important: the conduct of free COVID-19 tests for all staff based on planning or an emergency event, the provision of preventive teleworking to vulnerable -and not only- groups, special trainings and updates on prevention measures, as well as regular disinfection. [GRI 3-3-d-i] [GRI 403-3]

- **An additional private health care program** covered by the Company, which is included in the additional benefits of employees at a rate of 100% for the promotion of their health, complementary to the statutory access to state health structures provided through the social insurance paid by the Company for each employee. The Company takes care of the confidential management of employees’ health information in the context of the implementation of the regulatory provisions of the General Data Protection Regulation [GRI 3-3-e-iii] [GRI 403-6]
- **Provision of medical** services to its employees on a daily basis at the organized medical clinics available at its facilities, and implementation of a special vaccination program for specific categories of its employees. Additionally, regular voluntary blood donation programs are organized at the Company’s facilities. [GRI 3-3-d-i] [GRI 403-6]
- **Continue to strengthen the mental health of employees** and their families, within the framework of the “Employee Assistance Program” that began in 2021 and concerns the creation of a Psychological Support Hotline. It is a service that provides employees and their families with 24-hour counseling support, through a network of experienced psychologists and specialists in personal, family and work issues, as well as free personalized face-to-face or remote sessions. [GRI 3-3-d-i] [GRI 403-6-b]

- Systematic **monitoring of health and hygiene issues**, which are a decisive factor for the quality of life of employees and, by extension, of the local communities where the Company operates. The monitoring, assessment, and control of all key factors of the working environment aims at the continuous improvement of the good health and healthy living of workers, including exposure to dust, noise, high temperatures, as well as substances such as: fluorine compounds, sulfur dioxide, carbon monoxide, and aromatic polycyclic hydrocarbons. [GRI 3-3-d-i] [GRI 403-7]

Consultation with stakeholders on Health & Safety issues [GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-f]

In each Business Sector of MYTILINEOS, corresponding Health & Safety at Work Departments operate, aiming at a greater understanding of risks and impacts, as well as the definition of collaborative ways to prevent and mitigate any negative impacts. Furthermore, specialized Health & Safety Committees operate in key activities of the Company within the Metallurgy and Energy sectors, ensuring employees’ right to express comments, suggestions, and opinions on procedures, policies, and administrative practices for safeguarding and fostering a positive culture regarding the safety and health of the workforce. The Committees cover all employees, representing both direct and indirect workers, who are actively involved in the processes that determine how to manage safety and health in the workplace. [GRI 3-3-d-i] [GRI 403-4]

The **Metallurgy Sector** operates:

- An official **Plant Health and Safety Committee (PHSC)**, in which **100% of employees are represented**. The Committee consists of 6 members, who are elected by the employees of the Sector. The responsibilities of PHSC are extended and its members participate in all key processes and committees or working groups, namely:
 - “Green light committees” for new projects and major plant conversions,
 - analyses of accidents and incidents carried out using the “Causal Factor Tree Analysis” method,
 - working groups on written occupational risk assessment,
 - scheduled OHS visits with the Occupational Doctor and the Safety Coordinator.
- **additional safety committees**, which **are coordinated by managers**, with representatives from all departments of the factory participating in them. These committees are: Work at Heights Committee, Lockout/ Tagout and Confined Space Committee, Circulation Committee and Contracting Committee. The topics addressed correspond to the main processes of the factory, while at the same time proposals for improvement and revision of these processes are also discussed. [GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 403-4]

In the Committees, **employees of all hierarchical levels** are the protagonists of a continuous, systematic, and methodical process, which makes them participants in the formulation of safety rules through the implementation of the actions of “Confident Professional Movement”, “Confident Professional Behavior”, “Hierarchy Safety Visits” and “Personal Safety Actions”. These actions aim to implement health and safety in action, while at the same time they are tools of communication, dialogue, and participation, resulting in the gradual consolidation of a “safety culture”. Also, the Metallurgy sector participates in the quarterly internal consultation meetings (Corporate HSE Meeting). [GRI 3-3-d-iii] [GRI 403-4] **ASI**

In 2023, there were separate safety actions aimed at involving and informing employees on H&S issues, such as:

- **Safety alert week:** Daily hierarchy visit for one hour (9-10am) for a week with one topic per day aimed at observing, communicating and discussing with employees. The issues discussed concerned work at height, use of appropriate tools, orderliness in intervention areas, etc. [GRI 3-3-d-i] [GRI 3-3-d-ii]
- **Easter awareness campaign** with disposable coffee glasses, where during Easter glasses were printed with a safety message and distributed to the collaborating catering businesses in the plant area, in order to reach the largest possible of the employee population. The Health and Safety Committee of the Plant also made an important contribution to the creation of the messages, a committee composed of employees of the factory, of various hierarchical levels, which deals with Health and Safety issues. [GRI 3-3-d-i] [GRI 3-3-d-ii]
- **Safety Pavilion:** a new training program with the use of digital tools, launched by the Aluminium of Greece plant, which had as its main topic the identification of risks that can be identified in an industrial environment. Participants through their navigation in a virtual work environment, were asked to identify and point out the different risks that exist in it, discussing what they see and feel in the virtual – digital environment with the factory’s Safety team that monitors and guides each one throughout the program. About 600 employees have already participated in the “Safety Pavilion”. [GRI 3-3-d-i] [GRI 3-3-d-ii]
- **World Day for Occupational Health and Safety**, where under the slogan “I care: All together, ONE Team, ONE Family: Health and Safety at Work is a team affair”, Aluminium of Greece organized an informative exercise demonstrating the provision of First Aid for the treatment of cardiac arrest & drowning in the workplace. In the action organized and implemented by a group of volunteer employees, 300 employees participated. [GRI 3-3-d-i] [GRI 3-3-d-ii]
- **Safety week** where 7 experiential stations were created that touched on safety issues related to staff such as work at height, proper use of tools, risk identification with the participation of 730 employees. [GRI 3-3-d-i] [GRI 3-3-d-ii]

At the **Volos plant**, the appointment of the H&S Committee is made by the employees, who also have the opportunity to submit requests related to Health and Safety through the Committee. They are also provided in accordance with National Legislation and European Regulations, instructions, while there are health and safety signs in all workplaces, in accordance with ISO 45001: 2018, as well as the Occupational Risk Assessment Study. At the same time, internal inspections are carried out by the Quality Assurance & Quality Control Department of the Factory. [\[GRI 3-3-d-i\]](#) [\[GRI 403-4\]](#)

At **EPALME's secondary aluminium plant**, representatives of the direct employees meet once every three months with the plant's management. [\[GRI 3-3-d-i\]](#) [\[GRI 403-4\]](#)

Finally, at **DELPHI-DISTOMO**, the right of employees to express comments, suggestions, and opinions (named or anonymous) on procedures (Code of Business Conduct, Policies, Administrative Practices) is guaranteed. At the same time, OHS procedures and instructions are posted on every construction site, while regular **consultation and dialogue** meetings are held **through the Employees' Union**. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-ii\]](#) [\[GRI 403-4\]](#) **ASI**

In the **Energy Sector**

- Although no formal Occupational Health & Safety Committees have been established, the Sector participates in the quarterly Corporate HSE Meeting.
- The Health & Safety system at the operational level (industrial energy production units, construction sites, and renewable energy sources) represents 100% of both direct and indirect employees. [\[GRI 403-4\]](#)
- There is **constant cooperation** between the Safety Officer and the Occupational Doctor with the Commission on issues related to the safety, protection and health of workers. [\[GRI 403-4\]](#)
- All members of the Committee, the Safety Officer, the Occupational Doctor and the company's representatives participate in **training programs** related to Health and Safety, as well as in relevant official information days. [\[GRI 403-4\]](#)
- Regular meetings with employees and workers are **held at site level**, where all Health, Safety and Environmental issues concerning the project are discussed, as well as any remarks, complaints, or suggestions for improving existing situations or practices. All issues are examined, and relevant actions are taken. [\[GRI 403-4\]](#)
- Health and Safety executives, Technicians and Safety Coordinators **consult** with employees, within the framework of the Occupational Health & Safety Management System. Especially in the Company's Energy Centers, the consultation process is implemented at least once a year with the active participation of their staff, on relevant issues, within the framework of the Health & Safety Management System in Work, aiming to promote the implementation of the Company's current OSH policy, the communication of OSH actions and programs and the **involvement of employees through active participation and consultation** in occupational risk management. [\[GRI 403-4\]](#)
- In the context of OHS audits, in accordance with the Management System, a relevant mechanism has been established to monitor the implementation of OSH regulations in the facilities and activities of Energy Centers, Head Offices, stores and RES installations. [\[GRI 403-4\]](#)

- Also, at the construction sites there is a continuous presence of specialized personnel for the management of Health and Safety issues, a First Aid Service (personnel and equipment), as well as the availability of an Ambulance and an Occupational Doctor for the provision of First Aid and emergency response. [\[GRI 403-4\]](#) [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-ii\]](#) [\[GRI 403-4\]](#)

The above-described **participatory consultation process** of the Company's employees and employees, in the general context of Health and Safety of the Business Sectors and their individual production units, ensures the timely identification of risks whose ineffective management may create negative effects on both themselves and the Company. On the basis of continuous dialogue and corporate processes for Health and Safety issues are made with the necessary changes and modifications in order to minimize the identified sources of risk creation, while through the committees and the corporate media and communication, employees receive the necessary information in order to contribute to the establishment of the Health and Safety culture. [\[GRI 3-3-f\]](#)

Effectiveness of actions [\[SASB EM-CM-320a.1\]](#)
[\[SASB EM-MM-320a.1\]](#) [\[SASB IF-EU-320a.1\]](#) [\[SASB IF-EN-320a.1\]](#) [\[GRI 3-3-e-i\]](#)
[\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-e-iii\]](#) [\[GRI 3-3-e-iv\]](#)

Evaluation of progress

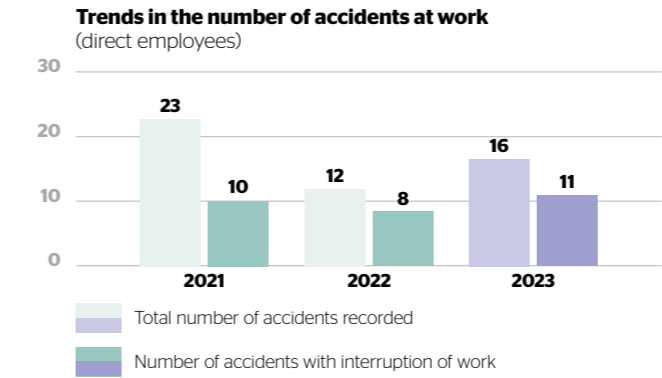
In 2023, MYTILINEOS' dynamic growth was combined with its commitment to maintaining high performance in Health and Safety issues. In particular:

- The CEO and the Business Sectors Executive Committees **are informed and evaluate the progress** and performance of the Company's Health & Safety in a monthly basis by providing the appropriate **directions**. [\[GRI 3-3-e-i\]](#)
- The utilization of the findings of scheduled or extraordinary safety inspections carried out by specially trained personnel of the Company, as well as by customers, partners, public bodies and independent control and assurance organizations, contribute to the further improvement of the level of Health and Safety, the formulation and renewal of relevant procedures and ultimately the implementation of necessary activities and actions. In 2023, **122** (2022: 90) **internal audits** and 273 (2022: 91) **external audits were carried out**, the result of developing new partnerships and developing new projects, while strengthening the Health and Safety culture. [\[GRI 3-3-e-iii\]](#) [\[GRI 3-3-e-iv\]](#)
- The **number of near-misses reported and investigated** by direct and indirect workers in production processes that could, if left uninvestigated, pose a potential risk to workers totaled 226 (2022: 213), **an increase of 6.1%**, continuing the progress achieved over the last two years (2021: 85). Increase highlights **commitment** of the company in achieving Health and Safety objectives, the **effective operation** of the policies, systems, procedures, and directives followed, as well as the **value of consultation** and **“open doors” for reporting and recognition of near misses**. [\[GRI 3-3-e-iii\]](#) [\[GRI 3-3-e-iv\]](#)
- Especially in the Metallurgy Sector, the Company participates in capturing the overall industry data published by the [Aluminium International](#), monitoring, among others, especially the issues of Health and Safety at Work **through the IAI Safety Performance Benchmark** issued on an annual basis. Specifically, the **index of recorded accidents** (Recorded Accident Rate) of the sector is an average of 3.4 accidents per one

million (1,000,000) hours worked for 2022 (date of issue of results: April 27, 2023, <https://international-aluminium.org/statistics/workplace-accidents/>), while **the corresponding performance of MYTILINEOS in 2023 amounted to 1.9** (2022: 2.1) **accidents per one million hours (1,000,000) worked (direct and indirect employees)**, confirming the progress and effectiveness of the approach taken to Occupational Health and Safety. [\[GRI 3-3-e-iii\]](#)

Direct employees

- The goal of zero accidents and zero serious incidents of occupational diseases for immediate staff was achieved.** [\[GRI 3-3-e-ii\]](#) [\[GRI 403-10\]](#)
- The total recorded accidents were 16** (2022:12), with the corresponding frequency index (TRIR) amounting to **0.40** (2022: 0.33) accidents per 200,000 hours worked, lower than the corporate target of 0.60 accidents per 200,000 hours worked. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#) [\[GRI 403-9\]](#)
- The total recorded accidents with loss of working time of more than three days were 11** (2022: 8) with the Lost Time Injury Rate (LTIR) being at **0.27** (2022: 0.22) accidents per 200,000 hours worked, lower than the corporate target of 0.3 accidents per 200,000 hours worked. All accidents concerned fractures, dislocations, sprains and dislocations, superficial injuries, and burns. All events were analyzed using the method of “Causal Factor Tree Analysis” to ensure the **recording of the causes that caused them** and the **dissemination of the results of the investigation**, to prevent their repetition. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#)



- The **total number of visits to doctors' offices** for First Aid in relation to non-working incidents amounted to 17 (2022:13), up 31% compared to 2022. [\[GRI 403-9\]](#) [\[GRI 403-10\]](#)
- The **basic measures taken as** corrective actions after accident and depending on the type of incident are:
 - Informing the staff working on location about the incident,
 - Training of staff on the risks and necessary protection measures related to the incident
 - Adaptation and/or revision of the relevant Directives
 - Informing supervisors about more increased surveillance of workplaces
 - Training of personnel in the proper use of Personal Protective Equipment
 - Demarcation of sites in height work, load lifting, scaffolding erection
 - Adjustment and rearrangement of the workplace (e.g. signage, cleaning, etc.) [\[GRI 3-3-e-iv\]](#) [\[GRI 403-2\]](#)
- There were no employees exposed to activities involving a risk of occupational diseases.** [\[GRI 403-10\]](#)

As in previous years, in 2023, special emphasis was placed on preventing major accidents through continued investment in education. In all Business Sectors of the Company, the **hours of training on Health and Safety issues**, in which **the direct staff participated, amounted to 17,002, significantly increased compared to the previous year** (2022: 6,217). This increase is due to the strengthening of the Company's awareness of the importance of health and safety in the workplace and the desire to further enhance the awareness of its employees in these areas. At the same time, it is related to the objective of continuous improvement of corporate performance in this regard, as well as to the expansion of MYTILINEOS' activities in more countries worldwide, but also in undertaking new projects that require staff training on health and safety issues.

The training of office workers covered general Health and Safety issues, while the training of employees of production units and construction sites included, among others, the following topics: [\[GRI 3-3-e-iv\]](#) [\[GRI 403-5\]](#)

- ISO45001 Management System
- Report near misses - unsafe actions/conditions
- Accident, Injury First Aid
- Fire and emergency
- Fire prevention - Firefighting
- Environmental parameters
- Risk Assessment-Working methods
- Emergency plans
- Site evacuation plan
- Personal protective equipment
- Main construction site work
- Safety on the construction site
- Safety marking
- Safety marking of hazardous materials
- General Site Rules
- Worksite Order
- Manual handling of loads
- Use of tools
- Work at height, indoors, in underground sites
- Major Hazards (Electricity, Excavations, Construction Machinery-Vehicles,
- Slips, missteps & falls
- Loading-unloading
- Written occupational risk assessment,
- On-site risk assessment;
- Working with scales,
- Work in extreme weather conditions (heatwave, cold),
- Risk Identification
- Safe pedestrian movement
- Musculoskeletal risks
- Mental health at work

Table of Health & Safety Indicators (Direct employees) [GRI 403-9]	2021	2022	2023
Fatalities Frequency Rate (FR) / 200,000 working hours			
FR (Total Index)	0.00	0.00	0.00
FR (Men)	0.00	0.00	0.00
FR (Women)	0.00	0.00	0.00
High Consequence Incidence Rate (HCIR) / 200,000 working hours			
HCIR (Total Index)	0.07	0.00	0.00
HCIR (Men)	0.09	0.00	0.00
HCIR (Women)	0.00	0.00	0.00
Total Recordable Injury Rate (TRIR) / 200,000 working hours			
TRIR (Total Index)	0.85	0.33	0.40
TRIR (Men)	1.01	0.42	0.50
TRIR (Women)	0.20	0.00	0.00
Lost Time Injury Rate (LTIR) / 200,000 working hours			
LTIR (Total Index)	0.37	0.22	0.27
LTIR (Men)	0.41	0.28	0.34
LTIR (Women)	0.20	0.00	0.00
Lost Working Days Index / 200,000 working hours			
Total index of lost working days	n/a	7.87	9.26
Lost working days index (Men)	n/a	9.82	11.57
Lost Working Days Index (Women)	n/a	0.00	0.00
Number of Lost Working Days			
Total number of Lost Working Days	n/a	282	372
Number of Lost Working Days (Men)	n/a	282	372
Number of Lost Working Days (Women)	n/a	0	0
<div><div>- FR (Fatalities Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate)</div><div>- The Lost Time Injury Rate Index (LTIR) includes accidents with lost working time of ≥ 3 days.</div></div>			

Indirect employees

Managing the safety of employees of independent contractors is a particular challenge for MYTILINEOS. The Company persists in its efforts and focuses on the need to establish a Health and Safety culture that requires changing everyone’s behavior and mentality regarding accident prevention.

Indicatively, it is mentioned that all contractors -who for the company are part of its supply chain-, who employ a significant number of personnel within the premises of the aluminum plant, of the Metallurgy Sector, **are required to have a certified Health & Safety management system according to ISO 45001**, while the Company **systematically evaluates their relative performance** with specific criteria. **ASI**

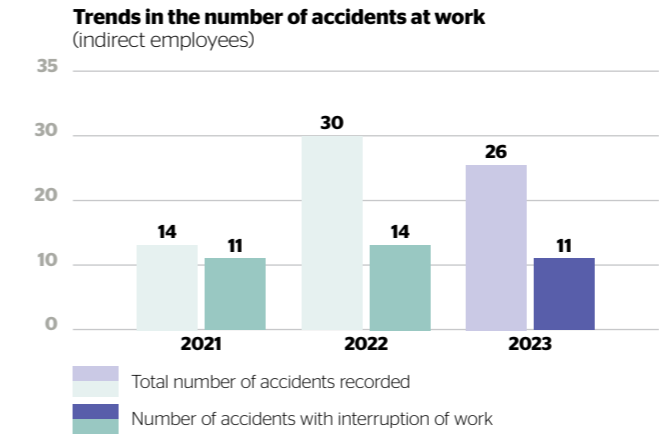
Correspondingly, the management of Health and Safety issues in the Energy Sector is governed by a series of **actions that the collaborating contractors have a duty to implement**, for the

proper implementation of the Occupational Health and Safety Management System prepared for each project separately and the taking of appropriate measures within the framework of the project they undertake.

On 11.06.2023, a fatal (road) accident occurred at a project construction site, where MYTILINEOS participates in the construction consortium. The accident, which involved a collision between a telehandler and a pedestrian, involved exclusively employees of a third-party subcontractor of the project. Regarding the aforementioned accident, no judicial or legal proceedings have been initiated ex officio against MYTILINEOS. Additionally, no fines, administrative penalties, or any other threatened actions have been imposed or brought to the attention of MYTILINEOS, nor is there any pending or threatened litigation or claim.

- More specifically, the total recorded accidents **amounted to 26** and **the Total Accident Frequency Index to 0.38** accidents per 200,000 hours worked. [GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 403-9]

- There were **11 accidents with lost working time of more than three days, with an incidence rate of 0.16** accidents per 200,000 hours worked. [GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 403-9] [GRI 403-10]



- The Company **actively participates in the process of investigating the accidents of its indirect employees**, but the responsibility for coordinating the investigation lies with the company of the cooperating contractor supplier, while at the same time it takes corrective measures, depending on the findings arising on a case-by-case basis [GRI 3-3-e-iv]
- **A total of 53 (2022: 23) employee visits to the medical**

clinics (first aid) were recorded, a number significantly higher compared to 2022. [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 403-9] [GRI 403-10]

- **In order to strengthen and consolidate a common safety culture among all MYTILINEOS associates, 62,100 (2022: 49,725) man-hours of training** were implemented by all Business Sectors and subsidiaries for the prevention of serious accidents, on topics similar to that of direct employees. [GRI 3-3-d-i] [GRI 3-3-iii] [GRI 403-5]
- In 2023, the **evaluation process** of **MYTILINEOS’** key suppliers continued with **ESG** criteria in order to reflect their level of maturity in sustainability issues. From the **171 main suppliers that completed the evaluation process** in the period 2022-2023, it emerged that:
 - a significant 92% have a mechanism for monitoring and recording incidents of fatalities, accidents, and occupational diseases,
 - 92% have a Health & Safety Policy,
 - 70% have a certified occupational H&S management system (e.g. ISO 45001 certification) while,
 - 6% is in the process of certification.

As part of the assessment, suppliers are also asked whether they have a Policy/statement of commitment towards respect and protection of Human Rights with more information provided in the material topic “Responsible Supply Chain” of this report.

Table of Health & Safety Indicators (Indirect employees) [GRI 403-9]	2021	2022	2023
Fatalities Accident Frequency Rate (FR) / 200,000 working hours			
FR (Total Index)	0.02	0.00	0.01
FR (Men)	0.02	0.00	0.02
FR (Women)	0.00	0.00	0.00
High Consequence Incidence Rate (HCIR) / 200,000 working hours			
HCIR (Total Index)	0.00	0.00	0.00
HCIR (Men)	0.00	0.00	0.00
HCIR (Women)	0.00	0.00	0.00
Total Recordable Injury Rate (TRIR) / 200,000 working hours			
TRIR (Total Index)	0.29	0.48	0.38
TRIR (Men)	0.30	0.53	0.39
TRIR (Women)	0.00	0.00	0.00
Lost Time Injury Rate (LTIR) / 200,000 working hours			
LTIR (Total Index)	0.22	0.23	0.16
LTIR (Men)	0.24	0.25	0.17
LTIR (Women)	0.00	0.00	0.00
Lost Working Days Index / 200,000 working hours			
Total Lost Working Days Index	n/a	4.23	5.58
Lost Working Days Index (Men)	n/a	4.62	5.80
Lost Working Days Index (Women)	n/a	0.00	0.00
Number of Lost Working Days			
Total number of Lost Working Days	n/a	263	384
Number of Lost Working Days (Men)	n/a	263	384
Number of Lost Working Days (Women)	n/a	0	0
<div><div>- FR (Fatalities Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate).</div><div>- The lost time Injury Rate (LTIR) Index includes accidents with a loss of > 3 working days</div></div>			

Table of Health & Safety Indicators for all Company personnel, direct and indirect.

Table of Health & Safety Indicators (Direct & Indirect employees) <small>[GRI 403-9]</small>	2021	2022	2023
Fatalities Accident Frequency Rate (FR) / 200,000 working hours			
FR (Total Index)	0.02	0.00	0.01
FR (Men)	0.02	0.00	0.01
FR (Women)	0.00	0.00	0.00
High Consequence Incidence Rate (HCIR) / 200,000 working hours			
HCIR (Total Index)	0.00	0.00	0.00
HCIR (Men)	0.00	0.00	0.00
HCIR (Women)	0.00	0.00	0.00
Total Recordable Injury Rate (TRIR) / 200,000 working hours			
TRIR (Total Index)	0.29	0.43	0.39
TRIR (Men)	0.30	0.49	0.43
TRIR (Women)	0.00	0.00	0.00
Lost Time Injury Rate (LTIR) / 200,000 working hours			
LTIR (Total Index)	0.28	0.22	0.20
LTIR (Men)	0.29	0.26	0.22
LTIR (Women)	0.13	0.00	0.00
Lost Working Days Index / 200,000 working hours			
Total Lost Working Days Index	n/a	5.56	6.94
Lost Working Days Index (Men)	n/a	6.36	7.69
Lost Working Days Index (Women)	n/a	0.00	0.00
Number of Lost Working Days			
Total number of Lost Working Days	n/a	545	756
Number of Lost Working Days (Men)	n/a	545	756
Number of Lost Working Days (Women)	n/a	0	0
<div><div>- FR (Fatalities Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate)</div><div>- The Lost Time Injury Rate Index (LTIR) includes accidents with lost working time of ≥ 3 days.</div></div>			



Employment & Labour Practices

Management approach & impacts on sustainable development and human rights

[GRI 3-3-a] [GRI 3-3-b]

Employment is recognized as a material issue for all Business Sectors and subsidiaries of MYTILINEOS, due to its high locality and the large number of staff it employs. Focusing on issues related to decent working conditions, including the working environment, pay, benefits, working time, rest periods, leave, disciplinary and dismissal practices, maternity protection, mental health, and other welfare issues, is a critical factor for the satisfaction and retention of MYTILINEOS' employees.

At the same time, with a view to further developing and improving MYTILINEOS' competitiveness internationally, along with the characteristics of its Business Sectors and subsidiaries, the continuous **strengthening of the theoretical and technical knowledge, skills and competences of its employees** is recognized as a prerequisite for addressing current and future challenges, while aiming at the personal development of its employees.

The challenge in the context of Sustainable Development

MYTILINEOS recognizes that competition for talented and skilled employees is increasing internationally, and aims to **empower, develop, and retain existing employees**, as well as **attract** new ones. Creating a work environment where all employees thrive and are motivated to contribute to the creation of a sustainable business is key to maintaining the Company's capacity to create and distribute value to all its stakeholders, in the long term. [GRI 3-3-a]

Potential negative impacts

Changes in the Company's human capital are recognized as having consequences on employee productivity and satisfaction, exacerbating the loss of knowledge and experience, increasing inequality in the workplace, and bringing about direct cost consequences in terms of increased replacement costs for qualified personnel. All the above are recognized as factors that can cause short-term and medium-term negative impacts on any limited contribution of the Company to the creation of opportunities for long-term employment, development and retention of employees and the creation of a non-discriminatory working environment. [GRI 3-3-a]

Existing positive impacts

The **preservation of existing jobs** and the orientation towards **the creation of new ones is a strategic choice** of the Company with the aim of achieving its growth in all sectors directly or indirectly related to its activities. MYTILINEOS, as an employer, contributes to one of the most widely accepted social goals, namely the improvement of living standards through **full and secure employment** and **decent work**. The working practices applied by the Company comply, as a minimum, with all applicable legislation with respect to the fundamental principles as defined in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

In addition, the development, management and retention of human resources, through the implementation of **inclusive practices**, with **equal opportunities** and **respect for Human Rights**, in accordance with the main pillars of MYTILINEOS' Human Rights Policy, has direct positive impacts such as: the high retention rate of full-time employees, the absence of violations of labour rights,

proven growth and competitiveness of the Company, its contribution to halting unemployment at local and national level, strengthening the economy of its local communities and enhancing employability in the country's industrial sector. [GRI 3-3-a] [GRI 401-1]

The Company's contribution to the impacts

Directly involved in the above impacts are the Business Sectors of MYTILINEOS and its subsidiaries, while its permanent contractors/suppliers, who perform important tasks for the Company, especially in the activities of bauxite mining and construction, may be indirectly involved.

Major risks

Increasing labour market competitiveness and **labour mobility** can lead to the **loss of valuable knowledge and experience** gained through the employment of workers, as well as the **loss of financial investment and time** required to train them. Also, the Company can bear **increased costs** due to mobility and need **replacement of qualified personnel**.

Company policies and commitments

[GRI 2-23-a] [GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

MYTILINEOS is committed to **the development, management and retention** of human resources, through the implementation of practices that promote an **inclusive working environment, with equal opportunities and respect for Human Rights at its core**, in accordance with the key pillars of MYTILINEOS' Corporate Social Responsibility Policy and Human Rights Policy which defines the basic principles concerning respect for human rights and sets the framework for employment management. [GRI 3-3-c] [GRI 3-3-d-i]

Furthermore, MYTILINEOS fully embraces and incorporates the internationally accepted **Principles of the UN Global Compact**, within which the **Labour Conditions** are highlighted as a particular area of commitment, namely the support of freedom of association and the recognition of the right to collective bargaining, the complete avoidance of all forms of forced or child labour, as well as the elimination of discrimination in relation to employment and labour. [GRI 3-3-c] [GRI 3-3-d-i]

At the same time, the revision of **the Talent Recruitment & Selection Policy and procedure within 2023**, ensures meritocracy and equal treatment in the selection of personnel based on the candidates' capabilities and suitability to the requirements of the positions, as well as the best possible utilization of employees regarding their prospects for development and professional career progression within the Company. [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-d-iii]

In 2023, the full implementation of the Policy for **Combating Violence and Harassment at Work began**, which was developed and approved in 2022. The aim of the Policy is to ensure a working environment free from violence and harassment, which **respects and safeguards human dignity**. The Policy concerns employees, associates, apprentices, interns, former employees, and job applicants etc. and is fully harmonized with labor legislation (Law 4808 / 2021). At the same time, part of the Policy is the **Internal Reporting Management Process for incidents of violence and harassment**, in such a way that there are **safe and easily accessible communication channels** for the reception of complaints, to facilitate the immediate, timely and **impartial handling**



of such incidents while ensuring respect for human dignity, confidentiality and protection of the personal data of affected and reported persons. [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-d-iii]

As of 2022, MYTILINEOS has adopted the new **Employee Training and Development Policy**, which defines the criteria based on which the management and assessment of employees' training needs is carried out, as well as the planning and conduct of training programs by the Talent Learning & Development department of the Human Resources General Division. The purpose of the training programs is to enhance employee performance. The training programs are carried out either by internal trainers or by external bodies who are selected and evaluated in relation to the quality of the training provided. In addition, their overall effectiveness in achieving corporate goals is evaluated.

Also, within 2023, MYTILINEOS proceeded with the update of its **Remote Work Policy**, to define the teleworking framework for the Company, enabling employees to apply on a voluntary basis for teleworking at agreed and approved intervals by the Company, in accordance with the provisions of Greek Law 4808/2021. The Remote Work Policy applies to the employees of MYTILINEOS and its subsidiaries within Greece, whose work can be performed remotely either wholly or partially in an efficient manner.

The **Human Resources General Division** of MYTILINEOS is responsible for the creation and implementation of the management & development framework of the relevant policies and practices as well as for providing professional support to Business Sectors in addressing human resources issues.

Impact management and response tactics

[GRI 3-3-d-i] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

To address the above identified risks, the Company has implemented the following approaches:

Retention systems and practices including:

- Development of programs for the **formation of a unified corporate culture**, based on common values and employee behaviors, [GRI 3-3-d-iii]
- Implementation **of employee learning and development programs** aimed at strengthening personal and technical skills and competencies required to address the current and future challenges of the Company's business activity, while aiming at the personal development of employees, [GRI 3-3-d-iii]
- Providing **incentives, both in terms of pay and benefits and development and progression**, aimed at increasing employee engagement and retention, [GRI 3-3-d-iii]
- Timely and continuous **briefing of employees on changes in structures and procedures**, which are associated with the development of its activities and the adoption of best practices in its operating model. [GRI 3-3-d-iii]

Key pillars of the Company's employment approach

- **Attracting and retaining competent executives**, continuous improvement of relations with employees and implementation of modern performance evaluation systems. [GRI 3-3-d-iii]
- **Development of an attractive remuneration and benefits framework** according to market data and specialized research on critical areas of the Company. [GRI 3-3-d-iii]
- **Promotion and understanding of the Code of Business**

Conduct for all staff as well as the avoidance of discrimination, either directly or indirectly, in any employment practices. [GRI 3-3-d-i]

- **Recognition of the importance of continuous improvement**, healthy and safe employment for all staff and associates with emphasis on mental health. [GRI 3-3-d-iii]
- **Focus on localization**, prioritizing the recruitment of workers from local communities and enhancing local employment domestically and internationally based on its activity. [GRI 3-3-d-iii]
- **Ensure the flow of information and timely communication** about organizational changes through the available communication channels: intranet, email, SharePoint application and non-electronic means of communication such as hierarchy meetings, written announcements in production areas and generally open communication with human resources through the role of HR-Business Partner per Business Sector. [GRI 3-3-d-iii]

- **Protection of employees’ personal data** by allowing their use only to authorized persons and only where required by law and for purposes related to the operation of labour relations and the business activity of the Company. [\[GRI 3-3-d-i\]](#)
- **Ensure the elimination of any arbitrary or discriminatory practice** of termination of cooperation with employees, through the individual Labour Regulations and the Code of Business Conduct. [\[GRI 3-3-d-i\]](#)

Relations between management and employees

MYTILINEOS aims, among other things, to effectively realize its social role, seeking to **ensure the well-being of its people**, who are an important factor in its development. Therefore, employees are considered “integrated” into the company beyond the employment-remuneration relationship that connects them to it, in the sense that the continuous improvement of their abilities and skills and the result of their work is inextricably linked to the progress and prosperity of the Company.

Also, the Company sets the safety and protection of the interests and rights of its employees as its priorities, in the context of good management, given that one success factor is the absolute dedication of employees to their duties. Therefore, **employees can communicate with authorized members of management on all issues** that concern them to receive timely answers and solutions. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#)

Initiatives in the Metallurgy Sector:

- The meeting of the Factory Navigation Committee (FNC) on issues of Safety, Environment, Production, Finances and organizational-operational changes (if any) is held on a weekly basis, in which **all the Company’s Directors participate**. At the same time, the meeting of the Health & Safety Committee, the presentation of the monthly KPIs of all Plant Divisions, as well as the presentations of the Innovation Division (mainly on Continuous Progress issues), all take place monthly. **The results of** these meetings **are disseminated directly**, through the executives, **to all** other employees. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#) **ASI**
- A reasonable duration, estimated based on the circumstances, is respected, in consultation with the elected representatives of the employees, in order to provide comprehensive information. **The Management meets regularly with the Board of Directors of the Employees’ Union** and informs them on issues that concern them. In exceptional cases, the Company’s meeting and briefing with the Board of Directors of the Employees’ Union precedes the implementation of any change, positive or negative, that affects the employees, while at the same time providing the necessary time for information and consultation. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#) [\[GRI 402-1b\]](#)
- **Meetings of the Executive Committee are held**, while the resulting information is disseminated to the rest of the organization by each Director, on issues that need to be updated and concern employees. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#)

Initiatives at central level:

- The Human Resources Committee has been established and meets at regular intervals. The purpose of the Committee is to design and approve initiatives for the timely and effective handling of issues related to attracting, developing, retaining, empowering, and rewarding human resources as well as informing on issues of “good practices” and decision making. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-iv\]](#) [\[GRI 3-3-f\]](#)

- Employment contracts shall stipulate a reasonable period for informing employees in case of operational changes that may affect them, subject to the statutory notice periods. [\[GRI 3-3-d-i\]](#) [\[GRI 402-1a\]](#)

Employee benefits

In all areas where MYTILINEOS operates, employees’ remuneration and welfare programs **comply at minimum with the provisions of labour law and corporate collective agreements** where these exist. The remuneration of employees, in addition to the legal compensation, is based on their individual performance, which is evaluated on an annual basis. In addition, MYTILINEOS offers a range of benefits to permanent employees of all levels. These benefits vary by Business Sector, and include health care, life insurance, disability/ disability coverage, retirement provision, maternity/ paternity leave and emergency loans. These privileges are non-discriminatory and governed by the principles of equal treatment and transparency, setting clear policies for each category of staff.

At the same time, since 2020, the Company, recognizing as a priority the issue of mental health, that was highlighted during the pandemic, has taken the initiative to create **a psychological support line**, which is coordinated by an external organization with extensive experience in this field, in which specialized health professionals participate, and can provide support and guidance to employees in need. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 401-2\]](#)

Employee training

MYTILINEOS’ activity in different Business Sectors creates different training needs, while offering employees a wide range of knowledge and skills, giving them the opportunity to develop management and problem-solving skills, as they face new challenges every day. With the aim of improving the professional skills and competences needed to address existing and future challenges of the Company’s business activity, as well as the personal lives of its employees, **the professional education, training, and development of its human resources continued in 2023**. [\[GRI 3-3-d-iii\]](#)

Remediation of negative impacts [\[GRI 401-2\]](#)

MYTILINEOS’ policies, such as the Human Rights Policy, the Corporate Social Responsibility Policy, the Policy Against Violence & Harassment in the Workplace, the Codes of Conduct, etc. highlight the Company’s commitment to remedying any negative employment-related impacts and especially to the protection and respect of human rights. Each Policy concerns a specific topic and has an appointed responsible person or department to provide information and clarifications on the matter and arrange for relevant updates.

In case **employees wish to seek advice**, raise a relevant issue, or report a breach of the Code, there are alternative options. In this context, they may contact any of the following people: their Supervisor, Director, General Manager or the Regulatory Compliance Division directly. [\[GRI 3-3-d-i\]](#) [\[GRI 2-26-a\]](#)

In addition, the Company operates **a whistleblowing line** at central level by submitting reports of violations in relation to the policies of personal data protection, bribery and corruption, human rights, or the Company’s code of conduct to the Regulatory Compliance Director. **The Company’s employees are encouraged to freely disclose** if they have become aware of any activity that deviates from the principles of the Code and may be a cause for concern. The Company’s Management **ensures that no action will be taken against any employee who reports, in good faith**, any actual or perceived misconduct. [\[GRI 3-3-d-i\]](#) [\[GRI 2-26-b\]](#)

The above Codes of Conduct and policies are communicated to all employees of all hierarchical levels, as well as to suppliers and business partners of the Company (those that concern them) via e-mail, and are available in Greek and English, on the intranet, while most of them are also posted on the official website of the Company. More information can be found in the introductory section of this Report. [\[GRI 2-23-c\]](#) [\[GRI 2-23-f\]](#)

Employee engagement survey

MYTILINEOS, emphasizing the feedback of its employees and the continuous improvement of the work experience, implemented for the first time in 2023, an **Employee Engagement Survey**, in which a very large part (80%) of its human resources from 32 countries participated. Through the survey, the Company had the opportunity to collect the comments of its employees and start planning targeted actions in order to respond to the topics that emerged as most important, to be implemented in 2024. [\[GRI 3-3-d-iii\]](#)

Effectiveness of the actions

[\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-e-iii\]](#) [\[GRI 3-3-e-iv\]](#)

Employee training

Specifically, **in 2023, €291,422 were invested for the implementation of 61,407.9 man-hours of training** (2022: 383,367), essentially maintaining the sum of hours compared to the previous year, while numerous programs were implemented with own resources (human, technological, intangible, etc.) which is reflected in the following table “Programs skills with the aim of strengthening and developing work-living beings”, leading to economies of scale, alongside increasing them to 738 internal programs in total for the 2023 (2022: 484).

The Company’s training program, in which **56.4% of the direct staff participated**, focused mainly on the following key modules: [\[GRI 404-2\]](#)

- Induction
- Foreign languages
- Development of skills and personal competences
- Development of technical skills
- Occupational Health and Safety
- Product/ Service Security
- Internal Processes & Management Systems
- CSR

- Regulatory Compliance Program
- GDPR & Code of Conduct
- Development of managerial skills & leadership
- Digital Security
- Human rights
- Technological systems and tools
- Professional certification
- Postgraduate programs (support)

In addition, **in 2023, programs were implemented that aimed to further enhance the high-performance culture** and to **strengthen skills and personal abilities**, as well as **technical skills**, so as to **increase effectiveness** and address current and future challenges of doing business. Programs were implemented on issues of effective communication, **Health & Safety, project management, IT tools** and **compliance**, as well as **ESG issues**, such as the theme “**Diversity and Inclusion**”. [\[GRI 3-3-e-iii\]](#)

Employee details (direct employees)	Average man-hours training / employee [GRI 404-1]		
	2021	2022	2023
Analysis / gender			
Total	14.5	13.0	15.2
Men	14.5	13.4	17.0
Women	14.3	11.2	9.9
Analysis / age			
<30 years old	39.5	27.4	29.9
30-50 years	12.4	12.1	13.8
>50 years old	6.4	5.9	7.9
Analysis / category of staff			
Executive staff	29.0 ¹	18.3	16.2
Administrative staff	12.8	11.9	8.9
Technical staff	13.7	13.1	22.3
1. The increase in the average is due to the realization of specialized performance management training to all MYTILINEOS managers			

Development of specific skills

At the same time, for yet another year, in 2023 **Skills Development Centers** were implemented in which company executives participated in order to: **a)** identify and develop successors for critical positions, **b)** select the most suitable for promotion and **c)** identify and accelerate talent development. [\[GRI 3-3-e-i\]](#) [\[GRI 404-2\]](#)

Development of technical skills

The implementation of **training programs** for the development of theoretical and technical skills in all production units of the Company continued in 2023, as presented in the following table. [\[GRI 3-3-e-iii\]](#) [\[GRI 404-2\]](#)

Skills development programs aimed at empowering and developing employees		
	Internal programs	External programs
Training Modules:	<ul style="list-style-type: none">Induction,Development of personal skills,Development of technical skills,Training in technological systems and tools,Internal management processes & systems,Health and SafetyLeadership skillsManagement Development,Professional certification,Regulatory compliance	<ul style="list-style-type: none">Language learningDevelopment of personal skills,Development of technical skills,Training in technological systems and tools,Internal management processes & systems,Health and SafetyLeadership skillsManagement Development,Regulatory compliance
Total programs:	738	206
Number & hierarchical position of employees trained:	Total employees: 2,046 <ul style="list-style-type: none">Executive staff: 119Administrative staff: 794Technical staff: 1,133	Total employees: 436 <ul style="list-style-type: none">Executive Staff: 40Administrative staff: 201Technical staff: 195
Total number of hours of implementation:	32,218	3,824

Performance evaluation

In 2023, the **Performance Appraisal System** was revised with the aim of optimizing it in key points, while at the same time the implementation of the Company's employee training program on the process of providing feedback in relation to the overall effectiveness of the Company's administrative and managerial operation was completed.

The aim of the specific interventions that were included in the context of **strengthening skills** in the process of final evaluation of the unified Performance Dialogue system was:

- Information on the performance evaluation process and the role of the immediate supervisor throughout
- Understanding the importance of preparation as well as developing confidence in providing effective feedback throughout the process

Also, at the end of the year, the implementation of short training interventions began with the aim of informing and empowering employees regarding the tools and the process of final performance evaluation. [\[GRI 3-3-e-i\]](#)

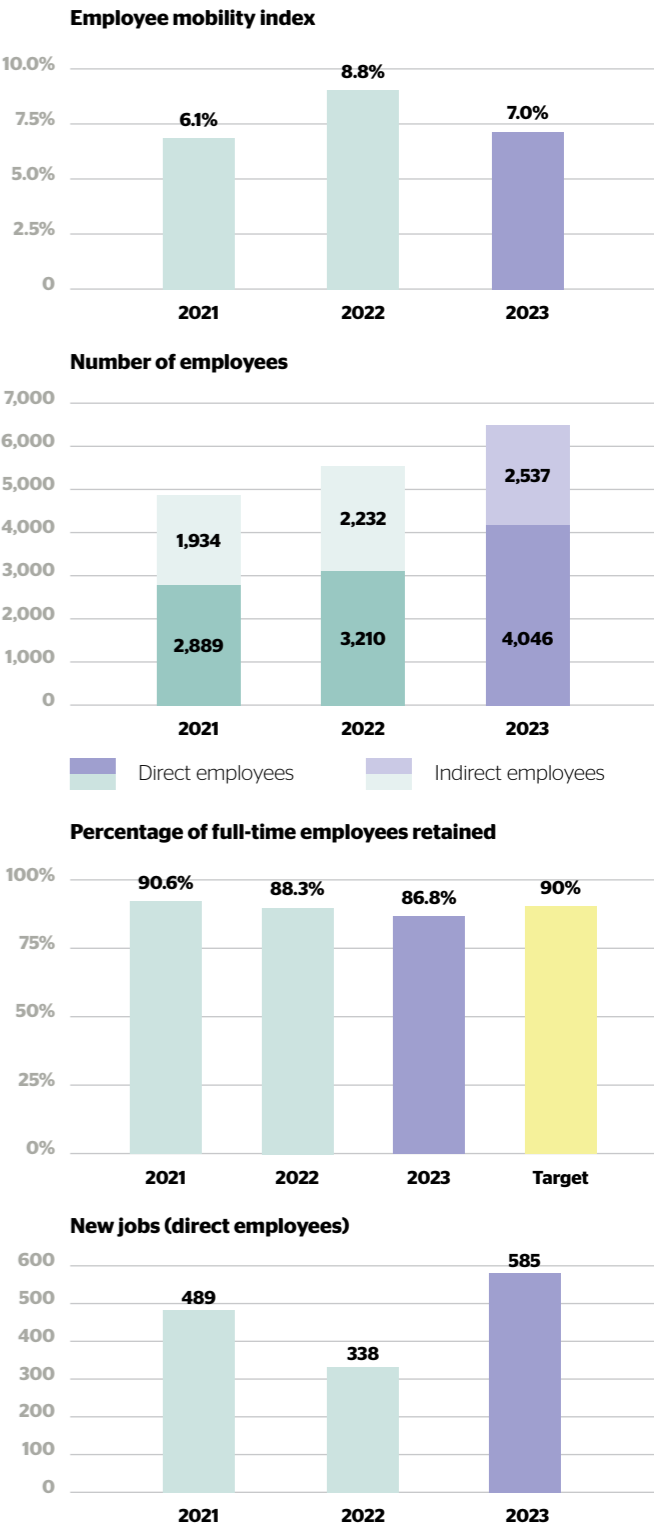
Employee details (direct workers)	Total percentage of employees evaluated for their performance, [GRI 404-3] ^{1,2}		
	2021	2022	2023
Analysis / gender			
Total	50.2%	47.3%	43.5%
Men	51.8%	51.1%	49.1%
Women	43.4%	32.4%	27.5%
Analysis / category of staff			
Executive staff	53.2%	63.8%	80.8%
Administrative staff	47.8%	39.5%	30.0%
Technical staff	44.1%	43.8%	48.8%

1. Percentage of all direct employees. The corresponding percentage of employees who met the conditions to be included in the annual performance evaluation process (i.e. excluding those working for the Company for less than 6 months, as well as special categories of employees based on role / object) is almost 87%.

2. It refers to an evaluation of the performance of direct employees and concerns the calendar year 1/1/2023-31/12/2023.

Employment Data

- Direct **employment showed a significant increase of 26.0%**. The total number of direct employees of the Company amounted to **4,046 persons** (2022: 3,210), with **approximately 77.9% of them employed in Greece**.
- The **average period of stay of direct employees** in the Company is **7.25 years** and concerns **4,046 direct employees**.
- The total number of **indirect employees** (permanent independent contractors, partners with long-term contracts or project contracts) amounted to **2,537 persons** (2022: 2,232), bringing the **total number** of employees (directly and indirectly) of the Company to **6,583 persons, increasing total employment by 21.0% from 2022**. [\[GRI 203-2a\]](#)
- The Company maintained for yet another year the **very high rates of local employment**, where approximately **8 out of 10 of its direct and indirect employees** come from the **communities directly** adjacent to its industrial units, but also the wider region.
- The **share of women in direct employment stood at 25.6%**, up 17.1% compared to the base year 2019.
- Total **new hires reached 1,316** with 27% of them being women, while almost **33% of them were young workers under the age of 30**. The **average cost of new hires** made in 2023 has been estimated at around €32,000 gross salary (2022: €29,000 gross salary).
- MYTILINEOS created **82 quality internships** and vocational training positions, with the aim of developing skills and converting many of these positions into permanent jobs.
- The **retention rate of full-time employees remained stable at 86.8%** (2022: 88.3%).
- The **high proportion (93.5%) of direct workers employed under an employment contract of indefinite duration** increased significantly (2022: 82.6%)
- Low part-time employment rates remained at 1.6% in 2023 (2022: 0.7%).
- About **3 out of 10 workers (28.3%) are covered by company collective agreements**, while the rest are covered by the National Collective Labour Agreement. [\[GRI 2-30\]](#) [\[SASB EM-MM-310a.1\]](#)
- The **rate of employees returning to work after the end of parental leave stood at 100%** (2022: 100%), while the corresponding **rate of staying in work 12 months after the end of parental leave also amounted to 100%** (2022: 100%). Specifically, in 2023, a total **of 21** (2022: 24) direct workers took parental leave, including those who took parental leave in 2023, and those who took parental leave in 2022 and which expired in 2023, with a ratio of **14 women** (2022: 6) and **7 men** (2022: 18), who made use of this right. [\[GRI 401-3\]](#)
- A total of **585 new jobs were created**, an increase of 73% compared to 2022, covering needs in all Business Sectors of the Company (2022: 338).
- Regarding **staff mobility**, the voluntary redundancy ratio decreased to 7.0% (2022: 8.8%), while the non-voluntary redundancy ratio increased by 2.0% (2023: 3.7%) compared to the performance of 2022 (1.7%).
- In 2023, a total of 502 **jobs were filled by internal candidates**, as a result of the transformation of the Energy sector and the creation of a new organizational chart, which was staffed by 199 Protergia employees, as well as by 270 employees of the absorbed company Watt&Wolt, which was acquired by MYTILINEOS, in 2023, while another 6 positions were filled through transfers of Company employees to other sectors to the Energy Sector. In the Metallurgy Sector, there were also 27 internal movements. [\[GRI 401-1\]](#)



Details of employees (direct employees) [GRI 2-7] [GRI 2-8]

	2021	2022	2023
Breakdown/gender			
Total	2,889	3,210	4,046
Men	2,348	2,564	3,010
Women	541	646	1,036
Employment contract type breakdown/gender			
Open-ended	2,406	2,653	3,781
Men	1,975	2,145	2,812
Women	431	508	969
Fixed-term	483	557	265
Men	373	419	197
Women	110	138	68
Work contract type breakdown/country			
Open-ended	2,406	2,653	3,781
Greece	2,182	2,299	3,001
Libya	64	120	100
United Kingdom	44	86	171
Spain	36	39	67
Australia	27	34	49
Chile	25	20	193
South Korea	7	5	6
Italy	6	18	90
Turkey	5	5	4
Romania	4	13	45
Mexico	2	-	-
Ghana	1	4	-
Saudi Arabia	1	-	1
Slovenia	1	-	4
Singapore	1	1	2
Kazakhstan	-	-	6
Uganda	-	-	1
Albania	-	1	4
Belgium	-	1	1
Cyprus	-	2	5
Uzbekistan	-	-	6
Poland	-	2	7
Tunisia	-	-	1
Georgia	-	3	-
North Macedonia	-	-	1
Bulgaria	-	-	11
Ireland	-	-	2
Canada	-	-	2
New Zealand	-	-	1

	2021	2022	2023
Work contract type breakdown/country			
Fixed-term	483	557	265
Greece	202	245	150
Chile	116	181	1
Ghana	57	55	46
Australia	30	16	7
Kazakhstan	21	8	-
Spain	16	8	1
Uzbekistan	14	10	2
United Kingdom	6	9	23
Algeria	5	5	2
Nigeria	5	5	3
Slovenia	5	4	3
Uganda	2	1	-
Korea	1	1	-
Tunisia	1	1	-
Georgia	1	1	16
Italy	1	4	1
Albania	-	-	-
Belgium	-	-	-
United Arab Emirates	-	1	1
Cyprus	-	1	1
Poland	-	-	6
Turkey	-	-	-
Saudi Arabia	-	1	1
Mexico	-	-	-
Libya	-	-	1
Romania	-	-	-
Singapore	-	-	-
Employment type breakdown/gender			
Full-time	2,872	3,189	3,980
Men	2,345	2,558	2,995
Women	527	631	985
Part-time	17	21	66
Men	3	6	15
Women	14	15	51

Employee data (direct employees) [GRI 401-1]

	Recruitment			Departures		
	2021	2022	2023	2021	2022	2023
Breakdown/gender						
Total	915	920	1,316	426	582	650
Men	720	718	961	333	481	500
Women	195	202	355	93	101	150
Breakdown/age category						
<30 years old	327	344	429	150	180	219
30 - 50 years old	444	474	711	217	303	327
>50 years old	144	102	176	59	99	104
Breakdown by category of staff						
Executive staff	49	25	68	175	23	32
Administrative Staff	354	360	725	50	234	281
Technical Staff	512	535	523	201	325	337
Breakdown by country						
Greece	556	591	796	314	433	458
Chile	126	119	80	37	44	64
Libya	60	76	42	-	18	12
United Kingdom	35	53	136	13	9	30
Australia	43	16	28	11	19	17
Spain	32	-	35	20	13	12
Uzbekistan	19	5	2	7	16	3
Ghana	16	10	13	16	9	18
Kazakhstan	10	1	-	4	14	-
Italy	7	17	86	-	3	15
Slovenia	4	-	4	1	1	1
Romania	4	10	44	-	1	12
South Korea	1	3	1	-	2	-
Georgia	1	5	12	-	-	-
Singapore	1	-	1	-	-	-
Nigeria	-	-	-	3	-	1
Algeria	-	-	-	-	-	3
Uganda	-	6	-	-	-	-
Albania	-	1	3	-	-	-
United Arab Emirates	-	1	-	-	-	-
Cyprus	-	3	3	-	-	-
Poland	-	2	11	-	-	1
Saudi Arabia	-	1	-	-	-	-
Bulgaria	-	-	13	-	-	3
North Macedonia	-	-	1	-	-	-
Ireland	-	-	2	-	-	-
Canada	-	-	2	-	-	-
New Zealand	-	-	1	-	-	-

Human Rights & Equal Opportunities



Management approach & impacts on sustainable development and human rights

[GRI 3-3-a] [GRI 3-3-b]

The Company’s business activity in geographies and markets with significant human rights risks increases its responsibility to ensure that itself, its suppliers, and its business partners operate in accordance with international standards for the protection and respect of human rights.

MYTILINEOS aims to **safeguard labour relations** that promote mutual trust, constructive cooperation, two-way communication and recognition, as stated in the Company’s [Human Rights Policy](#). At the same time, it aims to promote the fundamental principles of the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization, including: **(a)** respect for freedom of association and substantive recognition of the right to collective bargaining, **(b)** the elimination of all forms of forced or compulsory labour, **(c)** non-participation in forms of child labour, and **(d)** the elimination of discrimination at work.

Moreover, with the largest part of MYTILINEOS’ activity covered by heavy industry, **the participation of women and young employees in employment** (proportionally and always according to the requirements of each sector of activity) present the two main issues with regards to promoting equal opportunities and diversity in the Company’s working environment.

The challenge in the context of Sustainable Development

Ensuring equal opportunities within the framework of respecting and safeguarding human rights, by abolishing any discriminatory policies and practices (in relation to wages, age, gender, disability, race, nationality, origin, religion, sexual orientation, or other status), while promoting actions to provide a working environment where **every employee has the same rights and is treated fairly** and according to their abilities to fulfil their role.

Potential negative impacts

Due to the size of MYTILINEOS, its different business activities and its international presence in countries with developing economies, a potential negative impact on human rights, including equal opportunities and diversity, is recognized, which may arise under certain circumstances, within the large number of its business partners and suppliers, due to potential shortages, incomplete or ongoing procedures, policies, codes of conduct or due to a different culture, as well as other parameters (such as stereotypical perception, mentality, beliefs or customs, depending on the country of activity, etc.), and therefore the control of the faithful implementation of the protective and preventive framework of the Company against violation incidents becomes of primary importance and a constant goal to be achieved.

Regarding the issue of equal opportunities, a potential limited contribution by the Company to the mitigation of inequalities, mainly related to gender equality, equal pay, equal education, and training, as well as the provision of opportunities for equal progression and human capital development, may have short- and medium-term consequences on employee morale, productivity, and retention, as well as the Company’s reputation as a responsible employer. [GRI 3-3-a]

Actual positive impacts

Based on its control mechanisms, the Company does not to date record incidents of violation of the rights of its employees, nor the rights of its local communities, while at the same time it does not participate in any form of child or forced labour (modern slavery). The relevant policy of the Company enhances the promotion of respect and protection of Human Rights, both within its internal environment and within its sphere of influence.

The provision of a working environment of equal opportunities is a basic practice of MYTILINEOS, as formulated in the Company’s “Human Rights Policy”, and is associated with medium and long-term positive impacts, such as the enrichment of its corporate culture with the elements of diversity and equality as well as the observance of meritocracy and equal treatment in the selection of personnel regardless of special-personal characteristics. [GRI 3-3-a]

The Company’s contribution to the impacts

Directly involved in these impacts are all Business Sectors of MYTILINEOS and its subsidiaries, while its contractors/ suppliers may be indirectly involved. The impacts concern all workplaces of the Business Sectors, subsidiaries and contractors and suppliers of the Company. [GRI 3-3-a]

Major risks

MYTILINEOS, due to its activity in developing countries, mainly through the Energy Sector and specifically the M Power Projects and the M Renewables Business Units, identifies risks related to human rights, both **within its working environment and in the environment of its main suppliers and business partners**. Potential risks include activities related to child labour, culture of corruption, inequalities in the workplace, restriction of human rights at the level of local communities, etc. These risks can affect both the financial and the human and social capital of the Company, through possible impacts on its reputation and social license to operate and may lead to legal sanctions and the adoption of extraordinary measures beyond those imposed by normal business conditions.

In particular, specific risks related to inequalities in the workplace relate mainly to wage provision, education and training, as well as opportunities for human resource development and progression. The occurrence of such risks may have an impact on employee morale and productivity, while inequalities in remuneration provision may stand in the way of retaining talented and skilled employees, burdening the Company with increased costs for their replacement, while at the same time they can call into question the Company’s reputation as a responsible employer.

Company policies and commitments [GRI 2-23]

[GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f] [GRI 3-3-c] [GRI 3-3-d-i]

- MYTILINEOS operates on the basis **of its long-standing commitment to zero tolerance of the violation of Human Rights**, which is implemented both by **the non-participation (direct, passive or silent) of the Company in relevant violations**, as well as by **avoiding any transaction and contact** with third parties, in the countries in which it operates, that may have caused or for which reasonable suspicions exist that they may contribute to the creation of conditions that could cause violations of Human Rights, in accordance with the main pillars of MYTILINEOS’ [Human Rights Policy](#), [the Code of Business Conduct](#)² and the [Suppliers/Business Partners Code of Conduct](#)³. [GRI 3-3-c] [GRI 3-3-d-i]
- MYTILINEOS is committed to the **first 6 Principles of the UN Global Compact**, which are based, inter alia, on the internationally recognized principles of the protection of Human Rights, as set out in the Universal Declaration of Human Rights (UDHR). The specific commitment of MYTILINEOS regarding the monitoring and publication of impacts in this field, as well as the Code of Business Conduct and the Suppliers/ Business Partners Code of Conduct addressed **to all hierarchical levels** of the Company **and to suppliers/ business partners**, promote the respect and protection of Human Rights and working conditions, reducing the likelihood of incidents in its work environment. [GRI 3-3-c] [GRI 3-3-d-i]

At the same time, [MYTILINEOS’ Human Rights Policy](#) includes the following **commitments regarding Equal Opportunities**. [GRI 3-3-c] In particular:

- The Company is committed to providing equal opportunities while **prohibiting discrimination and harassment**. The corporate processes of talent recruitment and selection, access to education and training, remuneration, performance evaluation and termination of cooperation **are devoid of discrimination** based on race, sex, colour, national or social origin, religion, age, disability, sexual preference, and political belief.
- The Company **does not tolerate offensive or inappropriate behavior, unfair treatment, or retaliation of any kind**. According to the Company’s **Code of Conduct**, physical or verbal harassment of a sexual, racist, or defamatory nature is **prohibited** in the workplace, but also in any circumstance related to work outside the workplace.
- The Company is committed, in the context of gender equality at work, to take appropriate measures to **eliminate all discrimination against women** in the field of employment, equal pay for work of equal value, vocational education and training as well as decision-making processes.
- The Company respects the **privacy of the personal data** (GDPR) of its employees whenever it collects personal information or controls workplaces.
- At the same time, within the first months of 2024, the approval flow of the **new Diversity, Equity and Inclusion Policy** is expected to be completed.

In addition, the Company, faithful to its commitment to

1. https://www.mytilineos.com/media/rp3edd3u/politiki_anthrwpinwn_dikaiwmatwn_en.pdf
2. https://www.mytilineos.com/media/hwdhvhaw/kodikas_deontologias_omilou_2019_eng_web.pdf
3. https://www.mytilineos.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf

implement **best practices in Corporate Governance**, aims to **apply the principle of Diversity** (with key parameters, that is gender, age, experience, skills, and knowledge, among others) in the composition of its Board of Directors, the potential of its senior executives as well as all employees of direct employment in its activities, where possible.

MYTILINEOS’ priority regarding practices that foster an inclusive working environment, promoting equal opportunities and respecting Human Rights, is also ensured through **MYTILINEOS’ Corporate Social Responsibility Policy**. [GRI 3-3-c]

At the same time, in 2023, the Company’s Human Resources General Division took the initiative regarding the creation of **a new Talent Recruitment & Selection Policy and Procedure**, to further ensure the above for the entire Group in all areas of its activity. Already in the first quarter of 2024, the process of approving the flow of this Policy has begun. [GRI 3-3-c]

MYTILINEOS’ long-standing commitment to promote the Reduction of Inequalities in the context of the Company’s contribution to the Global Sustainable Development Goals (5 & 10), as well as its commitment to the Principles **of the UN Global Compact** and specifically the 6th Principle to reduce all forms of discrimination at work, is reflected through the **Policy for the Prevention and Combating of Violence and Harassment at Work**, which was developed at the end of 2022 and was fully implemented in 2023, with the aim of ensuring a positive working environment without Violence and Harassment. [GRI 3-3-c]

Impact management and response tactics [GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

[SASB EM-MM-210a.3]

Human Rights

- MYTILINEOS monitors the relevant labour legislation (national, European, ILO), including reports on respect for human rights, working conditions and child labour, and is in full accordance with collective and relevant international conventions. **Employees of the Company may, without any restriction, participate in trade unions and professional associations**. [GRI 3-3-d-iii]
- Labour rights are a material issue for all employees. **The Company’s direct employees are covered by business or collective labour agreements** where applicable, and **participate through their representatives in health and safety committees**, providing their suggestions to the management for continuous improvement. At the same time, employee unions operate in the Metallurgy Sector, where at the level of business units, **primary trade unions operate**, with **representatives elected by the workers** in a general assembly, as well as representatives in secondary trade unions (Volos Labour Centre, PFMW - Panhellenic Federation of Metal Workers). [GRI 3-3-d-iii]
- The Company, through the **basic mechanism for reporting violations** of the Code of Business Conduct and the Suppliers and Business Partners Code of Conduct that it applies (anonymous or named reports by phone, fax, mail, as well as via email to the Regulatory Compliance Division), **provides the opportunity to its employees and suppliers/ business partners to express any concerns**, as well as incidents

of Human Rights violations. At the same time, it commits not to take any action against anyone who reports, in good faith, any real or alleged inappropriate behavior. This mechanism is under enrichment in relation to the European Whistleblowing Directive (EU) 2019/1937 of the European Parliament and of the Council, and after the relevant local legislation, its revised version will become operational. [GRI 3-3-d-iii] [GRI 3-3-f]

- Regarding **its activity in developing countries**, MYTILINEOS takes all necessary measures to comply with the law. The management of safe work is governed by a series of actions that everyone has a duty to implement for the proper implementation of the Health & Safety system of employees and the taking of appropriate measures. At the same time, in **the contracts signed with contractors and suppliers** there is **an explicit provision** regarding the **Code of Conduct to ensure the protection of human rights**. [GRI 3-3-d-iii] [GRI 3-3-f]
- Furthermore, the Company is committed to the regular evaluation of its core business units, its Business Sectors, regarding the **impact on key areas of Human Rights protection**, in accordance with the methodology proposed by the UN Global Compact Self-Assessment Tool (Human Rights section), as well as to the publication of relevant findings. This process is also supported by daily communication, but also by the procedures and employee management systems implemented by the Human Resources General Division. [GRI 3-3-d-iii] [GRI 3-3-f]
- At the same time, in 2023, the evaluation process which began in 2022, continued for MYTILINEOS' **key suppliers** on sustainability issues, **including the protection of Human Rights**. The results of the evaluation may highlight issues that could, under certain circumstances, give rise to violations of these rights (such as deficiencies in procedures, policies, codes of conduct, depending on the country of operation, etc.) [GRI 3-3-d-iii] [GRI 3-3-f]

Equal Opportunities

In 2023, the actions that had begun in 2022 continued, regarding the collection and analysis of data on employment parameters such as education, salary scales, etc. from the different Business Sectors, to gain a deeper understanding of these issues and to formulate specific action planning. [GRI 3-3-d-i]

Indicatively, the following ongoing actions are mentioned:

- In addition to the **Code of Business Conduct** and the **Human Rights Policy**, where there is explicit reference to the prohibition of discrimination at work, MYTILINEOS **constantly evaluates existing** human resources policies, in order **to formulate new ones** where necessary, **in order to enhance equality at work**. [GRI 3-3-d-iii] [GRI 3-3-e-i]
- During Q4 2023, a **training program** was implemented for a total of 18 MYTILINEOS executives (from all business sectors) on issues of unconscious biases, as well as ways of cooperation and interaction to create a culture of open communication. The participants selected were employees, who had also assumed the role of Assessors in the Assessment Centers of MYTILINEOS' graduate program. [GRI 3-3-e-i]
- In the Metallurgy Sector, **awareness raising programs were carried out to prevent sexual harassment and violence at work**, as well as any other form of discrimination, with the participation of 185 employees. [GRI 3-3-e-i]
- The United Nations Women's Empowerment Principles (UN WEPs) are studied and implemented, while MYTILINEOS participates in the Peer Learning Groups organized by UNGC

Network Greece. As a member of this voluntary initiative, MYTILINEOS hosted the 1st meeting of the Peer Learning Group that took place in September 2023, at the Company's headquarters, with the participation of executives from other companies, during which **the relevant initiatives of the Company regarding the empowerment of women and their development to positions of responsibility were presented**, as well as the broader strategy proposed by the Company on inclusion and diversity issues, along with best practices and approaches on these issues. [GRI 3-3-d-iii] [GRI 3-3-f]

- On an annual basis, **salary brackets are analyzed and evaluated** to identify areas that need corrective action in the short and long term to **eliminate the pay gap between men and women**. The aim of this study is to evaluate alternative actions that can be phased in from 2024. [GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-e-i]
- In November 2023, **an interactive workshop entitled “Women in Industry”** was also implemented, with the participation of 92 women from different departments of the Company, with the aim of both networking and exchanging ideas with each other on topics such as work-life balance, workplace safety and personal empowerment. [GRI 3-3-e-i]

Effectiveness of the actions

[GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv]

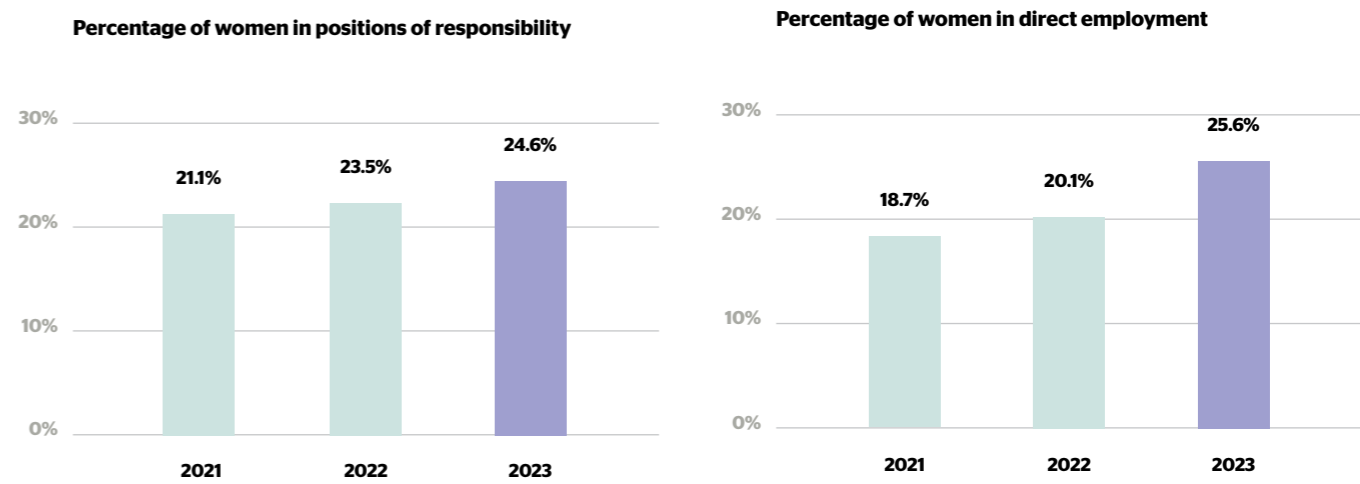
- In 2023, in the context of employee training on the Code of Business Conduct, the Company implemented special training for its executives, through the **e-learning process, on the subject of Human Rights**, with the participation of 322 employees, following the 211 employees in 2022, regarding the respect of freedom of association, the elimination of any form of forced or compulsory labour, the recognition and elimination of child labour and the elimination of any discrimination in relation to the workplace and employment. [GRI 3-3-d-iii] [GRI 3-3-e-i]
- MYTILINEOS' focus on creating a working environment that promotes reciprocity and equal opportunities for all is the foundation for establishing a positive work experience for all the Company's people. This approach reflects the Company's commitment to **continuously monitor and record any deviations**, but also to take immediate action in case of incidents that could challenge it. Through the extension of this approach, in 2023, 15 cases of organizational behavior were recorded in the Group's companies outside Europe, which were immediately investigated with seriousness and dedication and appropriate corrective actions were taken, as it was recognized that they can potentially weaken the creation of a positive working environment, avoiding their reappearance in the future. [GRI 406-1] [GRI 406-2]
- The employment of employees with disabilities in MYTILINEOS is recorded in 2023. [GRI 405-1]
- In 2023, and following the organizational transformation of the Company, **the process of analyzing and evaluating**

the Company's job positions at all levels has begun, in order to lead to a new ranking/ internal rating, analyzing in detail the responsibilities and duties of each position, thus ensuring fairness and equality in terms of pay. The application of the methodology for collecting and analyzing data of the **gender pay gap equity index** between men and women continued in 2023, recording an average pay gap of men and women (by calculating average earnings - mean) in the category of executives at a rate of 17%, in the administrative at a rate of 19%, while in the technical workforce at a negative rate of -9%. However, in the case of the latter category, the proportion of employees is more than 98% men, and the rest are women. It is noted that the same method of calculation was maintained for 2023 as the previous year, while especially for the technical workforce the result of the ratio of men to women is affected by extreme values and extremely large deviation in quantities and therefore cannot be considered representative. [GRI 405-2]

- In revenue-generating divisions, the proportion of women in the Company's Executive Staff increased by 1% to 23% in 2023 (2022: 22%). [GRI 405-1]
- For the 6th consecutive year, the Company implemented a **self-assessment process for the protection of Human Rights**, in all Business Sectors and all countries of activity mentioned in the "Countries of Operation 2023" section. According to the findings of the process, no areas were recorded where deficiencies were observed that could jeopardize the protection of Human Rights in the Company's activities. The Key areas explored up to and including 2023, according to the above procedure, are presented in the table below. [GRI 412-1] [GRI 3-3-e-iii]

Assessment Areas	Results
Occupational Health & Safety	<p>During the self-assessment process, no deficiencies were observed at the level of procedures or policies related to the Health and Safety of employees.</p> <ul style="list-style-type: none">The Company ensures safe facilities and hygienic working conditions for its employees. [GRI 3-3-d-iii]It also ensures that its employees are equipped with the necessary protective equipment and have the required training necessary to carry out their work safely. [GRI 3-3-d-i]The Company promotes the active participation of its employees in the Health and Safety processes in the workplace [GRI 3-3-e-iii] [GRI 3-3-f]In 2021, the Company highlighted the importance of promoting and strengthening the mental health of employees and their families by activating a 24-hour Psychological Support Hotline, which has been operating continuously ever since.Overall, the Policy, the planned actions to achieve the defined objectives and the initiatives voluntarily adopted by the Company to ensure the Health and Safety of employees, are applied with absolute consistency, as presented in the relevant section of this report. [GRI 3-3-c]
Working hours, wages and leave	<p>A basic and non-negotiable principle for MYTILINEOS is that its business activity is implemented in full harmony and compliance with the applicable labour legislation in each region or country of its operation. [GRI 3-3-c]</p> <ul style="list-style-type: none">The Company ensures that all employees have a formal employment status. [GRI 3-3-d-iii]It ensures that the working week is limited to 40 hours, however due to extraordinary and unplanned workload, in various activities, groups of employees may work more than 40 hours. [GRI 3-3-e-iii]The Company has procedures in place to plan, record and monitor each employee's working hours to control overtime, while providing employees with a reasonable break time during work (as provided by legislation and industry standards). [GRI 3-3-e-iii]The Company ensures the remuneration of its employees in any case of sick or parental leave and vacation leave, in accordance with international standards. [GRI 3-3-d-iii]Through the formal process of reporting violations of the Company's Code of Conduct, no incident of violation of these labour rights was reported to the Human Resources General Division. [GRI 3-3-d-i]
Fair treatment	<p>In accordance with its Code of Business Conduct and Rules of Procedure, the Company:</p> <ul style="list-style-type: none">Protects its employees from harassment in the workplace as well as from physical, verbal, sexual or psychological harassment or any kind of threat. [GRI 3-3-d-i]Respects the privacy of its employees' personal data whenever it collects personal information or controls workplaces. [GRI 3-3-d-iii] <p>Through the formal process of reporting violations of the Company's Code of Conduct, no incident of discrimination was reported to the Human Resources General Division, which was confirmed. In 2022, the planning and approval flow of the Violence and Harassment Policy in the Workplace was completed so that its application began in early 2023. In the Metallurgy Sector, a survey of employees was carried out for further investigation on issues related to respect for human rights and women's rights in the workplace. At the same time, with the contribution of an external partner, 64 executives attended seminars on Discrimination and Violence & Harassment in the workplace. [GRI 3-3-d-i] [GRI 3-3-f]</p>
Freedom of association	<p>The Labour Legal Framework includes provisions that provide for and safeguard the right of collective bargaining and unionization of employees, which MYTILINEOS fully respects. In all Business Sectors, the right of employees to unionize is recognized. During 2023, no areas were identified or incidents recorded where the relevant right was endangered or violated. This is the result of the implementation of a specific collective bargaining process, which has as its basic prerequisite the commitment of the Company's Management and employees to a thorough regulation of social and labour issues, taking into account the rights and interests of both parties. [GRI 3-3-c] [GRI 3-3-d-iii] [GRI 3-3-e-i]</p> <p>Through the formal procedure for reporting violations of the Company's Code of Conduct, no incident of violation of this labor right was reported to the Human Resources General Division. [GRI 407-1] [GRI 3-3-d-i] [GRI 3-3-e-i]</p>
Impact on local communities	<p>The Company, through its formal and informal contact mechanisms with local communities, which it maintains per Business Sector outside the industrial units located in demarcated Industrial Areas, ensures the recording of the concerns of local communities regarding any general impact of its activity by taking, where necessary, appropriate measures. [GRI 3-3-d-i] [GRI 3-3-f]</p> <p>It also takes the necessary measures to ensure that its security system or arrangements are consistent with international law enforcement and use of authority. In this context, no circumstances were identified in 2023 to justify the possibility of incidents of human rights violations at community level. The Company's activity does not restrict but on the contrary ensures citizens' access to resources or various other means of subsistence. At the same time, the consultation process and consequently the cooperation with municipalities during the development and operation of RES projects is systematic</p>

Assessment Areas	Results
Child labour	<p>MYTILINEOS does not employ employees under the age of 15 or 18 for work. [GRI 3-3-c] [GRI 3-3-d-iii]</p> <p>As a result, in no activity of the Company is there a risk (significant or not) of occurrence of either incidents of child labour or conditions that may lead to the employment of young employees in hazardous work. [GRI 408-1] [GRI 3-3-e-i]</p> <p>Also, through MYTILINEOS' Code of Conduct for Suppliers and Business Partners, it is explicitly stipulated that they must strictly adhere to the limits and restrictions of legal work by age that apply in the countries where they operate, while when no relevant legislative limit has been set, then this should be considered at least 15 years. Also, persons over the age of 15 but under the age of 18 should not be employed for hazardous work or for work that may endanger their personal mental and physical health and safety.</p>
Forced labour	<p>MYTILINEOS, following the Greek Constitution (Article 22 par. 4) which establishes the freedom of employment, incorporates the relevant provisions within the Code of Business Conduct and the Suppliers & Business Partners Code of Conduct, prohibiting any form of forced or compulsory labour in its workplaces as well as in the workplaces of its suppliers/ business partners. As a result, in all activities of the Company, the risk of conditions that may lead to incidents of forced labour is significantly reduced. [GRI 3-3-c] [GRI 3-3-d-iii] [GRI 3-3-e-i]</p> <p>In 2023, through the formal process of reporting violations of the Company's Code of Conduct, no complaint or incident of forced or compulsory labour was reported to the Human Resources General Division. [GRI 409-1][GRI 3-3-e-i]</p>
Discrimination	<p>MYTILINEOS follows international practices in all regions and countries where it operates, ensuring that decisions on issues such as recruitment, remuneration, promotion, vocational training, retirement, and termination of contracts are based solely on impartial criteria and are not linked to any form of discrimination. [GRI 3-3-c] [GRI 3-3-d-iii]</p> <p>Through the formal process of reporting violations of the Company's Code of Conduct, no incident of discrimination was reported to the Human Resources General Division, which was confirmed. [GRI 406-1] [GRI 3-3-e-i]</p>



Percentages of gender and age representation in the composition of MYTILINEOS' governance bodies, as well as in its executive and administrative staff <small>[GRI 405-1]</small>	2021	2022	2023
Board of directors			
Men	72.7%	72.7%	75.0%
Women	27.3%	27.3%	25.0%
<30 years old	0.0%	0.0%	0.0%
30-50 years	18.2%	18.2%	17.0%
>50 years old	81.8%	81.8%	83.0%
Executive Committee (Cabinet of the CEO)			
Men	92.9%	81.8%	73.3%
Women	7.1%	18.2%	26.7%
<30 years old	0.0%	0.0%	0.0%
30-50 years	14.3%	9.1%	20.0%
>50 years old	85.7%	90.9%	80.0%
Executive Staff			
Men	78.9%	76.5%	75.4%
Women	21.1%	23.5%	24.6%
<30 years old	6.1%	8.7%	8.5%
30-50 years	59.6%	54.8%	57.0%
>50 years old		34.3%	36.5%
Percentage of employees belonging to nationalities other than Greek	N/A	N/A	11.7%
Administrative Staff			
Men	63.1%	61.5%	57.8%
Women	36.9%	38.5%	42.2%
<30 years old	14.8%	16.7%	19.3%
30-50 years	63.4%	61.7%	61.9%
>50 years old	21.8%	21.7%	18.8%
Percentage of employees belonging to nationalities other than Greek	N/A	N/A	18.5%
Technical Staff			
Men	96.1%	94.7%	93.4%
Women	3.9%	5.3%	6.6%
<30 years old	11.8%	13.3%	12.7%
30-50 years	68.9%	67.1%	68.8%
>50 years old	19.3%	19.7%	18.5%
Percentage of employees belonging to nationalities other than Greek	N/A	N/A	26.9%



Sustainability of Local Communities

Management approach and impacts of the issue on sustainable development and human rights

The Company's goal is to familiarize itself with the **needs and priorities** of its local communities, so that its development efforts are as compatible as possible with their own, but also with those of the Greek society at large. Social participation reinforces the **preventive approach** followed by MYTILINEOS, limiting unforeseen non-financial risks while contributing to the maintenance of social leave its operation, but also its good reputation. This is an **ever-evolving effort** in various forms, all of which imply the Company's commitment to meeting the diverse expectations of its local communities, to the extent that it deserves.

Actual positive impacts

MYTILINEOS contributes to the creation of a sustainable future for its local communities, through **social dialogue** processes with its Social Partner groups at local level. The exchange of views through the institution of consultation is a useful tool for the participatory approach in the recognition and implementation of social initiatives of the Company associated with direct positive effects such as:

- maintaining the **Company's high local employment rates**,
- supporting domestic suppliers**
- implementing social programmes** and initiatives to alleviate poverty, reinforce the social inclusion of vulnerable social groups, educate and develop the younger generation, reinforce local infrastructure, and preserve cultural and natural heritage, as well as
- develop innovative services** (smart cities).

The Company's contribution to the impacts

In 2023, no significant negative impacts on local communities were recorded. The effects mainly concern the communities adjacent to the Company's industrial units and construction sites, at home and abroad. Impacts are caused by both MYTILINEOS' Business Sectors, Voluntary & Non-Governmental Organizations, as well as local authorities in the context of their cooperation with the Company for the implementation of its social policy.

Major risks

The Company's inability to timely identify and manage the frequently changing social, economic, and cultural particularities of its local communities may jeopardize the Company's position as an integral member of them with common interests. This may have implications for maintaining the Company's "social license", placing potential constraints on its future development.

Company policies and commitments

The consistent implementation of **MYTILINEOS' social dialogue** and **social policy** with actions and initiatives that enhance its harmony of coexistence with its local communities and the wider society, as well as the protection of the rights of citizens of local communities adjacent to the Company's industrial units, in accordance with the main axes of the [Human Rights Policy](#) and the [Corporate Social Responsibility Policy](#) of the Company,



The Company's Corporate Social Responsibility policy has **been aligned with the 17 Global Sustainable Development Goals**, which constitute a universal set of goals, targets, and indicators that UN member states use to frame their agendas and policies until 2030 and are used as a common basis for dialogue and cooperation with its Social Partner groups.

Impact management and response tactics

MYTILINEOS' long-term goal is for its social investments (initiatives and programs) to prioritize projects that are sustainable in the long term, contributing to **the improvement of the social aspects of the lives of its local communities** and to Sustainable Development as a whole. MYTILINEOS' collaboration with both the wider society and its local communities is ongoing, multidimensional, and substantial.

- The General Divisions of each Business Sector of MYTILINEOS are **responsible for managing relations** with the local communities where they operate. The main objective is to identify any negative business impacts and minimize them through responsible business behavior and activity.
- In each Business Sector, MYTILINEOS has appointed and operates a **Sustainability/ESG team** that manages the implementation of social policy, the annual consultation of social partners, the cooperation with local media and the organization of community members' visits to the Company's premises whenever requested.
- The Company communicates with its local communities in a clear and transparent manner through the **"open door" policy** applied mainly in the areas where its main industrial units are located.
- The initiatives undertaken by the Company are linked to the needs of each community and its wider region and are shaped either through **open dialogue with local social partners** or through conducting surveys to identify substantive issues and opinion surveys. At the same time, annual thematic or general open consultations are organized with representatives of local communities for monitoring and discussion in specific issues of local interest.

Key pillars of MYTILINEOS' contribution to the sustainability of its local communities

- Strengthening local employment:** MYTILINEOS' core activities are mainly located in the periphery of Greece, which shows that the Company recognizes and accepts its important role in developing and maintaining the prosperity of local communities. In all geographical areas where the Company operates, most of its human resources come from local populations.
- Development of the local economy:** The principle of all Business Sectors of the Company is the selection of domestic and by extension local suppliers as a matter of priority, for the purchase of products and services, always according to their needs and particularities. More information can be found in the 4th study of the socio-economic impact of MYTILINEOS in Greece on the Company's website.
- Contributing to the global clean energy transition in a fair way:** MYTILINEOS, through its Energy Sector, contributes to the global clean energy transition by demonstrating a firm commitment to the sustainability of local communities. The sector's projects have increased the share of renewable energy sources and boosted economic growth, while contributing to the reduction of greenhouse gas emissions and energy security. In this way, the Company not only promotes renewable energy solutions, but also contributes to the holistic sustainability of communities, boosting local employment and strengthening the local economy.
- Substantial contribution through the annual Social Investment program through the implementation of social programs and actions:** The Company aspires to contribute to the strengthening of social cohesion by strategically seeking its greater activation, through selected actions, in areas directly related to: **a)** its culture and business values, **b)** the effects of its business activity, **c)** the basic social needs that emerged through the long economic crisis and the consequences of the COVID-19 pandemic and **d)** the Global Sustainable Development Goals. More information at: [sdactionsmap.mytilineos.gr](#).
- Further strengthening the constructive relationships,** it has built over time **with social actors, by implementing the electronic system for evaluating and managing social requests, "IN PRACTICE"**, which enhances transparency, ensuring the sustainability of its social investments, and developing new partnerships. During the process of evaluating requests, priority is given to those that are consistent with the Global Goals Sustainable Development: Zero poverty, zero hunger, Good health & well-being, Quality education, Less inequalities, Sustainable cities and communities. The **Process of Evaluation & Management of Social Requests, Corporate Social Programs and Initiatives** of the Company describes in detail the individual stages of the process for setting strategic goals, preparing the budget, and managing social requests as well as the initiatives undertaken by the Company. In addition, the Metallurgy Sector through the Process of Handling Requests and Complaints aims to improve the communication of the Company with the local groups of its Social Partners, as well as the **effective management of all requests** (questions, cooperation requests, sponsorship / donation requests, requests for sending information material, requests related to visit planning), comments, complaints, etc. related to ESG and Responsible Business issues. More information on the [Company's website](#).
- Specialized executives** in each Business Sector manage the Company's relations with its local communities and, in

cooperation with MYTILINEOS' Sustainable Development Division, implement at local level the institution of the annual Consultation of Stakeholders, to record local needs and examine new opportunities for cooperation.

Effectiveness of the actions

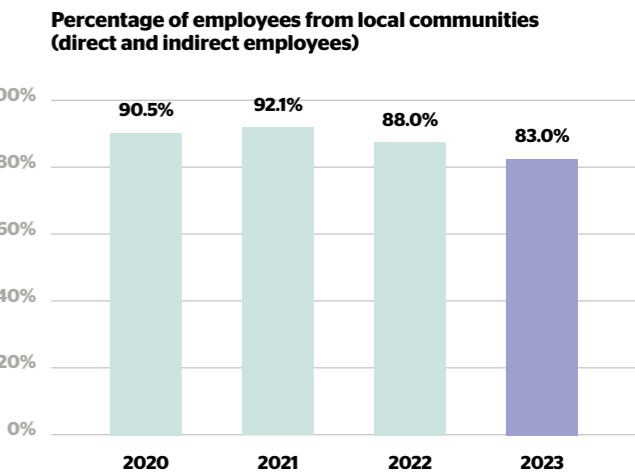
In the period **2019-2023**, MYTILINEOS recorded **367,217 beneficiaries** through the systematic implementation of social programs. This **exceeds the Company's target of approximately 47%, which was set at 250,000 benefiting citizens for the period from 2020 to 2025**.

Stakeholder Engagement

The Company, with absolute consistency over the last **13 years**, implements the institution of **Open Social Dialogue with its Stakeholder groups**. The Company is among the pioneers in this field in Greece, creating the conditions for the **formation of new perceptions and practices in its relations with Stakeholder groups**. In this direction, the 9th thematic consultation of the Stakeholders on "Responsible Supply Chain Policy" was held at central level. Detailed information on this is presented in the relevant section of this Report.

Local employment and growth

MYTILINEOS, considering the results of 2023, has created more than 2,400 new jobs over the last 14 years. At the same time, the Company, recognizing its important role in generating income in its local communities, aims and continues to maintain a very high percentage of local employment with almost **8 out of 10 of its direct and indirect employees coming from local populations**. In addition, by supporting the domestic and by extension local supply chain with purchases of products and services, which generate income, jobs (more than **2,500 indirect jobs** in the Company's total activities in 2023) and salaries, which are consumed in the market and in turn create induced jobs, wages and taxes paid to the State.

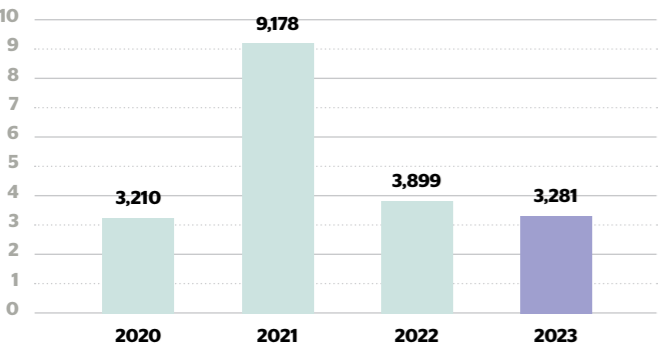


Social Programs and Actions [GRI 203-1b] [GRI 413-1a-iv]

In 2023, the Company, continuing the implementation of its social policy, implemented actions in key social sectors contributing to the Global Sustainable Development Goals (SDGs), **with a total value of €3.3 million**. The **average total expenditure over the last five years exceeds €4 million € per year**, while the Company's contribution to SDG 11 (Sustainable Cities and Communities) is noteworthy; where it exceeds 70%, with particular emphasis on the strengthening of local infrastructure & services and the implementation of actions related to the fields of Culture and Sports. [GRI 3-3-e-i]

By expanding its solar and photovoltaic portfolio, MYTILINEOS is increasing its financing and construction capabilities for additional projects, further strengthening its position in the wider energy market of Latin America and Australia. In this context, in 2023, the Company contributed significantly through the implementation of social programs and actions, to the enhancement of education and development of the new generation, good health & well-being, the reduction of food insecurity, local infrastructure, and the protection of cultural and natural heritage (Sustainable Development Goals 2,3,4,11). Through a series of actions that are part of the above programs, the Company demonstrates its commitment to meet the diverse expectations of its local communities, including indigenous peoples who may be affected by its activities, focusing on empowering them to the extent that it deserves. Specifically, MYTILINEOS invested more than €123,000 in the implementation of social programs in Chile and more than €57,000 in Australia, benefiting more than 56,000 citizens.

Social Investments (k €)



Year	Total expenditure on social programs
2023	€3,281,510
2022	€3,899,921
2021	€9,178,895
2020	€3,210,850
2019	€3,478,357
2018	€2,296,020
2017	€2,018,275
2016	€1,456,714
2015	€1,135,037

Social Action Cost Analysis by SDG 2023		
Social Sectors	Relevant Sustainable Development Goals	% of total social investment
Local Infrastructure & Services		50.9%
Culture/Sports Support		23.7%
Access to Health Services		8.0%
Strengthening Quality Education		4.9%
Alleviation of Poverty and Unemployment		3.5%
Reducing inequalities		3.1%
Reducing food insecurity		3.0%
Climate Action		1.7%
Gender equality		1.2%

The Company divides its social actions into three categories:

A) Charitable Donations, which refers to one-time or occasional needs support and response to calls from Non-Profit Organizations, local community organizations, employee requests or in response to external events, such as emergencies. **B) Community Investments**, which refers to the long-term cooperation of the Company with Non-Profit Organizations and local community organizations to address social issues selected by MYTILINEOS. **C) Commercial Initiatives**, which includes business activities towards local communities or wider society, undertaken by commercial departments to directly support the Company's business objectives by promoting its corporate and commercial identities and other policies, in partnership with charities and organizations. [GRI 3-3-d-iii] [GRI 3-3-e-i]

Cost Analysis of Social Actions by category and percentage of total (2023) [GRI 203-1c]

Charitable Donations	258,612.87€	8%
Community Investment	2,694,879.32 €	82%
Commercial Initiatives	328,018.11€	10%

Valuation of Social Value

In 2023, MYTILINEOS proceeded with the **analysis of the social value of social programs**, through the **Social Return on Investment (SROI) methodology**, which is an innovation and a pioneer in the industry. It concerns a **holistic approach** through which the Company calculates the impact it creates and makes informed decisions, to maximize the value returned by the investment it implements for each social program. Specifically, the results of three key social programs of the Company were analyzed, whose SROI ratios ranged at high levels, namely from 3.03:1 to 6.12:1. This means that **for every €1 invested in each program, €3.03 to €6.12 of social value was generated respectively**. The Company's key performance indicators regarding the sustainability of local communities are externally ensured in the context of securing the Sustainable Development Report. More information on SROI results can be found on [the MYTILINEOS website](#). [GRI 3-3-d-iii] [GRI 3-3-e-i]

Social benefits from the development of RES projects

The **long-term added value** from the Company's business operation with the development of Renewable Energy Sources (RES) projects through the Energy Sector, lies not only in its contribution to the achievement of national environmental goals, but also in the significant benefits to local communities. Thus, **in 2023, the total investment** the support of infrastructure projects and services and the strengthening of logistical infrastructure, to improve the living conditions of residents, in municipalities where new RES projects operate or will be developed, **exceeded €672,000**. Over time, these investments are implemented in cooperation with the relevant Municipalities and according to their needs and mainly concern: civil engineering projects such as asphalt paving, maintenance and rehabilitation of municipal and rural road construction, replacement, extension or construction of water supply and irrigation networks of settlements, supply and installation of LED street lighting fixtures, earthworks, construction or repair of municipal buildings and facilities, but also donations of vehicles and equipment necessary for the operation of municipal services and fire protection. [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 203-2a]

Key Social Initiatives & Programs

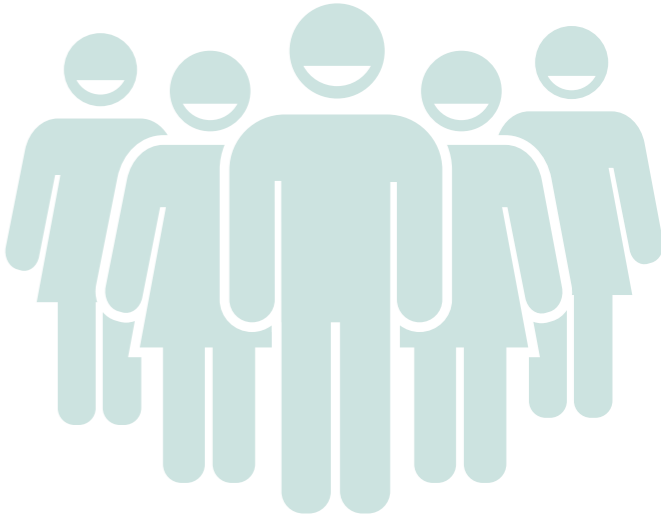
In 2023, MYTILINEOS implemented social programs and special social actions at central and local level, with **more than 162,000 beneficiaries in total**, contributing across the social spectrum of the Global Sustainable Development Goals.

Below are presented the most important programs that either took place for the first time in 2023 or are a continuation of previous implementations within the last five years (2018-2023). The description of each program is followed by a diagram of the long-term partnership with the collaborating organizations to implement the foreseen actions, while the dimension of the company's intention for their continuation in 2024 is also depicted.

The Company revised the initial target of the number of beneficiaries it had set through the implementation of social programs for the period 2020-2025. It was initially set at 250,000 citizens, a target achieved by 47% (Benefiting citizens 2020-2023: 367,217), and it was decided to increase significantly to 550,000 citizens for the same period.

Target
250,000
beneficiaries

New Target
550,000
beneficiaries



within five years
2020 - 2025

Key Social Initiatives & Programs

"Supporting the Operation of Ithaca's Mobile Laundry Unit" program, in collaboration with the non-profit organization Ithaca.

Impact: MYTILINEOS, implemented for the second consecutive time the innovative 12-month program that ensures access to personal hygiene services to those who lack them, contributing to the social and labor integration of homeless and other vulnerable groups. Specifically, through the daily operation of the Mobile Unit and the increase of operating points, 4,022 laundry washes were carried out, serving a total of 1,324 beneficiaries, delivering them 20,520 kg of clean clothes. During 2023, the program was strengthened by providing beneficiaries with career counseling services monthly, contributing to their effort to reintegrate into the labor market, enhance self-esteem / self-confidence, reduce social exclusion, as well as improve their skills through special skills development workshops. Upon completion of the program, MYTILINEOS proceeded to the analysis of its social value, through the Social Return on Investment (SROI) methodology, in order to calculate the socio-economic generated value of the program. For the total investment of the program implemented in 2022 and calculated in 2023, amounting to € 33,700, social, and economic benefits are attributed, which in social value are equivalent to € 148,320.48, providing a ratio of the SROI ratio of 4.40:1.

Total Program Investment	Social & Economic Benefits	SROI Index
33,700€	148,320.48€	4.40€ : 1€

The Company decided to continue its collaboration with the organization in 2024, aiming to benefit more than 1,000 homeless citizens, providing them with over 15,000 kilos of clean clothes. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



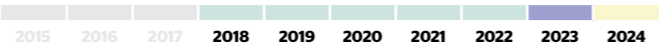
Initiative to support the actions of the "AROGI" Foundation

Impact: In 2023, MYTILINEOS continued to financially support 300 families who have joined the "Arogi" Foundation of the Holy Metropolis of Thebes, Levadia & Avlida and face serious financial and health problems, supporting their daily needs by offering them 531 vouchers for purchases from a Food Chain. In addition, the Company, through the "Arogi" Foundation, financially supported 15 students from vulnerable social groups with cheques, to meet their needs. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"DIATROFI" program, in collaboration with the Institute "PROLEPSIS"

Impact: For the 6th consecutive year, MYTILINEOS secured the distribution of 15,448 healthy meals to 309 students in 11 schools in the regions of Viotia, Magnesia, Trikala and Karditsa, reducing on the one hand the individual high food insecurity indicators, while improving their eating habits and on the other hand strengthening those areas that were most affected by the catastrophic floods during 2023. The Company continues its valuable cooperation with the organization since 2018, and aims to

expand it in 2024, aiming to benefit more than 180 students, distributing over 17,000 healthy meals. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Collect" program, in collaboration with the Institution against Hunger named "Food Bank"

Impact: MYTILINEOS, after two years of successful cooperation with the organization, decided to proceed with the implementation of the new program for the collection and distribution of food from consumers to chain stores, with the active participation of trainee volunteers of the "Food Bank". Specifically, 56,171 of our fellow citizens of vulnerable social groups who reside in more than 140 institutions in Athens have benefited, gathering more than 54,000 kilos of food from 88 locations in Attica. The Company continues its valuable cooperation with the organization from 2021 and aims to expand it in 2024, aiming to benefit more than 50,000 citizens, collecting and distributing over 50,000 kilos of food. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"BOROUME at school" program, in collaboration with the non-profit organization "Boroume - saving food - saving lives"

Impact: MYTILINEOS inaugurated its collaboration with the organization by implementing the information and awareness program for children on the issue of food waste, volunteering, and social contribution. Specifically, 4,400 students and 217 teachers from 65 schools from all over Greece participated in the educational interactive program (verbal exercises, artistic activities, activities for expressing emotions and ideas, etc.) investigating the causes of food waste and seeking solutions and ways to deal with it. The Company continues its valuable cooperation in 2024, aiming to benefit more than 4,000 students and teachers. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

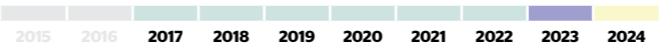


"Upgrading of Emergency Departments in Hospitals and Pediatric Clinics of the country" program, in collaboration with the organization "Pediatric Trauma Care"

Impact: MYTILINEOS upgraded, with the necessary medical equipment (provision of 30 machines), 4 new Emergency Departments: 1) at the General Hospital - Health Center of Kalavryta, 2) at the General Hospital of Laconia - N.M. Molaon, 3) at the Health Center of Iasmos and 4) at the University Hospital of Heraklion "PAGNI", serving more than 2,000 children on an annual basis. At the same time, it proceeded to the publication of 4,942 specialized information leaflets: "Summer & holidays safely" and "Respect for Animals" which were distributed in 184 presentations of the program "Prevention of Children's Accidents" informing children, teachers, and parents on how to recognize risks and how to avoid them. In addition, more than 54,000 leaflets were distributed to Kindergartens, Primary Schools, and Hospitals Association with prevention advice for the various categories of accidents "Safety at School", "Safety at Home", "Safety in Sports", "Beware of burns", "Attention to the choice of toys", "Safety in the playground" that the Association has strengthened throughout the program. Upon completion of the program, MYTILINEOS proceeded to the analysis of its social value, through the Social Return on Investment (SROI) methodology,

in order to calculate the socio-economic generated value of the program. For the total investment of the program for the years 2018-2022, amounting to € 208,372.79 calculated in 2023, social and economic benefits are attributed, which in social value are equivalent to € 1,274,342.87, providing a ratio of the SROI ratio of 6.12:1. Since 2017, MYTILINEOS has upgraded/created a total of 20 Emergency Departments throughout Greece and aims to 2024, to benefit more than 4,000 children through the upgrading of 2 Emergency Departments. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

Total Program Investment	Social & Economic Benefits	SROI Index
208,372.79€	1,274,342.87 €	6.12€ : 1€



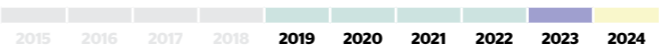
"Provision of medical equipment" program, in collaboration with the association "PNOE - Friends of Intensive Care for Children"

Impact: MYTILINEOS provided the University Universities of Alexandroupoli and Crete (Neonatal Intensive Care Unit) with medical equipment necessary for the hospitalization of more than 250 newborns requiring mechanical support annually. The Company continues its valuable cooperation in 2024, aiming to benefit more than 6,000 newborns and children. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"The Tipping Point" program, in collaboration with "The Tipping Point" organization

Impact: The program was implemented in 40 schools across Greece, where with the use of technology, through live mentoring lasting 30 minutes, 4,392 students and with the help of 68 teachers, regardless of geographical area, economic and social situation, were able to talk with successful professionals and receive answers to questions about their future. The Company, from 2019 until today, gave the opportunity to 12,772 students of 125 schools in Greece and abroad to discuss with mentors of different disciplines and specialties and decided for 2024, to extend its cooperation with the organization by giving the opportunity to participate in the program to more than 2,000 students of 32 schools. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

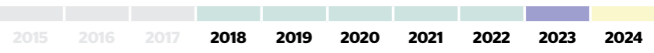


Digital skills development programs & initiatives

A) "S.T.E.M. Education - Renewable Energy Sources & Hydrogen Technology", in collaboration with the Organization of Educational Robotics & Science "WRO Hellas"

Impact: 20 "Gigo Light and Solar Energy" and "Gigo Wind Power" packages were offered to a corresponding number of Gymnasiums, enabling 1,408 students to experiment as modern engineers in various applications of renewable energy sources and specifically photovoltaics and wind turbines with the valuable contribution of their 60 teachers. From 2018 until today, the Company collaborates with the organization, giving the opportunity to students, from its local communities and beyond, to develop their digital skills, offering educational robotics packages

and equipment, contributing to the enhancement of the STEM (Science-Technology-Engineering-Mathematics) educational method. In this direction, and in 2024, at least 2,000 students of 30 public schools will experiment in various applications, developing their imagination and creativity. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

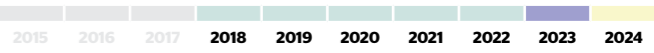


B) Participation in Educational Robotics initiatives

Impact: MYTILINEOS participated in 3 Educational Robotics initiatives, giving the opportunity to a total of 2,578 students to demonstrate creativity, teamwork, and ingenuity, utilizing educational robotics equipment. Specifically, 2,560 students participated in the first Minoan Robotsports Global Olympiad (MRC) Sports Robotics Olympiad and 18 students participated in the First Lego League World Robotics Research and Innovation Championship held by WPI University in Massachusetts, USA and at the FLL World Competition held in Los Angeles. (Collaborating Institutions: Hero, Futurelab, Kessaris Schools). [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"Scholarships" & "Renewal of electronic equipment of schools programs"

Impact: The Company, actively contributing to the modernization of schools with appropriate technological equipment, strengthened 6 schools in Athens, Anafi, Thessaloniki, Xanthi with computers, printers, and video projectors, giving the opportunity to 1,262 students and 82 teachers to have access to quality education. In addition, the Company secured 20 scholarships to students as part of its collaboration with the Athens University of Economics and Business for the implementation of the 14th Youth Entrepreneurship Summer School "Yes Program", which has now become an institution and attracts the interest of more and more students from all over Greece. In this direction and for the sixth consecutive year, MYTILINEOS aims to provide 20 more scholarships in 2024. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Engineers in Action" program

Impact: Implementation of the successful 12-month paid internship program "Engineers in Action". We created 60 new quality vocational training, internship/apprenticeship positions, giving young engineers the opportunity to take the first step of their career by gaining unique professional experiences. A total of 49 participants in the program, upon its completion, remained in the Company and were allocated to the Branches 12 people in the Metallurgy Sector, 28 people in the Energy Sector, 4 in the subsidiary company METKA ATE and 5 people joined the Central Functions of MYTILINEOS. The Company has been successfully implementing the program since 2014 and aims to extend it to 2024. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"CSR School" program

Impact: For the 5th consecutive year, MYTILINEOS supported the annual CSR School (Corporate Sustainability & Responsibility School) training program, which is the first partnership initiative in Greece between a public academic organization (University of Crete), a private one (ALBA Graduate Business School of the American College of Greece) and a business entity specializing in Corporate Social Responsibility and

Sustainable Development (CSR HELLAS), investing systematically in the value of educating young people and developing specialized market executives on Sustainable Development issues. Since 2019, when the initiative was launched, approximately 190 participants have benefited, while more than 20 University professors from around the world have taught, as well as a corresponding number of renowned market executives, Greek and multinational companies, transferring their best practices and experiences. The CSR-School program structure integrates the modern ESG approach to managing Sustainable Development, through the thematic training workshops, to important developments (risks & opportunities) that play out around the biggest environmental, social and governance challenges affecting business sustainability today. Through its participation in this initiative, the Company contributes to the wider development of the market of specialized sustainable development executives with appropriate knowledge and skills, capable of covering part of the ever-increasing relative demand. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"FemStem" program, in collaboration with the Social Enterprise "Knowl"



Impact: The program was implemented for the first time aiming at training, empowering, and mentoring women in STEM disciplines. Utilizing the award-winning methodology of the #mellon Skills + Employability Accelerator, the Company gave the opportunity to 30 women graduates of higher and higher schools from all 4 STEM disciplines (Science, Tech, Engineering & Math) to realize their potential and skills, attend 1,132 hours of training, 89 hours of personalized Counseling (job, skills mentoring + coaching), 15 thematic Workshops with the contribution of 9 Consultants / Speakers, all experienced professionals and scientists of human resources development, psychology and career guidance, science, environment and technology. Of the 30 beneficiaries who successfully completed the program, 14 are employed, 8 are active students and the rest are in the process of finding a job and/or continuing their studies. The Company continues its valuable partnership in 2024, aiming to benefit more than 30 women. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Learning to See Man" program, in collaboration with the Association of Social Responsibility for Children and Youth



Impact: MYTILINEOS, having as a priority the assurance of equal opportunities and the reduction of inequalities, implemented for the 2nd year the innovative educational program, giving the opportunity to 4,325 students in 69 Primary & Secondary schools of the Prefecture of Attica to conduct an open dialogue of awakening & awareness with speakers of the organization with disabilities, aiming at the acceptance of diversity and the understanding and familiarization with concepts such as: Disability, Accessibility, Inclusive Communication and practical guidelines for daily interaction with people with disabilities. The Company decided to continue the implementation of the program in 2024, in Primary & Secondary schools in the prefectures of Attica and Fthiotida. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Construction of a therapeutic garden for people with developmental mental disorders and autism spectrum disorders at the premises of I.P.A.P. "THEOTOKOS" initiative, in collaboration with the association "Together for Children"



Impact: MYTILINEOS contributed to the construction of a therapeutic garden at the "Theotokos" Foundation, where therapeutic gardening will promote a new and attractive educational opportunity for adults with developmental mental disorders and autism spectrum disorders, most of whom have a low level of skills, knowledge, and abilities. Specifically, 330 beneficiaries with disabilities with the help of 64 teachers had the opportunity to train and participate in innovative programs, while enhancing their environmental awareness and awareness about the importance of nature and natural elements in their daily lives for a healthy and balanced lifestyle. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"Therapeutic riding program for children with disabilities" program, in collaboration with the Hatzipatereio Center for the rehabilitation and support of children



Effect: Therapeutic riding is an additional method of rehabilitation, fun for children with disabilities, aiming at the overall approach of each child's disorder implemented by the organization. MYTILINEOS, implemented for the 2nd year the 9-month program, giving the opportunity to 9 children to participate in an alternative therapeutic experience, in which the therapeutic tools are replaced by the horse, improve their motor image and enhance their organizational and cooperation skills. In this direction, MYTILINEOS aims to continue its cooperation in 2024, aiming to benefit more than 9 children. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Program of alternative augmentative communication of children with disabilities" program, in collaboration with the association "Together for Children"



Impact: MYTILINEOS, through the implementation of the six-month pilot program, gave the opportunity to 10 children with cerebral palsy and associated problems, aged from 0 to 14 years old, to focus on activities with visual stimuli, actions with sounds and musical instruments, activities aimed at enhancing social skills and emotional maturation, phonological awareness and oral speech combined with visual arts activities, to achieve informal learning through play. To this end, MYTILINEOS aims to continue its cooperation in 2024, benefiting 30 children. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Touch" program, in collaboration with the association "Lighthouse for the Blind of Greece"



Impact: MYTILINEOS inaugurated its collaboration with the association, implementing the educational program of the Tactual Museum through two innovative experiential workshops "Reading fairy tales at the Tactual Museum" & "My first touch book". The pilot implementation of the program gave the opportunity to a total of 915 students, teachers, students and visitors of the Museum, through experiential contact with blindness and enriched, educational activities, to be informed and sensitized about this disability through playful processes. In this direction,

MYTILINEOS aims to continue its cooperation in 2024, with the implementation of the program. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Creation of equal opportunities for the education of visually impaired young people in New Technologies" program, in collaboration with the association "Lighthouse for the Blind of Greece"



Impact: MYTILINEOS gave equal access to new technologies and coverage of the demands of modern everyday life to 377 beneficiaries with visual impairments, in terms of effective inclusion and elimination of technical and social exclusion. Through specially adapted classes and with the help of trainers, participants had the opportunity to familiarize themselves with technology, utilizing means and tools adapted to the graded their needs. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"Provision of an electrically powered portable stairlift" initiative, in collaboration with the Non-Profit Organization of Psychosocial Interventions "Agakalia"



Impact: MYTILINEOS ensured the accessibility of the building that houses the Day Center for Psychosocial Interventions in the Community by providing an electrically powered portable stairlift, suitable for indoor and outdoor use, connected to most manual wheelchairs, benefiting 234 people with physical disabilities. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"Green Future" program, in collaboration with the non-profit, environmental and humanitarian organization "We4all"



Impact: MYTILINEOS launched its partnership with the organization, focusing on environmental education. Specifically, during the school year 2022-2023, 723 students of 15 schools in the Prefecture of Attica were trained through interactive presentations and participating in tree plantings in their schools, learning about the problems facing the planet and ways to solve them. The Company, continues its valuable partnership in 2024, aiming to benefit more than 1,000 students. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



"Green Planet" program, in collaboration with the non-profit, environmental and humanitarian organization "We4all"



Impact: MYTILINEOS proceeded with reforestation and tree planting in areas affected by fires with the participation of 550 citizens. Specifically, it contributed to the planting of 1,700 trees in Loutraki, Oinofyta, North Evia and Mati, benefiting more than 3,000 citizens of the wider regions. The selection of trees was carried out with careful sorting, giving priority to species that are native and resistant to fire, while requiring a minimum amount of water. In addition, some of these species also contribute to the recovery of affected bee populations, which have been severely affected by the fires. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

"Educational actions for circular economy and zero waste in schools" program, in collaboration with the Civil Non-Profit Company "NoWaste21"

Impact: MYTILINEOS implemented education, information, and

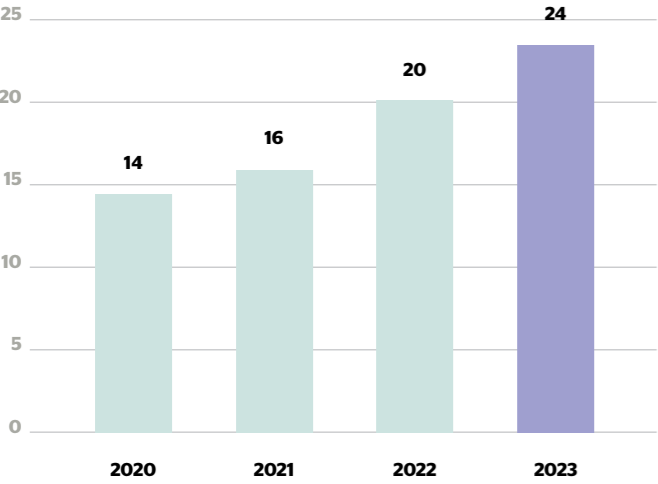
awareness actions in primary schools in the Prefecture of Vio-tia for students and teachers with modern methods of education on Circular Economy and Zero Waste issues. Specifically, 2,107 students and 250 teachers of 20 schools were informed about waste prevention, reuse and recycling, in the context of harmonization with the strategies of the European Union and Greece, for the Circular Economy. While the indirect objective of the program was also the activation of municipal authorities to strengthen information and awareness actions of their residents on circular economy issues, which will respectively enhance the performance of municipalities in recycling issues, as has been proven at national and international level. The Company continues its valuable cooperation in 2024, aiming to benefit more than 3,000 students. [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)



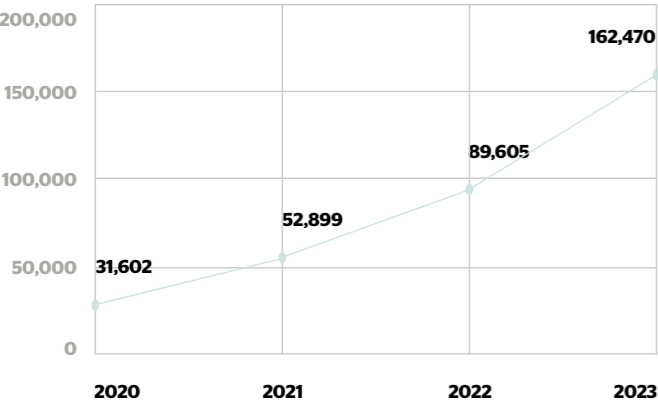
"Planet Melissa" program, in collaboration with the Association of Beekeepers of Attica

Impact: MYTILINEOS implemented the environmental program in 14 schools in the prefectures of Attica and Viotia. Specifically, trained and trained instructors, utilizing educational and beekeeping material, brought 1,267 students and 38 teachers in contact with the world of bees and beekeeping in order to get to know the relationship of bees with the environment, its offer, its products, the dangers that threaten it and how we can help, while encouraging volunteering in actions of environmental interest. [\[GRI 3-3-d-iii\]](#)
[\[GRI 3-3-e-i\]](#)

Number of corporate social programs and initiatives



Number of citizens benefiting from corporate social programs/initiatives



Responsible Supply Chain



Management approach and impacts on sustainable development and human rights [GRI 3-3-a] [GRI 3-3-b]

MYTILINEOS **seeks to develop strong and long-term relationships of trust and mutual benefit** with its suppliers and partners. The Company's priority is to support its local communities by entering **partnerships with local suppliers and contractors**, while at the same time, as part of its strategy for sustainable development, it has initiated the implementation of special initiatives aimed at **expansion of responsible practices in its supply chain**.

MYTILINEOS maintains **long-term partnerships** with many suppliers. Depending on the scope and type of supply required, priority is given to local suppliers according to their financial, qualitative and time solvency, the cost of their products or services, based on their ability to ensure the required quality, to meet the needs of supply according to the specified specifications, which are set by the Company's business Divisions.

Basic Description of MYTILINEOS Supply Chain [GRI 2-6]

- Core business activities that require services or products from the supply chain
- Production & Maintenance of the alumina chemical industry and primary cast aluminium metallurgy
 - Factory production for the purchase of raw materials or other materials
 - Production of secondary cast aluminium using recycled (scrap) aluminium
 - Construction for the purchase of equipment for the execution of EPC and RES projects
 - Transportation for the way and time of delivery of products in different countries
 - Operation and maintenance of Energy Centers (Thermal Power Stations)
 - Development, construction, and maintenance of Renewable Energy Sources (Wind, Photovoltaic, Hydroelectric projects)
 - Construction of Infrastructure, Environmental, Building, and other types of projects
 - Retail activity
 - Studies – Investments
 - Administrative, Financial, Legal and Other Services

- Main categories of suppliers
- Producers of raw materials
 - Energy and Natural Gas Suppliers
 - Subcontractors
 - Manufacturers
 - Distributors/Freight forwarders
 - Suppliers of Spare Parts/Materials
 - Wholesalers
 - Suppliers of consulting services & studies

MYTILINEOS recognizes that **due diligence** regarding **responsible supply chain management** is gradually being incorporated into the regulatory framework at European and national level. In response to this gradually strengthening **regulation**, the Company's approach incorporates environmental, social and governance aspects. Already, the Company has started monitoring the relevant risks with the aim of avoiding any adverse impacts that may arise from its supply chain. In addition, **it encourages its key suppliers not only to comply with legal requirements but also to go beyond them**. Consequently, the Company understands the sustainability performance of its key suppliers as an important aspect in creating added value and creating positive impacts.

Key/critical suppliers

The Company's main priority is to enhance the maturity level of its key and critical suppliers, to achieve an overall better management of sustainability issues that arise as important in the context of cooperation. MYTILINEOS, having defined the criteria that characterize its suppliers as basic or critical in cooperation with

the individual divisions and the purchasing and procurement and raw materials purchasing departments of its business Sectors, proceeded in 2023 to the creation of a register of key / critical suppliers in Greece and abroad.

The main criteria that characterize the Company's suppliers as basic/critical are the following:

- **The proven ability to ensure the smooth and uninterrupted operation of all the Company's facilities.**
- **The high volume of purchases and critical components.**
- **Suppliers that are difficult to replace.**
- **Repeated/continuous cooperation.**

Potential negative effects

The lack of responsible practices in MYTILINEOS' supply chain may be a source of negative effects such as: problems in the supply of raw materials, materials, and services, increased environmental impacts, Health and Safety risks, violation of human rights, ethical and compliance risks, with consequences on the Company's reputation and credibility as well as potential financial sanctions.

Actual positive effects

Since 2019, MYTILINEOS has developed the "Code of Conduct for Suppliers and Partners", while in 2023 it proceeded with the development and publication of its Responsible Supply Chain Policy, seeking to develop positive effects, in the medium and long term, such as: ensuring better risk management in its supply chain, exploiting business opportunities, and creating responsible suppliers and partners who can create expanded economic and social value.

The Company's contribution to the effects

Effects are caused in all workplaces of the Company's business sectors, subsidiaries, contractors, and suppliers. Directly involved in these effects are the Business Sectors of MYTILINEOS, its subsidiaries as well as its contractors/suppliers.

Main risks

The lack of responsible practices in the Company's supply chain can be a source of different risks, such as: problems in the supply of raw materials, materials, and services, increased environmental impact, Health and Safety risks, risks of human rights violations, risks related to ethical and compliance issues, with financial consequences for the Company, but also consequences for its reputation and credibility.

Company policies and commitments

[GRI 2-23-a] [GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

Responsible Supply Chain Policy

In **2023, MYTILINEOS developed its Responsible Supply Chain Policy** based on its Sustainable Development Strategy. The Policy confirms MYTILINEOS' commitment to promote responsible entrepreneurship and thus enhance the sustainability of its supply chain. **The purpose** of the Policy is to promote responsible business practices in the activity of its suppliers and partners with the goal of developing collaborations and partnerships for a better understanding of the impact on Sustainable Development and the mutual harmonization of relevant goals and expectations.

The aim of the Policy is to contribute to the achievement of MYTILINEOS' overall Sustainable Development strategy, through its integration into procedures and policies governing its wider procurement and supply activities. Specifically, the Policy assists in the execution of actions followed to ensure that all MYTILINEOS suppliers, based on the principles of proportionality and materiality, and especially those with whom MYTILINEOS has or wishes to have an established business relationship, are approved, and operate in accordance with the basic principles of integrity, transparency, competence, professionalism as well as ESG criteria.

The Policy identifies as suppliers/partners of MYTILINEOS any natural or legal person who provides, sells, or leases materials, products, or services directly to MYTILINEOS, including all Central Functions, Business Sectors and its subsidiaries in Greece and abroad. [GRI 2-23-e]

In accordance with its values and operating framework, MYTILINEOS is committed to the following basic principles, which are also the **Principles of its Policy**:

- Self-commitment to operate consistently in terms of timely payments

- Cooperation with local suppliers & SMEs
- Renewing standards of ethical behaviour
- Integrating ESG criteria into procurement decision-making processes
- Commitment to responsible, ethical, and sustainable practices
- Due diligence procedures
- Avoidance of the use of materials from illegal mining/war zones
- Supplier evaluation based on ESG criteria
- Monitoring of indirect emissions (Scope 3)
- Providing support on Sustainable Development issues
- Awareness and training of its employees who interact with suppliers
- Termination of cooperation with a supplier in case of violation of the Responsible Supply Chain Policy

The Policy and any amendments thereto **are approved by the Board of Directors** ("BoD") of the Company upon the recommendation of the Sustainable Development Committee, which is responsible for preparing, reviewing, and monitoring its implementation through the General Directorate of Corporate Governance and Sustainable Development. [GRI 2-23-d]

MYTILINEOS' "Responsible Supply Chain Policy" is **publicly available** through the [corporate website](#) and is accessible to all suppliers. It is also an annex to the Purchase Orders of the supplies implemented in 2023, after its adoption, while in 2024 it will be a contractual obligation when signing a contract or other agreement with a supplier. [GRI 2-23-c]

MYTILINEOS expects its suppliers and partners to share its commitment to ethical, safe and responsible business practices in the conduct of their activities, with particular emphasis on, among others, the promotion of responsible entrepreneurship and ESG criteria in their internal environment, as well as **in their own supply chain**. [GRI 2-23-f]

At the same time, MYTILINEOS implements a whistleblowing line at central level for **reporting violations** in relation to the Policy and is committed to defending both its suppliers and their employees without fear of retaliation against those who report actual or suspected violations of this Policy. If remediation is required, the supplier is obliged to prepare and inform MYTILINEOS about the corrective actions and implementation plans and timetable for the effective and immediate resolution of the violation. **MYTILINEOS takes violations of its Policies seriously and** depending on the severity of the violation, the consequences may range from notice to termination of employment if it concerns an employee or termination of the supply relationship if it concerns its supplier.

Suppliers & Business partners Code of Conduct

The Company has developed a special "Suppliers & Business partners Code of Conduct" that includes the description of the minimum requirements/expectations of the Company from its suppliers, on issues related to responsible entrepreneurship and sustainable development, while it is a basic prerequisite for the commercial cooperation of the two parties. The Code is structured according to ESG criteria and aligned with the Sustainable Development Goals. [\[GRI 3-3-d-i\]](#)

The " Suppliers & Business partners Code of Conduct" of MYTILINEOS is publicly available through the [corporate web-site](#) and is accessible to all suppliers. **Acceptance of the Code is a prerequisite when signing a contract** or other agreement with a supplier (compliance with it is a contractual obligation). [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

The Company, in the context of its **"zero tolerance"** policy on these issues, reserves the right to terminate any form of cooperation with its Supplier / Partner that does not comply with the principle of integrity, as well as with applicable legislation and relevant regulations **against corruption and bribery**, in the countries where it operates. The Code explicitly reflects the responsibility of suppliers to have and be able to implement procedures to prevent conditions or incidents related to any form of bribery, corruption, blackmail, and abuse in the context of their activity, following a policy of "zero tolerance" to these phenomena and their own supply chain. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

Also, within the Code, care is taken, and suppliers are asked to be able to prove that **they comply with applicable national legislation or industry standards**, operating in a few issues such as:

- Payment of salaries and allowances to all their employees, equal to or exceeding the thresholds provided by law, as well as to the provision of all allowances defined by law (leave periods, vacation time, etc.).
- Prevent discrimination against their employees based on race, colour, age, sex, sexual orientation, nationality, disability, religion, political opinion, union membership, national origin, or marital status and which may directly or indirectly affect corporate processes
- Prohibition of child labour
- Prohibition of forced labour
- Safeguarding freedom of association
- Fight against Corruption and Bribery
- Avoidance of any act of unfair competition
- Protection of Intellectual Property
- Privacy protection
- Disclosure

MYTILINEOS' Suppliers & Partners, in accordance with the Suppliers & Business partners Code of Conduct, should take measures to **avoid the use of materials that are considered the result of illegal mining or are raw materials from conflict zones** (Conflict Affected and High-Risk Areas - CAHRAs). Upon request, the Company's suppliers should provide information relevant to the country of origin of the materials supplied. In particular, they must comply with all applicable trade control laws and regulations. Such controls are particularly relevant in the case of restricted Contracting Parties. Restrictions imposed on natural persons, legal persons, countries, sectors of the economy, or specific products may be based on reasons of public security,

human rights violations or participation in criminal or terrorist organisations. Violation of the above limitations may result in serious sanctions imposed under administrative or criminal law on the business partner. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

MYTILINEOS' Suppliers/Partners should be able to work in harmony with the Company in case they are asked to complete a **questionnaire** regarding the coverage **of ESG criteria**, while providing/submitting the relevant documents confirming their compliance with them. Their compliance with the criteria of the Code is considered as a criterion in their overall assessment, carried out either centrally or by the Procurement Departments of the Company's Business Sectors. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

To ensure the above, through both the Responsible Supply Chain Policy and the Code of Conduct for Suppliers and Partners, it is possible to carry out a systematic audit at the site of Suppliers/Partners and their subcontractors, by representatives of MYTILINEOS or its authorized partners, to **verify their performance in relation to ESG criteria** placed within the Policy and Code. The verification of compliance with environmental and social criteria may be carried out simultaneously and/or in combination with other audits of MYTILINEOS towards its Suppliers/Partners (e.g. Financial, Technical, Quality Assurance, etc.). The process of implementing these audits is being reviewed with the aim of updating it and restarting them within the framework of the Policy within 2024. [\[GRI 3-3-f\]](#)

MYTILINEOS expects its Suppliers/Partners to **report any concerns** regarding compliance with the Code, as well as violations that may originate from MYTILINEOS employees or other third parties, ensuring that no action is taken against the reporter (whether a natural person or a company) provided that such termination is made in good faith. MYTILINEOS Suppliers/Partners can submit the relevant reports by name or anonymously to the competent Supervisor or Manager of Purchasing/Procurement or Project of MYTILINEOS or alternatively contact the Company's Compliance Director at compliance@mytilineos.com.

Impact management and response tactics

[\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#) [\[SASB EM-MM-210b.i\]](#)

MYTILINEOS plays an active role in domestic, international initiatives and organizations that aim to address the challenges of Sustainable Development in its supply chain. Specifically, the Metallurgy Sector (and specifically the companies Aluminium of Greece and Delphi-Distomon) was certified in 2022, and valid for 2023, by the **ASI** Initiative for all its activities according to the **Chain of Custody Standard**). Furthermore, the President and CEO of MYTILINEOS, Mr. Evangelos Mytilineos, who was elected in 2022 as President of the Pan-European **Eurometaux** Association for a two-year term, representing the non-ferrous metals industry at European level, including mining, metallurgy, processing and recycling of basic, precious and secondary metals, [recognizes](#) the importance of ensuring responsible procurement of all raw materials and materials, supporting EU actions to guarantee resilient and ethical supply chains for green primary raw materials in Europe.

At the same time, the Special Advisor to the Chairman and CEO and President of the Sustainable Development Committee of the Board of Directors of MYTILINEOS, Mrs. Sophie Daskalaki Mytilineou, was elected in 2021, as a member of the Board of Directors of the **UN Global Compact Network Greece** (GCNG), holding the position of Secretary General of the BoD and later that of Vice-Chairman of the BoD. GCNG is the local network of the United Nations Global Compact, having as its mission the promotion of corporate sustainability by supporting its member companies at national level. Through the implementation of its action plan, GCNG provides a number of businesses with support in understanding the guidelines regarding the adoption of the 10 Principles, as well as training programs, contributing substantially to the strengthening of companies to develop sustainable practices in the supply chain.

To develop a responsible and sustainable supply chain, MYTILINEOS has so far adopted the following initiatives:

1. Training programs for Responsible Supply Chain Management

1.1 Supplier Training Program "Business Responsibility for Sustainable Development"

To effectively understand the framework of responsible entrepreneurship, as well as to enhance the level of maturity of its supply chain on sustainability issues, MYTILINEOS has been offering **training seminars on an annual basis to its main suppliers in Greece for the last four years, i.e. since 2020**. In this way, the Company consistently promotes knowledge in the application of standards and procedures to establish sustainability as a key enabler of the business operations of **its key suppliers**, as it recognizes the positive link between sustainability, resilience, and financial performance. Furthermore, through this initiative, MYTILINEOS promotes a constructive dialogue between suppliers and Company executives, focusing on the pillars of sustainable development and analyzing the impact of business activities on sustainability. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

The program seeks to familiarize trainee executives with essential sustainability issues that cause the effects of their business activities, including human rights, working conditions, including overtime, child and forced labor, freedom of association and

equal opportunities, environmental protection and business ethics, including the fight against Through real examples and **inter-active dialogue**, participants understand that poor management of these issues can enhance business risks, but also that proactive behavior, citing examples of good practices, can be a factor in improving and enhancing their competitive advantages. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

1.2 Procurement/purchasing department training program

For the effective implementation of the Policy and the promotion of responsible practices, aligned with its Sustainable Development strategy, the Company **implements regular working meetings with its Procurement/Purchasing Departments**, from all its Sectors and subsidiaries, aiming at understanding the framework of the Policy and the commitments undertaken through it. Specifically, the workshops cover issues related to the key elements of the Policy, the principles and tools for its implementation, taking into account particularities related to the supply chain of each different Sector and subsidiary of MYTILINEOS. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

The program seeks to establish a continuous platform for dialogue with procurement/purchasing departments, enhancing cooperation internally, while enabling the transfer of good practices between Sectors and subsidiaries for the proper implementation of the Policy. The main part of the workshops in 2023 was the management of the **integration of ESG scores in the evaluation of the offers** and its connection with the inclusion of an ESG criterion in the supplier selection process that MYTILINEOS plans to implement in 2024, thus ensuring the Company's cooperation with suppliers operating with a view to sustainable development. [\[GRI 3-3-e-i\]](#)

1.3 Greek Sustainable Entrepreneurship Pact

MYTILINEOS participated in the new initiative "Greek Sustainable Entrepreneurship Pact" of the non-profit business organization CSR Hellas (Hellenic Network for Corporate Social Responsibility) as its main member. The Pact is a roadmap towards a sustainable business model for the three-year period 2023-2025, addressed to all Greek businesses, regardless of size and sector of activity, to manage responsibly and sustainably all issues related to their strategy and operation, as well as their supply chains including distribution networks. It is a dynamic and **constantly evolving** initiative aimed at better **preparing participating** companies to adapt to the new regulatory framework and transition to the new sustainable business model. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#)

Company executives attended 9 interactive and face-to-face **training workshops** (CSR Atelier), while they participated in 2 workshops, and consultation, among the **16 pioneering member companies** of the initiative from all productive sectors of the Greek economy. During the workshops, executives had the opportunity to further develop their skills in order to be able **a)** to better manage upcoming challenges, but also the emerging opportunities related to managing the responsibility and sustainability of their companies, **b)** to receive information on the issues highlighted by the new EU sustainable finance package, **c)** to highlight innovation, leadership and good practices in relation to the strategic approach and operation of their business, as well as their leading position in enhancing sustainability at the level of sectoral bodies and professional associations involved and contribute substantially **d)** to the development of partnerships between them on commonly identified material issues, in order to develop better approaches to improve corporate sustainability and responsibility. In the context of this multi-company initiative, MYTILINEOS gave the opportunity to 6 of its main suppliers from the Metallurgy and Energy Sectors to participate, at no financial cost on their part. The main benefits that participating suppliers can leverage are:

- ability to measure and capture their level of maturity using a methodology applicable at European level,
- information and education on the new requirements brought about by the European and national regulatory framework regarding the Green Deal and the disclosure of sustainable development information,
- networking and exchange of good practices on sustainable development management issues by similar companies in their sectors,
- improving targeting and measuring performance on material sustainability issues. [GRI 3-3-d-i] [GRI 3-3-d-iii] [GRI 3-3-e-i]

2. Evaluating suppliers with ESG criteria

MYTILINEOS has set a goal by 2025 to work mainly with suppliers that embrace the principles of the UN Global Compact (UNGC) and contribute to practice, to the extent that they deserve, to the Global Sustainable Development Goals (SDGs). Through the evaluation process, the Company seeks to **identify critical issues, provide support** as well as **continuous improvement** of key suppliers here. In 2023, MYTILINEOS continued the **systematic integration** of sustainable development principles into its supply chain with the aim of creating a register of key suppliers that meet ESG criteria, through the application of a special evaluation methodology, harmonized with the requirements of its Supplier and Partner Code of Conduct and the principles of Responsible Supply Chain Policy.

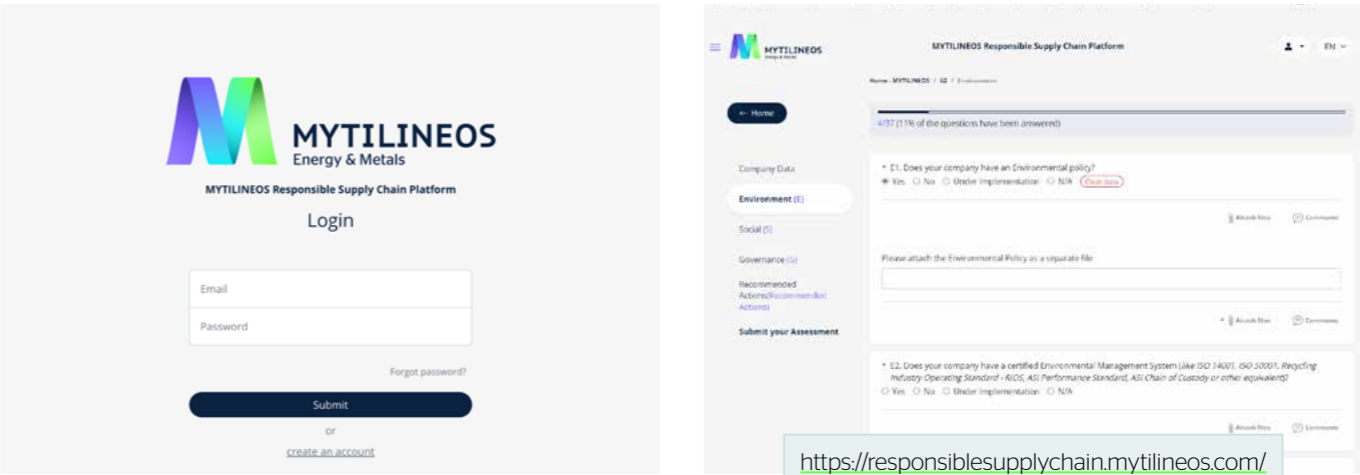
The methodology for evaluating key suppliers has been developed by the Sustainable Development Division, to meet the key elements of the Company's Supplier/Partner Code of Conduct based on ESG criteria. The methodology **is applied internally** because of the cooperation between the Procurement/Purchasing Departments of the business Sectors, the Central Services, the subsidiaries, and the Sustainable Development Division. The Company, considering the responses of its suppliers and evaluating the submitted evidence, identifies the key sustainability risks in its supply chain. At the same time, it communicates and **collaborates** with suppliers lagging in sustainable development, to help them improve their performance, through **specific adaptation** plans, in the management of material ESG issues that concern them, and which MYTILINEOS will monitor on an annual basis.

The process of evaluating key suppliers **is gradually integrated into all purchasing and purchasing departments/divisions** of all business sectors and focuses on material issues directly related to the Sustainable Development Goals and include the assessment, among others, of compliance with environmental requirements, health and safety management, protection of human rights, as well as issues ethics and integrity. [GRI 3-3-d-i] [GRI 3-3-d-iii] [GRI 3-3-e-i]

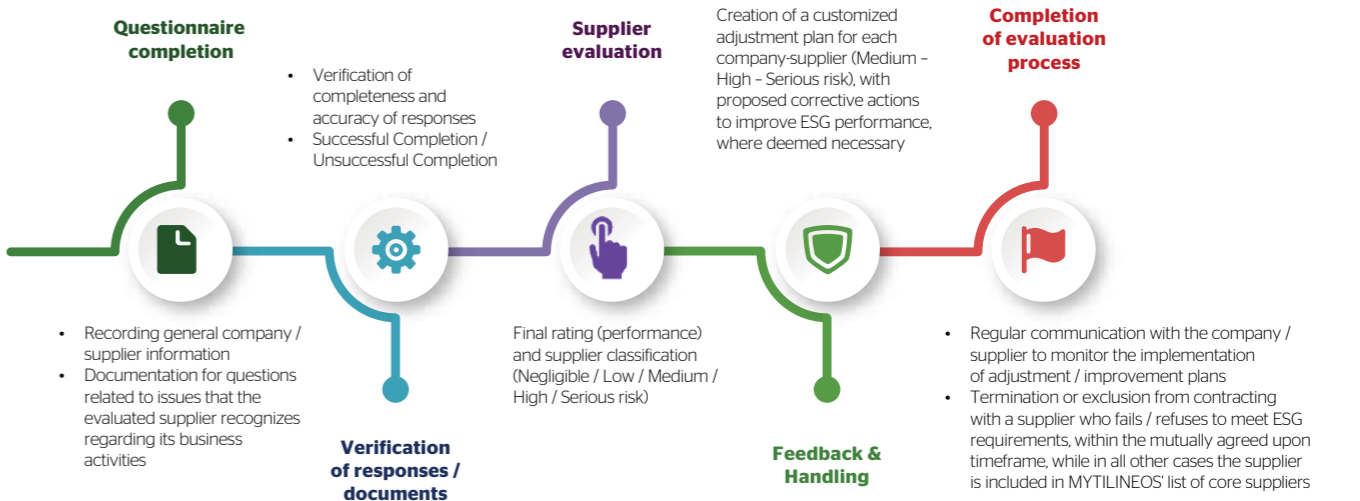
2.1 Digital evaluation platform

In 2023, MYTILINEOS' Sustainable Development Division, to manage its ESG supply chain assessment more effectively, developed the specialized **digital evaluation platform entitled "MYTILINEOS Responsible Supply Chain platform"**. Through the platform, the Company collects, evaluates, and controls information on the ESG performance of its suppliers on an annual basis. The digitalization of the evaluation process contributes to savings, time, and efficient management of suppliers' responses, while at the same time achieving the direct cooperation of the Sustainable Development Division with the procurement/purchasing departments, to monitor the ESG performance of each supplier.

After the completion of the review and evaluation of the suppliers' responses by the competent executives of MYTILINEOS, each participating company/supplier collects the **final score based on its maturity and management approach in managing the relevant issues that it recognizes as material**, according to its industry and geographical area of activity, as well as its cooperation framework with MYTILINEOS. In addition, the company/supplier has the opportunity to connect to the digital platform after the completion of the evaluation in order to be informed about its overall performance, but also about the performance it has received in each pillar (ESG) separately, while at the same time having filled in the activity code number and / or the statistical classification code of economic activities in the European Community (NACE) of its sector, has the ability to compare its performance and ranking in relation to the average (average) of the other evaluated companies/suppliers in the same industry.



ESG assessment methodology



More information on the evaluation method and the benefits of participating in it can be found in the "Responsible Supply Chain Management" section of MYTILINEOS' website.

Suppliers are classified into the following categories, taking into account the overall score they received from the evaluation:

Percentage Performance	Classification level	Performance	Action
80,01 - 100%	Negligible risk	>41	No action required (White List entry)
60,01 - 80%	Low risk	31-40	
40,01 - 60%	Medium risk	21-30	Commitment to specific issues or creation of a specific adaptation action plan is required
20,01 - 40%	High risk	11-20	
0 - 20%	Serious risk	<10	Direct dialogue with the supplier - The continuation of cooperation with the Company is under consideration

Below are presented the issues that are considered during the ESG assessment of the main / critical suppliers:

Environment	Social	Governance
Environmental Management Tackling Climate Change Water Management Waste Management Ecological Impacts Compliance with environmental legislation	Occupational Health & Safety	Code of Business Conduct Risk Management System Confidentiality Supply Chain Corruption and bribery
	Human Rights	
	Labour issues	
	Child and forced labour	
	Impact on local communities	
	Compliance with legislation on social issues	
	Quality control	
	Participation in Sustainable Development initiatives	

Effectiveness of the actions [GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv]

- In 2023, the **annual thematic Consultation** of MYTILINEOS was implemented at Central level, online, on **the subject: "Responsible Supply Chain Policy"**, with the participation of 154 key suppliers. More information on the results is described in the section: Relations with the Social Partners.
- At the end of 2023, **MYTILINEOS'** active suppliers and partners **were more than 14,000** in Greece and abroad. Compared to 2022, no significant changes were recorded in the basic structure of the Company's supply chain that affected its activity.
- MYTILINEOS' total expenditure to its suppliers in Greece to produce products, the provision of services and the development of projects exceeded €2.1bn, which means that approximately 40% of total expenditure was allocated to domestic and local suppliers, contributing to both job retention and income generation within the country.

Key suppliers

In 2023, the **evaluation process of 335 existing key suppliers against ESG criteria continued**. In total, during the two-year period 2022-2023, **205 key suppliers** from all business sectors of the Company, its Central Services and subsidiaries were evaluated. The data submitted by suppliers are studied in order to identify any actions required in case of non-compliance, with the aim of mitigating risks in the Company's supply chain.

In detail:

MYTILINEOS	Total key suppliers	Suppliers evaluated within the two-year period (2022-2023)		Suppliers evaluated in 2023		Suppliers who did not complete the assessment*	Target 2025
		Total key suppliers	% of the total number of main suppliers	Total key suppliers assessed in 2023	% of the total number of main suppliers		
Central Function	38	38	100%	9	24%	1	
M Generation & Management	27	25	93%	12	44%	0	
M Renewables	25	23	92%	16	64%	2	
M Power Projects	114	59	52%	59	52%	13	
Metallurgy	131	60	46%	60	46%	18	
Total	335	205	61%	156	47%	34	60%

* Non-response of suppliers to the request for additional data and/or documentation, following their initial evaluation within the two-year period (2022-2023).

MYTILINEOS	Negligible/Low risk	Medium risk	High/Severe risk	Target
Central Function	97%	3%	0%	
M Generation & Management	100%	0%	0%	
M Renewables	95%	5%	0%	
M Power Projects	98%	0%	2%	
Metallurgy	75%	9%	16%	
Total	92%	3,5%	4,5%	65%*

* Through its ESG performance assessment, the Company identifies high-risk sustainability suppliers and sets a target of 65% of 100 key suppliers at low/negligible risk for 2024.

In conclusion, from the ESG supplier evaluation within the two-year period 2022-2023 with the participation **of 205 key suppliers, 171 successfully completed the process which shows that 92% of them are recognized as negligible/low risk** in relation to the approach of sustainable development issues that they are called upon to manage in the context of their business activity.

Specifically:

- **75%** have a Certified Environmental Management System (ISO 14001),
- **61%** carry out CO₂ emission measurements,
- **85%** ensure that they properly manage their waste through its recycling and reuse,
- **70%** have a Certified Occupational Health & Safety Management System (ISO 45001), while **92%** have a mechanism for monitoring and recording incidents of occupational diseases, accidents, and accidents of employees during their work,
- **92%** have a Health & Safety Policy,
- **89%** have a Code of Business Conduct,
- **85%** have either a Policy or a statement of commitment to human rights and
- at least **6%** of key suppliers participate in the Ecovadis assessment platform¹.

MYTILINEOS, in the context of the the ESG supplier assessment, **identified 8 High/Serious risk suppliers** and then identified their key sustainability risks and ensured, in cooperation with the procurement/purchasing departments, that these suppliers continue to be its key partners for the next year (2024). For those who continue to be its key partners, **a consultation** with them is planned in 2024 to receive additional data, which will form the basis for the creation of appropriate adaptation and improvement plans for sustainable development management, within a mutually agreed implementation schedule.

For 2024, the **Company's goal** is to **complete the evaluations of key suppliers at a minimum of 60%** of their total. The process is implemented through the new digital online platform **MYTILINEOS Responsible Supply Chain**, while in addition from the beginning of 2024, it is extended to potential suppliers participating in the Company's tender procurement procedures.

Areas of study	Evaluation results
Freedom of association and collective bargaining [GRI 407-1]	<p>The Labour Legal Framework includes provisions that provide for and safeguard the right of collective bargaining and unionization of employees, which MYTILINEOS fully respects and seeks similar respect from its suppliers.</p> <p>During the assessment carried out, no areas were reported, or incidents were recorded where the relevant right was compromised or violated leading to fines or other sanctions for relevant regulatory violations.</p> <p>Also, through the official process of reporting violations of the Code of Conduct for Suppliers and Partners of the Company, no incident of violation of this labor right was reported to the Compliance Department. [GRI 407-1] [GRI 3-3-d-i] [GRI 3-3-e-i]</p>
Child labour [GRI 408-1]	<p>The Code of Conduct for Suppliers and Partners of MYTILINEOS explicitly stipulates that its suppliers and partners must strictly adhere to the limits and restrictions of legal work by age that apply in the countries where they operate, while when no relevant legislative limit has been set, then this should be considered at least 15 years. Also, people over the age of 15 but under the age of 18 should not be employed for hazardous work or for work that may endanger their personal mental and physical safety and health. [GRI 3-3-c] [GRI 3-3-d-iii]</p> <p>As a result of the assessment in 2023, no incidents of child labour or conditions that may lead to the employment of young workers in hazardous work were recorded. [GRI 408-1] [GRI 3-3-e-i]</p>
Forced labor [GRI 409-1]	<p>MYTILINEOS, following the Greek Constitution (Article 22 par. 4) which establishes the freedom of employment, incorporates the relevant provisions within the Code of Conduct for Suppliers / Partners, prohibiting any form of coercive or compulsory in the workplace of its suppliers / partners. As a result, in all the Company's partnerships, the risk of conditions that may lead to incidents of coercive action is significantly reduced. working. [GRI 3-3-c] [GRI 3-3-d-iii] [GRI 3-3-e-i]</p> <p>As a result of the evaluation in 2023, no incidents of forced or compulsory labor were recorded, nor were any complaints or incidents recorded through the formal process of reporting violations of the Company's Code of Conduct to the Compliance Division. [GRI 409-1][GRI 3-3-e-i]</p>

¹ EcoVadis is the world's leading supplier rating organization on responsible business issues. The EcoVadis ranking system (CSR Rating) refers to the evaluation of the quality of a company's Corporate Social Responsibility management system through the policies it has, the practices it implements and the relevant results.

Areas of study	Evaluation results
Environmental assessment of suppliers [GRI 308-1]	<p>MYTILINEOS, in addition to complying with environmental legislation and regulations, is committed to reducing environmental impacts and promoting the sustainability of natural resources, which depend on its activity. In this direction, it expects from its Suppliers / Partners, both by implementing environmentally responsible practices and by submitting alternatives and proposals on their behalf, play an important role in achieving these objectives. [GRI 3-3-c] [GRI 3-3-d-iii]</p> <p>As a result of the assessment, 6% of the evaluated key suppliers have been fined or face other sanctions for regulatory violations or incidents of non-compliance with environmental legislation in the last three years, while there are no records of complaints or incidents through the formal process of reporting violations of the Company's Code of Conduct, to the Compliance Division. [GRI 406-1] [GRI 3-3-e-i]</p>
Social evaluation of suppliers [GRI 414-1]	<p>At MYTILINEOS, the Health and Safety of employees in all Business Sectors and its subsidiaries is a top priority, investing continuously in achieving the only acceptable goal "NO ACCIDENTS AND NO OCCUPATIONAL DISEASES AT WORK", which is one of the dominant challenges in the industry sector. In this context, it expects its Suppliers/Partners, share this commitment to create a decent working environment, without Health and Safety risks. [GRI 3-3-c] [GRI 3-3-d-iii]</p> <p>However, according to the results of the evaluation, 8% of the evaluated suppliers report receiving a fine or other type of sanctions for incidents of non-compliance with Health & Safety legislation, other labor issues (from which the above mentioned are excluded; freedom of association, child labor, forced labor), as well as issues related to product quality during the last three years. There are no relevant records of complaints or incidents, through the formal procedure for reporting violations of the Company's Code of Conduct, to the Compliance Division. [GRI 406-1] [GRI 3-3-e-i]</p>

New suppliers

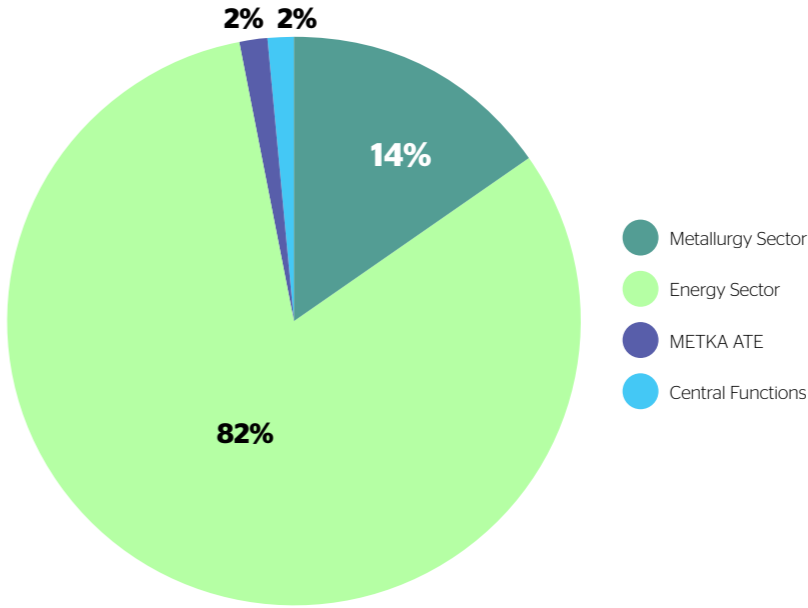
In 2023, the Company **partnered for the first time with 1,120 suppliers** across its entire spectrum of activity. In this context, in addition to the incorporation of MYTILINEOS' "Suppliers & Business partners Code of Conduct" in the cooperation agreements, a total of **61 new suppliers** were deemed necessary **to be additionally audited based on Environmental and Social criteria** included in the Code.

Analytically::

MYTILINEOS	Number of new suppliers	Number of new suppliers assessed in 2023 against environmental criteria [GRI 308-1]	Number of new suppliers assessed in 2023 on the basis of social criteria [GRI 414-1]
Metallurgy Sector	243	7	7
Energy Sector	30	0	0
METKA ATE	847	54	54
Total	1,120	61	61

- Regarding the **total number of inspections** on issues from which the main sustainability risks for the Company originate for 2023, it appears that for: a) environmental issues, 67 audits were carried out **on contractors/suppliers**, resulting in 9 findings for which **appropriate measures were taken** and b) **health and safety issues**, 121 audits were carried out on contractors/suppliers and 16 findings were identified for which **appropriate action was taken**. [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv]
- In addition, after the completion of the **4th cycle of training of key suppliers** on corporate responsibility issues, a total of **141 key suppliers (42% of all key suppliers)** have participated and been trained since 2020, while **6 of them** receive further training through their active participation in the "Greek Sustainable Business Pact" initiative. [GRI 3-3-e-i] [GRI 3-3-e-iii] [GRI 3-3-e-iv]
- Below is presented the distribution of expenses incurred in 2023 to suppliers by Business Sector of the Company. As can be observed, the largest volume of expenditure concerns the Energy Sector, followed by the Metallurgy Sector, where cumulatively the two Sectors reach 96% of the total expenditure. The following distribution also reflects the recent transformation of the Company, as the Energy Sector now gathers the largest number of suppliers and presents the largest capital expenditure for 2023.

Breakdown of expenditures (€) by Business Sector



Target

- In this context, **MYTILINEOS' main objectives by 2025** are:
- enhancing the level of maturity and integration of Sustainable Development in its supply chain,
 - the completion of the implementation of the ESG assessment in all key suppliers and the extension of the rating to new and potential suppliers participating in the Company's tender procedures,
 - the inclusion of an ESG criterion in the selection process of new suppliers, considering their performance from their evaluation process,
 - the commitment of existing suppliers to good and responsible practices, with a view to developing partnerships to better understand impacts and mutually harmonize objectives and expectations; and
 - conducting on-site inspections at the premises of a sample of evaluated suppliers of all Sectors (Energy & Metallurgy) and its subsidiaries, selected by the purchasing/purchasing departments of the Sectors/subsidiaries, based on the outcome of the ESG assessment.

Below are data on the number of suppliers, geographical distribution and spending on them.

Supply Chain Data	2021	2022	2023
Total number of suppliers	10,277	11,504	14,133
Geographical distribution	Greece: 73.7% Abroad: 26.3%	Greece: 68.6% Abroad: 31.4%	Greece: 63.3% Abroad: 36.7%
Total expenditure	€2,632,552,530	€5,888,164,613	€5,161,902,847
Geographical distribution [GRI 204-1]	Greece: 59.6% Abroad: 40.4%	Greece: 28.4% Abroad: 71.6%	Greece: 40.7% Abroad: 59.3%
% of total expenditures on key suppliers			18%

Business Continuity

Management approach and impacts on sustainable development and human rights

[GRI 3-3-a] [GRI 3-3-b]

MYTILINEOS implements **emergency response plans** in its facilities and areas of operation, to ensure its uninterrupted operation. The Company's goal is to **effectively deal with emergencies**, while protecting the environment, ensuring the Health & Safety of all those within its facilities and areas of operation and the well-being of neighboring local communities.

The challenge in the context of Sustainable Development

The development of an organization's ability to ensure the **uninterrupted provision of products / services** (without affecting their quality / availability) **in abnormal operation situations**, such as e.g. natural disasters, epidemic / pandemic crisis or other adverse events (and combinations thereof), as well as internal operation & organization issues such as e.g. shutdown of critical IT applications, failures of suppliers / subcontractors, deficiencies in human resources, etc.

Potential negative impacts

The possible inadequate treatment of relevant risks may create negative effects on employees, the local community, the natural environment but also on the smooth operation of the Company's activities and consequently on its reputation, as well as its financial results.

Existing positive impacts

Managing emergencies and ensuring business continuity is a top priority for MYTILINEOS. For this reason, in all Business Sectors of the Company, appropriate Emergency Prevention and Response Plans are implemented, aiming at the effective management of emergencies and situations, at all levels for the protection of the natural environment and social welfare at local and national level.

The Company's contribution to the impacts

The effects can occur on the Company's industrial units and facilities and on construction sites as well as in the local communities adjacent to them. They may be caused by MYTILINEOS' Sectors, its subsidiaries, as well as by the strategic suppliers and contractors with whom they cooperate.

Major risks

The low degree of response and preparedness to emergencies (fires, explosions, soil subsidence, release of chemicals into the environment, transportation of products, waste, natural hazards such as weather and seismic events, health and safety incidents and other risks) is a key risk for the Company.

Company Policies and Commitments

[GRI 2-23-a] [GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

Ensuring business continuity, environmental protection and health and safety in cases of emergency, in accordance with the main pillars of MYTILINEOS' [Occupational Health and Safety](#) and [Environmental Policy](#). [GRI 3-3-c]

Impact management and response tactics

[GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

Managing emergencies and ensuring business continuity is a **top priority** for MYTILINEOS. That is why in all Business Sectors of the Company the appropriate Emergency Prevention and Response Plans (fire, explosion, leaks, natural phenomena, extreme weather conditions, etc.) are implemented to **effectively deal with all recognized incidents** resulting in deviation from their smooth operation, with serious effects on the environment and the Health & Safety of employees and local communities in general.

In the **Metallurgy Sector**, an Emergency Response System has been developed at the facilities of Ag. Nikolaos, Viotia, with main axes: **a)** an integrated Internal Emergency Plan (IEP) with special evacuation plans, **b)** systematic staff training and **c)** the planning and implementation of preparedness exercises in accordance with the annual plan and adaptation to the requirements of the IEP. Especially for the risks associated with the use of industrial substances, both prevention measures and response plans follow those mentioned in the SEVESO III Directive and are described in the relevant **Plant Safety Study**, which is registered in the National Register established for such installations. [GRI 3-3-d-i] **ASI**

In the **Energy Sector**, both in energy centers and in RES units, construction sites, shops, but also in offices, a package of emergency response measures is implemented that includes: **a)** Emergency Team or Emergency Officer, **b)** recorded Emergency Response Procedures / Incidents / Accidents, Emergency Plans **c)** implementation of Emergency Management Plans and **d)** implementation of exercises and training of personnel in accordance with the specific Evacuation Plans and the Instructions for Building Emergencies, in order to effectively deal with all recognized emergencies and protect the workforce and the environment in the event of an incident. Any installation (construction site, RES, Energy Centers, shops) have their own emergency plan, appropriate to the nature of the activities and the risks identified and assessed. Emergency plans shall be documented, accessible and clearly communicated to all personnel, who shall be trained in understanding these plans as well as learning their role and responsibilities in an emergency, through the implementation of regular preparedness exercises.



Also, the M Power Projects Business Unit, which specializes in the construction of specialized, large-scale and value-added energy projects, implements an integrated and certified **Business Continuity Management System (ISO 22301:2019) since 2021**. [GRI 3-3-d-i] [GRI 3-3-f]

Similarly, the **subsidiary METKA ATE** also implements an integrated and certified Business Continuity Management System (ISO 22301:2019) with appropriate Emergency Prevention and Response Plans, which are designed to effectively deal with all identified emergencies. **Each construction site has its own contingency plan**, appropriate to the nature of its activities and the risks identified and assessed. Emergency plans shall be documented, accessible and clearly communicated to all staff trained in understanding these plans and learning their role and responsibilities in the event of an emergency, through the implementation of regular preparedness exercises. [GRI 3-3-d-i] [GRI 3-3-f]

Effectiveness of actions

[GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii] [GRI 3-3-e-iv] [GRI 300-c]

In 2023, there were no industrial accidents or environmental incidents with impacts on the natural environment or public health. [GRI 3-3-e-i] [GRI 3-3-e-ii]

In total, more than 80 readiness exercises were carried out in all production units, construction sites and office buildings of the Company. [GRI 3-3-e-i] [GRI 3-3-e-ii]

Especially:

- In the **Metallurgy Sector**, a total of **37 preparedness exercises** were carried out **concerning the response to** fire of production facilities, **rescue in an enclosed space and at height**, as well as the evacuation of offices and Chemical Laboratory facilities after an earthquake. The exercises took place within the framework of the operation of the "Mobile Emergency Response Unit" consisting of team employees Fire. The staff is highly trained in fire safety and guarding of the facilities, while this team is actively supported by about **100 volunteer firefighters** of the rest of the factory's services, who **are properly trained and retrained periodically**. In addition to conducting and analyzing emergency response exercises, the Fire Protection team has the **appropriate certified, mobile equipment** and the appropriate means of intervention assisting local authorities in **dealing with incidents in the wider area**, by providing effective and timely assistance, when required. The team's preparedness was not affected by the circumstances of the pandemic and responded promptly to all incidents inside and outside the factory. In addition, evacuation-preparedness (alert) exercises were carried out, dealing with aluminium heat, as well as exercises related to gas explosion and dealing with polluted firefighting water, as well as exercises related to height rescue at the IPP II construction site and firefighting in a high-voltage transformer of the plant's Substation. [GRI 3-3-e-i] [GRI 3-3-e-iii]
- In the **Energy Sector**, **36 preparedness exercises** were carried out concerning general evacuation exercises, as well as building evacuation, fire, lightning, earthquake and explosion response exercises, rescue exercise from height and in a confined space, chemical and gas leakage exercise, as well as building evacuation in case of explosion, earthquake, (forest) fire and station abandonment due to severe weather phenomena and lightning. [GRI 3-3-e-i] [GRI 3-3-e-iii]

- In **METKA ATE** as well as its subsidiaries ELEMKA and ZEO-LOGIC were conducted **6 preparedness exercises** related to site evacuation exercises due to the risk of explosion, fire safety due to fire in part of a forest, building evacuation exercises and the use of fire extinguishers in case of fire. [GRI 3-3-e-i] [GRI 3-3-e-iii]
- At **headquarters level**, **2 evacuation preparedness exercises** were also implemented in a fire scenario. [GRI 3-3-e-i] [GRI 3-3-e-iii]

Other significant Social topics

Product Quality & Safety



MYTILINEOS emphasizes on the quality of its products, in order to be safe, **beyond the existing legal and regulatory safety requirements**. Any deviation from the quality standards of the Company’s products and services affects its responsible operation, with consequences on the level of customer satisfaction, reputation, reliability and consequently on its financial results.

In each Business Sector, due to the different nature of activities, different challenges arise:

- **In the Metallurgy Sector**, the impacts on the health and safety standards of the Company’s primary products are related to the **end use of secondary products that will arise from its processing customers**. The Company is committed and takes care to ensure the best quality of its offered products (alumina and aluminum), according to the expectations and requirements of its customers. **ASI**
- **In the Energy Sector**, in addition to considering the internationally applicable regulations for the **design of all industrial production and renewable energy projects**, there is detailed monitoring of quality measures and characteristics during the supply of materials and the manufacture of the final product, in order to ensure the satisfaction of the specified customer requirements. At the same time, it is very important for MYTILINEOS to the greatest possible availability and **reliability of its thermal units** in electricity production is ensured, as well as the continuous improvement of the quality of the services that accompany it, while taking advantage of new developments in areas such as electromobility, energy efficiency and energy netting.

In all Business Sectors of the Company, **a certified Quality Management System is applied**, according to the international standard **ISO 9001: 2015**, which is accompanied by individual **Quality policies**. In particular:

- **In the Metallurgy Sector**, the Company’s laboratories, which are a key contributor to the quality program, systematically check all stages of production, from raw materials to finished products. To this end, the official **version of SDS (Safety Data Sheets)** describes the risks associated with the products, as well as all the necessary precautions to be taken to avoid/deal with these risks. The Company **is committed and cares to ensure the best quality of its products**, according to the expectations and requirements of its customers, by offering them products, hydrated and anhydrous alumina and aluminium products (alloys), as well as related services that meet quality requirements. In this context, in order to monitor product safety performance, the **following are systematically collected: Any customer complaints that may be related to product safety** are analyzed and addressed through specific **corrective actions**, while the aim is to eliminate such complaints. Also, the activities of the Sector have been harmonized with the **requirements of the European Regulation “REACH” for the effective management of chemicals** used in industrial processes. In the context of ISO 9001:2015, methodologies are applied for the identification and analysis of operational risks, as well as opportunities for improvement, such as risk analysis, and external quality audits are carried out, including product safety. The **quality control laboratory of the Sector is accredited** according to the requirements of the international standard **ISO 17025: 2017**, by the National Accreditation Council (ESYD), and its scope of accreditation is the analysis of bauxite, alumina,

aluminum and its alloys. Finally, it is noted that **the products of the Sector do not include harmful chemicals. ASI**

- **In the Energy Sector**, the highest international quality criteria and the requirements of specialized international specifications and codes are applied to ensure the quality of the heavy and/or composite steel structures it undertakes. For each construction project undertaken by the Company and **before the commencement of construction. Hazard and Operability Study (HAZOP) or Risk Assessment**. The purpose of HAZOP is to identify and evaluate problems that may represent risks to personnel or equipment that have not been identified at the design and design stages of the project.
- In particular, the renewable energy Business Activity **M Renewables of the Energy Sector**, in the context of measuring customer satisfaction and identifying room for improvement, conducted an annual customer satisfaction survey through an electronic Survey, which was sent to customers whose projects were completed within 2023. The results resulted in the following findings:
 - 50% of respondents preferred our company due to successful previous cooperation, 17% due to competitive financial offer while 33% judged based on the company’s experience.
 - 100% of participants said YES and PROBABLY YES to a future collaboration.
 - Also, the Company was rated >=4/5 in all categories. (Financial, Environment, Health and Safety, Facilities / Equipment, Project Management Assessment, Quality Assessment, Assessment of Technical Competence.
- Additionally, in the Energy Sectors’ Business Unit of M Energy Generation & Management, the aim is to ensure the reliable supply of electricity and natural gas to distribution networks to businesses, professionals, and households, serving customer needs for competitive prices, through a series of specially designed modern and reliable energy saving procedures, advice and services. In addition, to ensure the effectiveness of the Commercial Division of the Sector and to recognize its room for improvement, retail customer satisfaction is measured, through Customer Satisfaction Surveys, on an annual basis. Specifically, in 2023, **Protergia** planned to conduct through an external specialized partner, **a quantitative telephone customer satisfaction survey**, which was implemented in July 2023. The sample of customers (N = 307 Household Benefits and N = 107 Business Benefits) was divided according to the following criteria: gender, region, age, time of cooperation with Protergia (new/old customers), type of supply (electricity/gas). The above criteria are representative of the Company’s customer base, except for age, which is determined by population. From the evaluation of the survey results, it was found that **7 out of 10 customers are overall satisfied with Protergia (71% satisfaction)**. Also, satisfaction with the Customer Service Department is stated by almost 8 out of 10 customers (79%), intention to stay at Protergia 7 out of 10 customers (71%), satisfaction with the monthly bill more than 8 out of 10 customers (83%), with an overall positive NPS (9).
- Also, of all Protergia customers, **70% have chosen to be informed through an electronic bill** (ebill), while almost 3 out of 10 customers (28%) use the Company’s digital application to monitor details of their provision.
- At the same time, Protergia, which is the retail pillar of the Energy Sector, has taken care of and proceeded with additional **support actions to vulnerable customers and vulnerable social groups** in relation to what is defined by the relevant regulatory framework in Greece. (Δ5-ΗΛ/Β/Φ29/16027/6.8.2010

decision of the Ministry of Environment, Energy and Climate Change, as amended and in force) through which it is determined that all electricity suppliers are obliged to provide vulnerable groups of consumers with a different preferential tariff, known as the Social Residential Tariff (SRT). The focus of social tariffs is security in terms of uninterrupted supply and in this context, Protergia provides SRT beneficiaries with an additional month of electricity supply, in case of non-payment of legal debts. Also, on a case-by-case basis, special support and/or facilitation measures are decided on special groups of customers, when there is a severe weather event or a significant disaster, in order to facilitate them by providing them with the time to return to everyday life without additional pressure. For 2023, the relevant data are presented in the following table:

Time Period (2023)	Disaster	Protergia	Watt & Volt (company acquired by Protergia)	Action
February	Bad weather Barbara	●		Temporary suspension of recovery - deduction actions
March	Fatal accident with railway train in Tempi	●	●	
July-August	Fires in various parts of Greece, such as Attica, Rhodes, Corfu, Anchialos, Alexandroupoli, Rodopi, Psachna Evia, Loutraki,	●	●	
September	Floods in Volos, Thessaly, Skopelos, Alonissos, Evia, Attica, Fthiotida	●	●	

- In addition to considering the internationally applicable regulations for the design and construction of all environmental, building and other infrastructure projects, the subsidiary METKA ATE undergoes detailed monitoring of quality measures and characteristics during the procurement of materials and the manufacture of the final product, in order to ensure that **the specified customer requirements are met**.
- Overall, in 2023, **no incidents of non-compliance** with regulations and voluntary codes were recorded regarding the impact of MYTILINEOS’ products and services on health and safety. [\[GRI 416-2\]](#) [\[GRI 417-3\]](#)
- In the **Metallurgy Sector**, regarding the marking requirements for aluminium and alumina products for sale, a **“Certificate of Conformity/Analysis”** was issued for each relevant cargo, which contained all the necessary information. [\[GRI 417-1\]](#) [\[GRI 417-2\]](#) **ASI**
- In the Energy Sector, the Company’s projects and services were in **accordance with the terms of the contracts** and its contractual obligations to its customers, to whom information and warnings on health & safety and the environment are delivered, such as: **a) instructions for use, maintenance and disposal** for all equipment provided (operation & maintenance manuals) and materials, **b) marking of all materials and equipment** (signs, warnings and relevant instructions) in a prominent place and **c) instructions for use - recycling** as safety data sheets (SDS) for all hazardous materials. [\[GRI 417-1\]](#) [\[GRI 417-2\]](#)
- In METKA ATE, the Company’s projects and services were in **accordance with the terms of the contracts** and its contractual obligations towards its customers, to whom health & safety and environmental information and warnings are delivered, such as: a) instructions for use, maintenance for all equipment provided (operation & maintenance manuals) and materials; (b) marking of all materials and equipment (signs, warnings and instructions) in a conspicuous place. [\[GRI 417-1\]](#) [\[GRI 417-2\]](#)

Communication & Marketing

12 YEARS OF INDEPENDENCE

MYTILINEOS, due to the range of its activities, acts at **many levels of communication**, including stock exchange disclosures, new activities and projects, consumer updates, updates to other Social Partners including local communities, etc. At the same time, the Company's international activity, with presence in 52 countries on 5 continents, increases its degree of difficulty and challenge **timely and correct information**, as each country of activity has different morals, culture, mentality, but also institutional framework, which the Company is called upon to harmonize. Therefore, the many and different audiences to which the Company addresses, in conjunction with the plethora of its activities, constitute a significant challenge from the outset.

Recognizing these dimensions, the Company proceeds with the design and implementation of its Communication and Marketing Strategy, through the **implementation of an annual communication strategy plan** and individual plans, depending on its business goals. Accordingly, these plans are evaluated to investigate whether updates or corrective actions are required. Communication and marketing are planned and implemented by the Communication and Marketing Strategy General Division, however, its scope concerns all General Divisions and activities of the Company, and for this reason cooperation mechanisms have been developed with all General Divisions, Committees, as well as the Company's Management.

At the same time, MYTILINEOS monitors developments in the relevant legislation and voluntary codes of conduct, to ensure the legality of its communication and promotional activities. In this direction, **the Company's communication partners are committed to the Greek Code of Advertising - Communication**, the compliance of which is determined advisory, preventive, or even repressive by the Communication Control Council within the framework of Greek legislation. The principles of the Greek Code of Advertising - Communication require that all promotional activities must be **legal, decent, honest**, created in a spirit of social responsibility and comply with the principles of **fair competition**.

as generally accepted in the market.

In addition, the Company **participates in institutions** such as: SEV-Hellenic Federation of Enterprises, the Hellenic Capital Market Commission and the Hellenic Advertisers Association, which have a series of obligations, commitments, and rules that **MYTILINEOS embraces and considers** for the way it moves in matters of Communication and Marketing.

Finally, the CEO and the Executive Leadership Team are informed and evaluate the progress and performance of the General Directorate of Communication and Marketing Strategy at regular intervals.

As for the **2023 results**:

- **There were no incidents of non-compliance during the implementation of MYTILINEOS' communication strategy** with the regulations and optional communication codes, including promotions and sponsorships. [\[GRI 417-3\]](#)
- **The Company's products do not fall under any restriction on their distribution** in specific markets, **while there were no significant issues** regarding product communication that concerned the groups of its Stakeholders.
- Regarding the provision of verifiable and clear information regarding the labelling of its products, MYTILINEOS responds fully. Each customer has the means to check all important information and if he wishes, he checks accordingly. **No incidents of non-compliance with the regulations concerning the information and labelling of the Company's products were recorded.** [\[GRI 417-2\]](#)

Type of information concerning product labelling [GRI 417-1] ASI		
Main categories of products subject to the following information requirements	Aluminium	Alumina
Information on the origin of elements or ingredients of the product.	100%	100%
Information on content, on substances that may have an environmental or social impact.		
Information on safe use of the product or service.	Non-applicable requirements	
Information on the method of disposal of the product and the environmental/social effects it may have.		

In the Metallurgy Sector, the above-mentioned labelling requirements concern products for sale, aluminium pillars, and plates as well as anhydrous and hydrated alumina. For each load of aluminium or alumina, a "Certificate of Conformity" is issued, which contains all the necessary quality specifications for each load and the Safety Data Sheet (SDS) of each product is available.



ESG KPIs

Social KPIs	2021	2022	2023
Employment			
Direct employees	2,889	3,210	4,046
Indirect employees	1,934	2,232	2,537
Employee turnover ¹	61%	8.8%	7.0%
Percentage of full-time employees covered by business collective bargaining agreements	44%	40%	28%
Retention rate of full-time employees	90.6%	88.3%	86.8%
Percentage of women (direct employees)	18.7%	20.1%	25.6%
Percentage of women in management positions ²	21.1%	23.5%	24.6%
Percentage of employees <30 years old (direct employees)	12.6%	14.3%	15.8%
Percentage of employees 30-50 years old (direct employees)	65.8%	64.0%	64.2%
Percentage of employees >50 years old (direct employees)	21.7%	21.7%	20.0%
New job positions ³	489	338	585
Human Capital – ROI ⁷	4.20	3.97	6.03
Employment Practices			
Number of employees who received formal performance evaluation review ⁴	50.2%	47.3%	43.5%
Average training man-hours (Executives)	290	18.3	16.2
Average training man-hours (Management)	12.8	11.9	8.9
Average training man-hours (Workers and technical staff)	13.7	13.1	22.3
Training man-hours (direct employees)	41,879	41,619	61,408
Average training man-hours per employee	14.5	13.0	15.2
Total training cost (€)	414,741	383,367	291,422
Training cost per employee (€)	143.6	119.4	72.0
Human Rights			
Human Rights Policy	Yes	Yes	Yes
Human Rights violation incidents ⁵	0	0	0
Discrimination incidents	0	0	0

Social KPIs	2021	2022	2023
Occupational Health & Safety			
Percentage of industrial plants & RES units with ISO 45001:2018 certification	89.3%	92.9%	90.0%
Number of fatalities (direct & indirect employees)	1	0	1
Lost-Time Injury incidents (direct employees)	10	8	11
Lost-Time Injury incidents (indirect employees)	11	14	11
Total number of recordable accidents ⁶ (direct employees)	23	12	16
Total number of recordable accidents ⁶ (indirect employees)	14	30	26
Total Recordable Injury Rate per 200,000 working hours (direct employees)	0.85	0.33	0.40
Total Recordable Injury Rate per 200,000 working hours (indirect employees)	0.29	0.48	0.38
Lost-Time Injury Rate per 200,000 work hours (direct employees)	0.37	0.22	0.27
Lost-Time Injury Rate per 200,000 work hours (indirect employees)	0.22	0.23	0.16
Training man-hours on Occupational Health & Safety (direct & indirect employees)	34,619	49,725	79,102
Sustainability of local communities			
Percentage of employees from local communities (direct & indirect employees)	92.1%	87.5%	82.7%
Social investments (m €)	9.2	3.9	3.3
Incidents of non-compliance with laws and regulations on labor and social issues	0	0	0

1. Number of voluntary departures as a percentage of the number of direct employees of the Company as of 31.12.2023. (Terminations of fixed-term contracts are not considered as voluntary departures for the purposes of calculating this index).

2. Percentage of the total number of Company Executives.

3. The difference between the total number of new hires and the total number of departures in the specific year.

4. Percentage of the total number of direct employees. The corresponding percentage on the total number of eligible employees is nearly 84%. The term "eligible" includes employees who meet the requirements for inclusion in the annual performance evaluation process. In particular, employees working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work, are not included.

5. Includes issues such as: forced and child labor, health and safety, working hours, staff salaries and leaves, fair treatment, freedom of association, restriction of the rights of local community populations etc.

6. According to the GRI 403-9 (2018) standard. Includes all accidents resulting in death, days away from work, limited work or transfer to another job, medical treatment in addition to first aid or loss of consciousness or significant injury or ill health diagnosed by a doctor or other authorized health care professional. Includes all fatalities.

7. The index has been calculated based on the methodology of S&P Global's Corporate Sustainability Assessment. In more detail: Human Capital ROI = (Total revenue - (Total operating expenses - Total expenses related to direct employees)) / Total expenses related to direct employees.



Governance



Corporate Governance

This section briefly describes the main points of Corporate Governance at MYTILINEOS. Detailed information is available in the “Corporate Governance Statement” section of the Company’s [Annual Financial Report 2023](#)¹, posted on the Company’s official website, and in the remuneration policy. Relevant disclosure indicators are reported in the GRI Content Index table (p. 174-187), with corresponding references to both the above-mentioned sources and this Report.

MYTILINEOS applies the **Corporate Governance Principles** in line with Greek legislation and adopting internationally recognized practices, aiming at ensuring that the Company operates **transparently** and **responsibly** across all activities.

Corporate Governance Code

Since 01.01.2019, following a relevant decision of the Board of Directors dated 15.11.2018, MYTILINEOS (the “Company”) has **voluntarily adopted the UK Corporate Governance Code** (THE UK CORPORATE GOVERNANCE CODE – 2018), with a view to **ensuring that the Company operates transparently** and responsibly across all activities. The [Code](#)² is posted on the Company’s website and on the [website](#)³ of the Financial Reporting Council (FRC) of the United Kingdom. According to Decision No. 2/925/28.07.2021 of the Board of Directors of the Hellenic Capital Market Commission, the Financial Reporting Council is a respected organisation for the drafting of a corporate governance code in accordance with article 17 of Law 4706/2020 on corporate governance.

Company seeks a constructive dialogue with its investors based on the highest international standards of entrepreneurship, with the goal of unlocking further value for its shareholders. Following the best practices of corporate governance, the Company shapes its strategy and develops the general guidelines, policies, values and principles that govern its operation, ensuring transparency and safeguarding the interests of its shareholders. **According to an independent assessor, compliance with the UK Corporate Governance Code in 2023 was 82.5% (2022: 80%).**

Corporate Governance Structure [GRI 2-9-c-i] [GRI 2-9-c-ii]

The Board of Directors of MYTILINEOS consists of twelve (12) members, of which 4 are executives and 8 non-executives. Of the non-executive members, eight (8) are independent within the meaning of Law 4706/2020 on Corporate Governance and the British Corporate Governance Code that the Company has voluntarily adopted and applies. The **composition and independence of the Board of Directors** of MYTILINEOS are presented in detail on the [Company’s official website](#)⁴. [GRI 2-9-a]

The Board of Directors is supported by 3 Committees: The **Audit Committee**, the **Remuneration and Nomination Committee** and the **Sustainability Committee**. The composition, responsibilities and rules of procedure of the MYTILINEOS Board of Directors’ Committees are presented in detail on the company’s official [website](#)⁵. [GRI 2-9-b]

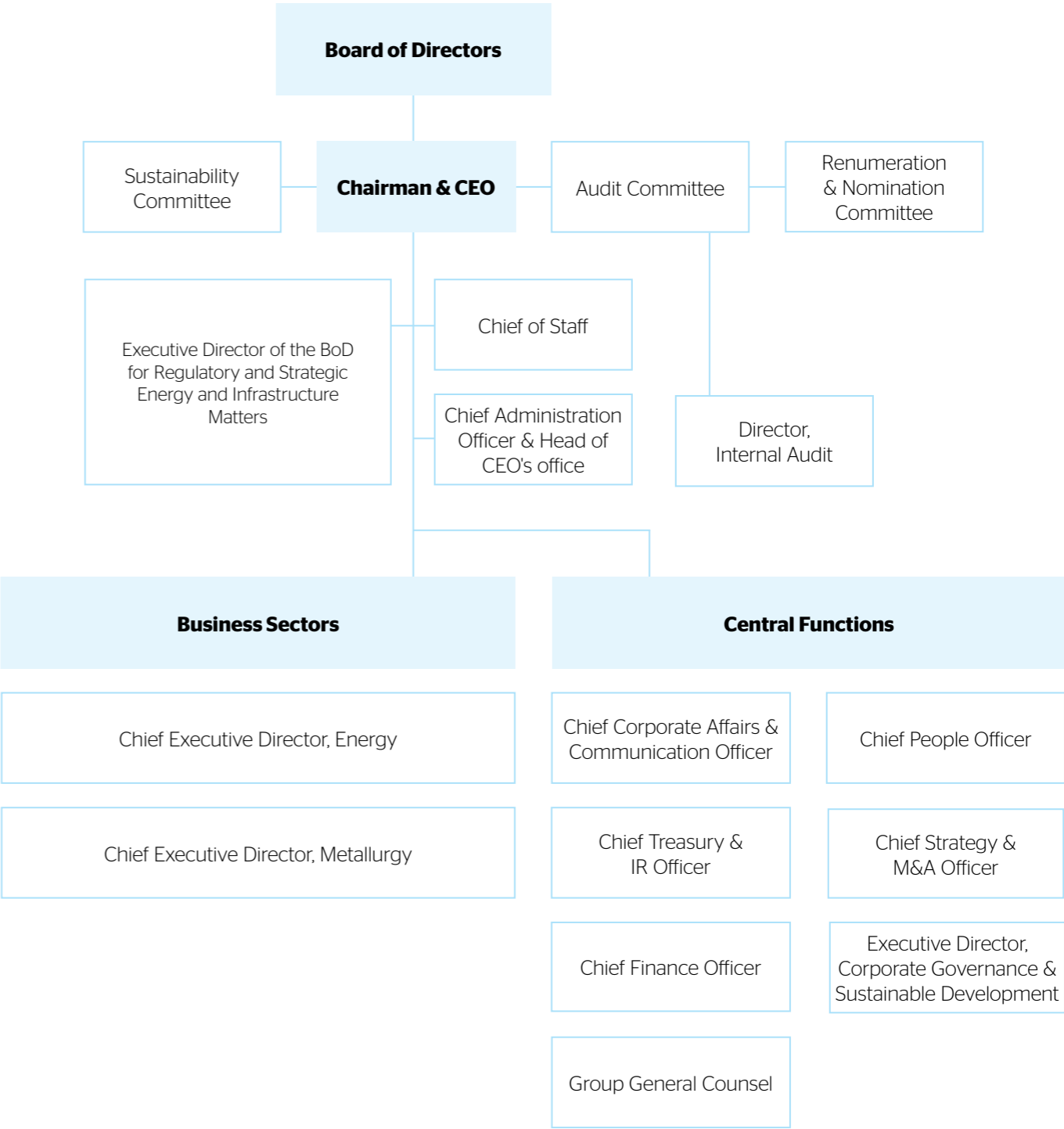
In 2023, the Sustainability Committee **met on a regular basis**

(4 times in total) and discussed the following issues falling within its remit:

- It was informed about the main trends and developments in relation to Sustainable Development and ESG criteria.
- **It was informed** about the implementation of the **process of defining the material issues of Sustainable Development** of the Company both internally and externally and then **validated the 14 material issues** that emerged.
- **It reviewed the content of the 2022 ESG Sustainability and Performance Report**, and after certifying that it includes all material issues, approved its publication.
- **Discussed the evolution of key carbon reduction initiatives**, and, by extension, the Company’s climate goals and the future impact of its new business activities, as well as the first results from the implementation of TCFD recommendations.
- **It was briefed on the basic requirements for disclosure of sustainability data** included in the new European Corporate Sustainability Reporting Directive (CSRD) and focused on the key impacts (operational and organizational) that its implementation will have on the Company.
- **It approved two new central Policies of the Company**, namely a) the Corporate Social Responsibility (CSR) Policy and b) the Responsible Supply Chain Policy.
- **It was briefed on the results of key ESG ratings** of the Company by major ESG Raters such as MSCI and S&P Global and discussed the evolution of the Company’s overall ESG performance against the set target for 2023.
- **It was informed about the analysis of SROI studies** for 8 social programs implemented by the Company in the period 2022-2023.
- **It discussed sustainability issues of general interest** such as:
 - the findings of the Global Confidence Barometer for 2023,
 - Eurobarometer results for Greece on citizens’ perceptions of the just green transition
 - the management of the communication of sustainable development issues by the Company and suggestions for improvement.

Of the above issues, the ones that were considered to be most important are:

- 1. the new European Corporate Sustainability Reporting Directive (CSRD)** and the new European Standards European Sustainability Reporting Standards (ESRS) and the main effects that its implementation will have on the Company,
- 2. the results of the Materiality 2023 process**, as well as the double materiality process that the Company will adopt in 2024, to determine, on the one hand, the significant impact of the Company’s activity on Sustainable Development and, on the other hand, the impact of these impacts (taking into account risks and opportunities) on the Company’s financial performance and more generally on the Company’s ability to generate value,
- 3. the evolution of key carbon reduction initiatives** and, by extension, corporate climate goals,
- 4. ESG performance** was communicated to the Company’s Board of Directors, in the context of its annual regular meetings, by the Chairwoman of the Sustainability Committee. [GRI 2-16-a] [GRI 2-16-b]



1. https://www.mytilineos.com/media/13wjmfd/annual_financial_report_2023.pdf
2. https://media.frc.org.uk/documents/UK_Corporate_Governance_Code_2018.pdf
3. <https://www.mytilineos.com/who-we-are/governance/corporate-governance/corporate-governance-code/>
4. <https://www.mytilineos.com/who-we-are/leadership/board-of-directors/>
5. <https://www.mytilineos.com/who-we-are/governance/corporate-governance/committees/>

Sustainable Development Governance [GRI 2-24-a-i]

The management of Sustainable Development is exercised at the **highest management level** of MYTILINEOS. It is integrated into the Company's organizational structure and operating model steadily, through the **regular review of all material issues**, the planning of appropriate actions and targets, as well as the implementation of environmental, social and governance practices. The management of Sustainable Development issues is implemented through the corporate The Company's **Sustainable Development Governance System**, aiming at:

- **highlighting the importance of Sustainable Development**, with the ultimate goal of preventing business, social and environmental risks,
- **adopting initiatives and actions** that substantially contribute to the Global Sustainable Development Goals (2030 Agenda) and the corresponding national priorities, and
- **balancing the economic, social, and environmental impact** of MYTILINEOS' activity while enhancing the value generated towards all groups of its key Stakeholders.

The **structure of MYTILINEOS' Sustainable Development Governance System** is as follows:

Sustainability Committee of the Board of Directors

[GRI 2-14] [GRI 2-16-a]

The **purpose** of the Sustainability Committee is to **assist the Board of Directors** (BoD) in strengthening the Company's long-term commitment to value creation in all three pillars of Sustainable Development (economy, environment and society), and to **oversee the implementation** of responsible and ethical business conduct, regularly assessed on the basis of its environmental, social and governance (ESG) results and performance.

The Sustainability Committee was established by the decision of the Board of Directors of the Company dated 02.04.2021. The Committee is composed by majority of independent non-executive members of the BoD. The President is appointed by the members of the Committee.

The Committee is responsible for **examining** and **approving** the **process of determining the material issues of** Sustainable Development, validating, on an annual basis, its results, which constitute the basic structure of the Company's annual Sustainable Development Report. Also, through a special meeting where the process of collection and synthesis of sustainability data by the Sustainable Development Division is analyzed, it approves its content relevant Annual Report, including the material issues of the Company as mentioned above.

More information is available in the [Terms of Reference of the Sustainability Committee](https://www.mytilineos.com/media/ewna0uo1/terms-of-reference-of-the-sustainability-committee.pdf)¹.

Corporate Governance and Sustainable Development General Division

The General Division of Corporate Governance and Sustainable Development, through its key and coordinating role, **determines** the **short-term strategic priorities**, as well as the **long-term overall** Sustainable Development strategy of the Company. It informs the Company's Executive Committee and

provides information to the Board of Directors, through the Sustainability Committee, on sustainability issues, including the progress of climate objectives. It cooperates directly with the Central Functions on sustainability issues and is responsible for supporting all Sustainability/ESG teams per Business Sector, regarding MYTILINEOS' Sustainable Development standards and goals. In addition, it coordinates, monitors, gathers and synthesizes the sustainable development actions carried out throughout the Company, ensuring that, collectively, they produce the best possible results based on ESG criteria and relevant assessments, maintaining the Company's ESG performance at the highest possible level and meeting the increased demands of the investment community in this field.

Enterprise Risk Management System

MYTILINEOS' Enterprise Risk Management System has been adopted in order to reduce the chances and impacts of risks and to maximize the benefit of the opportunities presented, concerning, inter alia, the Company's Material Sustainable Development Issues. In this context, an Enterprise Risk Assessment methodology has been adopted, which is based on international best practices and is tailored to its needs MYTILINEOS, promoting **a unified culture** that integrates risk management into **processes, activities** and **decision-making** at all levels.

Business Sectors

The **General Managers** of the Business Sectors and subsidiaries of MYTILINEOS, manage any impact of their Sector's activity on Sustainable Development, giving the relevant guidelines to the respective **Sustainability/ESG teams**, and in cooperation with the central General Division of Corporate Governance and Sustainable Development, ensure **responsible operation** and that the Sustainability Key Performance Indicators (KPIs) are in line with the **central strategic objectives**. In addition, the Sustainability/ESG teams, with the creation of special roles "BU Sustainability Leaders" and "BU Sustainability/ESG Initiative Owners", are responsible for the organization and implementation of Sustainable Development initiatives per Business Sector of the Company. [GRI 2-13-a-i] [GRI 2-13-a-ii]

Consultations with Stakeholders and Local Communities

The institution of Stakeholder Consultation is a timeless principle of MYTILINEOS' responsible operation, which contributes to enhancing **transparency, social acceptance** of MYTILINEOS' operation and further improving the Company's responsible entrepreneurship and sustainable development initiatives.

Codes of Conduct [GRI 2-24-a-iii]

An important role in the governance of Sustainable Development is played by:

a) The Company's **"Code of Business Conduct"** concerning the rules of acceptable behavior of MYTILINEOS' Management towards employees, the principles of professional ethics, as well as the rules that determine behavior between employees and third parties.

b) The **"Suppliers and Business Partners Code of Conduct"** which describes the minimum requirements / expectations of the company from its supply chain on environmental, social and governance (ESG) issues as one of the basic conditions for commercial cooperation.

Integration of Sustainable Development issues into the business model [GRI 2-24-a-ii]

In order to integrate Sustainable Development issues into its business model, MYTILINEOS **has renewed its organizational structure**, while gradually adapting its operating model. It is an extremely important undertaking, as it comes to frame its overall strategy and align with it, its efforts towards Sustainable Development. It was designed to ensure that **policies and commitments** are implemented by the Company and to coordinate the efforts of both Central Functions and Business Sectors towards the common goals of Sustainable Development. In this direction, **the integration of ESG criteria into the Company's key processes has already begun**, such as the performance management system, the evaluation of investment projects, the annual budget formulation process, the evaluation of existing and future suppliers, etc. At the same time, it is planned, with implementation **in 2023**, the creation of a permanent special Sustainability/ESG section in each Sector Committee with the aim of both monitoring **CO₂ emission reduction initiatives** and highlighting material ESG issues related to business decisions that have any financial impact and affect the Company's ESG performance. With regard to non-financial disclosures, their correlation with financial data is systematically promoted through the inclusion of ESG-related Key Performance Indicators (KPIs) in all major financial reports.

Regarding the **Company's operating model**, the General Division of Corporate Governance and Sustainable Development **works closely** with the General Divisions of the Business Sectors, as well as with the Sustainability Leaders appointed in each Sector, for the **integration** of policies and commitments and **monitoring** progress in implementing continuous progress initiatives on Sustainable Development issues. These initiatives express MYTILINEOS' **response to the requirements** arising either from new regulatory requirements, from existing or new standards to which the Company has voluntarily committed, or from new **sustainability trends** and are tailored to the specific characteristics and activities of each Business Sector. Also, the **Sustainability Leaders** have, in turn, designated, according to the particularities of their Industry, **responsible persons** (ESG Category Owners) **for each ESG pillar**, with whom they are

in constant communication and cooperation. **ESG Category Owners** coordinate and cooperate with those responsible for the implementation of specific initiatives across the spectrum of Sustainable Development.

1. <https://www.mytilineos.com/media/ewna0uo1/terms-of-reference-of-the-sustainability-committee.pdf>

Regulatory Compliance

Management approach and impacts on sustainable development and human rights

[GRI 3-3-a] [GRI 3-3-b]

A fundamental and non-negotiable principle for MYTILINEOS is to make every effort to ensure that its business activity is carried out in **full harmony, compliance and compliance with the applicable legislation and the operating principles governing it in each region or country of operation**. Regulatory compliance (environmental, social, product) is a key element of MYTILINEOS' business activity and at least of equal importance to issues it manages in the context of its continuous and responsible development. This position is primarily based on the principle of compliance with legal requirements, as well as the agreements and commitments voluntarily undertaken by MYTILINEOS through its Business Sectors.

Potential negative effects

MYTILINEOS implements a **system of continuous monitoring and compliance with regulatory and legislative changes and developments**, minimizing the possibility of negative non-compliance effects that could have a significant impact on MYTILINEOS' financial position and cash flow, reputation and, consequently, MYTILINEOS' ability to meet its obligations. [GRI 3-3-a]

Actual positive effects

Maintaining regulatory compliance at environmental, social and product level, ensuring that overall corporate activity is lawful and meets **high standards of responsible entrepreneurship**, enhancing the climate of trust between MYTILINEOS and the Stakeholders that deal with it (customers, employees, suppliers, administrative authorities, etc.). [GRI 3-3-a]

The Company's contribution to the impacts

The impacts may be caused by MYTILINEOS' Business Sectors, its employees, subsidiaries, business partners and its supply chain. The impacts of non-compliance with laws and regulations take place primarily within the operating limits of the Company, its subsidiaries and its strategic partners and suppliers. They can also be extended to the economy, society, and the environment as a whole, in the context of sustainable.

Major risks

- Financial risks, from **possible negative outcomes of litigation** related to non-compliance with legislation in general.
- Possible non-compliance with its obligations arising from environmental legislation** and more specifically with the terms of the environmental permits of its industrial facilities. In case of violation of existing regulations, competent authorities may impose fines or sanctions, as well as revoke or refuse to renew permits and approvals.
- Risks arising from MYTILINEOS' operations in countries with emerging economies, where its operations **may be affected by political conditions** and changes in them. This could adversely affect the Company's activities.

Company policies and commitments [GRI 2-23-a]

[GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f] [GRI 3-3-c] [GRI 3-3-d-i]

Operation in full harmony, compliance and compliance with the **applicable legislation and operating principles in each region or country of operation**, in accordance with the main axes of the [Code of Business Conduct](#) and the [Suppliers & Business Partners Code of Conduct](#) , updated in 2023.

In order to ensure and safeguard the proper, safe, transparent and effective operation of the company and to protect its interests, MYTILINEOS has established and implemented a **Conflict-of-Interest Policy**. The Policy identifies the circumstances that constitute or may lead to a conflict of interest, while setting out the procedures to be followed and the measures to be taken to mitigate it; managing and resolving any such conflict should it arise.

The business culture and history of MYTILINEOS is characterized by zero tolerance to violations of free competition and it constantly provides, through its procedures and its Central Services, the appropriate support, training and information to all employees in order to avoid any competitive violations. Through the **Policy of Compliance with Free Competition** Law it is ensured that the Company takes all necessary measures against employees and associates who have violated the law. It is very important for MYTILINEOS to recognize, in a timely manner, any risk arising from an imminent anti-competitive incident, to exclude in an absolute and effective manner, any participation, even indirect, of one of our associates even in its discussion, in order to eliminate the risk of violation of free competition (Anti-trust) in every aspect of the Company's activity and of businesses and associations, in which it participates, directly or indirectly.

Impact management and response tactics

[GRI 3-3-d-i] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f]

- In order to prevent the aforementioned risks, MYTILINEOS: **a) complies with the legal and regulatory requirements of the** regions in which it operates, **b)** ensures that its relations and activities comply with the applicable legislation and the applicable institutional framework, **c)** is informed of its legal obligations applicable over time, and **d)** has established procedures for monitoring legislative developments concerning its Sectors of activity and regularly reviews and evaluates its compliance with the applicable laws and regulations. [GRI 3-3-d-i]
- In addition, the **monitoring of compliance with the approved environmental permits** of the Company's business units is a process that is carried out internally, on a regular basis in each Business Sector, by qualified personnel and annually by a recognized independent third party that undertakes the audit and certification of the environmental management system. [GRI 3-3-d-i] [GRI 3-3-e-i]



- The Company, as **a member of the UN** Global Compact, ensures that its business practices comply with the ten (10) internationally recognized Principles of the Compact. Also, through the Company's Corporate Social Responsibility Policy, MYTILINEOS is committed to adopting a responsible, sustainable, and ethical business conduct, which **is regularly evaluated based on its** results, while committing to improving its environmental, social, transparency and corporate governance performance. [GRI 3-3-d-i] [GRI 3-3-e-i]
- During bidding for a project, the Policies, and procedures (**management system or due diligence procedures**) are applied to prevent bribery and corruption as well as anti-competitive behavior. [GRI 3-3-d-i] [GRI 3-3-e-i]
- The Compliance Division has developed three trainings for staff: **personal data protection training** (GDPR), MYTILINEOS **Code of Conduct** (CoC) **training** and **anti-bribery training** (facilitation payments). These trainings are implemented in the philosophy of remote access due to teleworking conditions and limitation of face-to-face meetings and They are implemented asynchronously via computer, ensuring that employees have fully monitored and understood them. The trainings include full reference to theory, case analysis in daily work, awareness to the upcoming risk and methodology for responding and upgrading incidents where required. All MYTILINEOS employees, including employees of subsidiaries, have been categorized according to their nature of work and their duties (target group) in order to be included in the relevant trainings according to their exposure to risk. In addition, material has been developed and **thematic trainings are carried out to specific employees** whose topics concern:
 - Initial training in Regulatory Compliance for new employees,
 - Fair competition law,
 - Thorough third-party audit using the in-house integrity control platform,
 - Financial sanctions and counterparty control,
 - Management of a complaints platform and their investigation.

Effectiveness of the actions [GRI 3-3-e-i] [GRI 3-3-e-ii]

[GRI 3-3-e-iii] [GRI 3-3-e-iv] [SASB EM-MM-140a.2] [SASB IF-EU-140a.2]

- The observance of the applicable legislation, as well as the implementation of controls for compliance with the rules related to the activity of MYTILINEOS, during 2023, resulted **in the absence of incidents of non-compliance with the legislation** and the related impact on environmental, social, and economic levels. [GRI 2-27] [SASB IF-EN-160a.1] [GRI 3-3-e-i] [GRI 3-3-e-iii]
- The Compliance Division continued the implementation of the **training on the Code of Conduct of MYTILINEOS** (CoC). Specifically, since 2020, these trainings have targeted Directors, employees who have staff under their supervision, employees in positions whose nature of work poses a risk of non-compliance, while from 2022, the training was extended to other employees, and in the same direction it continued in 2023. In total, over the four-year period 2020-2023, more than 1,400 employees have been trained. [GRI 3-3-e-i] [GRI 3-3-e-ii] [GRI 3-3-e-iii]
- In 2023, **there were no litigation or financial penalties** for anti-competitive behaviour, anti-trust or monopolistic practices, corruption, bribery, cartel, or price-fixing activities. [GRI 206-1] [SASB IF-EN-510a.2] [SASB EM-CM-520a.1]

Business Ethics

Management approach and impacts on sustainable development and human rights

[GRI 3-3-a] [GRI 3-3-b]

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

Potential negative effects

MYTILINEOS recognizes that the phenomena of corruption, bribery, fraud, violation of fair competition, and money laundering **undermine the ethical environment** of every business. Among the consequences that can be caused include violation of human rights, adverse effects on the environment, indirect participation in unfair practices, especially in countries of activity with an increased index corruption, as well as hindering the distribution of wealth and economic development of countries. **These phenomena constitute a major obstacle to Sustainable Development**, with a disproportionate impact on poor communities, eroding the structure of society. [GRI 3-3-a]

Actual positive effects

Tackling **corruption and bribery and business ethics are material issues for MYTILINEOS** because they can: **a)** contribute to **the identification, recording, better assessment, and management of risks**, as well as to legislative compliance, which is a non-negotiable principle for MYTILINEOS, in every region or country of its activity, **b)** **serve its business objectives**, such as meeting relevant requirements in the context of tendering for construction projects by customers or financial institutions; and **c)** **strengthen the protection of the Company** from any phenomena of corruption, fraud, embezzlement, and abuse, further enhancing its corporate image.

The Company operates on the basis of transparency and emphasis on its firm commitment to **zero tolerance for corruption and bribery** in its activities, the **implementation of Codes of Conduct**, and the **avoidance of unfair business practices** that prevent **fair competition**. [GRI 3-3-a]

The Company’s contribution to the impacts

The impacts of the phenomenon of Corruption in all its forms constitute a burden on Sustainable Development and can occur throughout the Company’s operation, with consequences for its local communities, the wider business environment as well as society as a whole. The impacts may be caused by MYTILINEOS’ Business Sectors, its employees, subsidiaries, business partners and supply chain. [GRI 3-3-a] [GRI 3-3-b]

Major risks

MYTILINEOS, through **its activity in developing countries** with high energy needs, that, according to the annual survey (Corruption Perceptions Index) of Transparency International, are in the area of high risk of corruption, MYTILINEOS may face the risk of exposure to facilitation payments or other benefits to local partners, in order to continue the unimpeded operation of projects.

Any deviation from the principles and ethical practices of the Company jeopardizes the good reputation, credibility, trust of the stakeholders and consequently its financial results and ability to undertake new projects.

Company policies and commitments [GRI 2-23-a]

[GRI 2-23-c] [GRI 2-23-d] [GRI 2-23-e] [GRI 2-23-f]

Zero tolerance in situations of corruption and bribery, in accordance with the main pillars of the [Code of Business Conduct](#) and the [Suppliers & Business Partners Code of Conduct](#). [GRI 3-3-c]

The Company’s function as a “**Responsible Corporate Citizen**” is reflected by its voluntary **participation in international initiatives to enhance transparency** (UN Global Compact), in national working groups and generally **its commitment to ethical business practices and good corporate governance**. MYTILINEOS has **formally committed to the 10th principle of the UN Global Compact**, according to which “It is opposed to all forms of corruption, including extortion, bribery and facilitation payments” and which acts as a catalyst for the development of the relevant ethical culture throughout the Company. [GRI 3-3-c]

Also, **in 2023, MYTILINEOS issued the following policies: a)** Anti-fraud, corruption and bribery Policy, **b)** Policy on its financial sanctions against terrorist financing and **c)** Policy of MYTILINEOS regarding reporting channels (whistleblowing) in accordance with Greek Law 4990/2022¹.

In the context of its Anti-Fraud, Corruption and Bribery Policy, MYTILINEOS’ Top Management demonstrates **leadership and commitment** in the fight against bribery, corruption and fraud, as it ensures, inter alia, the support of other relevant management roles to demonstrate their leadership in preventing and detecting bribery, corruption and fraud as applied in their areas of responsibility, as well as for the framework of reports at scheduled intervals to the Audit Committee on the content and operation of the Management System and on allegations of serious or systematic bribery, corruption and fraud.

In particular, by launching actions in 2023, MYTILINEOS **was certified for its Anti-Bribery Management System (ISO 37001:2016)**, within the first quarter of 2024, which underline the Company’s continuous commitment to integrity, transparency and ethical business practices. This certification covers all MYTILINEOS activities, demonstrating the collective effort to maintain the highest standards of behavior and the creation of A work culture where integrity is non-negotiable.

Furthermore, MYTILINEOS, in the context of the correct, secure, transparent and effective conclusion of transactions with related parties, as well as the **assurance of appropriate supervision and control** of these transactions, has established and applies a “Procedure for Compliance with the Obligations arising from the framework for Related Party Transactions”, which is considered appropriate for the size and organization of the Company, as well as the nature, scale and complexity of its business.

Regarding insider dealings, MYTILINEOS has a special procedure in place under the Market Abuse Regulation

1. LAW NO. 4990 Government Gazette A 210/11.11.2022: Protection of persons reporting breaches of EU law Incorporation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (L 305) and other urgent arrangements.



Employee performance appraisal systems take into account the dimension of compliance with the Code of Business Conduct, as if an employee of the Company is proven to have been involved in a violation, then disciplinary measures are taken against him.

At the same time, MYTILINEOS carries out regular audits to ensure that the above policies and procedures are followed.

Impact management and response tactics

[GRI 3-3-d-i] [GRI 3-3-d-ii] [GRI 3-3-d-iii] [GRI 3-3-e-i] [GRI 3-3-f] [SASB EM-MM-510a.1] [SASB IF-EN-510a.3]

Tackling corruption and bribery is a key element of MYTILINEOS’ Code of Business Conduct, as well as the Suppliers & Business Partners Code of Conduct. For the Company, the benchmark in tackling corruption and bribery is the **principle of integrity**, which is linked to its firm commitment to zero tolerance in these matters and is implemented through the thorough scrutiny of third parties before entering into an agreement or payment of these and avoidance of any transaction and contact with any third party that has participated in creating conditions for the development of incidents of corruption, extortion or bribery. [GRI 3-3-d-i] [GRI 3-3-e-i]

MYTILINEOS is taking a number of measures to implement this commitment:

- It conducts on an annual basis, in the context of Enterprise Risk Management, a **risk study** related to the potential corruption and bribery in its various business activities and prescribes measures to minimize these risks. [GRI 3-3-d-i] [GRI 3-3-e-i]
- In countries of high risk of corruption, the Company establishes a **Grievance Mechanism**, to which every employee (direct or indirect) has access either by name or anonymously to report violations in relation to the policies of personal data protection, bribery and corruption, human rights or the Company’s code of conduct. The Company **protects whistleblowers from retaliation** provided that the complaint is made in good faith even if the outcome of the investigation does not confirm it. In addition, the Company operates **reporting channels** for MYTILINEOS in accordance with law 4990/2022 using a platform, email, telephone communication or letter. In addition, it has named to the competent authority the person responsible for receiving and following up on reports and an investigation team for reports. [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-d-ii]
- The Compliance Division of MYTILINEOS collected the statements of executives and employees in key Management positions for 2023, in accordance with **the Policy regarding the conflict of interest of its employees and partners**. [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-e-i]
- The Company ensures the **systematic training of staff** per category of regulatory risk exposure on issues of the Code of Conduct with a thorough analysis of corruption and bribery, healthy competition, fraud, thorough control of business partners and conflict of interest. In 2023, the Compliance Division implemented new anti-corruption staff training. [GRI 3-3-d-i]

Business ethics in MYTILINEOS’ cooperation with third parties

- MYTILINEOS ensures the **analysis of circumstances** and the identification of potential risks or threats that may encourage the existence of corruption and bribery incidents in the corporate environment, through a process **of thorough review**

and due diligence of 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 lists of restrictions on terrorist financing and human rights abuses, mediation and advisory services, and aims to create prevention procedures where they do not exist. The Compliance Division has developed an **in-house application for the thorough control of third parties** and the decision to cooperate or not with them. The application includes the categorization of third parties according to the company’s exposure to regulatory risk, the **in-depth audit of third parties** according to the risk category in which they are classified, the interaction of commercial departments, regulatory compliance and Management with the necessary documentation and retention of all supporting documents and responses of the third party. [GRI 3-3-d-i] [GRI 3-3-d-iii] [GRI 3-3-e-i]

- MYTILINEOS’ Suppliers & Business Partners Code of Conduct provides for addressing conditions of Corruption and Bribery in the supply chain. MYTILINEOS conducts **supplier integrity checks prior to the commencement of cooperation** and the Code provides for audits aimed at **ensuring the implementation of the Code** and providing **recommendations for corrective measures** where required. See also, in the process of evaluating its suppliers according to specific ESG criteria, includes a specific question on whether they require their own suppliers to operate responsibly and in accordance with applicable laws, regulations and international standards on issues related to the fight against corruption. [GRI 3-3-c] [GRI 3-3-d-i] [GRI 3-3-e-i]

- The Company ensures that all transactions carried out on its behalf, on behalf of its shareholders, employees, and key partners and suppliers, are governed by **a high level of integrity**. Through defined procedures, mainly applied to the Purchasing-Procurement Departments, as well as project management for the selection of suppliers and other partners, the conditions under which each transaction takes place are checked on an annual basis, with the aim of identifying and eliminating those that may lead to corruption or fraud. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)
- The Company implements systems and controls at preventive and detection level to ensure that suppliers comply with MYTILINEOS standards, to **avoid questionable payments** and to identify them correctly and transparently in the Company's accounting books. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)
- An important part of the **Compliance Program** is the trainings, which support the **culture of ethics and compliance** throughout the organization and strengthen business ethics. In 2023, **all new entrants** (1,316 people) **were trained**, while more information is provided in the "Regulatory Compliance" section. [\[GRI 3-3-e-iv\]](#)

The General Division of Legal and Regulatory Affairs, which includes the Compliance Division of the Company, is responsible for the creation and implementation of further **mechanisms to ensure** the protection of the Company from corruption and bribery at preventive and control level. Specifically, the Director of Compliance reports to the Director General of Legal, Regulatory & Regulatory Affairs and the **Audit Committee of the Board of Directors**, from which **the Compliance work plan is approved and monitored**. [\[GRI 3-3-e-i\]](#)

MYTILINEOS, in accordance with the Code of Conduct, **does not make any donations to political formations** or to persons related to them.

Effectiveness of the actions [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-ii\]](#)
[\[GRI 3-3-e-iii\]](#) [\[GRI 3-3-e-iv\]](#)

- In 2023, MYTILINEOS implemented all necessary internal procedures to **safeguard** its policy. Through the **control mechanisms** applied in the Purchasing - Procurement Departments of the Company's Sectors, where both the selection of partners and any kind of transaction were examined, **there were no confirmed incidents of corruption**, incidents that led to the removal or disciplinary action of employees for reasons of corruption, confirmed incidents related to corruption that led to the termination or non-renewal of cooperation with associates or public court cases related to corruption against the Company or its employees. [\[GRI 205-3\]](#) [\[GRI 3-3-e-i\]](#)
- The Compliance Division undertook and **distributed** with a certificate of signature and compliance with the **Code of Business Conduct** to all new employee hires that took place in 2023. [\[GRI 3-3-e-iii\]](#)
- MYTILINEOS' Metallurgy Sector **has no production activity in the 20 countries that have the lowest ranking based on Transparency International**. [\[SASB EM-MM-510a.2\]](#) [\[GRI 3-3-e-iv\]](#)
- According to the MYTILINEOS Code of Conduct (Article 5,14 - p.18), **which prohibits political contributions** to political parties or persons associated with them, **there was no such activity in 2023**. [\[GRI 3-3-e-i\]](#)
- Every year, within the framework of the ERM, **the Compliance and Personal Data Protection risk study** takes place. Through this process, the inherent risk of the above areas for the company is identified, the risk reduction, which is achieved through the applicable safeguards and finally the remaining risk arises, which must be less than the management's risk appetite. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-e-iv\]](#)



Cybersecurity



Management approach and impacts on sustainable development and human rights [\[GRI 3-3-a\]](#) [\[GRI 3-3-b\]](#)

Maintaining and continuously enhancing the level of Cybersecurity are of major importance for MYTILINEOS, both in the context of compliance with international and domestic regulatory information security standards, as well as in the wider effort to safeguard the services provided against constantly evolving cyber threats. Given the complexity of the relevant regulatory framework and the significant reliance of operational activities on resilience and smooth operation of infrastructure, MYTILINEOS has put in place technical and organizational safeguards that focus on ensuring key pillars of security, such as **confidentiality, integrity and availability**.

Key Impacts	Main impact recipient	Impact type				Impact horizon
		Actual	Potential	Positive	Negative	
Ensuring business operations, protection of corporate and personal data and a high level of compliance with applicable regulatory requirements.	Company Human rights					Short, Medium, and Long-Term

Major risks

A decisive factor for the effective maintenance of an adequate level of cybersecurity is the **successful identification of the most critical information security risks** that lurk and are directly related to the size of MYTILINEOS, the nature and scope of its business activities and services, as well as the active partnerships with third parties.

MYTILINEOS identifies as more important the risks arising from targeted cyberattacks, which aim to disrupt the Company's proper operation. Indicative examples of such attacks are "Distributed Denial of Service" attacks, as well as attacks with encryption malware or otherwise "ransomware".

At the same time, in the context **of safeguarding human rights**, MYTILINEOS identifies as equally important the risk of data breaches to unauthorized entities, which may occur intentionally or unintentionally, due to human error.

Company policies and commitments [\[GRI 2-23-a\]](#) [\[GRI 2-23-c\]](#) [\[GRI 2-23-d\]](#) [\[GRI 2-23-e\]](#) [\[GRI 2-23-f\]](#) [\[GRI 3-3-c\]](#) [\[GRI 3-3-d-i\]](#)

MYTILINEOS has developed and is committed to the implementation of a complete **Information Security Management System**, which consists of policies, procedures, and guidelines, based on the ISO27001 standard, through which the effective and efficient protection of the Company's information systems and data is achieved. Already in 2023, both the M Power Projects segment of the Energy Sector, and its subsidiary METKA ATE successfully completed the preparation and received ISO27001 (IT Information Management System) certification. The Information Security Management System is designed to support MYTILINEOS' business objectives, reduce the risk of breach of confidentiality, integrity and availability of corporate information and information systems, and instill the Company's strategy and ethical values, as well as information security principles, in the Company's personnel. In addition, MYTILINEOS, being fully aware of the criticality of the cyber threats it faces and the associated potential impacts, has decided to address information security risks **with increased vigilance**, which is achieved through its existing Information Security Management System. The objectives, responsibilities,

accountabilities, and commitments of MYTILINEOS are communicated through the Information Security Management System, to all employees, partners and third parties involved. [\[GRI 3-3-c\]](#) [\[GRI 3-3-d-i\]](#)

Impact management and response tactics

[\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-i\]](#)

- Aiming at the timely, effective, and efficient handling of identified risks and the avoidance or mitigation of any potential impacts, MYTILINEOS has implemented **a holistic Information Security Program**, which consists of the appropriate organizational and technical safeguards. The ultimate goal of the Program is to maintain and continuously enhance the level of cybersecurity, thus contributing to the achievement of the Company's business objectives regarding sustainable development and the provision of safe services, while protecting the rights of its employees, customers and partners. Part of the Information Security Program is the aforementioned **Information Security Management System (ISMS)**, which defines all the organizational safeguards required for the proper functioning of the Program. [\[GRI 3-3-d-i\]](#)
- MYTILINEOS, through **its cooperation with independent organizations** and consultants, periodically reviews the adequacy and effectiveness of its information and IT security policies, procedures and instructions, and proceeds to any necessary update of the Information Security Management System, according to the Company's needs. This update shall also take place following any technological developments; new information security risks and incidents of information security breaches, in order to ensure that the Information Security Program and the achievement of operational objectives are adequately supported. [\[GRI 3-3-d-ii\]](#)

- An integral part of the Program is the periodic **identification, assessment, and prioritization of information security risks**, identifying the related information resources, their exposure to cyber threats, the potential impact on the Company, as well as the existing safeguards. Through this assessment, it is possible to determine the level of maturity of the safeguards applied and the extent to which they are mitigated the risks identified, thus contributing to the continuous improvement of the Information Security Program. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-e-i\]](#)
- Parallel actions that are implemented and contribute to the continuous identification of risks are **the vulnerability assessments of information systems**. Such technical inspections are carried out periodically by external organizations and consultants, as well as through information security systems implemented by MYTILINEOS, in order to timely identify systemic vulnerabilities exposed to cyber threats that may have significant consequences. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-e-i\]](#)
- Paying particular attention to the human factor, **MYTILINEOS has developed a regular and structured information and information security awareness and training program**, which is implemented on an ongoing basis and with different topics each time. The objective of the program is to ensure that all employees, contractors and related third parties with access to information and information systems of the Company, understand the need for information security, accept the responsibilities assigned to them under the Information Security Management System, and perform their duties by demonstrating a high level of professional ethics. [\[GRI 3-3-d-i\]](#)
- That program **shall be evaluated and revised** if appropriate, at regular intervals **through examinations as well as exercises** simulating real cybersecurity attacks. At the same time, given the size of MYTILINEOS, the continuous training and awareness of the Company's staff and partners on information security issues contributes to the enhancement of the relevant level of knowledge in the wider society, promoting an information security culture and ultimately protecting data from cyber threats. [\[GRI 3-3-e-i\]](#) [\[GRI 3-3-f\]](#)
- Recognizing the potential negative effects arising from a targeted information security attack, MYTILINEOS has implemented technical safeguards aiming at the early detection of information security incidents. At the same time, **organizational security safeguards** are in place, such as roles, responsibilities, and procedures, that enable the confirmation of incidents as information security incidents, as well as the investigation, evaluation, mitigation and dealing with them within strict time frames, with the aim of mitigating the relevant impacts and implementing measures to avoid similar incidents in the future. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-e-i\]](#)
- Finally, recognizing the increased likelihood of information security incidents, MYTILINEOS has designed and implemented a **business continuity and disaster recovery plan**, which is tested and updated on a regular basis, with the aim of ensuring business continuity, minimizing, and remedying negative impact following a cybersecurity breach or natural disaster. [\[GRI 3-3-d-ii\]](#)

At regular intervals, or if issues arise in the wider cybersecurity environment in which the Company operates, relevant presentations are made at the level of Senior Management and/or Audit Committee. Senior Management is responsible for taking appropriate measures to guarantee business continuity according to the Company's needs. [\[GRI 3-3-e-i\]](#)

Effectiveness of the actions [\[SASB EM-CM-320a.1\]](#)

[\[SASB EM-MM-320a.1\]](#) [\[SASB IF-EU-320a.1\]](#) [\[SASB IF-EN-320a.1\]](#)

In order to evaluate the adequacy and effectiveness of the Information Security Program, MYTILINEOS has established and systematically monitors a **set of key performance indicators** (KPIs) while conducting periodic and continuous **compliance audits**, aiming to ensure compliance **with regulatory requirements** and **adequate achievement of objectives** that have been set, as well as the continuous enhancement of the Company's level of cybersecurity. The **results of the performance evaluation** as well as **the internal and external audits / inspections are** periodically reported to the Company's Senior Management, so that, based on them, the appropriate plan of actions for correction and improvement of the Program is determined and implemented. [\[GRI 3-3-e-ii\]](#) [\[GRI 3-3-e-iii\]](#)

Paying particular attention to the continuous awareness of employees on information security issues, MYTILINEOS diligently monitors this action and has put in place appropriate controls and quantitative performance measurement indicators. [\[GRI 3-3-e-i\]](#)

Indicatively, it is mentioned that:

- 100% of the users of the Company's information systems, i.e. 3,029 users, participated in the training activities that were conducted, which focused on 10 different security issues.
- 62% of employees completed these trainings, while 38% are in the process of completion.
- 90% of employees successfully completed the corresponding information security assessments.

The actions of MYTILINEOS' Information Security Program for the year 2023 included the assessment of the level of achievement of the objectives set for maintaining an adequate level of cybersecurity, smooth operation, protection of corporate and personal data, and compliance with applicable regulatory requirements. [\[GRI 3-3-d-i\]](#) [\[GRI 3-3-d-iii\]](#) [\[GRI 3-3-e-iii\]](#)

Other significant Governance topics

Customer Privacy

Management Approach

The **protection of individuals regarding the processing of personal data is a fundamental right and a matter of utmost importance for MYTILINEOS**. Therefore, the collection and processing of personal data is done only **in accordance with the law and where required** in relation to the operation of employment relations and the business activity of the Company. The Company allows access only to authorized persons and takes increased data security measures.

Although MYTILINEOS does not primarily process special categories of data (sensitive), Protergia's business direction in electricity and gas retail, as well as the size of MYTILINEOS in terms of employees and business partners, require **large-scale processing of personal data**. MYTILINEOS remains responsible for data processing with specific obligations and responsibilities also in cases of outsourcing such processing to third parties. In addition, transactions with business partners outside the European Union and especially in countries with less stringent legislation on the protection of personal data, create the need for the transfer of personal data whose protection should be ensured.

The Company may face various risks related to the protection of personal data, which may be of a financial nature from possible sanctions of European data protection authorities or from claims of personal data subjects, which have been damaged, but also risks related to negative publicity and damage to reputation in case of improper safeguarding and processing of its customers' personal data.

For this reason, MYTILINEOS has taken a series of **actions** to ensure, to the extent possible, the protection of the personal data it manages. More specifically, it has:

- **proceeded**, since 2018, to the creation of an administrative position of Data Protection Officer (DPO) and its notification to the State Authority,
- **implemented a deviation study** from the General Data Protection Regulation and has taken appropriate corrective actions since 2018,
- **established a data protection policy** for all employees and subsidiaries, as well as for business partners and has communicated it to all interested parties,
- **appointed** Data Protection Coordinators **in each unit**, who have access to processing activities and are in constant cooperation with the DPO,
- **created a register of personal data processing**, which is regularly updated,
- **completed Data Privacy Impact Assessments** for the processing operations required,
- **established and operates a mechanism for recording** any personal data breaches and notifying them to the competent Data Protection Authority as well as to the affected data subjects, if required
- **conducted 2nd degree inspections** (GDPR Audits) to its external partners, who are the "Processors", in the context of checking their degree of compliance with the requirements of the General Regulation (2016/679), in order to protect the personal data of its customers,
- **trained** through a computer environment more than 1,400 employees in total by the end of 2023, since the start of this training program in 2020, **who deal with the processing of**

personal data,

- **obtained ISO 27701 certification** for the processing of personal data in the Energy Sector, specifically in the M Power projects sector and for the subsidiary company METKA ATE.

Results

In addition, **personal data protection risks are included in the Company's Risk Management System** and are constantly monitored.

The observance of the applicable legislation, as well as the implementation of controls for compliance with the rules concerning the activity of MYTILINEOS, during 2023, **resulted in the absence of substantial incidents of personal data breach**. In 2023, 15 personal data breaches were recorded, which involved sending contracts or bills to the wrong recipient (confidentiality breach), loss of accounts by a partner postal company and loss of recorded calls (violation of availability). 6 of them have been notified to the DPA in accordance with GDPR guidelines. The rest did not require notification.

The causes of failure were identified, and additional technical and organizational measures were taken to eliminate them. Within 2023, 3 complaints have been received by subjects through the Data Protection Authority, regarding promotional calls to telephone numbers that are on the list of article 11 of Law 3471/2006. None of these were confirmed to have come from external partners of MYTILINEOS. [\[GRI 418-1\]](#)

Number of requests by data subjects in relation to the GDPR for 2023: 114 requests, most of which concerned the right of access and opt-out from processing. These requests were answered / satisfied within the period provided by the GDPR (within 30 days).

Enterprise Risk Management

Enterprise Risk Management is an integral part of MYTILINEOS' operation and is achieved through a multidimensional approach which is reflected in detail in the Enterprise Risk Management Section of the [Annual Financial Report 2023](#) (p. 47-77).



ESG KPIs

G Governance KPIs	2021	2022	2023
Corporate Governance			
Corporate Governance Code	UK Corporate Governance Code - 2018	UK Corporate Governance Code - 2018	UK Corporate Governance Code - 2018
Diversity Policy	Yes	Yes	Yes
Board Members	11	11	12
Board Members' term of office (years)	4	4	4
Average age of Board Members (years)	59.6	60.8	61.6
Chairman's duality	Yes	Yes	Yes
Appointment of Lead Independent Director	Yes	Yes	Yes
Executive Members on the Board	3	3	4
Non-Executive Members on the Board	8	8	8
Independent, Non-Executive Members on the Board	7	7	7
Women on the Board	3	3	3
Voting standard	Majority	Majority	Majority
Number of Board Meetings	63	53	68
Number of Board Members present in <75% of Board meetings	0	0	0
Remuneration & Nomination Committee	Yes	Yes	Yes
Independent Board Members on the Remuneration & Nomination Committee (%)	100%	100%	100%
Audit Committee	Yes	Yes	Yes
Independent Board Members on the Audit Committee (%)	100%	100%	100%
Sustainability Committee	Yes	Yes	Yes

G Governance KPIs	2021	2022	2023
Corporate Conduct			
Code of Business Conduct	3 rd Edition 2019	3 rd Edition 2019	3 rd Edition 2019
Suppliers & Business Partners Code of Conduct	3 rd Edition 2019	4 th Edition 2022	4 th Edition 2022
Publication of business model & value creation process	Yes	Yes	Yes (p. 24-27)
Metariality process	Yes	Yes	Yes (p. 40-41)
Political contributions	Not allowed	Not allowed	Not allowed
External assurance of published information	Yes	Yes	Yes (p. 166-173)
Financial sanctions imposed for violations of the Code of Business Conduct (€)	0	0	0
Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	0	0
Confirmed incidents of corruption and bribery	0	0	0
Confirmed incidents of anti-competitive behavior	0	0	0
The ratio of the annual total compensation of CEO to the median annual total compensation for all employees (excluding the highest-paid individual) ¹	n/a	201:1	118:1
The ratio of the percentage increase in annual total compensation of CEO to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) ²	n/a	0	0

1. The CEO's annual total remuneration includes the base salary and annual variable remuneration (bonuses) based on the achievement of targets. The calculation of the median annual total remuneration of employees does not include the CEO's fixed and variable remuneration (bonuses).

2. The calculation of the percentage increase in annual total employee compensation does not include any increase in the CEO's fixed compensation (for 2023 the increase was 0%).



Sustainability Standards & Assurance

Independent Assurance Statement

[GRI 2-5]

Limited Assurance Report of the Independent Auditor on the "Report 2023 Sustainable Development and ESG Performance"
(Translated from the original in Greek)

To the Board of Directors of
MYTILINEOS S.A.

Subject Matter

Based on our engagement letter dated 8 March 2024, as amended on 30 April 2024 we undertook the assignment of limited assurance on specific elements of the “Report 2023 Sustainable Development and ESG Performance” (hereafter “Report”) of the company “MYTILINEOS S.A. (hereafter “MYTILINEOS” or “The Company”) for the year ended 31 December 2023 based on the criteria defined below as Applicable Criteria. The selected elements of the Report covered by the limited assurance engagement are as follows:

- 1 The General Disclosures of GRI 2: General Disclosures 2021, which are referred to in the GRI Table of Contents.
- 2 The Disclosures of Material Topics (GRI 3: Material Topics 2021), concerning Management Practices for Material Topics, for each of the selected GRI Disclosures as listed below.
- 3 The following specific GRI Disclosures linked to the Company's material topics and listed in the Company's 2023 Report

GRI Disclosures	Description
201-1	Direct economic value generated and distributed
203-1	Infrastructure investments and services supported
204-1	The percentage of proportion spending on local suppliers used for significant locations of operation
205-3	Confirmed incidents of corruption and actions taken
206-1	Legal actions for anti-competitive behavior, antitrust, and monopoly practices
301-1	Materials used by weight or volume
301-2	Recycled input materials used
302-1	Energy consumption within the organization
302-3	Energy intensity
303-1	Interactions with water as a shared resource

GRI Disclosures	Description
303-2	Management of water discharge-related impacts
303-3	Water withdrawal
303-4	Water discharge
303-5	Water consumption
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
304-2	Significant impacts of activities, products and services on biodiversity
305-1	Direct (Scope 1) GHG emissions
305-2	Energy indirect (Scope 2) GHG emissions
305-3	Other indirect GHG emissions (Scope 3: Categories C1, C2, C3, C10, C11)
305-4	GHG emissions intensity
305-6	Emissions of ozone-depleting substances (ODS)
305-7	NOx, SOx, and other significant air emissions
306-1	Waste generation and significant waste-related impacts
306-2	Management of significant waste-related impacts
306-3	Waste generated
306-4	Waste diverted from disposal
306-5	Waste directed to disposal
401-1	New employee hires and employee turnover
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees
403-1	Occupational health and safety management system
403-2	Hazard identification, risk assessment, and incident investigation
403-3	Occupational health services

GRI Disclosures	Description
403-4	Worker participation, consultation, and communication on occupational health and safety
403-5	Worker training on occupational health and safety
403-6	Promotion of worker health
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
403-8	Workers covered by an occupational health and safety management system
403-9	Work-related injuries
403-10	Work-related ill health
404-1	Average hours of training per year per employee
404-3	Percentage of employees receiving regular performance and career development reviews
405-1	Diversity of governance bodies and employees
406-1	Incidents of discrimination and corrective actions taken
413-1	Operations with local community engagement, impact assessments, and development programs
415-1	Political contributions
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services
417-1	Requirements for product and service information and labeling
417-2	Incidents of non-compliance concerning product and service information and labeling
417-3	Incidents of non-compliance concerning marketing communications
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data

3

4 The following sample of the ESG Indicators published by the Company based on the Athens Stock Exchange ESG Reporting Guide (2022) of the Athens Stock Exchange:

Athens Stock Exchange ESG Reporting Guide (2022)		Description
C-E1	C-E1-1	Direct emissions (Scope 1)
	C-E1-2	Intensity of direct emissions (Scope 1)
C-S2	C-S2-1	Female Employees
A-E1	A-E1-1	Other indirect emissions (Scope 3)
	A-E1-2	Intensity of other indirect emissions (Scope 3)
A-S4	A-S4-1	CEO's annual total compensation
	A-S4-2	CEO pay ratio
A-G2	A-G2-1	Business ethics violations
SS-S6	SS-S6-1	Number of injuries
	SS-S6-2	Number of work-related fatalities
	SS-S6-3	Accident frequency rate
	SS-S6-4	Accident severity rate

Criteria applied

The Report has been prepared according to the following criteria:

The criteria set in the GRI Universal Standards 2021 («Reporting in accordance with the GRI Standards» option) (GRI 1: Foundation 2021).

The framework of the 17 Sustainable Development Goals (SDGs) of the United Nations Organization.

AA1000 Principles Standard (APS)

- a) Inclusivity – The Company's approach for sustainability should take into account the views of stakeholders.
- b) Materiality – The Company should identify and be clear about the sustainability topics that matter.
- c) Responsiveness – The Company should act transparently on topics of interest for stakeholders.
- d) Impact – The Company should monitor, measure and be accountable for the effect of its actions.

4

The Athens Stock Exchange ESG Reporting Guide (2022) of the Athens Stock Exchange.

Also, the Report has been prepared taking into account the principles of the UN Global Compact.

The above are the criteria applied for the evaluation of the Subject Matter.

MYTILINEOS’s responsibilities

Company’s management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with the GRI Universal Standards 2021, with the Athens Stock Exchange ESG Reporting Guide (2022) of the Athens Stock Exchange, the AA1000 AccountAbility Principles Standard (APS), the framework of the 17 Sustainable Development Goals (SDGs) of the United Nations Organization and the 10 principles of the United Nations Global Compact Principles which are taken into account for the development of the Report, as described in the section of the Report entitled "Sustainable Development Strategy", as well as the information and statements contained therein.

Management is responsible for the identification of interested parties and material topics, for setting targets regarding the Company’s performance in sustainable development topics and for establishing and maintaining appropriate monitoring systems and internal control channels from which the relevant corporate performance information is derived on sustainable development topics.

Management is also responsible for preventing and detecting incidents of fraud and for detecting and ensuring the Company’s compliance with laws and regulations applicable to its activities.

Auditor’s responsibilities

Our responsibility is limited to the issuance of this Report regarding the evaluation of the Subject Matter, based on our work performed, described below in the "Scope of Work Performed" section. Our work was performed in accordance with the accordance with the International Standard on Assurance Engagements 3000 (Revised), "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000"), and the terms of engagement, which are described in the contract between us dated March 8, 2024, as amended on April 30, 2024.

ISAE 3000 requires from us to design and perform our engagement in order to obtain limited assurance about the assessment of the Subject Matter, in accordance with the Applicable Criteria. As part of the procedures performed, we assess the risk of material misstatement in the information related to the Subject Matter. Also, our work was conducted according to the requirements of a Type 2 assurance engagement, as defined by AA1000AS v3.

We believe that the evidence we have gathered is sufficient and appropriate to support the conclusion expressed in this assurance report.

Professional ethics and Quality Control

We are independent from the Company, throughout the duration of this assignment and have complied with the requirements of the Code of Ethics for Professional Auditors of the Board of International Standards of Ethics for Auditors (IASB Code).

Our audit firm applies the International Standard for Quality Management (ISQM) 1 "Quality Management for firms performing audits or reviews of financial Statements or other assurance engagements or related Services" and accordingly maintains a comprehensive quality management system that includes documented policies and procedures relating to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Scope of work

The procedures we performed in the context of our work were the following:

- 1 Performed interviews with certain Company’s managers to understand the status of sustainability activities and processes for the reporting period.
- 2 Checked Company’s processes for determining material issues to be included in the Report, as well as the coverage of material issues within the Report.
- 3 Interviewed Company’s specialists responsible for managing, collecting, and reviewing sustainability data reported for internal and public reporting purposes, linked to the GRI General and Specific Disclosures under the scope of our assurance engagement.
- 4 Checked 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, including limitations and assumptions relating to how these data are presented within the Report.
- 5 Read information or explanations to substantiate key data, statements and assertions regarding the sustainability disclosures under the scope of our assurance engagement.
- 6 Examined, on a sample basis, of the table in the section titled "UN Global Compact Progress Report" of the Report, as to the relevance of its references within the Report to the 10 principles of the United Nations Global Compact.
- 7 Examined, on a sample basis, of the table of the section entitled "Table of Contents of Disclosure of ESG Information of the Athens Stock Exchange" of the Report, as to the relevance of its references within the Report to the indicators of the "Guide to Disclosure of ESG Information (2022)" that fall under scope of our work.
- 8 Examined on a sample basis of the Group's alignment with the 17 Sustainable Development Goals (SDGs) of the United Nations Organization.

We also performed such other procedures as we considered necessary in the circumstances. Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Our procedures did not include third-party activities / performance and system testing (IT&T or other), attendance to stakeholder engagement events or site visits outside of Greece. Also, the scope excludes assurance of financial data.

Conclusion

Based on our procedures and the evidence obtained, nothing has come to our attention that would lead us to the conclusion that:

- The General Disclosures, the Disclosures on Management Approach, the specific GRI disclosures of the Report as presented for the year ended 31 December 2023 have not been prepared, in all material respects, in accordance with the requirements of the GRI Standards, as described in the "GRI Standards Table of Contents" section of the Report.
- The indicators of the "Athens Exchange ESG Information Disclosure Table of Contents" of the Report, that fall under the scope of our work, for the year ended 31 December 2023 have not been prepared, in all material respects, in accordance with the requirements of "Athens ESG Reporting Guide (2022)" of the Athens Stock Exchange.
- The Report for the year ended 31 December 2023 does not comply, in all material respects, with the 10 Principles of the United Nations Global Compact and does not take into account the framework of the 17 Sustainable Development Goals (SDGs) of the United Nations Organization.

Furthermore, regarding the Principles of the AA1000 (APS) Standard, nothing has come to our attention that would lead us to the conclusion that the Company has not applied the Principles of Inclusivity, Materiality, Responsiveness, and Impact when selecting the topics included in the Report.

Restricted use

This report is intended solely for the information and use by the Company's management regarding MYTILINEOS "Report 2023 Sustainable Development and ESG Performance", and shall not be used for any other purposes.

Athens, 22 May 2024
KPMG Certified Auditors S.A.
AM SOEL 114



AA1000
Licensed Report
000-67/V3-V1N1E

George Mitrellos, Certified Auditor Accountant
AM SOEL 32761

GRI STANDARDS Content Index

Statement of use	MYTILINEOS has prepared the Sustainable Development Report 2023 in accordance with the GRI Standards for the period from 1/1/2023 to 31/12/2023.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Oil & Gas Sector Standard

"GRI standard/ other source"	Disclosure	Location	Omission			External assurance	GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation		
General disclosures							
GRI 2: General Disclosures 2021	2-1 Organizational details	p. 14, 18					
	2-2 Entities included in the organization's sustainability reporting	p. 8					
	2-3 Reporting period, frequency and contact point	p. 8-9					
	2-4 Restatements of information	p. 9					
	2-5 External assurance	p. 9, 166-173					
	2-6 Activities, value chain and other business relationships	p. 8, 14-17, 19, 128				●	
	2-7 Employees	p. 108				●	
	2-8 Workers who are not employees	p. 108				●	
	2-9 Governance structure and composition	p. 148, c-iii: Annual Report 2023 p. 190 & 221, c-iv: Annual Report 2023 p. 220, c-v: Annual Report 2023 p. 221, c-vi & c-viii: not exist, c-vii: Annual Report 2023 p. 243 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	
	2-10 Nomination and selection of the highest governance body	a: Annual Report 2023 p. 186, b-i: Annual Report 2023 p.177 & 208, b-ii: Annual Report 2023 p. 188 & 190, b-iii: Annual Report 2023 p. 183, b-iv: https://www.mytilineos.com/media/nkuguef5/2_draft-resolutions-agm-01-06-2023.pdf (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	
	2-11 Chair of the highest governance body	a: Annual Report 2023 p. 183, b: Annual Report 2023 p. 180 & 183 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	
	2-12 Role of the highest governance body in overseeing the management of impacts	a: Annual Report 2023 p.172 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf) b & c: under development				●	
	2-13 Delegation of responsibility for managing impacts	p. 150				●	
	2-14 Role of the highest governance body in sustainability reporting	a & b: The highest governance body has established the Sustainability Committee for the approval of the annual Sustainable Development Report, p. 150				●	
	2-15 Conflicts of interest	a: Annual Report 2023 p. 180 & 223, b-i: Annual Report 2023 p. 216, b-iii: Annual Report 2023 - Explanatory report p.165, b-iv: Annual Report 2023 p.159 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	
	2-16 Communication of critical concerns	p. 148, 150				●	
	2-17 Collective knowledge of the highest governance body	a: Annual Report 2023 p. 192 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	
	2-18 Evaluation of the performance of the highest governance body	a, b & c: Annual Report 2023 p. 189 (Annual Report 2023: https://www.mytilineos.com/media/13wjmfed/annual_financial_report_2023.pdf)				●	

"GRI standard/ other source"	Disclosure	Location	Omission			External assurance	GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation		
	2-19 Remuneration policies	a: https://www.mytilineos.com/media/sl4fdnrl/item-3-mytilineos-rem-report-2023-eng.pdf b: https://www.mytilineos.com/media/sl4fdnrl/item-3-mytilineos-rem-report-2023-eng.pdf & https://www.mytilineos.com/media/1rfhlw0c/remuneration_policy_2023_eng.pdf	Describe the remuneration policies for senior executives	Information unavailable/incomplete	The current Remuneration Policy for Executive Committee & Senior Executives will be under review in 2024. For 2023, the same approach as the Board Remuneration Policy has been followed.	●	
	2-20 Process to determine remuneration	a: https://www.mytilineos.com/media/sl4fdnrl/item-3-mytilineos-rem-report-2023-eng.pdf b: https://www.mytilineos.com/media/rhvtqxr/voting_results_of_the_annual_general_meeting_01_06_2023.pdf				●	
	2-21 Annual total compensation ratio	p. 163				●	
	2-22 Statement on sustainable development strategy	p. 10-11				●	
	2-23 Policy commitments	p. 29-32, 47, 62, 69, 76, 92, 102, 105, 111, 118, 129, 138, 152, 154, 158				●	
	2-24 Embedding policy commitments	p. 150-151				●	
	2-25 Processes to remediate negative impacts	p. 30-32				●	
	2-26 Mechanisms for seeking advice and raising concerns	p. 32, 105				●	
	2-27 Compliance with laws and regulations	p. 153				●	
	2-28 Membership associations	p. 20				●	
	2-29 Approach to stakeholder engagement	p. 36-37				●	
	2-30 Collective bargaining agreements	p. 107				●	
Material topics							
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 40					
	3-2 List of material topics	p. 41-42					
Economic performance							
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	p. 24				●	11.14.2, 11.21.2
	201-4 Financial assistance received from government	p. 24					11.21.3
ENVIRONMENT							
Climate Change, Energy & Air emissions							
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 46, b: p. 46, c: p. 46-48, d: p. 48, 50-52, 56, 58-61, f: p. 37, 50				●	11.1.1, 11.2.1, 11.3.1
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	TCFD Report, p. 18-19 (https://www.mytilineos.com/media/kxlhgvol/tcfd_report_en.pdf)					11.2.2
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 57				●	11.1.2
	302-2 Energy consumption outside of the organization	-	a. Energy consumption outside of the organization, in joules or multiples, b. Standards, methodologies, assumptions, and/or calculation tools used, c. Source of the conversion factors used	Information unavailable/incomplete	It is considered immaterial in relation to the main business activities. More specifically, energy consumption outside of the organization is < 01% of total energy consumption.		11.1.3
	302-3 Energy intensity	p. 58				●	11.1.4

"GRI standard/ other source"	Disclosure	Location						
	302-4 Reduction of energy consumption	-		"a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples. b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all. c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it. d. Standards, methodologies, assumptions, and/or calculation tools used"	Information unavailable/incomplete	Calculation process in progress		
	302-5 Reductions in energy requirements of products and services	-		"a. Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples. b. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it. c. Standards, methodologies, assumptions, and/or calculation tools used"	Information unavailable/incomplete	Calculation process in progress		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 60					●	11.1.5
	305-2 Energy indirect (Scope 2) GHG emissions	p. 60					●	11.1.6
	305-3 Other indirect (Scope 3) GHG emissions	p. 60					●	11.1.7
	305-4 GHG emissions intensity	p. 59					●	11.1.8
	305-5 Reduction of GHG emissions	p. 55-56						11.2.3
	305-6 Emissions of ozone-depleting substances (ODS)	-		"a. Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent. b. Substances included in the calculation. c. Source of the emission factors used. d. Standards, methodologies, assumptions, and/or calculation tools used"	Not applicable	Emissions derived by business activities does not include ODS.	●	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	p. 61					●	11.3.2
Circular Economy, Raw & Other Materials								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 68, b: p. 68, c: p. 69, d: p. 69-71, e: p. 69, 72, f: p. 37, 69					●	11.5.1
GRI 301: Materials 2016	301-1 Materials used by weight or volume	p.75					●	
	301-2 Recycled input materials used	p. 75					●	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 64-65					●	11.5.2
	306-2 Management of significant waste-related impacts	p. 71					●	11.5.3
	306-3 Waste generated	p. 74, 78					●	11.5.4
	306-4 Waste diverted from disposal	p. 74					●	11.5.5
	306-5 Waste directed to disposal	p. 74					●	11.5.6

"GRI standard/ other source"	Disclosure	Location		Omission			External assurance	GRI sector standard ref. No.
				Requirement(s) omitted	Reason	Explanation		
Water Management								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 62, b: p. 62, c: p. 62, d: p. 62-65, e: p. 63, 65, 67, f: p. 37, 64					●	11.61
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	p. 63					●	11.6.2
	303-2 Management of water discharge-related impacts	p. 63-64					●	11.6.3
	303-3 Water withdrawal	p. 62, 66					●	11.6.4
	303-4 Water discharge	p. 62, 64, 66					●	11.6.5
	303-5 Water consumption	p. 67					●	11.6.6
Pollution Prevention								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 76, b: p. 76, c: p. 76-78, d: p. 77-78, e: p. 77-78, f: p. 37, 77					●	
MYTILINEOS - Internal index	Incidents involving smallscale, localised spills	p. 78					●	
Other significant Environmental topics								
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	p. 80-82					●	11.4.2
	304-2 Significant impacts of activities, products and services on biodiversity	p. 80-83					●	11.4.3
SOCIETY								
Occupational Health & Safety								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 92, b: p. 92, c: p. 92-94, d: p. 92-96, 99 e: p. 93-94, 96-99, f: p. 37, 95-96					●	11.91
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 93, 97, 99					●	11.9.2
	403-2 Hazard identification, risk assessment, and incident investigation	p. 94, 97					●	11.9.3
	403-3 Occupational health services	p. 94, 97					●	11.9.4
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 95-96					●	11.9.5
	403-5 Worker training on occupational health and safety	p. 94, 97, 99					●	11.9.6
	403-6 Promotion of worker health	p. 94					●	11.9.7
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 94-95					●	11.9.8
	403-8 Workers covered by an occupational health and safety management system	p. 93		"			●	11.9.9
	403-9 Work-related injuries	p. 97-101					●	11.9.10
	403-10 Work-related ill health	p. 97, 99					●	11.9.11
Employment & Labour Practices								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 102, b: p. 102, c: p. 102-103, d: p. 102-105, e: p.104-106, f: p. 37, 104					●	11.10.1
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 107, 109					●	11.10.2
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 104					●	11.10.3
	401-3 Parental leave	p. 107						11.10.4, 11.11.3

"GRI standard/ other source"	Disclosure	Location	Omission			External assurance	GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation		
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	p. 104					11.7.2, 11.10.5
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	p.105				●	11.10.6, 11.11.4
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 105-106					11.7.3, 11.10.7
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 106				●	
Human Rights & Equal Opportunities							
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 110, b: p. 110, c: p. , d: p. 111, 113-115, e: p. 112-115, f: p. 37, 112-114				●	11.11.1, 11.12.1, 11.13.1
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	p. 113, 115-116				●	11.11.5
	405-2 Ratio of basic salary and remuneration of women to men	p. 113					11.11.6
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	p. 113, 115, 136				●	11.11.7
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 114, 135					11.13.2
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	p. 114, 135					
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	p. 115, 135					11.12.2
	412-1 Operations that have been subject to human rights reviews or impact assessments	p. 113					
Sustainability of Local Communities							
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 118, b: p. 118, c: p. 118, d: p. 118-126, e: p. 118-126, f: p. 37, 118-119				●	11.14.1, 11.15.1
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	p. 120				●	11.14.4
	203-2 Significant indirect economic impacts	p. 107, 121 & MYTILINEOS' Socio-Economic impact in Greece (https://www.mytilineos.com/sustainability/how-we-create-value/mytilineos-socio-economic-impact-in-greece/)					11.14.5
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	p. 120				●	11.15.2
	413-2 Operations with significant actual and potential negative impacts on local communities	p. 118					11.15.3
GRI 415: Public Policy 2016	415-1 Political contributions	p. 156				●	11.22.2
Responsible Supply Chain							
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 128, b: p. 128, c: p. 135-136, d: p. 130-132, 135-136, e: p. 131-132, 135-136, f: p. 37, 130				●	11.10.1, 11.12.1, 11.14.1
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	p. 137				●	11.14.6
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	p. 136					
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	p. 136					11.10.8, 11.12.3
Business Continuity							
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 138, b: p. 138, c: p. 138, d: p. 138, e: p. 138-139, f: p. 37, 138				●	
MYTILINEOS - Internal index	Implementation of Emergency Preparedness Exercises	p. 138-139					

"GRI standard/ other source"	Disclosure	Location		Omission			External assurance	GRI sector standard ref. No.
				Requirement(s) omitted	Reason	Explanation		
Other significant Social topics								
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	p. 141					●	
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	p. 141-142					●	
	417-2 Incidents of non-compliance concerning product and service information and labeling	p. 141-142					●	
	417-3 Incidents of non-compliance concerning marketing communications	p. 141-142					●	
GOVERNANCE								
Corporate Governance								
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 148-150					●	
Regulatory Compliance								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 152, b: p. 152, c: p. 152, d: p. 152, e: p. 152-153, f: p. 37, 152					●	111.19.1
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 153					●	11.19.2
Business Ethics								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 154, b: p. 154, c: p. 154-156, d: p. 155-156, e: p. 155-156, f: p. 37, 155					●	11.20.1
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	p.156					●	11.20.4
Cybersecurity								
GRI 3: Material Topics 2021	3-3 Management of material topics	a: p. 158, b: p. 158, c: p. 158, d: p. 158-159, e: p. 159, f: p. 37, 159					●	
Other significant Governance topics								
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 160					●	
Enterprise Risk Management	3-3 Management of material topics	Annual Report 2023, p. 47-77 (https://www.mytilineos.com/media/13wimfed/annual_financial_report_2023.pdf)					●	

Topics in the applicable GRI Sector Standards determined as not material	
TOPIC	EXPLANATION
Oil & Gas Sector Standard	
Closure and rehabilitation	During the reporting period, the Energy Sector was not in the process of completing any related activity or moving infrastructure. MYTILINEOS does not expect to be in the process of completing a relevant activity or moving production units until 2030. In the respective Environmental Impact Studies there is always a provision for the end of operation and restorations.
Asset integrity and critical incident management	Included in the material topics "Business Continuity" and "Occupational Health & Safety".
Land and resource rights	The new production unit of MYTILINEOS as well as the transmission lines to connect it did not cause any involuntary displacement of the local communities. The additional land area required is acquired by the Willing buyer-willing seller method. No expropriation was needed.
Rights of indigenous peoples	The Energy Sector does not operate in areas that affect or are adjacent to indigenous communities.
Conflict and security	The Energy Sector operates in Greece and does not operate in countries where there are political and/or social unrests and no local disturbances of any kind have been caused in the areas of operation.
Payments to governments	Political contributions are not permitted based on the Company's Code of Conduct.
Public policy	This topic is not identified as a potentially material topic according to the most up-to-date materiality study of the Company.

SASB Content Index

SASB Standard	Metric Code / Industry	Disclosure/ Results	Pages and/or URL(s)
Greenhouse Emissions			
(1) Gross global Scope 1 emissions (Gross emissions are GHGs emitted into the atmosphere before accounting for offsets, credits or other similar mechanisms that have reduced or compensated for emissions.)	EM-CM-110a.1 - Construction Materials	864 tCO ₂	
	EM-MM-110a.1 - Metals & Mining	1,186,684 tCO ₂	
	IF-EU-110a.1 - Electric Utilities & Power Generators	1,541,483 tCO ₂	
(2) Percentage of gross Scope 1 emissions covered by EUETS (The percentage is calculated by dividing the total amount of gross Scope 1 emissions (CO ₂ -e) covered by EUETS by the total amount of gross Scope 1 emissions (CO ₂ -e))	EM-CM-110a.1 - Construction Materials	0.0%	
	EM-MM-110a.1 - Metals & Mining	98.50%	
	IF-EU-110a.1 - Electric Utilities & Power Generators	65.50%	
Greenhouse gas (GHG) emissions associated with power deliveries (gross greenhouse gas (GHG) emissions associated with electricity supplied to retail customers resulting from privately owned electricity production and purchased energy)	IF-EU-110a.2 - Electric Utilities & Power Generators	597,944 tCO ₂	
Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	EM-CM-110a.2 - Construction Materials	Climate change, energy & air emissions	(p. 46-61)
	EM-MM-110a.2 - Metals & Mining		
	IF-EU-110a.3 - Electric Utilities & Power Generators		
Air Quality			
Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), (2) SO _x , (3) particulate matter (PM ₁₀), (4) dioxins/ furans, (5) volatile organic compounds (VOCs), (6) polycyclic aromatic hydrocarbons (PAHs), and (7) heavy metals (e.g., mercury (Hg), lead (Pb) etc.)	EM-CM-120a.1 - Construction Materials	Climate change, energy & air emissions	(p. 46-61)
	EM-MM-120a.1 - Metals & Mining	Apart from the emissions stated within the chapter Climate change, energy & air emissions, MYTILINEOS does not emit other air emissions (e.g. dioxins/furans, POPs, PAHs, HAPs, heavy metals).	
	IF-EU-120a.1 - Electric Utilities & Power Generators		
Energy Management			
(1) Total energy consumed, (2) percentage grid electricity, (3) percentage alternative, (4) percentage renewable	EM-CM-130a.1 - Construction Materials	Climate change, energy & air emissions	(p. 46-61)
	EM-MM-130a.1 - Metals & Mining	MYTILINEOS does not consume energy from alternative sources such as but not limited to: used tires, spent solvents and waste oils, processed municipal solid waste, household wastes, agricultural wastes, and sewage sludge.	
Water & Wastewater Management			
(1) Total fresh water withdrawn, (2) total water consumed, (3) percentage recycled, (4) percentage in regions with High or Extremely High Baseline Water Stress	EM-CM-140a.1 - Construction Materials	Water management	(p. 62-67)
	EM-MM-140a.1 - Metals & Mining	Water management	
	IF-EU-140a.1 - Electric Utilities & Power Generators	Water management	

Introduction	Environment	Society	Governance	Sustainability Standards & Assurance	
SASB Standard		Metric Code / Industry		Disclosure/ Results	Pages and/ or URL(s)
Number of incidents of non-compliance associated with water quality permits, standards, and regulations		EM-MM-140a.2 - Metals & Mining		Water management	(p. 62-67)
				Regulatory compliance	
		IF-EU-140a.2 - Electric Utilities & Power Generators		Water management	(p. 62-67)
				Regulatory compliance	
Description of water management risks and discussion of strategies and practices to mitigate those risks		IF-EU-140a.3 - Electric Utilities & Power Generators		Water management	(p. 62-67)
Waste & Hazardous Materials Management					
Amount of waste generated, per- centage hazardous, percentage recycled		EM-CM-150a.1 - Construction Materials		Circular economy, raw & other materials	(p. 68-75)
Amount of coal combustion residuals (CCR) generated; percentage recycled		IF-EU-150a.1 - Electric Utilities & Power Generators		Not applicable. The Company does not own or operate Coal-fired Power Units.	
Total number of coal combustion residual (CCR) impoundments, broken down by hazard potential classification and structural integrity assessment		IF-EU-150a.2 - Electric Utilities & Power Generators			
Total weight of non-mineral waste generated (Non-mineral waste is defined as material for which the entity has no further use and that is discarded, intended to be discarded or released into the environment)		EM-MM-150a.4 - Metals & Mining		37,500 tons	
Total weight of tailings produced (Tailings: a mining by-product consisting of the processed rock or soil left over from the separation of the valuable commodities from the rock or soil in which they occur)		EM-MM-150a.5 - Metals & Mining		29,989 tons	
Total weight of waste rock generated (Waste rocks are defined as mineral materials and low-quality ore with no economic interest at the time of extraction)		EM-MM-150a.6 - Metals & Mining		194,637 tons	
Total weight of hazardous waste generated		EM-MM-150a.7 - Metals & Mining		20,810 tons	
Total weight of hazardous waste recycled		EM-MM-150a.8 - Metals & Mining		1,318 tons	
Number of significant incidents associated with hazardous materials and waste management (A significant incident is defined as an event that exceeds the volume and concentration limits of local regulatory requirements or industry-accepted codes, or is otherwise included in the entity's financial statements (e.g. due to obligations incurred), or is recorded by the entity as an event required to be reported by local jurisdictions; or is an event that is material in the entity's discretion)		EM-MM-150a.9 - Metals & Mining		zero	
Description of waste and hazardous materials management policies and procedures for active and inactive operations		EM-MM-150a.10 - Metals & Mining		Solid Waste Management Directive	
Ecological Impacts					
Description of environmental man- agement policies and practices for active sites		EM-CM-160a.1 - Construction Materials		Environmental Policy	(p. 80-83)
		EM-MM-160a.1 - Metals & Mining		Environmental Policy	
				Ecological Impacts	
Terrestrial acreage disturbed and percentage of impacted area restored		EM-CM-160a.2 - Construction Materials		Ecological Impacts	(p. 80-83)

SASB Standard	Metric Code / Industry	Disclosure/ Results	Pages and/or URL(s)	
Percentage of mine sites where acid rock drainage is: (1) predicted to occur, (2) actively mitigated, and (3) under treatment or remediation	EM-MM-160a.2 - Metals & Mining	Not applicable because acid rock drainage does not occur in Bauxite Mining sites. The percentage of mine sites where acid rock drainage occurs is 0%.		
Percentage of (1) proved and (2) probable reserves in or near sites with protected conservation status or endangered species habitat	EM-MM-160a.3 - Metals & Mining	The company does not own and has not developed mining activities in or near sites with protected conservation status or endangered species habitat.		
Number of incidents of non-compliance with environmental permits, standards, and regulations	IF-EN-160a.1 - Engineering & Construction Services	Regulatory Compliance	(p. 152-153)	
Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction	IF-EN-160a.2 - Engineering & Construction Services	There is a Construction Environmental Management Plan for the construction. For the site and design there is the Environmental and Social Impact Assessment (ESIA) and the Environmental Permit.		
Human Rights & Community Relations				
Percentage of (1) proved and (2) probable reserves in or near areas of conflict	EM-MM-210a.1 - Metals & Mining	MYTILINEOS does not have proved or probable reserves in or near areas of conflict or indigenous land.		
Percentage of (1) proved and (2) probable reserves in or near indigenous land	EM-MM-210a.2 - Metals & Mining			
Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	EM-MM-210a.3 - Metals & Mining	Human rights & Equal Opportunities	(p. 110-117)	
Discussion of process to manage risks and opportunities associated with community rights and interests	EM-MM-210b.1 - Metals & Mining	Sustainability of Local Communities	(p. 118-127)	
		Responsible Supply Chain	(p. 128-137)	
Number and duration of non-technical delays (This includes outages and delays in activity due to pending regulatory licensing or other cases and delays related to issues in the overall activity of the Sector that cause concern, resistance or protest from the local community or stakeholders)	EM-MM-210b.2 - Metals & Mining	There were no non-technical delays during the reporting period.		
Labour Practices				
Percentage of active workforce covered under collective bargaining agreements	EM-MM-310a.1 - Metals & Mining	Employment & Labour Practices	(p. 102-109)	
Number of reported cases of strikes and lockouts	EM-MM-310a.2 - Metals & Mining	There were no strikes or lockouts during the reporting period.		
Employee Health & Safety				
(1) Total recordable incident rate (TRIR), (2) fatality rate, (3) near miss frequency rate (NMFR) and (4) average hours of health, safety, and emergency response training for (a) fulltime employees and (b) contract employees	EM-CM-320a.1 - Construction Materials	Occupational Health and Safety	(p. 92-101)	
	EM-MM-320a.1 - Metals & Mining			
	IF-EU-320a.1 - Electric Utilities & Power Generators	Near miss frequency rate 2023: Direct employees: 3.26 Indirect employees: 1.38 Direct & Indirect employees: 2.07		
	IF-EN-320a.1 - Engineering & Construction Services			
Number of reported cases of silicosis	EM-CM-320a.2 - Construction Materials	There were no reported cases of silicosis during the reporting period.		

SASB Standard	Metric Code / Industry	Disclosure/ Results	Pages and/or URL(s)
Business Ethics			
Description of the management system for prevention of corruption and bribery throughout the value chain	EM-MM-510a.1 - Metals & Mining	Business Ethics	(p. 154-157)
Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	EM-MM-510a.2 - Metals & Mining	Business Ethics	(p. 154-157)
(1) Number of active projects and (2) backlog in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	IF-EN-510a.1 - Engineering & Construction Services	(1) 1 (Libya) (2) €2 m	
Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive practices	IF-EN-510a.2 - Engineering & Construction Services	Regulatory Compliance	(p. 152-153)
Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behavior in the project bidding processes	IF-EN-510a.3 - Engineering & Construction Services	Business Ethics	(p. 154-157)
Competitive Behavior			
Total amount of monetary losses as a result of legal proceedings associated with cartel activities, price fixing, and anti-trust activities	EM-CM-520a.1 - Construction Materials	Regulatory Compliance	(p. 152-153)
Critical Incident Risk Management			
Total number of nuclear power units, broken down by U.S. Nuclear Regulatory Commission (NRC) Action Matrix Column	IF-EU-540a.1 - Electric Utilities & Power Generators	Not applicable. The Company does not own or operate Nuclear Power Units.	
Description of efforts to manage nuclear safety and emergency preparedness	IF-EU-540a.2 - Electric Utilities & Power Generators		
Structural Integrity & Safety			
Amount of defect- and safety-related rework costs	IF-EN-250a.1 - Engineering & Construction Services	0 €	
Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents	IF-EN-250a.2 - Engineering & Construction Services	0 €	
Lifecycle Impacts of Buildings & Infrastructure			
Number of (1) commissioned projects certified to a third-party multi-attribute sustainability standard and (2) active projects seeking such certification	IF-EN-410a.1 - Engineering & Construction Services	(1) 0 (2) 2 (Koropi ATH3, ATH4 LEED)	
Climate Impacts of Business Mix			
Amount of backlog for (1) hydrocarbon-related projects and (2) renewable energy projects	IF-EN-410b.1 - Engineering & Construction Services	(1) €711 m (2) 0	
Amount of backlog cancellations associated with hydrocarbon-related projects	IF-EN-410b.2 - Engineering & Construction Services	zero	
Amount of backlog for non-energy projects associated with climate change mitigation	IF-EN-410b.3 - Engineering & Construction Services	€769 m	
Activity Metrics			
Number of: (1) residential, (2) commercial, and (3) industrial customers served.	IF-EU-000.A - Electric Utilities & Power Generators	(1): 371,675 (2): 111,469 (3): 2,400	
Total electricity delivered to: (1) residential, (2) commercial, (3) industrial, (4) all other retail customers, and (5) wholesale customers	IF-EU-000.B - Electric Utilities & Power Generators	(1): 1,394,400 MWh (2): 1,398,819 MWh (3): 2,977,056 MWh (4): 0 MWh (5): 0 MWh	

SASB Standard	Metric Code / Industry	Disclosure/ Results	Pages and/or URL(s)
Total electricity generated, percentage by major energy source, percentage in regulated markets	IF-EU-000.D - Electric Utilities & Power Generators	Natural gas fueled CCGT Thermal Plants: 5,275,139 MWh Wind Power Plants: 563,865 MWh, Photovoltaics: 553,904 MWh SHPP: 1,109 MWh	
Total wholesale electricity purchased (electricity consumed at generating facilities)	IF-EU-000.E - Electric Utilities & Power Generators	2,913,108 MWh	
Number of active projects	IF-EN-000.A - Engineering & Construction Services	38	
Number of commissioned projects	IF-EN-000.B - Engineering & Construction Services	2	
Total backlog	IF-EN-000.C - Engineering & Construction Services	€1,532 m	
Production of (1) metal ores and (2) finished metal products	EM-MM-000.A - Metals & Mining	(1) Bauxite: 394,156 tons (2) Aluminium: 239,239 tons	
Total number of employees, percentage contractors	EM-MM-000.B - Metals & Mining	(1) 2,279 (2) 38.2%	

TCFD Content Index

Focus fields	TCFD Recommendations	Reference in the Report
Governance	Disclose the organization's governance around climate-related risks and opportunities.	Climate Change, Energy & Air Emissions (p. 46-61)
	Describe management's role in assessing and managing climate-related risks and opportunities.	Climate Change, Energy & Air Emissions (p. 46-61)
Strategy	Describe the climate related risks and opportunities the organization has identified over the short, medium, and long term.	Climate Change, Energy & Air Emissions (p. 46-61)
	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Climate Change, Energy & Air Emissions (p. 46-61)
	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Climate Change, Energy & Air Emissions (p. 46-61)
Risk Management	Describe the organization's processes for identifying and assessing climate-related risks.	Climate Change, Energy & Air Emissions (p. 46-61) Annual Report 2023: <ul style="list-style-type: none">• Management / Risks control practices (p. 56)• Materiality process (p. 85-86)• Principle O: Determining and managing risks (p. 197)
	Describe the organization's processes for managing climate related risks.	Climate Change, Energy & Air Emissions (p. 46-61) Annual Report 2023: <ul style="list-style-type: none">• Management / Risks control practices (p. 56)• Materiality process (p. 85-86)• Principle O: Determining and managing risks (p. 197)
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Climate Change, Energy & Air Emissions (p. 46-61) Annual Report 2023: <ul style="list-style-type: none">• Management / Risks control practices (p. 56)• Materiality process (p. 85-86)• Principle O: Determining and managing risks (p. 197)
Metrics & Targets	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Climate Change, Energy & Air Emissions (p. 46-61)
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Climate Change, Energy & Air Emissions (p. 46-61)
	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Climate Change, Energy & Air Emissions (p. 46-61)

1. Annual Report 2023: https://www.mytilineos.com/media/13wimfed/annual_financial_report_2023.pdf

Accountability Principles Standard AA1000 Index

Principle applied	Methods	Reference in the Report
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	Value Creation (p. 24-25) Sustainable Development (p. 28-35) Stakeholder Engagement (p. 36-39) Materiality Process (p. 40-43)
Materiality	Identification of issues which are important to the company and its stakeholders	Stakeholder Engagement (p. 36-39) Materiality Process (p. 40-43)
Responsiveness	Responsiveness to key issues and transparency on performance	Strategic Priorities (p. 22-23) Value Creation (p. 24-25) Business Model (p. 26-27) Sustainable Development (p. 28-35) Stakeholder Engagement (p. 36-39) Human Rights & Equal Opportunities (p. 110-117) Sustainability of Local Communities (p.118-127) Responsible Supply Chain (p.128-137) Business Continuity (p. 138-139)
Impact	Analysis of direct and indirect impact of the company's actions	ESG Performance Statement (p. 4-7) Strategic Priorities (p. 22-23) Value Creation (p. 24-25) Business Model (p. 26-27) Sustainable Development (p. 28-35) Materiality Process (p. 40-43) Climate Change, Energy & Air emissions (p. 46-61) Water Management (p. 62-67) Circular Economy, Raw & Other Materials (p. 68-75) Pollution Prevention (p. 76-79) Ecological Impacts (p. 80-83) Occupational Health & Safety (p. 92-101) Employment & Labour Practices (p. 102-109) Human Rights & Equal Opportunities (p. 110-117) Sustainability of Local Communities (p. 118-127) Business Continuity (p. 138-139) Regulatory Compliance (p. 152-153) Business Ethics (p. 154-157)

ESG Reporting Guide 2022 - Athens Stock Exchange

The Athens Stock Exchange has been participating since 2018 in the Sustainable Stock Exchanges (SSE) initiative of the United Nations, which promotes the dissemination of best practices for the disclosure and integration of non-financial information, aiming to develop sustainable investments in local capital markets. Following the call for action of the organizations that promote sustainable development, the Athens Stock Exchange issued the “**ESG Reporting Guide**”, seeking to promote and strengthen the ESG-related information disclosure practices applied by

Greek listed companies. The table below presents MYTILINEOS’ response to the indicators of the Athens Stock Exchange ESG Reporting Guide (where C: Basic metrics, A: Advanced metrics, SS: Sector-Specific metrics), which are based on practices aligned with international sustainability guidelines and reporting frameworks such as GRI, SASB, GLOBAL COMPACT, IIRC, CDP, TCFD, and the Greek Sustainability Code.

ESG Category	ID	Sub-ID	Metric Title	References (Sustainable Development Report 2023)
Environment	C-E1	C-E1-1	Total amount of direct emissions (Scope 1)	2,729,731.8
		C-E1-2	GHG intensity of Scope 1 emissions	4,381.6
	C-E2	C-E2-1	Total amount of indirect emissions (Scope 2)	Material topic: Climate Change, Energy & Air Emissions (p. 46-61)
		C-E2-2	GHG intensity of Scope 2 emissions	
	C-E3	C-E3-1	Total amount of energy consumed within the organisation	
		C-E3-2	Percentage of electricity consumed	
		C-E3-3	Percentage of renewable energy consumed	
		C-E3-4	Total amount of energy produced	
		C-E3-5	Percentage of renewable energy produced	
	A-E1	A-E1-1	Total amount of other indirect emissions (Scope 3)	7,942,217.1
		A-E1-2	GHG intensity of Scope 3 emissions	12,748.3
	A-E2	A-E2-1	Discussion of climate change-related risks and opportunities that can affect business operations	Material topic: Climate Change, Energy & Air Emissions (p. 46-61)
	A-E3	A-E3-1	Total amount of hazardous waste	Material topic: Circular Economy, Raw & Other Materials (p. 68-75)
		A-E3-2	Total amount of non-hazardous waste	
		A-E3-3	Percentage of waste by type of treatment - Recycled	
		A-E3-4	Percentage of waste by type of treatment - Composted	
		A-E3-5	Percentage of waste by type of treatment - Incinerated	
		A-E3-6	Percentage of waste by type of treatment - Landfilled	
	A-E4	A-E4-1	Total amount of effluent discharge containing polluting substances	Material topic: Water Management (p. 62-67) Circular Economy, Raw & Other Materials (p. 68-75)
	A-E5	A-E5-1	Description of the impact of business operations on biodiversity sensitive areas	Ecological Impacts (p. 80-83)
	SS-E1		Emissions management strategy	Material topic: Climate Change, Energy & Air Emissions (p. 46-61)
	SS-E2		Air pollutant emissions	Material topic: Climate Change, Energy & Air Emissions (p. 46-61)
	SS-E3		Water consumption	Material topic: Water Management (p. 62-67)
	SS-E4	SS-E4-1	Description of water management risks and the respective mitigation measures taken	
	SS-E7		Critical materials	Material topic: Circular Economy, Raw & Other Materials (p. 68-75) The Company does not use the 27 critical raw materials identified by the European Commission. ¹
	SS-E8		Chemicals in products	Product Quality & Safety (p. 140-141)
Society	C-S1	C-S1-1	Discussion of organisation's main stakeholders and analysis of key stakeholder engagement practices	Stakeholder Engagement (p. 36-39)
	C-S2	C-S2-1	Percentage of female employees - Percentage of female direct employees in the total number of direct employees of MYTILINEOS	25.6%

1. European Commission (2019). Critical raw materials (europa.eu): https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials_en

ESG Category	ID	Sub-ID	Metric Title	References (Sustainable Development Report 2023)
	C-S3	C-S3-1	Percentage of women in managerial positions	ESG KPIs (p. 144-145)
	C-S4	C-S4-1	Percentage of full-time employee voluntary turnover	
		C-S4-2	Percentage of full-time employee involuntary turnover	
	C-S5	C-S5-1	Average training hours of employees in the top 10% of employees by total compensation	Employment & Labour Practices (p. 102-109)
		C-S5-2	Average training hours of employees in the bottom 90% of employees by total compensation	
	C-S6	C-S6-1	Human rights policy	Material topic: Human Rights & Equal Opportunities (p. 110-117)
	C-S7	C-S7-1	Percentage of employees covered by collective bargaining agreements	ESG KPIs (p. 144-145)
	C-S8	C-S8-1	Supplier assessment	Material topic: Responsible Supply Chain (p. 128-137)
	A-S1	A-S1-1	Percentage of sustainable turnover	Annual Report 2023 (p. 144-146)
		A-S1-2	Percentage of sustainable CapEx	
		A-S1-3	Percentage of sustainable OpEx	
	A-S2	A-S2-1	Total amount of monetary expenditure on employee training	ESG KPIs (p. 144-145)
	A-S3	A-S3-1	Percentage of difference between male and female earnings	Material topic: Human Rights & Equal Opportunities (p. 110-117)
	A-S4	A-S4-1	Total CEO pay	2,993,142€
		A-S4-2	Ratio of CEO to median employee earnings	118:1
	SS-S1		Product quality and safety	Product Quality & Safety (p. 140-141)
	SS-S2		Customer privacy	Customer Privacy (p. 160)
	SS-S3		Legal requests of user data	
	SS-S4		Labor law violations	Material topic: Regulatory Compliance (p. 152-153)
	SS-S5		Data security and privacy fines	Customer Privacy (p. 160)
	SS-S6	SS-S6-1	Number of injuries	Direct employees: 16 Indirect employees: 26
		SS-S6-2	Number of fatalities	Direct employees: 0 Indirect employees: 1
		SS-S6-3	Accident frequency rate	Direct employees: 0.40 Indirect employees: 0.38
		SS-S6-4	Accident severity rate	Direct employees: 9.26 Indirect employees: 5.58
	SS-S7		Marketing practices	Communication & Marketing (p. 142)
	SS-S8		Customer satisfaction	Product Quality & Safety (p. 140-141)
	SS-S9		Customer grievance mechanism	Material topic: Business Ethics (p. 154-157)
	SS-S10		ESG integration in business activity	Annual Report 2023 (ESG Criteria) (p. 92-93) ESG Performance Statement (p. 4-7) Sustainable Development (p. 28-35)
Governance	C-G1	C-G1-1	ESG related qualifications of the board members	Annual Report 2023 (CVS OF THE MEMBERS OF THE SENIOR MANAGEMENT) (p. 243-248)
		C-G1-2	Classification of the Chairman of the Board	Board of Directors
		C-G1-3	Percentage of female board members	ESG KPIs (p. 162-163)
		C-G1-4	Percentage of non-executive board members	
		C-G1-5	Percentage of both non-executive and independent board members	
	C-G2	C-G2-1	Description of approach to sustainability oversight	Sustainable Development Governance (p. 150-151)
	C-G3	C-G3-1	Material Topics	Materiality Process (p. 40-43)
	C-G4	C-G4-1	Sustainability policy	Corporate Social Responsibility Policy
	C-G5	C-G5-1	Business ethics policy	Material topic: Business Ethics (p. 154-157) Code of Business Conduct
	C-G6	C-G6-1	Data security policy	Privacy Policy
	A-G1	A-G1-1	Business model	Business Model (p. 26-27)

ESG Category	ID	Sub-ID	Metric Title	References (Sustainable Development Report 2023)
	A-G2	A-G2-1	Total amount of monetary losses as a result of business ethics violations	0
		A-G3-1	Short-term targets associated with strategic ESG objectives	Key ESG Targets (p. 7)
	A-G3	A-G3-2	Medium-term targets associated with strategic ESG objectives	
		A-G3-3	Long-term targets associated with strategic ESG objectives	
	A-G4	A-G4-1	Percentage of executive's variable pay	Board of Directors Remuneration Report
	A-G5	A-G5-1	External assurance	Independent Assurance Statement (p. 166-173)
	SS-G1		Whistleblowing policy	Whistleblowing channels
	SS-G2		Critical risk management	Material Topics: Pollution Prevention (p. 76-79) Business Continuity (p. 138-139)
	SS-G3		Systematic risk management	Annual Report 2023 (Enterprise Risk Management) (p. 47-77)

UN Global Compact Progress Report (table of contents)

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 in writing, since 2008, its commitment to uphold the ten principles of the Global Compact,

disclosing on an annual basis its relevant performance in the context of its broader activity. The table below presents the company's response to the 10 Principles of the Global Compact.



Pillar	Reference within the Sustainability Report	UN Global Compact Principle
Human Rights	Human Rights & Equal Opportunities (p. 110-117)	PRINCIPLE 1 Businesses should support and respect the protection of internationally proclaimed human rights.
		PRINCIPLE 2 Businesses should make sure that they are not complicit in human rights abuses.
Labour	Occupational Health & Safety (p. 92-101) Employment & Labour Practices (p. 102-109) Human Rights & Equal Opportunities (p. 110-117) Sustainability of Local Communities (p. 118-127) Responsible Supply Chain (p. 128-137) Business Continuity (p. 138-139) Other significant Social topics (p. 140-143) Regulatory Compliance (p. 152-153)	PRINCIPLE 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
		PRINCIPLE 4 Businesses should uphold the elimination of all forms of forced and compulsory labour.
		PRINCIPLE 5 Businesses should uphold the effective abolition of child labour.
		PRINCIPLE 6 Businesses should uphold the elimination of discrimination in respect of employment and occupation.
Environment	Environmental policy Climate Change, Energy & Air Emissions (p. 46-61) Water Management (p. 62-67) Circular Economy, Raw & Other Materials (p. 68-75) Pollution Prevention (p. 76-79) Other significant Environmental topics (p. 80-87) Regulatory Compliance (p. 152-153)	PRINCIPLE 7 Businesses should support a precautionary approach to environmental challenges.
		PRINCIPLE 8 Businesses should undertake initiatives to promote greater environmental responsibility.
		PRINCIPLE 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.
Anti-Corruption	Regulatory Compliance (p. 152-153) Business Ethics (p. 154-157)	PRINCIPLE 10 Businesses should work against corruption in all its forms, including extortion and bribery.
Governance	Corporate Governance (p. 148-151)	



Greek Sustainability Code (Table of contents)

The Greek Sustainability Code constitutes a structured system regarding the transparency and self-commitment tool of Greek Organizations / Enterprises and has been developed in the framework of the “Sustainable Greece 2020” initiative. It addresses the need for measuring the economic, environmental and social performance of Organizations / Businesses with the goal of strengthening their competitiveness in terms of incorporating the principles of Sustainable Development and Corporate Responsibility in their operation and of their compliance requirements with the EU Non-financial Reporting Directive. The table below presents MYTILINEOS' response to the Greek Sustainability Code criteria (LEVEL A), which are based on the following international standards: GRI, GLOBAL COMPACT, EFFAS, ISO & EMAS.



Pillar	Criteria	References (Sustainable Development Report 2023)
Strategy	Strategic Analysis & Action	<ul style="list-style-type: none">ESG Performance Statement (p. 4-7)Chairman's Message (p. 10-11)Strategic Priorities (p. 22-23)Sustainable Development (p. 28-35)Materiality Process (p. 40-43)
	Materiality	<ul style="list-style-type: none">Materiality Process (p. 40-43)
	Objectives	<ul style="list-style-type: none">Key ESG Targets (p.7)Sustainable Development (p. 28-35)
	Value Chain Management	<ul style="list-style-type: none">Stakeholder Engagement (p. 36-39)Responsible Supply Chain (p. 128-137)
Process Management	Responsibility & Accountability	Governance <ul style="list-style-type: none">Regulatory Compliance (p. 152-153)Business Ethics (p. 154-157)
	Rules & Processes	<ul style="list-style-type: none">Sustainable Development (p. 28-35)Materiality Process (p. 40-43)Corporate Governance (p. 148-151)
	Monitoring	<ul style="list-style-type: none">Report Parameters (p. 8-9)Sustainable Development (p. 28-35)ESG KPIs (p. 88-89, 144-145, 162-163)Participation in Socially Responsible Investment indexesSustainable Development commitmentsESG RatingsESG ScorecardIntegrated Value Creation Scorecard
		<ul style="list-style-type: none">Remuneration Policy and Remuneration of Board Members
		<ul style="list-style-type: none">Stakeholder Engagement (p. 36-39)
	Remuneration policies & incentives for Sustainable Development	
	Stakeholders Engagement	
Environment	Natural resource use	Society <ul style="list-style-type: none">Other significant Social topics (p. 140-143)
	Resource Management	
	Air Emissions & Climate Change	
Society	Labor Rights	Environment <ul style="list-style-type: none">Environmental PolicyClimate Change, Energy & Air emissions (p. 46-61)Water Management (p. 62-67)Circular Economy, Raw & Other Materials (p. 68-75)Pollution Prevention (p. 76-79)Other significant Environmental topics (p. 80-87)
	Equal opportunities	<ul style="list-style-type: none">Occupational Health & Safety (p. 92-101)Human Rights & Equal Opportunities (p. 110-117)Business Continuity (p. 138-139)
	Employment	<ul style="list-style-type: none">Human Rights & Equal Opportunities (p. 110-117)
	Human Rights in the Supply Chain	<ul style="list-style-type: none">Employment & Labour Pactices (p. 102-109)Other significant Social topics (p. 140-143)
	Corporate Citizenship	<ul style="list-style-type: none">Responsible Supply Chain (p. 128-137)
	Initiatives and Political Influence	<ul style="list-style-type: none">Sustainability of Local Communities (p. 118-127)
	Corruption prevention and fighting	<ul style="list-style-type: none">Sustainability of Local Communities (p. 118-127)Business Ethics (p. 154-157)
		<ul style="list-style-type: none">Sustainable Development (p. 28-35)Regulatory Compliance (p. 152-153)Business Ethics (p. 154-157)

ASI Content Index Metallurgy Sector

The Aluminum Stewardship Initiative (ASI) is an international standardization and certification body that encourages and aligns compa-nies in the aluminum industry with a view to sustainable development and responsible manufacturing. The acquisition of the **ASI** Perfor-mance Standard is related to the creation and maintenance of responsible environmental and social standards as well as Governance cri-teria, in order to ensure the responsible production and rational use of aluminum. In this context, the performance of the activities that fall within the scope of the standard for the Metallurgy Sector is presented. **ASI**

Environmental Metrics	AoG Aluminium Plant	DELPHI-DISTOMON
Direct GHG emissions (scope 1 – CO ₂ e thousand tons) ¹	1,168.7	3.7
Fuels (CO ₂ : 100%)	802.6	3.5
Processes (CO ₂ : 74% - PFCs: 26%)	362.3	0.0
Transport (CO ₂ : 100%)	3.8	0.2
Indirect emissions (scope 2 – CO ₂ e thousand tons) ²	1,523.7	2.5
Indirect emissions (scope 3 - t CO ₂ / t Al ingot) ³	0.945	-
Total NOx emissions (t)	621.1	0.0
Total SOx emissions (t)	2,892.2	0.0
Particulate emissions (t)	32.4	0.0
Fluorine emissions (t)	194.8	0.0
CF ₄ emissions (t)	8.0	0.0
C ₂ F ₆ emissions (t)	1.0	0.0
Total energy consumption (TJ)	29,935.3	66.5
Energy consumption from non-renewable sources (TJ)	14,402.0	49.8
Natural Gas	14,276.7	0.0
Mazut	71.8	0.0
Gas Oil	51.1	48.1
Heating Oil	2.4	1.2
Gasoline	0.0	0.5
Energy purchased (Electric Power) (Tj)	10,272.3	16.6
Non-Renewable sources	7,396.1	12.0
Renewable Energy Sources (RES)	2,876.2	4.6
Total water withdrawals (ML)	152,394.3	87.3
Total water withdrawal from surface waters (ML)	0.0	11.3
Total water withdrawal from groundwater (ML)	7,914.4	16.0
Total water withdrawal from mining operations (ML)	0.0	60.0
Total water withdrawal from public water supply companies (ML)	389.8	0.0
Water discharges (ML)	144,427.3	87.3
Water consumption (ML) ⁴	7,967.0	0.0
Water consumption (m ³ / ton of hydrated alumina production)	2.90	-

Environmental Metrics	AoG Aluminium Plant	DELPHI-DISTOMON
Water consumption (m ³ / ton of primary aluminium production)	1.13	-
Non-hazardous solid waste (t)	770,495.0	15.5
Controlled Landfill (Accumulation site for Bauxite Residues)	677,962.6	0.0
Controlled Landfills for Non-Hazardous Waste	3,317.5	3.3
Recycling / Reuse internally and at third-party facilities	80,050.2	12.3
Storage for recovery	9,164.7	0.0
Storage in third-party facilities	0.0	0.0
Recovery / Exchange	0.0	0.0
Incineration	0.0	0.0
Hazardous solid waste (t)	19,767.3	39.6
Controlled Landfills for Hazardous Waste	14,583.7	0.0
Recycling / Reuse internally and at third-party facilities	5,007.6	2.8
Recovery / Exchange	0.0	5.0
Storage for recovery	175.3	0.0
Incineration	0.8	31.8
Storage in third-party facilities	0.0	0.0
Solid waste reused or recycled (% of total waste produced)	10.8%	27.4%
Total volume of spills (lt)	-	27,641
Incidents of non-compliance with environmental or social laws and regulations	0	0
Significant fines and number of non-financial sanctions for non-compliance with environmental or social laws and regulations	0	0
Payments to Government (€)	45,979,205.9	1,068,743.4
Political contributions	Not allowed	Not allowed

1. The calculation of direct greenhouse gas emissions (scope 1) is performed using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalents (CO₂e). The numbers at the end of the reference period (year 2023) are used. The NIR 2023 methodology has been used for the values of the conversion factors.

2. The calculation of indirect greenhouse gas emissions (scope 2) is performed using conversion factors of energy from consumption electricity, heating, cooling, and steam (in TJ) to carbon dioxide equivalents (CO₂eq). The numbers at the end of the reference period (year 2023) are used. For the values of the conversion factors the methodology of the DAPEEP 2022 has been used.

3. A preliminary estimation of the scope 3 according to EIB Project Carbon Footprint Methodologies (December 2023) from the LCA study is at the level of 0.945 t CO₂/t Al ingot.

4. The difference between the total amount of water withdrawals and the total amount of water discharges.

Index of Key Terms

Areas with high biodiversity value

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

Business Sectors (BSs)

Business Activity Sectors of MYTILINEOS

Carbon Dioxide Equivalent (CO₂ eq)

Equivalent to CO₂ (carbon dioxide) is the global unit of measurement used to compare greenhouse gas emissions, based on their global warming potential (GWP). The equivalent CO₂ of a gas is determined by multiplying the tons of the gas by the associated global warming potential.

Circular Economy

The circular economy is an economic model that focuses on reducing the waste of resources used in the production process, the utilization of renewable resources, the recovery and reuse of products, but also the production of energy from the waste of production processes, the preservation of products in good working conditions for a long time, the use of products to provide services to multiple users and offering products as services.

Direct employees

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

Direct greenhouse gas emissions (Scope 1)

Direct greenhouse gas emissions (Scope 1) come from sources (natural units or processes that release greenhouse gas emissions into the atmosphere). Direct greenhouse gas emissions include, among other things, emissions of CO₂ equivalents from fuel consumption.

Discrimination

The act and result of treating persons unequally by imposing unequal burdens or denying benefits instead of equal treatment of each person fairly on the basis of individual merit. Discrimination can also include harassment, defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed.

Employees from local communities

People who have either been born or have the legal right to reside for an indefinite period of time in the same geographical location as the Company's operating facilities. The geographical definition of the term "local" may include the community surrounding operations, a region within a country or a country.

Employee Turnover (Voluntary Departures)

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

Environmental laws and regulations

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

Fatality

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

Forced labor

Any work or service required by a person under the threat of punishment and for which that person has not been voluntarily offered (DOE 29, Forced Labour Convention).

Fresh water

Water with a total of dissolved solids concentration equal to or less than 1,000 mg / l.

Global Sustainable Development Goals (SDGs)

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

Hazardous waste

Waste that possesses any of the characteristics contained in Annex III of the Basel Convention, or that is considered to be hazardous by national legislation.

HS Committees

Occupational Health and Safety Committees

Impact

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

Indirect employees

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

Indirect greenhouse gas emissions (Scope 2)

Emissions resulting from the generation of electricity, heating, cooling energy and steam purchased or acquired and consumed by the Company.

Injury Rate

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

Leakage

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

Local community

Persons or groups of persons who live and / or work in areas that are affected by positive or negative economic, social or environmental impacts resulting from the organization's operations. The local community may include individuals living close to the organization's activities and even isolated settlements within walking distance of the activities, and which may still be impacted by these operations.

Local supplier

An organization or person that provides a product or service to the organization and that is based in the same geographical market as the organization that compiles the report. The geographic definition of the term "local" may include the community surrounding operations, a region within a country or a country.

Lost Days Rate

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

Material Topics

Topics that reflect the economic, environmental and social impacts of the Company's activity and at the same time significantly affect the assessments and decisions of its Stakeholders.

NGOs

Non-Governmental Organizations

Non-renewable energy sources

Energy sources that cannot be replenished, reproduced, grown or generated in a short period of time through ecological cycles. Non-renewable energy sources include: Fuel distilled from petroleum or crude oil such as gasoline, diesel, heating oil - Natural gas such as compressed natural gas (CNG) and liquefied natural gas (LNG) - Combustion gas and oil refining - Coal - Nuclear power.

Non-renewable materials

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

Occupational disease rate

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

Other indirect (Scope 3) GHG emissions

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions.

Parental leave

Leave granted to male and female employees due to childbirth.

Priority substances

Substances that may pose a significant risk to the aquatic environment. These substances are defined by Directive 2013/39 / EU of the European Parliament.

Recycled input materials

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

Recycling and reuse of water

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

Reporting period

Specific time span covered by the information reported. For MYTILINEOS, the reporting period is the year that begins in 1st of January and ends in 31st of December.

R.E.S. (Renewable Energy Sources)

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

Restorations (Restored Areas)

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

Retention rate of full-time employees

Number of full-time employees at the end of the reporting period * 100 / Number of full-time employees at the end of the previous year.

Self-assessment of human rights

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

Significant impact on biodiversity

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

Significant operating changes

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

Social investment

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

Supply chain

Sequence of activities or parties that provide products or services to the Company.

Sustainable development

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

Total water discharge

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

Total water withdrawal

The total water withdrawn within the Company's boundaries from all sources (including surface and groundwater, rainwater and public water supply) for every use during the reporting period.

Vulnerable groups

A vulnerable group is a set or subset of persons with some specific physical, social, political, or economic condition or characteristic that places the group at a higher risk of suffering a burden, or at a risk of suffering a disproportionate burden of the social, economic or environmental impacts of the Company's operations. Vulnerable groups can include children and youth, the elderly, people with disabilities, refugees, HIV/AIDS-affected households, indigenous peoples, and ethnic minorities.

Waste disposal method

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

Water consumption

The amount of water that results by subtracting the amount of water that is returned to the original withdrawal source (after treatment) from the total amount of water withdrawn.

Water stress areas

Areas that are significantly affected by water withdrawals either in terms of water availability, quality or accessibility.

Wind Farm

Wind Power Plant



