Thematic Consultation 2020

MYTILINEOS, considering the new conditions that have been created in the context of dealing with the consequences of the pandemic, and wishing to protect and safeguard the health of its Stakeholders, decided to organize centrally and to hold online its annual Consultation, which was titled **"Corporate policy on the respect for and protection of Human Rights"** by sending a custom-developed questionnaire to all its Stakeholder groups.

The Consultation had a two-fold purpose:

a) for MYTILINEOS to communicate to its Stakeholders the formal corporate policy on the protection of and respect for Human Rights, which are directly related to its business activity, and

b) to record the Stakeholders' key views and attitudes, which are key to the design of corporate policy, in accordance with best international practices. Moreover, the Consultation had the following individual objectives:

- 1. To explore the Stakeholders' **level of AGREEMENT** with the way in which MYTILINEOS will approach the issue of Human Rights in its formal policy.
- 2. To explore the **level of SIGNIFICANCE** for the Stakeholders, of MYTILINEOS' decision to formally commit itself to the proper management of Human Rights.
- 3. To explore the **level of ACCEPTANCE** by the Stakeholders of the issues that MYTILINEOS wishes to include in its Human Rights policy.

Results

- Overall, the Stakeholders' response rate (42%) to MYTILINEOS' invitation was among the highest recorded so far.
- The greatest interest, with very high individual response rates, was shown by the groups of suppliers, employees, Sustainable Development Organizations, Business Organizations, and the Academic community.
- The main objective of the consultation was achieved, since overall, there was wide acceptance of the Company's specific initiative.
- Regarding the Stakeholder's recorded interventions, the most important ones concerned the following:
 (a) the creation of a dedicated call center (telephone line) for receiving complaints about Human Rights violations,
 (b) the creation of a due diligence procedure,
 (c) the need for suppliers and contractors to commit themselves to respect human rights, and (d) the translation of the policy into the languages of the countries where the Company is primarily active.

In detail:

Consultation Results				
Response ¹	Agreement ²	Significance	Acceptance ³	Participation ^₄
42%	94%	83%	99%	5%
A total of 673 responses were received from Employees, Suppliers, Customers, Shareholders - Financial Analysts, NGOs, Journalists, Local Communities, the Academic Community, Sustainable Development Institutions and members of the Business Community.	Over 9 out of 10 participants in the consultation expressed their agreement with the basic approach of MYTILINEOS' policy to the respect for and protection of Human Rights.	Over 8 out of 10 participants in the consultation stated that it is very important for them that MYTILINEOS undertakes a formal commitment to respect and protect Human Rights.	All Stakeholder groups expressed their universal acceptance of all the issues included by MYTILINEOS in its Human Rights policy.	A total of 31 comments were recorded, mainly by the Employees and Suppliers Stakeholder groups, which were taken into account in the policy finalization.

1. MYTILINEOS addressed all its Stakeholder groups (1,601 individuals and organizations) through a structured electronic questionnaire.

- 2. According to the approach adopted by MYTILINEOS, its policy should state the Company's commitment to the respect for all Human Rights, while it should focus on those issues that are directly related to its activity and to which it, as a business, it can have an increased contribution.
- Topics: Health and Safety at Work Appropriate working conditions (working environment, pay, leaves and working hours) Harassment, intimidation and inhuman treatment - Forced labor and human trafficking (Modern slavery) - Child labor - Discrimination and equal treatment (gender equality, people with disabilities) -Protection of personal data - Right to the freedom of association - Rights of local communities in the vicinity of the Company's activities - Facility security practices (concerns staff behavior).
- 4. The rate of active participation, determined on the basis of the submissions of views or comments by Stakeholders out of all those who spoke during the consultation.