

“ The new business model
is the challenge for
a sustainable future ”



Sustainable Development
Report **2021**





Contents

6	ESG Performance Statement'
8	Key ESG Targets
10	Parameters of the Sustainable Development Report
12	Discussion with the Chairman & CEO on Sustainable Development topics
17	Profile, activity sectors and Business Units
20	Countries of activity 2021
22	Strategic priorities
26	How we create value
28	Business Model
30	ESG performance visualization tools
32	Sustainable Development Strategy
38	Tackling Climate Change
40	Materiality process
42	Stakeholder Engagement

Environment

48	Adaptation to Climate Change
48	Management Approach
52	Results
54	Energy & Air emissions
54	Management Approach
55	Results
60	Water management
60	Management Approach
61	Results
64	Circular Economy
64	Management Approach
65	Results
67	Pollution prevention
67	Management Approach
68	Results
69	Ecological Impacts
69	Management Approach
71	Results
73	Other significant Environmental topics
73	Raw & other materials
74	Research & Development
76	ESG KPIs

Society

80	Occupational Health & Safety
80	Management Approach
82	Results
85	MYTILINEOS' response to the SARS-CoV-2 pandemic
86	Employment
86	Management Approach
88	Results
90	Human Rights
90	Management Approach
91	Results
94	Equal Opportunities
94	Management Approach
95	Results
96	Sustainability of local communities
96	Management Approach
97	Results
101	Responsible Supply Chain
101	Management Approach
102	Results
104	Business Continuity
104	Management Approach
105	Results
106	Other significant Social topics
106	Labor Practices
107	Product Quality & Safety
108	Communication & Marketing
110	ESG KPIs

Governance

114	Corporate Governance
117	Sustainable Development Governance
118	Regulatory Compliance
118	Management Approach
119	Results
120	Business Ethics
120	Management Approach
121	Results
122	Other significant Governance topics
122	Cybersecurity
122	Customer privacy
123	Enterprise Risk Management
124	ESG KPIs

Sustainability Standards & Assurance

128	Independent Assurance Statement
133	TCFD Content Index
134	GRI STANDARDS Content Index
144	SASB Content Index
147	Accountability Principles Standard AA1000 Index
148	ESG Reporting Guide 2022 - Athens Stock Exchange
150	UN Global Compact Communication Progress (Advanced level)
151	The Greek Sustainability Code
152	ASI Content Index Metallurgy Business Unit
154	Index of Key Terms

ESG Performance Statement¹

The purpose of this statement is to provide MYTILINEOS' Stakeholders with an up-to-date overview of Environmental, Social and Governance (ESG) issues of interest to them, also summarizing the Company's ESG performance in 2021.

In 2021, Sustainalytics, one of the world's leading ESG rating agencies, included MYTILINEOS in its list of **"Industry Top Rated Companies"**, which features companies that during 2021 showed "Strong ESG performance in the industry group in which they are classified". In addition, one more leading European agency specializing in the evaluation of corporate performance in sustainable development, **Ecovadis, awarded to MYTILINEOS the gold award** for its business practices and its commitment to sustainable development. Finally, MYTILINEOS **received the maximum ISS Quality Score in the "Environment" category by the ESG rating organization ISS**, while in 2021 it also maintained its top top-level performance in the "Society" category.

These distinctions represent the culmination of the systematic efforts that MYTILINEOS has been making for over 10 years now in the areas of responsible entrepreneurship and Sustainable Development, yet at the same time the Company has already set itself the ambitious target of further improving its performance in these areas by 2025.

The table below presents in detail the ESG rating schemes in which MYTILINEOS participates and their results for 2021. **The Company has managed to improve or maintain its performance levels in almost all of the ratings it has participated in. Based on this performance, it ranks among the top 15% of the companies with the best performance in 9 of the 11 ESG Raters it participates in.**



	Rating scale (High/Low)	2020	2021	
ESG Raters				
	0/100	30	22.4	▲
	1/10	2.3	1.3	▲
	D-/A+	B+	A	▲
	100/0	38	48	▲
	100/0	62.4	66.2	▲
	100/0	62.8	66.5	▲
	5/0	4.1	3.9	▼
	300/0	265	275	▲
Thematic Raters				
	A/D		C	
	A/D	B	B	
	100/0	71	71	

Performance data as of 31 December 2021

1. The acronym "ESG" refers to environmental, social and governance-related issues.
 2. According to the results of the 2021 Materiality process (p. 40-41)

ESG Performance

E Climate Change: • We are disclosing for the first time our indirect Scope 3 emissions from our upstream and downstream activities. • We have disclosed for the first-time data on our adaptation to climate change through the CDP international organization for Sustainable Development. • We are consistently supporting the production of clean energy with investments in RES, which in 2021 rose to 9.7% of our total production, increased by 12.8% relative to 2020. • The absolute direct and indirect (Scope 1 & Scope 2) CO₂ emissions decreased by nearly 12.4% relative to their 2019 levels.

Air quality: We further reduced by 2% the total quantity of our NOx/SOx emissions and the quantity of particulate emissions by **48.3%** relative to 2020.

Environmental management: • We implement an ISO 14001:2015 certified environmental management system and we also promote the systematic application of Best Available Techniques in all our Business Units. • Our expenditures for the protection of the environment in 2021 amounted to **€82.8 million**. • In 2021 there were no incidents of any form of pollution of the natural environment from our production activity.

Circular economy: • We increased the production of secondary aluminium using aluminium scrap as raw material, which in 2021 represented around **20%** of the Company's total production, significantly contributing to the reduction of energy consumption and air emissions. • The percentage of solid waste that was recycled and reused during 2021 increased to **25%**. • The percentage of solid

waste directed to landfills was limited to **2.0%**. • We have reduced the total amount of hazardous waste by almost 19% from 2020.

Research & Development: • We continued to invest in research and innovation, through the participation of the Metallurgy Business Unit in **24 European programs** for the development of new technologies for the utilization of bauxite residues, while MYTILINEOS' total R&D investments amounted to **€2.5 million**.

Ecological Impacts: • During 2021 there have been no incidents of degradation of biodiversity as a result of the Company's activities. • We continued our mining activity in a responsible and sustainable manner, increasing to **84%** the rehabilitation rate of the total exploitable land area used in mining operations, without earmarking new land areas for mining purposes.

Water: • We withdraw water from renewable sources, while our activity does not limit or threaten the adequacy of the water quantity available in the aquifer. • In 2021, total freshwater withdrawal stood at 5.6 thousand ML, slightly increased by 2.1% relative to 2020. • The amount of water reused in other Company plants, thus preventing an equivalent volume of water withdrawals, amounted to **7.5 ML**, increased by **10.7%** from 2020.

Environmental compliance: • There have been no incidents of non-compliance with environmental laws and regulations, as a result of which the Company avoided direct financial risks (e.g., fines) as well as indirect ones related to its image and reputation.

S Occupational Health and Safety: • No fatalities or occupational diseases were recorded among direct employees. Despite the efforts made on an ongoing basis, there was one fatality involving a contractor employee. • Injury rates (with interruption of work for 3 or more days) per 200,000 work hours of direct and indirect employees were kept at low levels (0.37 & 0.22 respectively). • The overall injury rates for direct and indirect employees were slightly higher than in 2020, at **0.85 and 0.29** injuries per 200,000 work hours respectively.

Employment: • As an industrial Company, we increased by **25%** our percentage share of total employment (direct & indirect), while at the same time we kept the percentages of part-time and fixed-term employees to low levels. • We continued to invest in the development of technical and personal skills, covering **54%** of our human resources with targeted professional training programs. • **More than 4 out of 10 employees** are covered by business collective bargaining agreements.

Human Rights: • We have implemented for the 5th consecutive year the self-assessment process regarding the protection of Human Rights, in all our Business Units. According to the results of the self-assessment process, no areas were identified in which the deficiencies observed could jeopardize the protection of Human Rights in the Company's activities. • We also implemented a special e-learning training program **for 730 of our Executives** on Human Rights topics.

G Corporate conduct: • We continued the implementation of a custom training programme on the Company's Code of Business Conduct for Company employees. • We applied our "Zero Tolerance" approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally. • There were no financial sanctions arising from violations of our Code of Business Conduct. • We have strictly complied with the legislation in force regarding our activity, as a result, there were no incidents of non-compliance involving any environmental, social and economic aspects of our activity. • We successfully continued the dialogue with our Stakeholders at the local level, implementing a special thematic Consultation in the Metallurgy Business Unit, which was entitled:

"Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity".

Corporate Governance: • We continue our voluntary adaptation to the UK Corporate Governance Code - 2018, and have already aligned ourselves with approximately 75% of the relevant requirements. • We have strengthened the supervision mechanism by which the Board of Directors oversees sustainable development issues, by creating the Sustainability Committee of the Board of Directors. • We incorporate ESG KPIs in the variable fees of the Board members' remuneration. • We increased the percentage of women on the Board of Directors to **27.3%**.

Key ESG Targets

(Related to the ESG strategy defined by the Company)

	Targets	Expected achievement time	
E Reduction of total Scope 1 & 2 CO ₂ emissions (relative to 2019 data) (t CO ₂ e)	-30%		
Metallurgy Business Unit: Reduction of total Scope 1 & 2 CO ₂ emissions (relative to 2019 data) (t CO ₂ e) ASI	-65%		
Metallurgy Business Unit: Reduction of specific CO ₂ emissions per ton of aluminium produced (relative to 2019 data) (t CO ₂ e) ASI	-75%		
Power & Gas Business Unit: Reduction of specific CO ₂ emissions per MWh produced (relative to 2019 data) (kg CO ₂ e)	-50%		
Sustainable Engineering Solutions (SES) Business Unit (t CO ₂ e) (relative to 2019 data)	Net Zero carbon footprint		
Renewables & Storage Development (RSD) Business Unit (t CO ₂ e) (relative to 2019 data)	Net Zero carbon footprint		
Metallurgy Business Unit: Fluorine emissions (kg/t Al) ASI	1.5	Annually	
Metallurgy Business Unit: Carbon tetrafluoride emissions (kg/tAl) ASI	< 0.06	Annually	
Metallurgy Business Unit: Sulphur dioxide (SO ₂) emissions (kg/t Al) - electrolysis process ASI	≤ 15	Annually	
Production of secondary aluminium (t) ASI	65,000		
Metallurgy Business Unit: Total water withdrawal (industrial use & drinking water, m ³ /day) ASI	≤10,550		
Metallurgy Business Unit: Final disposal of hazardous solid waste in the Controlled Landfill for Hazardous Waste ¹ (kg/t Al) ASI	< 75		
Serious environmental incidents	0	Annually	
Rehabilitation rate of total exploitable land area used in mining operations	87%		

	Targets	Expected achievement time	
S Number of fatalities	0	Annually	
Occupational diseases	0	Annually	
Number of serious injuries	0	Annually	
Total recordable injury rate (per 200,000 work hours)	Continuous improvement	Annually	
Human Rights violation incidents	0	Annually	
United Nations Women's Empowerment Principles (UN WEPs)	Adoption of Principles		
Percentage of employees who received formal performance evaluation reviews ²	> 80%	Annually	
Retention rate for full-time employees	> 90%	Annually	
Number of citizens benefiting from the development of social programs	-250,000		
Rate of assessment of key suppliers based on ESG criteria	60%		
G Confirmed incidents of corruption and bribery	0	Annually	
Financial sanctions imposed for violations of the Code of Business Conduct (€)	0	Annually	
Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	Annually	

Short-term Targets (1-3 years)

Medium-term Targets (4-7 years)

Long-term targets (8-10 years)

1. Concerns the Aluminium Production Department (Electrolysis Line - Smelter - Anodes Line).
 2. Concerns the percentage of employees who meet the conditions for inclusion in the annual performance evaluation process (i.e., excluding those working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work).

Parameters of the Sustainable Development Report

The MYTILINEOS Sustainable Development Report (hereinafter the "Report") is published annually **[GRI 102-52]** and refers to the review of the Company's non-financial performance, supplementing its Annual Financial Report. It is also available online at the official MYTILINEOS website (mytilineos.gr/sustainability/reports/sustainable-development-reporting/).

Report preparation principles

The Report was prepared in accordance with the Standards of the Global Reporting Initiative (GRI STANDARDS), key indicators of the Sustainability Accounting Standards Board

(SASB), the 10 Principles of the UN Global Compact, and the AA1000AP 2018 Accountability Principles Standard, taking also into account the ISO 26000 Social Responsibility international standard. In addition, the Report is in line with the relevant obligations arising from Greek legislation and European Directives.

Scope of the Report

This Report covers the period from 1/1/2021 to 31/12/2021 **[GRI 102-50]** and contains data about the following activities per Business Unit of the Company.

Business Unit	Activities
Metallurgy ASI	<ul style="list-style-type: none"> Bauxite mining. Production of anhydrous and hydrated alumina. Production of aluminium alloys. Operation of port facilities, loading and unloading of products. Treatment of aluminium alloys.
Power & Gas	<ul style="list-style-type: none"> Electric Power generation from gas-fired combined cycle power plants and RES plants. Development, management, operation and maintenance of the power plants. Cross-border trade of electric power and natural gas. Supply of electricity to final consumers. Supply of natural gas for the Company's own consumption, for sales to the natural gas wholesale market and to final consumers. Aggregate representation of RES / HCHP producers on the electricity markets – RES & HCHP Aggregator activity.
Sustainable Engineering Solutions (SES)	<ul style="list-style-type: none"> Development, construction and operation of power generation plants as well as construction of electric power transmission networks and substations. Public and private infrastructure projects, including concessions and projects implemented via public-private sector partnerships (PPPs). Environmental management and waste water and solid waste treatment projects. Development, construction and operation of energy efficiency projects, including projects implemented through Energy Performance Contracts (EPCs). Development and construction of hybrid and off-grid projects, as well as sustainable development projects using new technologies, digitization and smart management of energy production system. Projects involving the design and construction of data storage and processing infrastructure (Data Centers). Development, construction and operation of projects related to the hydrogen economy, with a strong focus on the production of blue and green hydrogen.
Renewables & Storage Development (RSD)	<ul style="list-style-type: none"> Development, Engineering - Procurement - Construction (EPC). Operation and Maintenance (O&M) of photovoltaic projects, energy storage and large-scale hybrid projects.

The data about these activities are obtained from the MYTILINEOS Central Functions and Business Units in the Greek territory, the construction sites operated by the Company through its Sustainable Engineering Solutions (SES) Business Unit in countries abroad, its RES subsidiaries currently in full operation and its other subsidiaries in which the Company's participation is over 50%, as stated in its Annual Report. Non-financial data from Zinc / Lead Metallurgy operations are not included. **[GRI 102-45]**

Report details

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

The data and information presented in the Report are initially collected using the procedures and scientific capture methods applied in each Business Unit and subsidiary of the Company, as well as from the databases kept in the context of the implementation of the respective central corporate systems. The data are then forwarded through the integrated management system for the disclosure of non-financial performance, which consists of a

software platform developed in-house (custom-configured Excel files based on the GRI Standards).

The calculation of the data composing the non-financial performance indicators included in the Report generally follows the definitions and the methodology described in the respective GRI and SASB Standards. The data are checked and verified using the SAP system (where available), as well as using internationally accepted verification methods which the Company has available, such as the ISO 45001 Occupational Health and Safety Management Systems Standard, the ISO 14001 Environmental Management Systems Standard, and the ISO 9001 Quality Management Systems Standard that the Company has established. Also, data from direct measurements or estimates are included, while for comparison purposes use is primarily made of three-year historical data. Performance results at top level are calculated by consolidating (aggregating the relevant quantities) the individual data obtained from the Business Units and subsidiaries of the Company.

The content focuses on the sustainability topics which are of material significance for the achievement of the strategic goals of MYTILINEOS and which have been identified based on the Company's formal Materiality process, in accordance with the GRI Standards: **[GRI 102-40]** to **[GRI 102-47]**. The information presented in the Report is supplemented by the required references to the Company's Annual Report 2021. Some figures have been rounded for reasons of consistency and better visualization.

Specifically for the Metallurgy Business Unit, throughout the scope of this Report, the data concerning the certification of the Aluminium Stewardship Initiative (ASI) plant will be accompanied by the badge: **ASI**.

Significant changes from previous reporting periods

[GRI 102-49]

- The transformation of the CSR Committee into the Sustainability Committee of the Board of Directors.
- The disclosure of the following new Material topics for sustainable development: "Responsible Supply Chain", "Business Model", "Equal Opportunities".
- New Report sections: "Research & Development", "Cybersecurity", and "European Taxonomy of Sustainable Investments".
- Integration of Sustainability Accounting Standards Board (SASB) indicators and inclusion of the SASB Content Index.

Communication

[GRI 102-53]

Views, comments or suggestions regarding the contents of the Report are most welcome and can be submitted using a custom-developed questionnaire, available at: mytilineos.gr/sustainability/reports/sustainability-report-evaluation-questionnaire/, while for more information or clarifications, please contact:

Mr. George Galanis

Sustainable Development Director
 MYTILINEOS S.A.
 8 Artemidos Street
 Maroussi, 15125 Athens
 E-mail: georgios.galanis@mytilineos.gr





Evangelos G. Mytilineos
Chairman and CEO
Discussion on Sustainable Development topics

[GRI 102-14]

What would be, in your view, a brief review of 2021 for MYTILINEOS?

For all of us, 2021 was a year full of contrasts. On one hand, humanity having just overcome the shock of the pandemic crisis and, on the other, having to face an even greater and unprecedented one, the economic, geopolitical and energy crises created by the war in Ukraine.

In this environment, the achievement of the goals we had set certify in the most emphatic way that we have moved in the right direction and, at the same time, have laid the foundations for the Company's further progress. Drawing on our strategic advantages, the admirable effort of our people, our sustainable strategy and our firm commitment to our values, we have entered a very dynamic growth trajectory, maintaining the solid foundations for achieving our next goals.

What is the significance of sustainable development for MYTILINEOS?

As has been the case for years now, in 2021 Sustainable Development remained an integral part of the Company's long-term business strategy. Sustainable Development for us, is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the Sustainable Development Goals. In this respect, we aim at creating long-term and sustainable value for our shareholders as well as for our other Stakeholder groups, by adopting a holistic approach in pursuing our activities, combining the safeguarding of jobs, and growing our business, our profitability, always in terms of social and environmental sustainability.

What are the main challenges (at the macroeconomic and/or political level) which you acknowledge MYTILINEOS is already facing or will have to face in the coming years and which may affect the Company's sustainable growth?

One of the most important challenges in the years ahead is to establish the upgraded role of MYTILINEOS in the new production model that the country needs, with a strong focus on

innovation, production, services and skills. At a time when rising energy costs, geopolitical developments, rapid climate change and compliance requirements for the implementation of good environmental practices and respect for human rights are already setting the scene, we are ready to evaluate our activities accordingly and, at the same time create a corporate culture, a new mindset and the operating model that will ensure the successful implementation of our Company's commitments in the context of Sustainable Development. We have the capacity to deal with all the obstacles that will arise and move forward with our climate-related aspirations, protecting or even enhancing at the same time the global competitiveness of the European and the Greek industrial sector.

What activities and specific products and services of MYTILINEOS contribute to Sustainable Development?

It is no coincidence that 55% of our turnover draws from our activities eligible under the European Taxonomy for sustainable activities. MYTILINEOS plays an important role in sustainable development and in the achievement of the EU's energy and climate goals. A key activity that directly contributes to sustainable development is the RES investment program that we have announced for 2030 and is central to our strategic priorities for a strong presence in both energy production and storage projects. In addition to making a substantial contribution to the national effort to increase green energy, this investment programme is a main pillar of our overall effort to achieve our ambitious targets regarding the reduction of carbon dioxide (CO₂) emissions.

In 2021, several investments aimed at increasing output levels in our "green" Aluminium production line were completed, to ensure that the Company will be able to respond to both the growing demand and the ambitious environmental goals it has set, firmly establishing its Renewables & Storage Development (RSD) Business Unit as an innovative and experienced player in the Greek and international markets.

At the same time, MYTILINEOS invests in the development of its Sustainable Engineering Solutions (SES) Business Unit, which, in addition to the construction of thermal power plants and selected infrastructure projects, is now focusing on projects

that promote the energy transition and sustainable development objectives, in areas such as solid and liquid waste management, hybrid and off-grid energy projects, energy efficiency upgrade projects and the implementation of innovative first-of-kind energy projects. Following the global trends, MYTILINEOS adopts a targeted approach for developing its activities in infrastructure, in view of the major projects to be carried out in our country in the context of restarting its economy.

Finally, MYTILINEOS is now also positioned at the heart of innovation, through the MYTILINEOS Smart Cities initiative, a project for the development of services, applications and products addressed to cities, communities, settlements and even large organizations, seeking to create sustainable smart communities, making everyday life of the local communities easier.

What were MYTILINEOS key ESG achievements in 2021?

2021 was a milestone year for us in the field of Sustainable Development, as MYTILINEOS became the very first industry in Greece and one of the first worldwide, to commit itself to clear decarbonization targets for 2030 and 2050. At the same time, we were among the first companies to fully integrate ESG criteria into our company's strategy, with our overall progress in this area establishing us as one of the world's leading companies. We started delivering on these commitments as we have already launched the implementation of 90% of our CO₂ reduction initiatives in all our Business Units, having also completed the development of a system for the identification of CO₂ Scope 3 emission sources and the calculation of the corresponding emissions in all our Business Units.

As a culmination of this effort, in 2021 MYTILINEOS was recognized by Sustainalytics - one of the world's leading ESG Raters - as one of the "Industry Top Rated Companies" for its ESG performance, ranked 2nd out of 114 companies in the Industrial Conglomerates group.

Moreover, we became the 1st Greek company to join the international Task Force on Climate-related Financial Disclosures (TCFD) initiative for the identification of the economic impacts of climate change, and successfully completed our 1st participation in the CDP Climate Change initiative. At the same time, in

2021 we joined the group of companies that support the international initiative "Science Based Targets initiative (SBTi)", in order to scientifically validate our climate targets. We successfully underwent 11 ESG evaluations by international ESG Raters, significantly improving our performance compared to 2020, thus further strengthening our position as one of the top corporate performers.

2021 also saw the development of the 1st edition of the MYTILINEOS Green Bond Framework (in the context of the Company's 1st Green Bond issuance), accompanied by very good recommendations from ISS-ESG (as Second Opinion Provider in the relevant process), while we embarked on our adaptation to the Sustainability Accounting Standards Board (SASB) disclosure standard, with the aim of gradually linking the potential impacts of sustainable development topics on our financial results, which is a key issue for the investment community.

Engagement with our Stakeholders during the year was also successful, as the Stakeholder consultations held at central and local level yielded very positive results, with 88% of participants stating that the performance of MYTILINEOS in Sustainable Development has "considerably" to "greatly" improved (a 4% increase compared to 2019). In this context, the 2nd Supplier Training Cycle in Sustainability/ESG issues was also implemented and attended by 80 suppliers, while official ESG supplier evaluations were launched in each Business Unit. Our social policy, centrally implemented through 13 social programs, benefited approximately 52,000 citizens and earned 4 Responsible Entrepreneurship & Sustainable Development distinctions.

How is the management of Sustainable Development integrated in MYTILINEOS?

A modified way of thinking and a renewed mindset and culture in accordance to our values, are some of the elements that help us remain loyal to our promises and our strategy. This direction is specifically designed for a new operating model, much more focused on sustainable development.

The 3 specific areas of focus are: (a) the establishment of the Board of Directors Sustainability Committee, a body responsible for the overall monitoring of the implementation of the

Company's Sustainable Development Strategy, (b) the establishment of the General Division for Corporate Governance and Sustainable Development, tasked with coordinating actions and developing new initiatives in Sustainable Development, to improve our ESG performance, and (c) the creation of special Sustainability / ESG teams in each Business Unit that cooperate with the General Division on the implementation of the corporate Sustainable Development Strategy. The new Sustainability / ESG teams, with their newly created roles of "BU Sustainability leaders" and "BU Sustainability / ESG category owners", are responsible for the organization and implementation of sustainable development initiatives in each Business Unit of the Company.

How does MYTILINEOS address the energy transition?

Our approach focuses on the interrelationship between energy transition and the actions taken to tackle climate change, based on the following action lines: (a) reducing emissions and achieving a net zero footprint, (b) supporting the national energy transition, (c) boosting investments in RES, (d) creating low-emission products and services, (e) electrification, and (f) research and innovation.

We aim at reducing our total CO₂ emissions by 30% and achieve a net zero footprint in 50% of our Business Units by 2030 and in 100% of our Business Units by 2050. At the same time, to achieve a net zero footprint, we create new low-pollutant activities and products through our Renewables & Storage Development (RSD) Business Unit, representing approximately 5 GW of RES projects that are fully operational or at an early stage of development, we increase the production of secondary aluminium to 65,000 tons by 2025, and we invest in sustainable development projects such as energy from waste (Protos) and solid & liquid waste management projects, through our subsidiary Zeologic. In connection with the above, the ASI international certification which we obtained, ensures our responsible production of primary aluminium, contributing towards our aim to produce "green aluminium".

In terms of supporting the national energy transition, we have over 2 GW of total installed capacity from thermal plants and, following the official launch of operation of the Company's new

state-of-the-art CCGT power plant, MYTILINEOS has taken the lead in the national effort for a smooth energy transition, contributing greatly to ensuring energy adequacy. In the field of clean energy, our ambitious investment program for over 2.5 GW of RES assets by 2030 is in progress, while we have 25 electricity storage projects under development and we are constantly building international partnerships for developing offshore wind farms in Greek sea areas.

In connection with the electrification of the Company's operation, we plan to gradually replace corporate vehicles with hybrid / electric technology ones, to replace oil burners with electric heat pumps in corporate buildings, and to store energy on-site at 50% of our work sites around the world, by 2030.

Finally, regarding research and innovation, we invest in the application of cutting-edge technologies and the exploitation of digital industrial methods in the production stages, examining in detail the future application of innovative technologies in our activities. Additionally, more than 10 Applied Research & Development and Innovation projects for the benefit of consumers are also currently under way in the Power & Gas Business Unit.

Are there opportunities created that the Company could exploit and manage in the context of sustainable development?

Despite any adverse conditions, we retain the flexibility to identify the key opportunities that the Company can take advantage of and manage in the context of sustainable development. Electricity will be the main source of energy in the new era due to the rapid electrification of the market, while it will be necessary to develop new technologies that will create added value in the energy market. Development opportunities at international level are also emerging from the accelerated transition to "green" energy sources, so that countries can meet the environmental targets that have been set, while achievement of carbon neutrality by 2050 necessitates the installation of highly energy-efficient infrastructure in buildings with aluminium being a key component. At the same time, significant national and international commitments of funds and government incentives aimed at tackling climate change, will further increase the availability of financial resources for the development of RES and

new technologies, while the response to the growing demand for low-carbon products and services is already noticeable.

2021 was one more year that will go down in history as a year of extraordinary -and, primarily, prolonged- challenges. The fluidity of the overall landscape, the uncertainty, the surprises and, of course, the issues related to the energy crisis that now need to be addressed with appropriate investments, compose a canvas fraught with challenges in a distant horizon, inspiring us to invest in creating a new green, innovative future.

Profile, activity sectors and Business Units

Vision

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

Mission

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

Corporate Values

[GRI 102-16]

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



Profile

Founded in Greece in 1990, MYTILINEOS **[GRI 102-1]** has been listed on the Athens Exchange (ATHEX) since 1995 and is a leading international industrial and energy company, whose share is a constituent of the FTSE/Athex Large Cap Index. Its complex and wide-ranging business activity is a driving force for the Greek economy, while at the same time the Company has a dynamic presence in all 5 continents. As a responsible industrial company, MYTILINEOS seeks, through continuous reinvestment, to continuously develop and maximize business and economic synergies, to maintain leadership in each one of its Business Units and to apply the principles of Sustainable Development across the entire range of its core activities. At the end of 2021, the consolidated turnover of MYTILINEOS stood at nearly **€2.6 billion**. MYTILINEOS is active in the sectors of Metallurgy, Power & Gas, Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD), with **4,823 direct and indirect employees** and more than **10,000 suppliers** (in Greece and abroad). **[GRI 102-2] [GRI 102-6]**

Metallurgy Business Unit

MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminium in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries. The main categories of hydrated alumina customers are industrial companies active in the production of water treatment products, chemicals, aluminium fluoride, catalysts and combustion retardants. The Company's international business activity is a driving force for the national economy as well as for the development of the Greek regional areas. **ASI**

Power & Gas Business Unit

The activity of MYTILINEOS extends from the production of electric power from the operation of thermal power generation plants and Renewable Energy Sources (RES) plants to the cross-border trade of electric power and natural gas, the aggregated representation of RES and HCHP producers on the electricity markets, and the supply of electricity and natural gas to the final consumer. It is the largest private electric power producer in Greece: with an energy portfolio of 1,200 MW thermal production capacity and over 200 MW Renewable Energy Sources capacity, it covered approximately 11% of total electricity demand in Greece for 2021. In the field of cross-border trade in electric power, the Company's total volume of transactions for 2021 stood at 2.69 TWh. In the natural gas sector, it played a leading role in 2021, representing 22% of the country's total natural gas imports, while in the LNG import sector this percentage stood at 26%. Concerning the supply of electricity and natural gas to final consumers, at the end of 2021 Protergia was representing about 335,000 customers in total, while its share of the electricity supply market stood at 6.9%. At the end of 2021, the Company ranked as the second largest aggregator representing RES / HCHP producers in the electricity markets, with a total capacity of 444MW (accounting for nearly 300 individual power generation projects) of different technologies, including photovoltaic parks, wind farms, small hydropower / biogas plants and cogeneration (Combined Heat and Power) plants.

Sustainable Engineering Solutions (SES) Business Unit

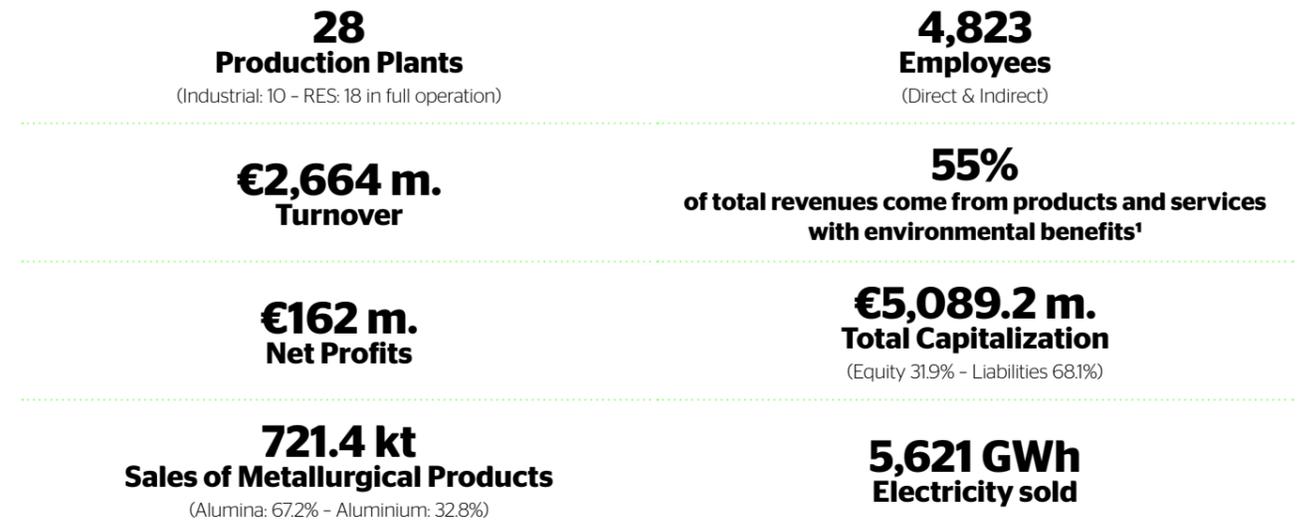
The Company proceeded to transform its EPC & Integrated Projects Business Unit (METKA) into a new, modern and innovative Business Unit, the Sustainable Engineering Solutions Business Unit (SES BU). With an expanded business scope, the new Business Unit, in addition to the construction of thermal power plants and selected infrastructure projects it traditionally carries out, also focuses on the dynamic development of projects that promote the Energy Transition and Sustainability. In what for example regards waste-to-energy projects (Energy Recovery Facilities), MYTILINEOS identifies great growth prospects in the field of environmental solutions and is actively engaged in discussions about undertaking large-scale projects of this type. Moreover, the SES BU undertakes the most complex and demanding projects on behalf of clients and investors in the fields of: Development, construction and operation of power plants as well as construction of transmission networks and substations, public and private sector infrastructure projects, including concession and public-private partnership (PPP) projects, environmental management and liquid and solid waste treatment projects, development, construction and operation of energy efficiency projects, including projects implemented through Energy Performance Contracts (EPCs), development and construction of hybrid and off-grid projects, as well as sustainable development projects using new technologies, digitization and smart management of energy production systems, projects involving the design and construction of data storage and processing infrastructure (Data Centers), as well as development, construction and operation of projects related to the hydrogen economy, with a strong focus on the production of blue and green hydrogen.

Renewables & Storage Development (RSD) Business Unit

MYTILINEOS is strategically investing in the national and global goal of the energy transition. The Company, acknowledging that its subsidiary METKA EGN has already established itself as one of the leading manufacturers of photovoltaic and energy storage projects worldwide, proceeded to create a new Business Unit, the Renewables & Storage Development Business Unit (RSD BU). The new Business Unit has evolved into a strong growth pillar and is also unlocking inherent synergies for the Company. The RSD BU is a global manufacturer and EPC/O&M contractor for the full range of solar energy and storage projects, from autonomous solar parks and energy storage projects to complex hybrid projects. With strong technical capabilities and a global business scope, the Company designs and implements high quality projects for customers worldwide. The Business Unit's broader strategy also includes the use of the Build-Own-Transfer ("BOT") business model for the development of photovoltaic projects, utilizing construction and development technology proprietary to MYTILINEOS. Mature and operational BOT projects represent 1,963 MW of installed capacity, while the projects of the Business Unit's BOT portfolio in their early stages of development represent in total a power generation capacity of approximately 3.0 GW. The clients of the RSD BU are the global markets for the production and storage of solar energy, in particular Electric Power Production and Distribution Companies, Institutional Investors, Industries and Private Investors.

Key Figures (2021)

[GRI 102-7]

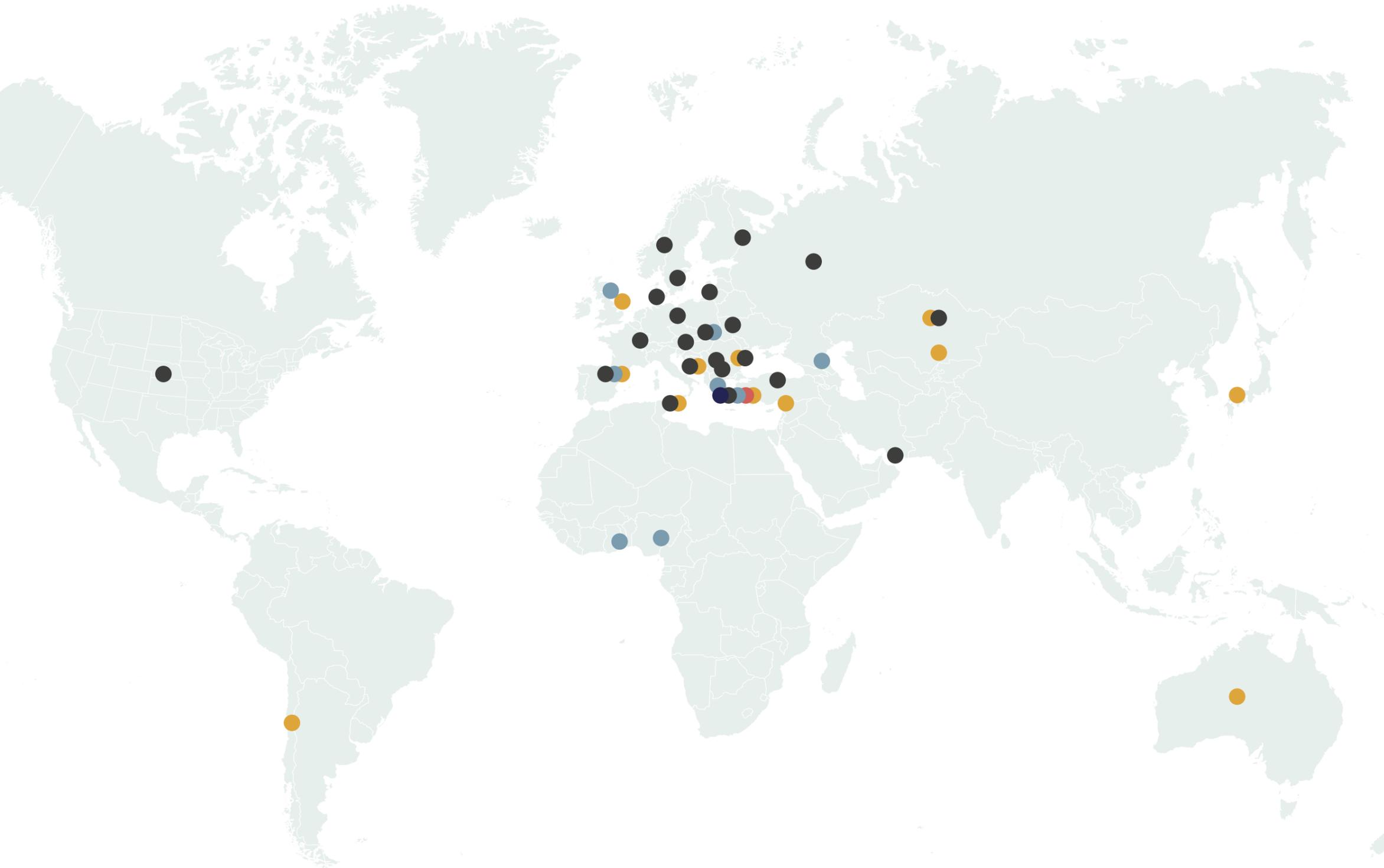


1. Includes only revenues from activities considered eligible under the European Taxonomy legislation for sustainable economic activities, on the additional condition that the said revenues do not concern own needs or intra-group sales.



Countries of activity 2021

[GRI 102-4]



● **MYTILINEOS**
[GRI 102-3]

Head Office

8 Artemidos Street
Maroussi, 15125 Athens

Industrial production plants

Greece

● **Metallurgy Business Unit ASI**

Countries where aluminium products are exported

Azerbaijan, United States of America, Austria, Bulgaria, France, Germany, Greece, Spain, Italy, Montenegro, Norway, Netherlands, Poland, Russia, San Marino, Slovakia, Slovenia, Sweden, Turkey, Tunisia, Finland

● **Sustainable Engineering Solutions (SES) Business Unit**

Major energy and infrastructure projects under way

Ghana, Greece, United Kingdom, Libya, Nigeria, Slovenia, Albania, Georgia

● **Renewables & Storage Development (RSD) Business Unit**

Greece, Cyprus, United Kingdom, Spain, Italy, Chile, Tunisia, Kazakhstan, Korea, Australia, Uzbekistan, Romania

● **Power & Gas Business Unit**

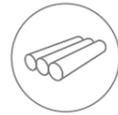
Production and Supply of Electricity and Natural Gas

Greece

Strategic priorities

The Company's main goal is to grow continuously and responsibly and to maintain the leading position of all its Business Units in their respective activity sectors through steady reinvestment, securing at the same time its sustainability and stable returns for its shareholders.

Metallurgy Business Unit ASI



- Continuous improvement in and commitment to Health & Safety at the workplace.
- Ongoing productivity and performance improvement to keep the Company's place within the first quadrant of the global cost curve.
- Increase of the quantity of aluminium produced through the production of secondary aluminium.
- Reduction of total CO₂ (Scope 1 & 2) emissions by 65% and of specific production emissions per ton of aluminium by 75%, by 2030 (relative to 2019 emission levels).
- Improvement of the environmental footprint through continuous investments, the development of relevant know-how and innovative solutions.
- Ensuring the supply of raw materials.
- Provision of best-in-class products and solutions to customers, over and above the mere supply of goods.
- Exploiting opportunities for expansion of the Metallurgy Business Unit to new areas of activity.
- Reinforcing vertical integration or expansion, to strengthen the Metallurgy Business Unit.
- Increasing competitiveness through strategic investments and risk-hedging methods.



Power & Gas Business Unit



- Largest vertically integrated private electric power and gas company (utility) in Greece.
- Top-notch private supplier in the electric power retail market with a growing presence also in the retail gas market, focusing on further expanding its market share and holding also a significant share of the wholesale natural gas market, thus securing competitive energy production costs.
- Strong presence in the RES sector, with further implementation of a significant portfolio of RES projects that substantially contribute to the effort of the Greek electric power generation sector to double its installed RES-based capacity, and gradual development of business activities in electric power storage projects.
- Operation of a new 826 MW combined cycle gas-fired power plant (CCGT), to further consolidate the Company's position as the leading independent electric power producer in Greece.
- Reduction of specific carbon dioxide (CO₂) emissions per MWh of electric power production by nearly 50% by 2030 (relative to 2019 emission levels).
- Maintaining its leading position in gas imports, with a strong presence also in cross-border gas trade.
- Expansion to the energy market of neighboring countries.

Renewables & Storage Development (RSD) Business Unit



- Leadership in the implementation of EPC contracts for Photovoltaic and Energy Storage projects, with a strong international presence.
- Investments in RES projects that are an important parameter for achieving the goals of decarbonization of economies worldwide.
- Achievement of net zero footprint of activities by 2030, by undertaking concrete initiatives and actions.
- Further implementation of energy storage projects, an important factor towards the increasing development of RES-based energy production.
- Adoption of a comprehensive approach to the development and implementation of projects falling within the scope of the Renewables & Storage Development (RSD) Business Unit, and decision-making regarding the implementation of a new combined investment model.
- Continuous exploitation of new opportunities emerging as a result of the rise in competitiveness.
- Strengthening relationships and strategic partnerships with major investors in the sector.



Sustainable Engineering Solutions (SES) Business Unit



- Dynamic penetration in Sustainable Engineering Solutions projects in the sectors of circular economy, hybrid, off-grid and innovative energy projects (e.g., hydrogen projects), in Greece and abroad.
- Entry and dynamic presence in the market for energy recovery projects from domestic and industrial waste, in collaboration with specialized technology providers, as well as in industrial and other wastewater treatment projects using pioneering technology proprietary to MYTILINEOS.
- Achievement of net zero footprint of the Business Unit's activities by 2030, by undertaking concrete initiatives and actions.
- Maintaining and strengthening our position in the Greek and international market for gas-driven energy production projects and gas transmission and distribution (T&D) projects.
- Further development of our presence in high added value infrastructure projects, including PPPs and Concessions, focusing as a priority on the Greek market and on selected developing countries.
- Continuous exploration and implementation of synergies with the other MYTILINEOS Business Units and with international partners in new technologies and strategies.
- Balanced geographical expansion to new markets with significant growth prospects, and strengthening of our presence in countries where we operate today.
- Exploiting energy saving opportunities by developing solutions for a wide range of activities and customers.
- Exploring and exploiting opportunities arising from the digitization of energy services in existing and new activities.

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



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



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



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



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



As of 2012, MYTILINEOS has taken account of the Principles of the Corporate Social Responsibility international standard in its operation, and is disclosing information on its progress and performance on an annual basis.



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



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



Since 2010, MYTILINEOS has been a member of the "Hellenic Association of Independent Power Producers", an initiative whose key objective is to promote and manage issues related to the generation and distribution of reliable, cost-effective and environment-friendly electric power and to deregulate 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, is also participating in the CDP's Climate Change Index, disclosing extensive quantitative and qualitative data regarding the management of water resources and its response to the impacts of climate change in the context of its business activity.



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



Through SEV, MYTILINEOS takes part in the Business Europe initiative, whose aim is to promote development and competitiveness at European level and to support European companies on the issues that affect their performance the most.

Distinctions

2021 was again a great year for the Company, which garnered major awards and distinctions.



- Inclusion of MYTILINEOS in **"The Most Sustainable Companies in Greece 2022"**.



- At the 19th edition of the **"MONEY Business Awards 2021"**, MYTILINEOS won the **1st Prize** in the in the category **"Corporate Governance - 2021"**.

Hellenic Responsible Business Awards 2021

- **GOLD Award** for the implementation of the program "Information and awareness raising of the school community on forest fire prevention and response, forest protection policies and practices", which seeks to provide students and educators of Primary and Secondary schools with up-to-date information about the prevention of forest fires and to help them understand the value of the forest through sowing of tree-seeds / tree-planting activities in areas affected by fires.
- **GOLD Award** for the Company's support of "The Tipping Point" initiative of The Tipping Point organization.
- **GOLD Award** for the implementation of the Suppliers Training Program "Business Responsibility for Sustainable Development", carried out by MYTILINEOS in cooperation with the CSR Hellas network.



Bravo Sustainability Dialogues & Awards 2021

- **Distinction in the BRAVO Society pillar** for the implementation of the program "Creation & Upgrading of Emergency Departments", in collaboration with the organization "Pediatric Trauma Care".
- **Distinction in the BRAVO In Action pillar** for the implementation of the program "We offer smiles to Children", in cooperation with the organization "Mission ANTHROPOS".
- **Distinction for MYTILINEOS' participation in the Bravo Dialogue 2021**, in the session "Public-Private Partnership in support of the Public Health System", for the initiative "MYTILINEOS' response to the COVID-19 pandemic".



Energy Mastering Awards 2021

- **GOLD Award** in the "Energy Engagement" category, for the submission "Protergia's shaping of users' energy-efficient behavior".
- **SILVER Award** in the "Reduction / Minimization Emissions" category, for the submission "Protergia Charge Business Complete".
- **SILVER Award** in the "Energy Transition Leadership" category, for the submission "Protergia's shaping of energy communities".
- **BRONZE Award** in the "Smart Building Technologies" category, for the submission "Protergia Charge Home Complete".
- **BRONZE Award** in the "Energy Efficiency in Mobility" category, for the submission "Protergia Charge City - 'Adopt the City' Project".



- MYTILINEOS' CCGT project for the Company's Power Plant in Ag. Nikolaos, Viotia, was named Project of the Year 2021.

HR Awards 2021

- **BRONZE Award** in the "Excellence in Performance Management Strategy / Initiative" category, for the submission "Performance Management: It's About You, Not The Process".



How we create value

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

From approaching the markets, developing and maintaining relationships with clients, purchasing raw materials, to producing, marketing and selling its products, collecting earnings and supporting them throughout their lifecycle, MYTILINEOS creates an important value chain with a **strong social and economic impacts**. Across all its Business Units, MYTILINEOS supports incomes, tax revenues and jobs, and the same applies for

its suppliers and business partners within their own value chain. This way, the Company's positive footprint is multiplied, reaching beyond the Company and affecting domestic employment and the relevant sectors of the economy. The information given on the production and distribution of economic value in the table below, illustrates how MYTILINEOS creates wealth for its key social partner groups.

Economic Value Table ¹ [GRI 201-1]	2019	2020	2021
Economic value generated			
Sales (thousands €)	2,256,091	1,898,623	2,664,050
Economic value distributed			
Cost of goods sold (thousands €) ²	1,939,672	1,558,864	2,249,228
Retirement and other employee benefits (thousands €)	93,807	112,538	114,114
Income tax and other taxes (thousands €)	84,767	73,544	75,929
Payments to capital providers (thousands €) ³	73,053	80,299	75,322
Social investments (thousands €)	3,471	3,211	9,179
Total (€)	2,194,770	1,828,456	2,523,772
% economic value distributed	97.3%	96.3%	94.7%
% economic value retained	2.7%	3.7%	5.3%

1. The amounts for "income tax and other taxes" have been updated after deferred taxes were excluded for the previous years. **[GRI 102-48]**
 2. Cost of goods sold plus administrative & distribution expenses, minus (a) retirement and other employee benefits, (b) taxes and duties, and (c) community-level social investments that have been included in this amount.
 3. Includes interest payments and dividends paid out to shareholders.

Social Product

MYTILINEOS' total Social Product for 2021 amounted to €2,348 million, increased by 72% compared to 2020. The economic value generated and distributed was the following, by key Social Partner group:



4. The MYTILINEOS environmental expenditures, in 2021, amounted to €82.8 million and related to waste disposal, management and cost of air emissions, environmental remediation, as well as environmental prevention & management actions. Out of the above expenses, the amount of €78.3 million related to operating expenses (Operational Expenditure - OpEx) and the amount of €4.5 million related to capital expenses (Capital Expenditure - CapEx).

MYTILINEOS' Socio-economic Impact in Greece

Every year, MYTILINEOS generates remarkable economic and social value in the country, as a responsible company that interacts with its social partners. In this context, the 3rd Socio-Economic Impact Study of the Company was carried out, with a reference period from January 1, 2021 to December 31, 2021, conducted by an independent specialized socio-economic footprint research company according to the Nobel Prize "input-output" model.

The results of the study confirmed once again the responsible attitude and broader contribution of MYTILINEOS to the national economy and employment. At the same time, the Company is contributing to the collective effort to achieve the UN Sustainable

Development Goals 8 & 9, regarding economic growth and boosting employment in the industrial sector respectively.

The social and economic impact of MYTILINEOS in Greece is derived from the economic activity it causes across its entire value chain, from the production to the promotion and sale of its products. For its operation, MYTILINEOS procures raw materials, products and services from Greek suppliers, thus supporting various business sectors of the Greek economy, such as electricity and gas, construction, metallurgy etc. In doing so, the Company supports incomes, tax revenues and jobs and, correspondingly, the same applies for its suppliers and business partners within their own value chain.

The Socio-Economic impact of MYTILINEOS in Greece (2021)

MYTILINEOS contribution to Greek economy and employment (broad picture)



Contributing, at the same time, to the achievement of the Sustainable Development Goals



* direct, indirect & induced impacts

The multiplier benefit of MYTILINEOS' operation for the Greek economy:

- In 2021, each unit of value added produced by MYTILINEOS contributes 2.6 units of value added to the economy.
- In 2021, 43.57 jobs are created in the Greek economy per million euros of added value of MYTILINEOS.
- For every 1 direct job of the Company, 10 additional jobs are supported in the wider Greek economy.
- The full Socio-Economic Impact study is available on the website of MYTILINEOS: mytilineos.gr/sustainability/reports

Business Model

The Company's business model is at the core of its operation. It is the system that converts the available resources used by the Company, through its Business Units, to products, services, by-products and waste, which it produces, sells and manages with positive or negative impacts, in order to fulfil its strategic goals and create sustainable value for its shareholders, employees, customers, the natural environment and the wider society. The relevant key performance indicators, together with descriptions of the interrelationships between the resources the Company utilises in the context of its Business Model, are available at: scorecard.mytilineos.gr.

1 Resources we utilise

Financial

Our business activities require significant resources, drawn from cash flows from our business activity, investments, own capital and loans. We manage our financial resources efficiently, supporting our growth in Greece and abroad.

Industrial

Our 10 industrial plants and 18 RES plants in full operation in Greece, and our 45 work sites in Greece and abroad, together with our supply chain, enable us to manufacture and offer products and services that meet the needs of customers and consumers.

Human

Our more than 4,800 direct and indirect employees add value with their knowledge, talent and skills across the entire range of our activities, from enhancing efficiency and developing innovation in production activities, to maintaining relationships of mutual trust and cooperation with our local communities and customers.

Natural

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

Intangible

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

Social

The social acceptance of our activity is based on our reputation, the strengthening of transparency in everything we do, our social investments, and the open dialogue with and the trust of the local communities where we operate, as well as our people, our customers, our suppliers and our other Stakeholder groups.

2 How we operate

Vision - Mission - Corporate Values

Governance	Central Functions & Support Services
<ul style="list-style-type: none"> Corporate Governance System Risk Management System Code of Business Conduct Corporate Policies and Procedures Established Stakeholder Engagement Process 	<ul style="list-style-type: none"> Finance Treasury Strategy, Mergers & Acquisitions Human Resources Management Corporate Governance & Sustainable Development Legal & Regulatory Affairs Corporate Communication & Marketing Strategy

Business Units



The diversified business model and the strong synergies between the Business Units enable MYTILINEOS to sustain its strong financial performance and enhance its business development in tandem with its commitment to the UN 2030 Agenda.

- We make **sustainability** a key pillar of our strategy, decision-making and operations.
- We implement a new strategy for the **net zero footprint** of our activities, with ambitious targets **for 2030 and 2050**.
- We aim to continuously improve our performance, **creating value in all three Sustainable Development pillars**.

Key Stages of Our Value Chain



3 Value generated by our business activities

Economic Value

- 4,823** direct and indirect employees.
- €114.1 m.** employee wages and benefits.
- €75.9 m.** taxes paid.
- €1.6 bn** total payments to Greek suppliers.
- €379 m.** total investments.
- €1.2 m.** total exports.
- 10.7%** share of the domestic electric power production.
- 334,000** electricity and gas customers.

Environmental Value

- 12.4%** reduction in total CO₂ (Scope 1 & 2) emissions compared to 2019 levels.
- Zero** incidents affecting the natural environment as a result of industrial accidents.
- €82.8 m.** total expenditure for the protection of the natural environment.
- 91%** of total water consumption **from renewable sources** (low-depth sources where freshwater is naturally renewed).
- 43.9%** increase in electricity production from **RES**, compared to 2019 levels.
- 97.4%** increase in the production of secondary aluminium as a share of total aluminium production, compared to 2019 levels.
- 34.3%** reduction in the total amount of solid (non-hazardous) waste directed to landfills, compared to 2019 levels.
- 53.7%** increase in the quantity of the total waste recycled, reused or recovered by third parties, compared to 2019 levels.
- €2.5 m.** invested in research and development.
- 84.3%** of the total land area used in mining operations was rehabilitated.

Societal Value

- 242** new jobs in Greece and over **430** in total in Greece and abroad in 2021.
- €9.2 m.** of total social investment in 2021, with over **€4 million** representing expenditures to deal with the COVID-19 pandemic.
- 105,750** citizens as direct beneficiaries of the Company's targeted social programs since 2019.
- 0.8** total recorded accidents / 200,000 work hours (direct employees).
- 41,879** man-hours of training to develop the skills of direct employees.
- 92** traineeships.
- 19%** percentage of women in direct employment and over **21%** of women hold management positions.

Application of **ZERO TOLERANCE** of human rights violations and of incidents of corruption and bribery across all our activities.

Sustainable Development Goals

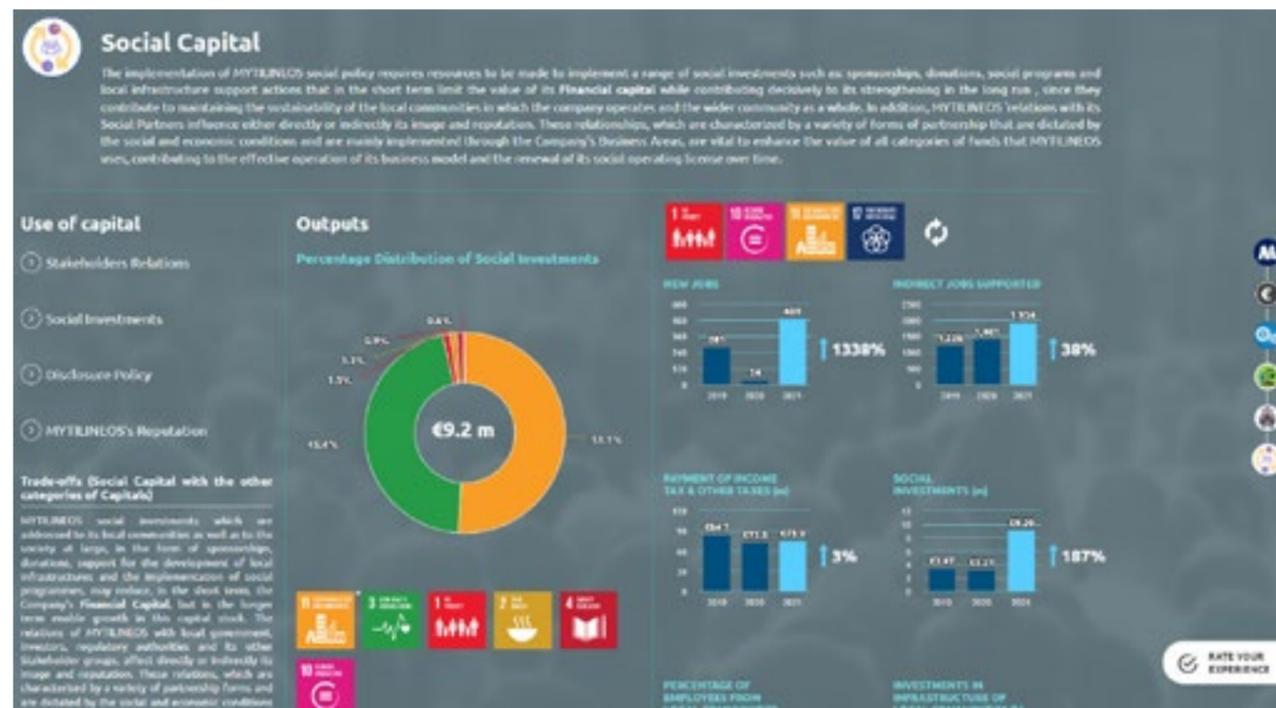


CONTRIBUTING TO THE SUSTAINABLE DEVELOPMENT GOALS

ESG performance visualization tools

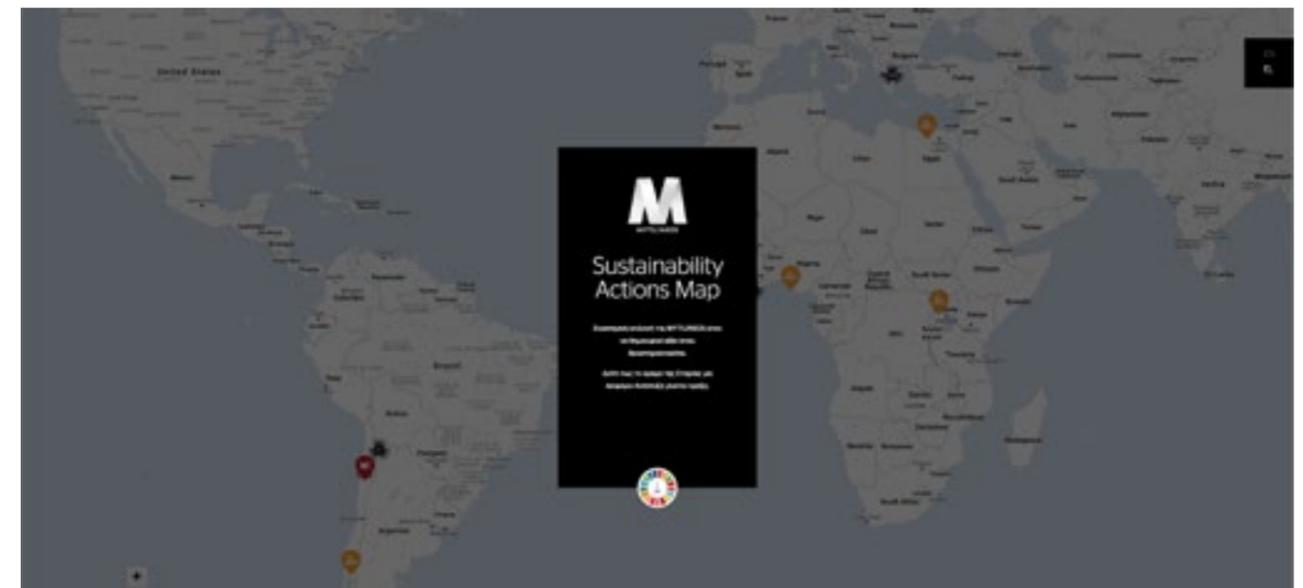
Integrated Value Creation Scorecard

The aim of the Integrated Value Creation Scorecard (scorecard.mytilineos.gr/index-en.html) is to present to all MYTILINEOS' Stakeholders the basic resources (financial, industrial, natural, human and social) that it uses in its activity, through its business model, the corresponding results and the value generated, in combination with the 17 UN Sustainable Development Goals.



Sustainability Actions Map

The Sustainability Actions Map (sdactionsmap.mytilineos.gr) is an innovative tool that presents in a concise and aggregated way the most relevant and accurate update on Sustainable Development issues to all the Company Stakeholders. The direct access to the desired information and the microsite's user-friendly interface are key features that ensure the continuous and effective provision of information to the Company's Stakeholders, focusing either on the desired Global Sustainable Development Goal or on the desired region / country for each Business Unit.



Sustainable Development Strategy

Sustainable Development is an integral part of the MYTILINEOS long-term business strategy. It is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the Sustainable Development Goals.

The Company's Sustainable Development Strategy is aimed at creating long-term and sustainable value for shareholders and other Stakeholder groups, through a holistic approach that combines economic stability with social and environmental sustainability. It is implemented on three basic levels that are inseparable from one another, and is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) across all its activities.

“We create long-term and sustainable value for all our Stakeholders, contributing to the Sustainable Development Goals and the respective national priorities.”

New Sustainable Development strategic framework

Climate Change	We participate effectively in the efforts to tackle climate change and in the national effort for a transition to a low-emissions economy, with:			
	Decarbonization strategy and practices in all areas of our business activity.	Ambitious emissions reduction targets for 2030 and 2050.	The development of new business units in Sustainable Development projects.	
ESG Approach	We enhance the valuation of our corporate value by:			
	Identifying & managing significant ESG risks and development opportunities.	Constantly improving our already solid ESG performance and publications.	Fully integrating the ESG criteria in our investment decision-making.	
Corporate Responsibility (CSR)	We operate responsibly towards:			
	Our people	The Environment	The Society	The Market
The Principle of Materiality: The Material topics that reflect our significant economic, environmental and social impacts or substantively influence the assessments and decisions of our Stakeholders, are the fundamentals of our Sustainable Development strategy implementation.		The Principle of Stakeholder Inclusiveness: Through an open and systematic consultation process, we seek to build quality and trusted relationships and to improve our collaboration with our Stakeholders, to jointly contribute to Sustainable Development.		The Principle of Accountability: We implement our commitment to transparency and to the regular provision of information to our Stakeholders, by publishing annually, for more than 12 years, the Sustainable Development Report which contains valuable information about our Non-Financial performance.



More specifically:

The first level expresses the Company's commitment to tackling climate change and its contribution to a low-emissions economy. MYTILINEOS is fully aware that climate change is one of the most urgent issues facing the planet. Moreover, the Company, considering the high CO₂ emission intensity in 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 key elements for its sustainable operation. In this respect, it has designed a local strategy to address climate change, which serves to guide its initiatives to reduce carbon dioxide emissions as defined by the Kyoto Protocol, the Paris Agreement on Climate Change (COP21) and the corresponding National Plan of Greece, which sets out its contribution to the European Green Deal (EU Green Deal).

Strategic priorities

- To further adapt its activity to the consequences of climate change by analyzing the risks involved, while also taking advantage of the opportunities arising.
- To implement, control and review the initiatives and the corresponding CO₂ emission reduction and net zero targets for 2030 and 2050.
- To integrate climate targets into the Company's strategic planning and decision-making processes.
- To implement an investment plan in >2.5 GW of RES assets by 2030.
- To develop strategic partnerships for the application of new technologies to production activities, with the aim of reducing the CO₂ emission intensity.
- To further develop the activities of its new Business Units in Renewables & Storage development projects.

The second level focuses on MYTILINEOS' systematic approach to the recording, optimal management and disclosure of information about the ESG risks and opportunities that may affect its performance, as well as its efforts to implement its strategy. Through the ESG approach, MYTILINEOS strengthens its ability to create long-term value and manage significant changes in the environment in which it operates. In this way, it responds to the current sustainability requirements of investors, capital markets and financial institutions, as well as to society's expectations of commitment and transparency regarding these issues, which keep increasing.

Strategic priorities

- To determine Material ESG topics and link them to the Company's financial performance.
- To optimally manage of ESG risks and opportunities to create long-term value.
- To enhance the trust and facilitate the flow of information between the Company and the investor community.
- To responsibly disclose Non-Financial Information in accordance with the international standards.
- To constantly improve / maintain ESG performance levels.
- To integrate ESG criteria into the Company's investment decisions and into main operating procedures.

The third 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. For MYTILINEOS, Responsible Entrepreneurship is an ongoing self-improvement and incessant learning process, while it also serves as a key mechanism for renewing its "social license to operate", while at the same time it helps improve its competitiveness at national and international level.

Strategic priorities

- To remain committed to its target of ensuring a healthy and safe work environment without accidents, adopting a prevention-oriented approach.
- To constantly mitigate the environmental impacts of its activity.
- To develop, manage and retain a dedicated human capital, with practices that promote an inclusive working environment, with equal opportunities and respect for Human Rights.
- To continue to treat its people with responsibility and consistency, remaining their first choice of employer during their entire career paths, while at the same time investing in their training and in the development of their skills.
- To implement actions of high social value, including through the development of employee volunteering.
- To engage in a systematic and honest dialogue with its key Stakeholder groups, seeking to maintain mutual trust and as well as a fuller understanding by the Company of the impacts of its operation.
- To contribute to the development of local infrastructure and, overall, to the prosperity and the respect of the rights of the citizens of the local communities adjacent to the Company's industrial units.
- To develop responsible procurement / purchases by expanding the commitment of the Company's key suppliers and business partners to sustainable development.
- To place emphasis on the quality and safety standards of the Company's products as well as on the continuous support, service and satisfaction of customers.

MYTILINEOS' contribution to the achievement of the Sustainable Development Goals (Agenda 2030)

The adoption of the 17 Sustainable Development Goals (SDGs) by all UN member states in 2015 is a milestone for the international community. These are universal goals, to the achievement of which not only all developed and developing countries, but also businesses, the academic community, NGOs and citizens' organizations, are invited to contribute, by joining forces. For Greece, the SDGs represent a major opportunity for its recovery and transition to a new growth model, with an emphasis on all three main pillars, the environment, society and the economy, as they focus on "leaving no one behind" and on eliminating inequalities of all kinds.

Since 2016, MYTILINEOS, applying the UN "SDG Compass Tool", has specified their relevance to its business activity and has identified ways to contribute to their achievement, acknowledging its share of the responsibility to do so. Since then, it has consistently contributed to the achievement of 40 specific SDG Targets (sub-targets), based on the overall approach outlined below:

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

MYTILINEOS believes that the recovery of the economy and of employment, especially in the post COVID-19 era, can only take place through the transition to a new socio-economic model that will be climate-neutral, resilient, sustainable and inclusive. In this respect, and in line with its activity, the Company has highlighted SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action) as its key strategic priorities, carrying out an ambitious RES investment plan and taking concrete initiatives to reduce CO₂ emissions by 30% until 2030 and achieve a net zero footprint, by 2050.

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

As a leading international industrial and energy company, MYTILINEOS invests in the circular economy, in the development of innovative waste recovery methods and in the application of "clean" industrial methods, through its participation in 24 european research projects.

At the same time, it steadily enhances employability in the domestic industrial sector and creates the conditions for a responsible supply chain, in all areas of its business activity. In this way, it acknowledges its share of the relevant responsibility and is actively contributing to SDG 9 (Industry Innovation & Infrastructure) and SDG 12 (Responsible Consumption and Production).

3. PROMOTION OF SAFE & PRODUCTIVE EMPLOYMENT (SDGs: 3 & 8)

In terms of its contribution to SDG 3 (Good Health and Well-being) and SDG 8 (Decent work and economic growth), MYTILINEOS promotes and ensures safe and healthy work conditions for its human resources, adopting a prevention oriented approach.

Almost all of its production units have in place ISO 45001:2018 certified Occupational Health & Safety management systems, while at the same time since the COVID-19 threat was first identified, MYTILINEOS has implemented a multifaceted action plan that focuses on protecting its employees and their families, ensuring its uninterrupted operation.

The Company, in parallel to its financial growth, continues the integration of policies and practices to enhance full and productive employment, through the creation of decent jobs for all.

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

MYTILINEOS, as it develops, strengthens the culture in its work environment with policies and practices that enhance equal opportunities, the respect for Human Rights, and the promotion of gender equality. In this way, the Company enhances the participation of women at all levels of the Company's hierarchy, the inclusion of young workers, <30 years, in its workforce as well as its effort to integrate people with disabilities into the labor market, contributing directly to SDG 5 (Gender Equality) and 10 (Reduced 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 Available Techniques for the proper management and reduction of environmental impacts are implemented at each Business Unit.

Investments are being made in order to upgrade the production process utilizing new technologies, while almost all Company production units have in place ISO 14001:2015 certified integrated environmental management systems as well as individual environmental rehabilitation plans for exploitable land areas, where necessary, thus contributing directly to SDG 6 (Clean Water and Sanitation), SDG 14 (Life below Water) and SDG 15 (Life on Land).

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

MYTILINEOS indirectly contributes to the other SDGs, by consistently implementing its social policy through actions and initiatives that enhance its harmonious coexistence with its local communities as well as with society at large.

Targeting 250,000 beneficiaries of our social policy for the five-year period 2020-2025, we continue to invest in the development of the local employment and economy through the creation of jobs (SDG 1) and the strengthening of local suppliers and local infrastructure (SDG 11), in the reduction of food insecurity for vulnerable social groups (SDG 2), and in the implementation of training programs in new technologies at schools, together with programs for the development of the professional skills of the young generation (SDG 4).

Detailed presentation of MYTILINEOS' contribution to the achievement of the Sustainable Development Goals and the respective national priorities (for the period 2016-2021)

Sustainable Development Goals & Targets directly or indirectly related to the activity of MYTILINEOS	The contribution of MYTILINEOS (Cumulative data 2016-2021)
 <p>(1.2) We contribute to the reduction of the percentage of men, women and children living in poverty in all its forms.</p> <p>(1.5) We contribute to the reduction of the exposure and vulnerability of the poor and of those in vulnerable situations, to economic and social problems.</p>	<ul style="list-style-type: none"> Considering the reduction of unemployment to be a key factor for alleviating poverty, we have created 1,044 new jobs in the framework of our activity. We support and cover the daily needs, on an annual basis, of 806 families facing serious economic and health problems, in our local communities. We have provided access to the labor market to 99 young unemployed engineers, through the implementation of custom-developed vocational training and skills development programs. Moreover, through six core social programs and initiatives we implemented, we have alleviated the consequences of poverty for more than 482 individuals (adults and children) in financial difficulty and social exclusion, ruling out all forms of discrimination.
 <p>(2.2) We contribute to ensuring access to sufficient and nutritious food throughout the year, for children in vulnerable situations.</p> <p>(2.2) We contribute to the reduction of all forms of malnutrition, and we address the nutritional needs of children and adolescents.</p>	<ul style="list-style-type: none"> We have reduced the food insecurity indicators in 63 schools in the prefectures of Attica, Viotia, Kavala, Trikala and Fokida, offering 150,486 hot and nutritious school meals to 1,487 students. We secured breakfast for 3,784 children in 25 soup kitchens in Athens, offering 61,338 glasses of milk with cereals. We helped alleviate the consequences of the COVID-19 pandemic, securing feeding arrangements for 80 vulnerable individuals (adults and children) in the Prefecture of Attica. We secured feeding arrangements, on an annual basis, for 411 children living in extreme poverty, by building a new dining hall and upgrading the restaurant equipment of St. Nicolas Preparatory School in Ghana, as well as by distributing food to the children's homes during the COVID-19 pandemic.
 <p>(3.2) We contribute to the reduction of the number of deaths of newborns and children under 5 years of age.</p> <p>(3.6) We contribute to the reduction of the number of deaths from injuries caused by road traffic accidents.</p> <p>(3.7) We help avoid deaths and illnesses caused by hazardous chemicals and air, water and soil pollution and contamination.</p>	<ul style="list-style-type: none"> We have completed the upgrade / creation of 13 Emergency Departments in the country's Public Hospitals and Health Centers, offering 168 medical devices for treating child injuries, directly benefiting more than 108,000 children annually. We upgraded the medical equipment of a University Hospital to cover the hospitalization needs of 700 newborns. We support in practice information campaigns at schools and Local Health Units across Greece, having informed from 2018 to this day 10,264 children, parents & teachers, by publishing specialized brochures annually ("Trauma prevention at School"; "Trauma prevention at Home"; "Sports & Safety"; "Beware of Burns!" and "Beware when choosing Games"). In particular, 86,340 leaflets have been distributed to this day in hospitals and schools. We covered the hospital costs of 6 surgeries for children from financially vulnerable families in urgent need of cardiac surgery. We contributed to alleviating the consequences of the COVID-19 pandemic, by offering 3,400 masks, 30,000 gloves and 60 liters of antiseptic solution to 156 senior citizens in 3 Homes for the Elderly. We performed 1,201 dental checks to 450 children from vulnerable social groups, of which 388 also required dental treatment. We fulfilled the wishes of 2 vulnerable children, seeking to help them regain the physical and emotional strength to address health problems. We implemented specialized Safe Driving training programs with over 700 direct beneficiaries (employees, professional drivers and school students in our local communities). We recorded zero incidents of degradation of the natural environment and, as a result, zero incidents of occupational diseases from our production activity.
 <p>(4.1) We contribute to ensuring that all boys and girls complete equitable and quality primary education.</p> <p>(4.3) We contribute to ensuring equal access for all to quality technical and vocational training as well as access to tertiary education.</p> <p>(4.4) We contribute to the increase of the number of young people who have the appropriate vocational and technical skills, providing them with access to employment and decent jobs.</p> <p>(4.b) We contribute to the increase of the number of scholarships, thus encouraging school students to enroll in higher education and to participate in vocational training programs in various fields.</p>	<ul style="list-style-type: none"> We created 251 new, quality vocational training and internship positions. We equipped 54 schools in regional Greece with modern technological equipment upgrading the educational process for more than 2,000 students and teachers. We offered to 4,004 school students from 45 schools around Greece the opportunity to participate, using suitable technologies and with the assistance of 115 teachers, in 340 live online group mentoring sessions, during which they communicated with successful professionals (355 mentors) and obtained answers to questions about their future. We offered 75 scholarships to the Youth Entrepreneurship Summer School of the Athens University of Economics and Business (AUEB) and to the Scholarships Program of the University of Piraeus. We supported S.T.E.M. Education programs, offering 89 Educational Robotics kits and "Renewable Energy Sources" educational kits to an equal number of schools that cannot afford to buy them. With the implementation of three core social programs, #skills4engineers, #HoMellon and #Mellonabilities, we strengthened the professional skills of 378 individuals. We offered 100 tablets to 21 Secondary education schools in the Prefecture of Aitolokarnania, helping alleviate the consequences of the COVID-19 pandemic. We created 15 school libraries in an equal number of Primary and Secondary schools in the Prefectures of Viotia, Magnesia and Preveza, benefiting 2,198 school students and 251 teachers. We supported for three years 56 students from vulnerable social groups, helping them improve their prospects of completing their basic education through their participation in program "IM IN", designed to tackle school dropout. We provided 2 robots and 18 robot kits to the Centre for Educational Robotics and Sciences of Crete, to be used for holding more than 100 educational workshops covering the entire range of S.T.E.M. subject areas, in the framework of the 3rd Educational Robotics and S.T.E.M. Festival of Crete, benefiting over 1,000 children and adults. We completed the construction of a secondary school in Nigeria and the supply of modern classroom equipment to a primary school in Uganda, offering access to education to more than 1,000 children annually.
 <p>(5.1) We support the efforts to end of all forms of discrimination against women everywhere.</p>	<p>We are opposed to all forms of discrimination against women and we demonstrate this with our performance as expressed by specific indicators:</p> <ul style="list-style-type: none"> Percentage of women in the Company's Board of Directors: 2016: 14% - 2021: 27% Percentage of women in direct employment: 2016: 13% - 2021: 18.7% Percentage of women in management positions: 2016: 18% - 2021: 21.1% Percentage of women still at work 12 months after returning from maternal leave: 65% Lost time injury rate for women (with 3 days lost) per 200,000 hours worked: 2016: 0.0 - 2021: 0.0

Sustainable Development Goals & Targets directly or indirectly related to the activity of MYTILINEOS	The contribution of MYTILINEOS (Cumulative data 2016-2021)
<p>6 CLEAN WATER AND SANITATION</p> <p>(6.1) We contribute to the efforts to achieve universal and equitable access to safe drinking water for all.</p> <p>(6.2) We contribute to the efforts to achieve adequate and equitable access to sanitary facilities for all.</p> <p>(6.3) We contribute to the protection of water resources as well as to a substantial increase in water recycling and reuse.</p> <p>(6.4) We contribute to the efficient use of water and to ensuring sustainable water abstraction.</p>	<ul style="list-style-type: none"> • We protect the water resources that we use in our activity against any identified risk of pollution. • Through our responsible practices, the main sources which we use to withdraw water from (the sea, groundwater, public water supply companies) are not affected by factors such as water depletion in the aquifer, shortage of water, limitation of the capacity of water-related ecosystems to perform their functions, and reduction of drinking water availability. • We are managing responsibly a controlled network of low-depth wells (boreholes) which allows water to be replenished naturally after withdrawal (renewable sources). • We ensure the availability and the sustainable management of water, as well as sanitary facilities, for nearly 2,000 citizens of the local settlements of Aspra Spitia, Antikyra and Ag. Nikolaos, in the Prefecture of Viotia, supplying them with over 1 million m³ of drinking water annually. • By recycling water discharges for reuse in our power plants in the Energy Center of Ag. Nikolaos (Viotia), we avoid, on an annual basis, the withdrawal of an additional volume of over 7 million m³ of seawater, which would otherwise be required. • A specific programme to reduce the consumption of industrial use and drinking water is implemented in the Metallurgy Business Unit, with very positive first results.
<p>7 AFFORDABLE AND CLEAN ENERGY</p> <p>(7.1) We contribute to ensuring universal access to affordable, reliable and modern energy services.</p> <p>(7.2) We contribute to increasing the share of renewable energy in the energy mix.</p> <p>(7.3) We aim to improve energy efficiency.</p> <p>(7.a) We enhance access to "clean" energy research and technology, by promoting renewable forms of energy and investments in energy infrastructure and cleaner energy technology.</p>	<ul style="list-style-type: none"> • Market share of the retail market for electric power: 2016: 2.69% - 2021: 6.91% (increased by 157%) • MYTILINEOS' Power & Gas Business Unit, steadily focused on creating added value for its customers, follows closely the developments in the global energy market, strategically opting to participate in international initiatives that develop new energy services. In 2021, the Business Unit participated over 10 research projects. • Portfolio of RES projects in operation: 2016: 130 MW - 2021: 222 MW (increased by 71%) • Electric power generated from RES projects: 2016: 175,530 MWh - 2021: 544,360 MWh (increased by 210%), thus avoiding the release to the atmosphere of nearly 250,100 tons of CO₂ emissions in 2021.
<p>8 DECENT WORK AND ECONOMIC GROWTH</p> <p>(8.1) We contribute to the economic development of the country.</p> <p>(8.4) We decouple our economic growth from environmental degradation and we promote sustainable production and consumption.</p> <p>(8.5) We contribute to full and productive employment and decent jobs for all women and men and for young people.</p> <p>(8.7) We contribute to the elimination of forced and child labor.</p> <p>(8.8) We protect labor rights and we promote safe working conditions for all employees without discrimination.</p>	<ul style="list-style-type: none"> • Through our overall business activity, we create an added value of €2.16 billion equal to 1.21% of the country's GDP (GDP 2021: €178,900 m. - Source: Eurostat). • Zero incidents of degradation of the natural environment from our production activity - Implementation of responsible and sustainable practices in the mining activity. • Our labor practices comply as a minimum with all the provisions of the legislation force and respect the fundamental principles laid down in the International Labour Organisation's (ILO's) Declaration on Fundamental Principles and Rights at Work. • We created 502 new jobs for young people <30 years of age. • We further reduced the exceptionally low percentage of part-time employees. 2016: 1.2% - 2021: 0.6% (reduced by 49%) • Our full compliance with the national laws in each country where we operate and the fulfilment of the commitments that we have taken in the context of our participation in international Sustainable Development Initiatives (UN Global Compact). result in the avoidance of incidents of child and forced labor. • Lost Time Injury rate (direct employees) 2016: 0.21 - 2021: 0.37 • Lost Time Injury rate (indirect employees) 2016: 0.49 - 2021: 0.22 • Zero fatalities & Occupational diseases for direct employees.
<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> <p>(9.2) We contribute to sustainable industrialization and to increasing employability rates in the industrial sector.</p> <p>(9.4) We contribute to the upgrading of the industry by adopting more "clean" and environmentally sound technologies and industrial processes.</p> <p>(9.5) We help enhance scientific research for upgrading the technological capabilities of the industrial sector.</p>	<ul style="list-style-type: none"> • Total number of direct employees: 2016: 1,888 - 2021: 2,889 (increased by 53%) • Implementation of the salaried employment (internship) program "ENGINEERS IN ACTION". A model "School for Engineers" of a high standard, which has been consistently providing Greek industry and entrepreneurship with talented and competent executives. • In the Metallurgy Business Unit, the €15 million investment in the new modern alumina calcination plant, to replace outdated technology and high thermal consumption units, was successfully completed. • Innovative 11-year collaboration of the MYTILINEOS Metallurgy Business Unit with General Electric (GE) for the implementation of the world's first Digital Smelter, an innovative digital solution in the electrolysis process, designed to optimize productivity and reduce energy costs.
<p>10 REDUCED INEQUALITIES</p> <p>(10.2) We contribute to empowerment and to the promotion of universal social, economic and political integration, regardless of age, gender, disability, race, nationality, origin, religion or economic or other status.</p>	<ul style="list-style-type: none"> • We have supported the development of the professional skills and special personal gifts of 25 individuals with disabilities (mobility / visual / hearing impairments), to assist them in their integration and development in the labor market.

Sustainable Development Goals & Targets directly or indirectly related to the activity of MYTILINEOS	The contribution of MYTILINEOS (Cumulative data 2016-2021)
<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> <p>(11.1) We contribute to strengthening local infrastructure.</p> <p>(11.4) We contribute to the effort to protect and safeguard the cultural and natural heritage.</p> <p>(11.5) We contribute to the reduction of the number of people affected by natural disasters.</p>	<ul style="list-style-type: none"> • Investments worth over €9.6 million for meeting needs related to local infrastructure & services of direct public benefit. (Supply of vehicles to municipalities, renovation of access infrastructure to playgrounds / churches / municipal libraries, paving and maintenance of central and rural roads, repairs to school buildings, financing of studies for the modernization of a biological treatment plant / the supply of water to a settlement / the construction of a local community public transport hub etc.) • We have supported studies for Cultural Routes & Archaeological Park projects, which are gradually extending to almost all the regions of the country. • We upgraded the energy efficiency of the Gymnasium-Lyceum school complex and nearby indoor gym of the Municipality of Rafina-Pikermi, where the educational and sports activities of 1,700 children from the fire-stricken areas of the Municipality and the adjacent Municipalities take place. • We donated six autonomous fire trucks to the Hellenic Fire Service Headquarters, reinforcing the operational readiness of the service. • As part of the national effort to extinguish the fires that hit the country in the summer of 2021, we strengthened the air fleet by offering to the Greek State 4 top-quality BELL 214BI helicopters for 60 days.
<p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> <p>(12.4) We contribute to the sound management of all waste in accordance with internationally agreed frameworks.</p> <p>(12.5) We contribute to the reduction of waste generation through prevention, reduction, recycling and reuse.</p>	<ul style="list-style-type: none"> • We participate, through the Metallurgy Business Unit, in 24 European research projects, some of which concern the development of technologies that will allow the holistic utilization of bauxite residues. • We drastically increased the amount of waste from our activity that was recycled, reused and/or utilized in other industrial uses: 2016: 36,000 tons - 2021: 233,000 tons (increased by 547%) • We achieved a 97% increase in the amount of recycled aluminum (compared to 2019).
<p>13 CLIMATE ACTION</p> <p>(13.1) We strengthen the adaptive capacity of our activity to natural disasters and climate-related hazards.</p> <p>(13.3) We contribute to the improvement of education and awareness-raising on climate change mitigation, adaptation, impact reduction and early warning in the event of natural disasters.</p>	<ul style="list-style-type: none"> • We have set ambitious targets for the reduction of our carbon footprint by 30% and the decarbonization of 50% (relative to the 2019 levels) of our Business Units by 2030. • We participate in the International Aluminium Stewardship Initiative (ASI) as a Production & Manufacturing member. We have obtained the relevant certification by integrating our Sustainable Development commitments into the value chain of the Metallurgy Business Unit. • We participated for the first time in the "CDP Climate Change" Sustainable Development Index, disclosing to our Stakeholders extensive information about our approach to adapting to and tackling climate change. • We implemented the special program "Information and awareness-raising of the school community on forest fire prevention and response, forest protection policies and practices" in 42 primary and secondary schools from all over Greece, directly benefiting 1,250 students and 76 teachers.
<p>14 LIFE BELOW WATER</p> <p>(14.1) We contribute to the prevention of all forms of marine pollution, especially from industrial activities.</p>	<ul style="list-style-type: none"> • Regarding the use and discharge of seawater in our activities and in particular in the cooling process of the cogeneration (Combined Heat & Power) plant of the Metallurgy Business Unit, the relevant legislative provisions defining the framework for avoiding any environmental impact are strictly adhered to. In addition, in collaboration with the authoritative organization Hellenic Marine Research Centre (HMRC), we have already carried out 5 research studies to monitor the status of living organisms on the seabed of Antikyra Bay. The studies are carried out in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change and the Water Management Directorate of the Decentralized Regional Administration). The findings of the recent studies (2019-2021), show a stable ecological status, with improvement trends at several observation stations. These studies will be continued for at least five more years.
<p>15 LIFE ON LAND</p> <p>(15.1) We contribute to the protection of natural habitats and the prevention of loss in biodiversity.</p>	<ul style="list-style-type: none"> • There have been no incidents of biodiversity degradation from the Company's activities, while the planned environmental rehabilitation activities for land areas used in mining operations are implemented annually. • So far, we have rehabilitated 84.34% of the total land area used for our mining activity, increased by 4.3% since 2016. • We have reforested a total area of 707,000 m² as part of the construction and operation of RES units. At the same time, we carry out annual bird fauna monitoring studies, while the movement of animals is not hindered as there is no fencing and the disturbance to birds is also negligible. Technical systems for their protection are installed where this is necessary.
<p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p> <p>(16.2) We contribute to the fight against all forms of corruption and bribery.</p> <p>(16.5) We contribute to the efforts to end child abuse and exploitation.</p>	<ul style="list-style-type: none"> • We follow a policy of ZERO TOLERANCE of all forms of corruption and bribery across all our activities. • We implemented two training programs for the Company's personnel, which covered training in personal data protection (GDPR) and in the MYTILINEOS Code of Business Conduct. Since 2019, 693 employees have completed training at the GDPR. • We organized 12 information seminars in 10 Greek cities on the subject of children and cybercrime, titled "Protect Your Child from Cybercrime", which directly benefited 3,166 parents & children. • We supported in Greece the Council of Europe's "ONE IN FIVE" campaign to stop sexual violence against children. We have undertaken to produce 20,000 DVDs with the campaign's information material. The campaign visited over 85 municipalities and 50 cities in Greece and was hosted on 164 television shows.
<p>17 PARTNERSHIPS FOR THE GOALS</p> <p>(17.1) We focus on corporate partnerships and on effective public-private sector partnerships, as well as on partnerships with the civil society.</p>	<ul style="list-style-type: none"> • We have held 7 thematic consultations with our Stakeholders, at local and central level, as well as 2 consultations with NGOs, in the context with our activities related to the Sustainable Development Goals. • We participate in 11 major Sustainable Development initiatives and we establish selective partnerships with academic institutions in the context of our research and development activities. • We have long-standing partnerships with more than 20 voluntary and non-governmental organizations for the implementation of our social policy. • We participate in 11 international ESG indicators, aiming to participate in assessments and draw on best practices for our continuous improvement. • We implemented a 3-year community service program in partnership with the Municipality of Levadia (2016-2018), under which we provided specific materials and financial resources for the renovation of public infrastructures, while at the same time promoting the employment of nearly 90 unemployed citizens.

Tackling Climate Change

[SASB EM-CM-110a.2] [SASB EM-MM-110a.2] [SASB IF-EU-110a.3]

In August 2021, the Intergovernmental Panel on Climate Change (IPCC), in its Sixth Climate Change Assessment Report (AR6 WGI - The Physical Science Basis), stressed that the climate system is facing changes at an unprecedented scale. According to the IPCC, climate change is already affecting many extreme weather and climate conditions around the world with rising temperatures expected to exceed 2°C unless greenhouse gas emissions are significantly reduced, achieving net zero carbon footprint and significant reductions in emissions of other greenhouse gases. According to the IPCC, between 3.3 and 3.6 billion people live in areas particularly vulnerable to climate change.

The European Commission, in the framework of the implementation of the **European Green Deal**, and the achievement of the greenhouse gas emissions reduction target of at least 55% by 2030, adopted in July 2021 a relevant package of proposals. The Commission emphasizes that it is crucial that the transition to a greener economy is done in a fair way, which was also highlighted at the United Nations Conference on Climate Change in November 2021 (CoP 26). At CoP 26, the **Just Transition Declaration** was signed by more than 30 countries worldwide, including Greece. Through this Declaration, countries are committed to securing the support of employees, businesses and communities in the transition to a greener economy.

MYTILINEOS, as a modern Company, recognized the need to move to a more sustainable business model early on. At the end of 2020, the Company made the strategic decision of the energy transition as this approach was considered correct, both economically, socially and environmentally. This decision was based on:

- the desire of the Company to contribute, to the extent possible,

to tackling climate change, as one of the greatest challenges facing humanity in the 21st century, which requires the participation of all in the transition to a net zero economy based on renewable energy sources, and

- to the realization, after conducting the relevant analysis and identifying the different needs arising from its expanded activities, that in order to remain resilient and competitive in the current challenges, the Company must integrate sustainability in the core of its activity, developing ambitious goals reducing CO₂ emissions and achieving a net zero carbon footprint, separately for each Business Unit.

The new vision of the Company was outlined by the Chairman and CEO of MYTILINEOS, Evangelos Mytilineos, at the beginning of the "ESG Summit Net Zero Action" organized by the Company in February 2021:

"Today, the need for urgent action to tackle climate change, is driving us at MYTILINEOS to take a big step towards this direction, wishing to contribute to the drastic response to the phenomenon. The time has come **to set the ground for a 100% sustainable and green industrial activity, and we are committed to achieve 30% reduction in emissions across our entire business activity by 2030 and net zero emissions by 2050.** Our ambitious climate targets are embedded in our corporate DNA, and have become a strategic pillar, a decision-making criterion, and a driver to every business operation. Moving forward, sustainable growth is and should be a priority for all. Only by aiming high and setting bold targets, all industries - including us - can ensure the creation of long-term value for all and a collective sustainable future for generations to come."

MYTILINEOS Climate Targets

Overall target 2030*	-30% reduction on total CO ₂ e (Scope 1 & 2) emissions		
Business Uni	Targets	Climate scenario	Core initiatives
Metallurgy	Total emissions kt CO ₂ e (Scope 1 & 2)	-65% ↓	Well below 2°C
	Relative emissions t CO ₂ e/t Al	-75% ↓	
Power & Gas	Relative emissions kg CO ₂ e/MWh	-50% ↓	• Production of 7,600GWh from RES
Renewables & Storage Development	Net zero carbon footprint		• Use of electric power from RES
Sustainable Engineering Solutions			• Use of electric vehicles
			• Replacement of gas-based office space heating installations with electric heat pumps
			• Use of batteries for energy storage at work sites
Overall target 2050	Net zero		

* compared to 2019 levels

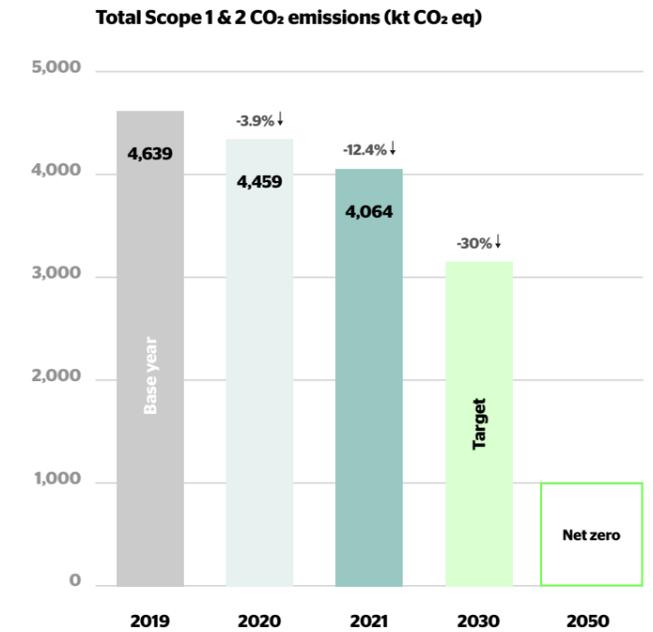
1. IPCC 2021, IPCC Sixth Assessment Report

In 2021, MYTILINEOS started the implementation of specialized action plans for each key initiative that contributes to achieving the ambitious goals of reducing its carbon footprint. **In total, 11 key initiatives and 50 sub-actions in all Business Units focus on the utilization of existing technology as well as on innovation and the development of pioneering solutions, taking into account the specific characteristics of each Business Unit and the current situation in the energy system.**

More specifically: the implementation of strategic collaborations in the field of RES, best practices, pilot programs and actions, specific technical actions applicable mainly to production activities, the optimization of existing processes and technological developments, participation in European programs, monitoring of new technologies for future application, are indicative categories of actions that began to be implemented in 2021.

The graph shows the progress against the main MYTILINEOS target to reduce total CO₂ emissions (Scope 1 & 2) by -30% in 2030 compared to the base year 2019. The Company has already recorded a decrease of almost 12.4% in 2021 through increasing its use of energy from renewable sources. However, due to the official start of the operation of the new natural gas fueled power plant, in mid-2022, the Company estimates that its CO₂ emissions will peak at the end of 2023, as 1.5 year of full operation of the new plant will have already passed. From this point onwards, the gradual reduction of CO₂ emissions is expected to begin as a large part of the individual actions of the key decarbonization initiatives in all Business Units will be at an advanced stage of implementation.

The progress against the individual targets per Business Unit is outlined below. The reduction of the total CO₂ emissions is mainly due to the reduction of Scope 2 emissions due to the optimization of the energy mix, through the gradual de-lignification and use of more energy from renewable sources.



Progress against each individual target per Business Unit

Business Unit	Target categories	Base year 2019	Status 2021	Target year 2030	% difference compared to the base year
Metallurgy	Total emissions kt CO ₂ e (Scope 1 & 2)	3,056	2,620 (-14.3%)	1,070	-65%
	Relative emissions (t CO ₂ e/t Al)	13.7	11.2 (-18.2%)	3.43	-75%
Power & Gas	Relative emissions (kg CO ₂ e/MWh)	329	322 (-2.1%)	165	-50%
Renewables & Storage Development	Total emissions kt CO ₂ e (Scope 1 & 2)	7.64	6.0 (-21.3%)	Net Zero	
Sustainable Engineering Solutions					

Materiality process

Identification of Material Topics

[GRI 102-46]

For the disclosure of **ESG** information, MYTILINEOS has established as its main criterion the identification of the topics related to its ability to create value and are therefore material for the Company itself, its Social Partners 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 the development of its Sustainable Development strategy. It is a dynamic process that is constantly evolving. The evaluations of the Material ESG topics carried out at each Business Unit are used as a basis for their respective identification at central level and vice versa. At the same time, the open dialogue of the Company with its Social Partner groups contributes new data to this process annually. The evaluation cycle of the material topics is implemented every 2 years with an interim review.

During the implementation of the process in 2021, the Company updated the sustainable development topics based on the internal and external sources it uses, with particular emphasis on the topics proposed by the **SASB (Sustainability Accounting Standards Board)** standard for each Business Unit. Subsequently, the topics were prioritized from the 4 Business Units in terms of the extent to which they affect the Company's ability to meet its business objectives, as well as in terms of their impact on sustainable development. The findings of this internal exercise were combined with the corresponding findings of a relevant field research conducted on more than 1,500 individuals, institutions and organizations from all groups of the Company's Social Partners. In addition, the alignment of the material topics with the Global Sustainable Development Goals, strengthens the Company's ability to manage them in accordance with international best practices.

The following is a detailed presentation of the process stages to determine the Material Non-Financial topics for the year 2021:

Identification Stage

PRINCIPLE: Stakeholder inclusiveness
PRINCIPLE: Sustainability context
22 topics identified in total

Sources used in the Sustainability Topics Identification exercise

- The MYTILINEOS Sustainable Development Strategy.
- Relevant laws, regulations, international agreements, or voluntary agreements of strategic importance to the Company (UNGC, SDGs).
- Significant risks for the Company.
- The SASB (Sustainability Accounting Standards Board) standard Materiality Map.
- 12 different international CSR and Sustainable Development standards and initiatives (e.g. GRI, ISO 26000, TI etc.).
- The feedback from the ESG ratings in which the Company participated.
- The results of the Social Partners annual Consultation.
- Study of material topics of peer companies.
- Media review (Study on the subject matter of publications related to the Company but also general publicity in this field during the reporting year).

Prioritisation Stage

PRINCIPLE: Stakeholder inclusiveness
PRINCIPLE: Materiality
16 topics prioritized as material

Synthesis of findings from the prioritization of the identified topics within & outside the Company

Within the Company

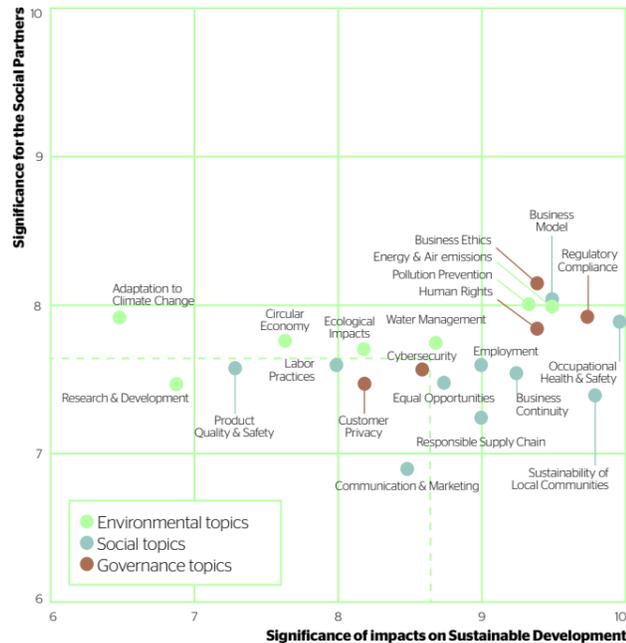
- Use of an online application for the prioritization of the identified topics, with reference to their relevance for MYTILINEOS, their impact on Sustainable Development at local and national level, and their correlation with the Sustainable Development Goals.
- ESG Team workshops at each of the Company's Business Units for prioritizing the identified topics - Confirmation and approval of the results by the General Management of the respective Business Units - Synthesis of the individual results and determination of the final value for each identified topic.

Outside the Company

Field research conducted in 2021 for the Social Partner groups of the Company (1,506 individuals, companies, institutions and organizations) through inviting them to respond to an electronic questionnaire for the evaluation of the 22 identified topics.

Materiality table 2021

[GRI 102-47]



The 16 material topics (with a value of > 8.60/10 on the internal evaluation scale and a value of 7.60/10 on the external evaluation scale) include:
a) the 3 most significant topics for the Social Partner groups.
b) the 5 most significant topics in terms of their impact on Sustainable Development and
c) the 8 topics that emerged as significant both for the Social Partners and for their impact on Sustainable Development.

In conclusion, the changes in the material topics are summarized in the following table:

New material topics	<ul style="list-style-type: none"> • Responsible Supply Chain • Business model • Equal Opportunities
Material topics with updated titles	<ul style="list-style-type: none"> • Regulatory Compliance (Legal Compliance) • Business Ethics (Anti-Corruption & Bribery) • Ecological Impacts • Business Continuity (Emergency Response Plans)

Validation Stage

PRINCIPLE: Stakeholder inclusiveness
PRINCIPLE: Completeness
All Material topics were validated

Sustainability Committee

The Validation of the Material Topics and the final approval for their publication in the Annual Report and the Sustainable Development Report of the Company was provided by the Sustainability Committee. The steps of the relevant methodology, its individual results, as well as the relevant Materiality table for 2021 were presented to the Sustainability Committee in a special meeting.

As part of the update of the Materiality process, continuous improvement and the best possible response to the modern requirements of the investment community and its Social

Partners, MYTILINEOS is already considering the implementation of the **"double materiality"** approach. By implementing this approach, the Company will include in the analysis of Material topics, in addition to the criterion of their impact on sustainable development, the criterion of their impact on the financial performance and position of the Company.

A supplementary table is provided below, presenting the grouping of Material Topics based on: a) the ESG pillar in which each identified topic is classified, b) the topics that emerged as Material from the Metallurgy Business Unit as a result of the prioritization process, within the context of the International Alumni Stewardship Initiative (ASI) in which the BU participates and c) the Global Sustainable Development Goals that the Company contributes to through the management of the respective Material topics.

ESG Pillar	Material topics 2021	Metallurgy Business Unit* ASI	Relevant SDGs
E	Ecological Impacts	●	15
	Energy & Air emissions	●	7, 13
	Water Management	●	6, 12
	Adaptation to Climate Change		13
	Circular Economy	●	6, 8, 12
	Pollution Prevention	●	12, 14, 15
	Research & Development		
S	Occupational Health & Safety	●	3, 8
	Employment	●	8, 9
	Human Rights	●	5, 8, 10, 16
	Equal Opportunities	●	5, 8, 10, 16
	Sustainability of Local Communities	●	1, 2, 3, 4, 10, 11
	Business Continuity	●	11
	Responsible Supply Chain	●	8, 12
	Labor Practices	●	
	Cybersecurity	●	
	Customer Privacy		
	Product Quality & Safety		
Communication & Marketing			
G	Business model		
	Business Ethics	●	16
	Regulatory Compliance	●	

Material topics – Other significant topics
* Metallurgy Business Unit Material Topics

Stakeholder Engagement

Relationships and cooperation with its Stakeholder groups are structural elements of MYTILINEOS' Sustainable Development Strategy. They contribute to the further understanding of the impact of its activities as well as to the Company's effort to respond consistently to the expectations of its Stakeholders, building mutual relationships of trust with them.

These different Stakeholder groups are identified, ranked and characterized as "key groups" for the Company, on the basis of specific criteria, such as: (a) the position they hold within its sphere of influence, (b) the degree of significance and relevance that they attribute to or have for its activities, and (c) the way in which they affect its ability to fulfil its vision and mission.

MYTILINEOS' Stakeholders identification table [GRI 102-42]	BU Metallurgy ASI	BU Power & Gas	BU Sustainable Engineering Solutions / BU Renewables & Storage Development
<p>Category A: Stakeholder groups that affect, and are significantly affected by, the operation of the Company's Business Units.</p>	<ul style="list-style-type: none"> Employees Customers Local community / Local municipalities Suppliers 	<ul style="list-style-type: none"> Employees Customers Local community / Local municipalities Suppliers Regulatory bodies 	<ul style="list-style-type: none"> Employees Customers Suppliers
<p>Category B: Stakeholder groups that affect the operation of the Company's Business Units, but are less affected by them.</p>	<ul style="list-style-type: none"> Regulatory bodies Press representatives Academic community 	<ul style="list-style-type: none"> Press representatives Business Organizations Sustainable Development Organizations 	<ul style="list-style-type: none"> Local community / Local municipalities Business Organizations Sustainable Development Organizations Regulatory bodies
<p>Category C: Stakeholder groups that affect, and are affected by, the Company's Business Units in a limited way only.</p>	<ul style="list-style-type: none"> Business Organizations Sustainable Development Organizations Non-Governmental Organizations 	<ul style="list-style-type: none"> Non-Governmental Organizations Academic community 	<ul style="list-style-type: none"> Press representatives Non-Governmental Organizations Academic community

Note:
1. In defining the Stakeholder groups, 5 main criteria were used (dependence, responsibility, intensity, influence and perspective) according to the **AA1000 Stakeholder Engagement - 2015 international standard**, leading to the classification of Social Partners in the above three main categories.
2. The group of Shareholders/Investors is not included in the above table since its management, as a key group, is carried out centrally by MYTILINEOS' Finance General Division.

MYTILINEOS promotes regular communication with its Stakeholder groups in a variety of ways, the frequency of which stems from the type of relationship built with each group. In doing so, the Company aims to understand the needs and expectations of the persons, organizations and businesses with which it interacts and to respond promptly to matters of concern to them, while at the same time maintaining and strengthening its "social license to operate".

Ways of communication & cooperation between MYTILINEOS and its Stakeholder groups

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
<p>Employees</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Established annual employee performance and skills evaluation process. Open daily communication via the HR-Business Partner role. Continuing education and training. Policies disclosure, whenever required. Regular and extraordinary meetings between management and employees (annual institution of hierarchy Consultations, annual meetings between the Management and employees in groups of 25 people). Annual Sustainable Development Report. Announcements via the online Intranet platform. HR Call Center for employees. 	<ul style="list-style-type: none"> Uniform corporate culture. Strengthening corporate innovation. Personnel evaluation system and incentives. Employee education and training. Work quality and employee development. Occupational Health & Safety. Information about the Company's good practices. Adaptation to Climate Change. Investments in RES projects. Protection from the COVID-19 pandemic. Mental health and well-being of employees. Initiatives to promote electro-mobility. Talent retention and development.
<p>Investing community (Shareholders - Investors - Financial analysts)</p>	<ul style="list-style-type: none"> Extraordinary and regular shareholder meetings on an annual basis. Annual presentations of financial results (Press releases, videoconferences, internet). Corporate Governance Roadshow: Shareholder engagement with investor stewardship teams and authorized consultants. Materiality process**. Information on relevant business developments (Press releases, internet). Annual meetings with financial analysts. Daily communication through MYTILINEOS' Investor Relations Division. Annual Financial Report and Sustainable Development Report. 	<ul style="list-style-type: none"> The Company's performance in international ESG indicators. Implementation of the UK Corporate Governance Code. Climate Change: Prospect of adaptation to TCFD recommendations, calculation and disclosure of Scope 3 emissions. Adoption of the SASB methodology. Diversity of the Board of Directors. Evaluation of the Board of Directors' effectiveness. Upgrading of the role of Lead Independent Director. Board Members' succession project. Linking remuneration of Board members to ESG indicators.

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
<p>Suppliers & Business Partners</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Regular communication (even daily) through the Purchasing Departments of the Company's Business Units. Promotion of MYTILINEOS' "Suppliers / Business Partners Code of Conduct". Social and environmental impact assessment every 2-3 years. Annual training program for key suppliers (Corporate Responsibility for Sustainable Development). 	<ul style="list-style-type: none"> Meritocracy. Added value of long-term partnerships. Strengthening local employment. Support of Greek suppliers. Cooperation for integrating the 10 Principles of the UN Global Compact in the business activity.
<p>Customers</p>	<ul style="list-style-type: none"> Promotion and information about products and services (continuous communication of the responsible departments). Annual Stakeholder Consultation process*. Materiality process**. Daily communication through via the Company's Commercial Divisions. Cooperation in the context of the annual customer satisfaction surveys. 	<ul style="list-style-type: none"> Product quality. Processing of orders placed. Prevention and support measures for dealing with the consequences of the COVID-19 pandemic. MYTILINEOS' performance in the EcoVadis leading supplier rating agency, on areas of responsible entrepreneurship.
<p>Local Government (local communities)</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Regular and extraordinary communication ("open door" policy, meetings, participation in local events or consultations, whenever deemed necessary). Annual communication as part of the implementation of MYTILINEOS' social policy. Annual Sustainable Development Report. Third-Party Requests & Complaints Management Procedure regarding ESG & CSR issues at the Aluminium of Greece. 	<ul style="list-style-type: none"> Support of local infrastructure and local cultural and sports activities. Strengthening local employment. The Company's environmental and social footprint.
<p>Business Organizations</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Regular and ad hoc communication (provision of data and information, meetings, participation in consultations). Participation in events, whenever deemed necessary. 	<ul style="list-style-type: none"> Social footprint of MYTILINEOS in its local communities. Fair treatment of employees.
<p>Regulatory bodies & Sustainable Development Organizations</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Regular and ad hoc communication (provision of data and information, meetings, participation in consultations). Participation in events held by Regulatory Bodies / Sustainable Development Organizations on an annual basis. 	<ul style="list-style-type: none"> Inclusion of ESG criteria in the financing of Company investments. Training of executives in dealing with Corruption and Bribery. Renewable energy sources by 2025. Incorporation of the TCFD recommendations. Greater development of Diversity & Inclusion issues. Increase in the number of women on the Company's Board of Directors.
<p>Academic community</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Forms of cooperation on an annual basis in the framework of the implementation of research programs and of the Company's social policy. Participation in career events & career days in universities. 	<ul style="list-style-type: none"> Development of partnerships (e.g. scholarships, traineeships). Support of schools with materials and equipment.
<p>Press representatives</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Direct daily communication through the Communication & Marketing General Division of MYTILINEOS on issues related to the Company's activity areas. Information on relevant business developments (Press releases, internet). Organization of briefing meetings with Greek and foreign journalists whenever deemed necessary. Organization of meetings with financial analysts. 	<ul style="list-style-type: none"> The Company's progress in light of the pandemic: (a) security of energy generation, (b) financial stability, (c) contribution to the national effort, (d) maintaining Company results at pre-pandemic levels. Upgrading of the EPC & Infrastructure Projects Sector to Sustainable Engineering Solutions (SES) Business Unit - highlighting the need to shift focus on sustainable development projects. Promotion of the Renewables & Storage Development (RSD) Business Unit through new projects and through the BOT platform. Upgrading the Metallurgy Business Unit through the promotion of news related to commodities. Company's contribution to the proper functioning of the energy market. Presentation of new products and services made available by the Company to third parties (Protergia retail). Promotion of corporate governance issues. Update on ESG issues and the Company's targets in connection with its commitment to reduce air emissions by 30% by 2030 and to zero emissions by 2050. Company's social profile - Promotion of the Company to media and audiences abroad.
<p>Volunteer Organizations</p>	<ul style="list-style-type: none"> Annual Stakeholder Consultation process*. Materiality process**. Electronic platform for submitting social requests, available throughout the year. Meetings with NGO representatives, whenever deemed necessary, based on the result of their requests' evaluation. Annual Sustainable Development Report. 	<ul style="list-style-type: none"> Development of innovative synergies to support actions around the strategic action lines of MYTILINEOS' social policy. Highlighting the positive impact on society. MYTILINEOS' commitment to respect & protect human rights. Promotion of the Company in social media via each organization. Strengthening MYTILINEOS' Corporate Volunteering. Right to education and lifelong training. Company's contribution to the escalating changes in the climate.

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

A special survey of MYTILINEOS' Stakeholders, conducted in 2021, found that the percentage of the respondents with a positive view of the improvement in the Company's performance in the framework of Sustainable Development, had increased compared to the corresponding measurement in 2019 (2021: 88%, 2019: 84%).

Percentage of positive view of the MYTILINEOS Social Partner groups on improving its performance



The institution of the Stakeholders Consultation process

[GRI 102-43]

The Stakeholder Consultation (or Dialogue) is the application in practice of MYTILINEOS' long-standing commitment to responsible entrepreneurship and to open social dialogue. Through this

practice, the Company improves the degree of understanding of the impact of its activities and meets its Stakeholder's expectations, ensuring its sustainability and the creation of added value in the wider society.

As an institution established by MYTILINEOS, the Consultation is governed by specific principles and has specific goals (<https://www.mytilneos.gr/sustainability/our-approach/our-relationship-with-stakeholders/>) and is carried out annually with absolute consistency primarily at local level, addressing current sustainability issues. The effectiveness and transparency of the Consultation is ensured through the Sustainable Development Governance system that the Company has established, under which the individual Sustainability/ESG Leaders and owners of MYTILINEOS' Business Units record and evaluate all proposals, ideas and concerns expressed by the Stakeholders. Once this has been done, the most important issues are forwarded to the respective General Divisions for decision-making regarding the responses to them and, where feasible, their integration into the corporate strategy. [GRI 102-21]

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

MYTILINEOS Thematic Consultations Table ASI

Thematic Consultation	Subject coverage	Implementation	Distinctions
2021	"Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity"	Metallurgy Business Unit	
2020	"Corporate Policy on the respect for and protection of Human Rights"	Sustainable Development Division (Central Function)	
2019	"Education - Skills Development and Creation of quality jobs"	Metallurgy Business Unit	
2018	"Developing a Responsible Supply Chain"	Metallurgy Business Unit	
2017	"Translating Entrepreneurship into Value for Society"	Metallurgy Business Unit	
2016	"We Talk about the Environment"	Metallurgy Business Unit	
2015	"Health & Safety at the Workplace"	Metallurgy Business Unit	

Thematic Consultation 2021

The Metallurgy Business Unit of MYTILINEOS, taking into account the new conditions that have been created in the context of dealing with the consequences of the pandemic, chose to hold the Company's 7th annual thematic Consultation online, entitled: "Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity".

The Consultation had a two-fold purpose:

- Presentation of all the measures and actions implemented by

the Aluminium plant for the effective management of the pandemic, during 2020-2021.

- Announcement and presentation of the new procedure for handling requests and complaints, which was recently approved in the Metallurgy Business Unit in order to improve communication with the local groups of the Company's Stakeholders, and to manage effectively all requests, comments and complaints regarding ESG and Responsible Entrepreneurship issues received by the Company.

Thematic Consultation 2021

"Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity"

37 Participants

Local Government, Church, Police, Media, Suppliers / Business Partners, Trade and other Unions, Associations, Other committees, NGOs

2 Topics to be developed

1. Management of the pandemic by the Metallurgy Business Unit
2. New procedure for managing requests and complaints from AoG's Stakeholders

Implementation of Consultation using technology (via Microsoft Teams) & **participation in 2 questionnaires** with responses given anonymously on a 5-level scale using a custom electronic platform (slidogr).

- Questionnaire A: Consultation 2021 (8 questions on the evaluation of the Consultation).
- Questionnaire B: Communication of the participating organizations with the Metallurgy Business Unit (6 questions on how and why the participants communicate with the Metallurgy Business Unit as well as on the degree to which they were satisfied with the way they were treated)

37 Comments / Proposals / Concerns presented

77% of the participants acknowledged and characterized the topics discussed as useful.

Results

The main objective of the Consultation was achieved, according to **76% of the participants**. At the same time, more than **70% of the participants said they were quite satisfied with the way the pandemic was managed**, as well as with the **management of their requests/complaints** by the Metallurgy Business Unit. No specific reports of issues requiring further improvement were noted.

The participants placed particular emphasis on the development of the Company's plan and the incentives for employees so as to increase vaccinations in MYTILINEOS units, on the continuation of checks by means of rapid tests, as well as on the management of the 4th wave of the pandemic and the actions for the transition to the next day.

Consultation with Non Governmental Organizations 2021

In the context of the implementation of its policy regarding consultation and cooperation with its Stakeholder groups, MYTILINEOS held, for the second consecutive year, an additional constructive dialogue with NGOs.

During this consultation, the Company, faithful to its long-standing approach, focused on the following objectives:

- To further develop successful partnerships already in place with partner organizations.
- To identify and report any problems and to develop new opportunities for joint action within the existing partnerships.
- To meet new organizations and plan new programs.

During this consultation, in which **18 NGOs** took part, the following issues were raised and discussed:

1. Evaluation of existing partnerships, continuation of current programs / launching new ones, and dealing with any problems.
2. The Company informed the organizations about the goals of its social policy for 2021 and their connection with the Sustainable Development Goals. For their part, the organizations informed the Company about programs of the NGOs that could serve these goals.
3. Exchange of views about how best to capture the quantitative and qualitative results of programs and actions.

4. The applicability of the Social Return on Investment (SROI) methodology to highlight the social impact of social programs, where feasible.
5. Exchange of views about the feasibility of initiating Corporate Volunteering activities, in order to involve employees in the actions of the NGOs.

The results of this Consultation confirmed that the mutually beneficial relationships of trust between the Company and the NGOs, including the availability from both sides for the purposes of communication and the prompt response to any arising issue, are maintained. Moreover, the NGOs were informed about current developments in Sustainable Development and about the development of new innovative collaborations to support actions along the key priority lines of the Company's social policy, towards further enhancing its positive impact on society. In addition, there was an improvement in the visibility of MYTILINEOS' contribution on social media (on the part of the NGOs) compared to the results of last year's consultation.



Environment

Alignment to UN Global Compact Principles

PRINCIPLE	PRINCIPLE	PRINCIPLE
7th	8th	9th

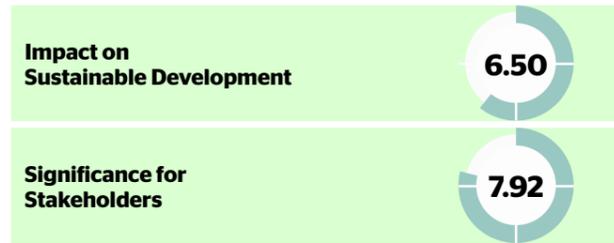
Material Topics

- Adaptation to Climate Change
- Energy & Air emissions
- Water Management
- Circular Economy
- Pollution Prevention
- Ecological Impacts

Alignment to UN Sustainable Development Goals



Adaptation to Climate Change



production, due to the significant water needs of the process. The main challenge for the Company is to assess the vulnerability of its activities to climate change, considering existing and expected climate events and the impacts that these are projected to have.

Commitment

[GRI 103-2c]

Enhancing the resilience of the MYTILINEOS production units and adapting its activities to the existing and potential impacts of climate change.

Recommendations of the Task Force on Climate - Related Financial Disclosures (TCFD)

TCFD MYTILINEOS, as an industrial company, faces various climate-related risks. These risks could have a significant negative impact on MYTILINEOS's financial position, operations, profits, image and access to capital. At the same time, there are opportunities related to climate change that the Company can take advantage of. In order to **fully understand the climate risks and opportunities that are presented, to consider the implementation of appropriate measures to manage them, and also to link them with financial data**, MYTILINEOS started in 2021 the study and implementation of the recommendations of the Financial Stability Board ([Task Force on Climate Related Financial Disclosures - TCFD](#)), in each of the four specific thematic areas: Governance, Strategy, Risk Management, Metrics and Targets. The Company aims at the end of 2022 to be in line with 70% of the total recommendations of this initiative.

Governance

At MYTILINEOS, the responsible body for the supervision of the material topics of sustainable development, is the Company's **Sustainability Committee of the Board of Directors (BoD)**. The Committee assists the Company's Board of Directors in integrating sustainable development into the Company's core decision-making processes and operations, including the potential risks and opportunities associated with climate change. The Committee supervises and monitors the implementation of the Company's Sustainable Development strategy, at every level (Climate Change, ESG approach and Responsible Entrepreneurship) in accordance with national and international trends that may affect the Company's activities and performance.

The Sustainability Committee meets at least 3 times a year and additionally whenever necessary, regarding issues related to the management of sustainable development in the Company and in particular on climate change which is a key pillar of its strategy. The **Board of Directors is informed at least twice a year, by the Committee**, on climate-related matters and has oversight on the overall progress of CO₂ reduction and net zero initiatives.

In particular, the remit of the Sustainability Committee is to **monitor the progress achieved towards the CO₂ reduction targets and the implementation of related initiatives**. The Committee is extensively informed of the progress of these initiatives by the Corporate Governance and Sustainable Development General Division, informs the Board and proposes points for improvement where necessary. In addition, the Committee monitors the progress of the Company in other important climate-related initiatives that the Company undertakes or

participates in, such as participation in the international CDP Climate Change initiative and alignment with the recommendations of the TCFD initiative.

The **Corporate Governance and Sustainable Development General Division**, through its crucial and coordinating role, cooperates closely with all Business Units and determines the strategic priorities of the Company regarding the management of climate change. It informs the Company's Executive Committee and provides information to the Board, through the Sustainability Committee, on the management of carbon reduction initiatives, the progress against climate targets and the potential risks and opportunities associated with climate change, if required. At the same time, it supports the work of the Sustainability Committee regarding the supervision of corporate initiatives for adaptation and response to climate change.

New operating model

In 2021, the Company conducted a special study for the **transformation of its operational structure** with the aim of further integrating sustainable development and issues related to climate change in its processes. In particular, the integration of ESG criteria in key processes of the Company, such as: in the performance management system, in the evaluation of investment projects, in the annual budgeting process, in the evaluation of existing and future suppliers, is currently underway. Regarding non-financial data disclosures, their linkage with financial data is systematically promoted, by incorporating basic "best practice ESG KPIs" in all the main financial reports.

Regarding the new operating model of the Company, the Corporate Governance and Sustainable Development General Division works closely with the Sustainability Leaders assigned at each BU to monitor the progress of the implementation of initiatives to reduce CO₂ emissions and achieve a net zero carbon footprint. The Sustainability Leaders, in collaboration with ESG category owners and ESG initiative owners at each BU, develop and implement the relevant action plans, the progress on which is the subject of dedicated meetings with the central Sustainable Development Division of the Company. The ESG category owners monitor progress and provide technical guidance to ESG initiative owners, who implement specific projects or initiatives related to the climate and Sustainable Development. Regarding climate change risks, the BU Sustainability Leaders in collaboration with the ESG category owners are responsible for identifying and initially assessing potential climate-related risks prior to integrating these risks into the Company's central Enterprise Risk Management System (ERM).

Strategy

MYTILINEOS launched in 2021 a thorough analysis and prioritization of the risks and opportunities associated with climate change that may affect its activities. Through this process, the Company will be able to properly adapt its operations, in order to address the risks and to take advantage of the opportunities presented. The analysis focuses on existing industrial facilities in Greece and projects owned by MYTILINEOS, as in these cases the assessment of climate risks and opportunities is material. In the context of this analysis, the time horizons examined by MYTILINEOS are the following:

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

Main categories of climate risks and opportunities for MYTILINEOS

[GRI 102-15]

- **Transition risks:** Responding to extensive changes in the policies, laws and technologies concerning the measures for adapting to and mitigating climate change, in the broader context of the transition to a lower carbon emissions economy at the domestic, European and global level. Additionally, climate change has been identified as a **potential source of reputational risk** associated with changes in the Stakeholders' perception of the Company's contribution to a lower carbon economy.
- **Physical risks:** These are risks associated with intense or longer-term natural changes which are considered important for the operation of the Company's industrial plants including, among others, the destruction of infrastructure due to extreme weather conditions, the reduction of available water resources due to lower rainfall, the rise in the sea level, the loss of working days due to extreme temperatures, the need to strengthen measures and actions to protect and restore the environment, etc. These physical risks may have economic impacts, such as direct damage to assets, as well as indirect impacts due to the disruption of the supply chain.

Both transition risks and physical risks may affect MYTILINEOS and its activities. Regarding transition risks, such as new regulatory requirements, the transition to a sustainable future with low carbon emissions will include the creation of additional regulatory measures by policy makers, in addition to existing ones. As the Metallurgy and Power & Gas BUs are among the industries that are difficult to become independent from coal, the new regulatory requirements related to climate and energy may have significant implications for the Company, both financial and others. MYTILINEOS closely monitors compliance with regulatory requirements and actively participates in work streams for the development of new regulations, in order to ensure that all relevant risks are included in the Company's risk management system.

At the same time, acute physical risks such as extreme weather events are relevant to all MYTILINEOS activities as they could affect the factories, facilities, construction sites and the normal operations of the Company. Depending on the Business Unit, some of these risks are more significant.

The table below presents the results of the first analysis of the most significant climate-related risks and opportunities that MYTILINEOS has identified for each time horizon.

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:

The impacts of climate change may occur in the industrial units, RES plants, mines and construction sites of the Business Units and subsidiaries of MYTILINEOS, as well as within the boundaries of their operation.

By whom are the impacts caused:

The Company's Business Units and subsidiaries are directly involved in these impacts, while its supply chain may also be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- Strengthening of the resilience and adaptability of its production process to natural disasters and the risks posed by climate change.
- The promotion of mechanisms to increase the ability to organize and manage activities related to climate change adaptation in the most sensitive areas of local communities.

Topic of increased significance to:

- **Employees**
- **Suppliers**
- **Customers**
- **Shareholders / Investors / Financial Analysts**
- **NGOs**
- **Press representatives**
- **Academic community**
- **Local communities**

in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

MYTILINEOS owns coastal industrial facilities in Greece and operates in countries where the impacts of climate change are more intense. Through its mining activity, which is directly related to natural resources, the Company may also face a range of challenges caused by the changes in the climate, as well as through the alumina

Risks	Short-term (2022-2025)	Medium-term (2030)	Long-term (2050)
Increased prices of GHG emissions	●	●	●
Increased electricity and fossil fuel prices	●	●	●
Increased raw materials cost		●	●
Raw materials' shortage (RMS) due to global recycling trends		●	●
Transition to new technologies for aluminium production		●	●
Extreme precipitation		●	●
Increased severity of extreme weather events (heat waves, storms, wildfires, floods, etc.)		●	●
Opportunities	Short-term (2022-2025)	Medium-term (2030)	Long-term (2050)
Investments on renewables	●	●	●
Electrification of final demand	●	●	●
Investments in technical development efforts (i.e. develop battery storage capacity and prediction technology for renewables)		●	●
Raising capitals through issuing "transition bonds"	●	●	●
Investments on energy efficiency and more efficient production processes	●	●	●
Increased use of recycled materials (secondary aluminium production)		●	●
Use of more efficient mode of transport			●
Investments on non-carbon materials	●	●	●
Investment on secondary aluminium production	●	●	●
Investments on storage systems	●	●	●
Increased demand for low carbon products and infrastructures (low carbon buildings, etc.)	●	●	●
Participation on projects aiming to protect infrastructure and restore climate-related damages			●

Integration of climate-related risks and opportunities in the Company business model

The Company has created Business Units oriented to the dynamic development of sustainable projects internationally (Renewables & Storage Development BU, and Sustainable Engineering Solutions BU). Therefore, the Company is projected to play, in the next critical decade, an important role in the energy transition and in the reduction of greenhouse gas emissions worldwide, scaling its positive impact in order to become one of the leading companies in the global market in this field. At the same time, taking into account the high intensity of CO₂ emissions in both aluminum production and electricity generation processes, climate change is a key element for the sustainability of MYTILINEOS's activities. In this context, the Company has developed a strategy for tackling climate change, which guides its initiatives to reduce carbon dioxide emissions as set out in the Kyoto Protocol, the Paris Agreement on Climate Change (CoP21) and the corresponding National Plan of Greece, which determines its contribution to the European Green Deal. MYTILINEOS is the first Greek industrial company to set specific, measurable and ambitious targets for reducing CO₂ emissions by 2030 and 2050, thus making carbon footprint reduction a priority of the new Sustainable Development Strategy. The strategy for the emission reduction targets for each of the 4 MYTILINEOS BUs was developed in December 2020, according to the well below 2 degrees Celsius scenario of the International Energy Agency (IEA). MYTILINEOS products and services have been drastically modified and improved over the last 4 years, incorporating climate-related risks and opportunities. Large or small adjustments have been made to the 4 MYTILINEOS BUs in order to create an organization that focuses on sustainability. MYTILINEOS has developed

and launched the implementation of specific action plans in order to address climate change risks and opportunities. More information is available in the section "Tackling climate change".

Furthermore, our financial planning incorporates instruments related to climate risks and opportunities. For example, in April 2021 MYTILINEOS issued a 500 million Euro Green Bond to finance future growth in solutions that contribute to the mitigation of climate change. More information is available at the following link: mytilineos.gr/sustainability/sustainable-finance/.

MYTILINEOS is currently in the process of integrating climate change risks and opportunities in its formal strategy and financial planning procedures.

Climate scenarios

In line with the TCFD recommendations, MYTILINEOS relies on climate "scenarios" to understand the strategic implications of climate risks and opportunities. In the context of the MYTILINEOS analysis, 3 scenarios (Representative Concentration Pathway - RCP) were selected, which present possible pathways regarding the concentration of greenhouse gases under different socio-economic assumptions and climate policies, based on the 5th Evaluation Report of the IPCC (AR5).

- RCP 8.5 Lack of implementation of climate policies
- RCP 4.5 Moderate scenario with implementation of certain climate policies
- RCP 2.6 Ambitious climate policy scenario

The analysis of selected social and economic parameters (e.g. coal, energy and fuel prices) as well as climate (e.g. temperature, drought, sea level rise) for each of the selected scenarios is currently in progress.

Quantification of financial impact and prioritization

At a final stage, MYTILINEOS will proceed with the quantification of the financial impact of risks and opportunities, through a special analysis of the relevant financial parameters. According to the results of the implementation of the climate scenarios, and the quantification of the financial parameters, the prioritization of the climate risks and opportunities that are expected to have a significant impact on its activities will be carried out.

Risk Management

Risk and opportunity identification

In 2021, MYTILINEOS launched an in-depth analysis to identify climate-related risks and opportunities in its Business Units. The identification of climate-related risks and opportunities was carried out following a systematic desk-based review of MYTILINEOS's activities, data analysis and consultations with relevant stakeholders. As a result of this analysis, a list of 57 risks and 27 opportunities related to climate change and found to affect the various activities of MYTILINEOS was compiled.

All identified risks and opportunities were assessed against two main criteria and the following sub-criteria:

- The **materiality** of the consequences that may occur from the identified risks and opportunities:
 - Time horizon: short-term (2022-2025), medium-term (until 2030), and long-term (until 2050).
 - Financial impact
- The level of **certainty** that the identified risks and opportunities will actually occur.
 - Confidence: to what extent the risk or opportunity can be quantified through the considered climate scenarios and reliable data can be found.
 - Sensitivity: what kind of variations do parameters related to climate risks and opportunities present based on the different climate scenarios considered.
 - Outcome likelihood: direction and / or rate of change of parameters related to climate risks and opportunities.

Following the implementation of the criteria, the risks and opportunities were categorized into 4 groups for each MYTILINEOS Business Unit:

- Risks / opportunities of **high importance and high certainty**. To the extent possible these risks and opportunities are analysed in quantitative terms, utilizing the background information of various climate scenarios as well as elementary data of the future development of MYTILINEOS. Proactive actions are envisaged for these risks and opportunities with a view to be integrated in the future policies of MYTILINEOS.
- Risks / opportunities of **high importance and low certainty**. These risks and opportunities are monitored on a systematic basis, and to the extent that they appear to constitute a significant risk or opportunity for MYTILINEOS, appropriate management plans will be developed. However, immediate action is not required.
- Risks / opportunities of **low importance and high certainty**. These risks and opportunities are watched without

- any further need to develop appropriate management plans.
- Risks / opportunities of **low importance and low certainty**, which are not considered material.

Management / Control practices

[GRI 103-2a]

In order to adapt to climate change and reduce the impact of relevant potential risks, the Company takes the following steps: a) examines climate forecasts locally to identify potential risks b) integrates the issue of climate change adaptation in its business decision-making in order to avoid or mitigate the damage associated with climate change and, where possible, to take advantage of opportunities to adapt to changing conditions; and (c) implements appropriate measures as a result of the above procedures.

In the context of the implementation of the relevant Management Systems of the Company, the following measures are implemented at each BU:

- In the Power & Gas Business Unit, the major risks have been assessed and no apparent need to adopt specific targeted measures has been identified. Regarding the Company's thermal plants, Emergency Response Plans have been developed to address the occurrence of extreme natural phenomena (heatwave, frost, storm, flood etc.), while special flood studies have also been carried out where streams are located in the vicinity of the Company's power plants. With regard to the operation of RES plants, wind turbines are fitted with safety systems which in the event of very strong winds switch the turbines off and move their blades to a secure position, while solar collector panels are hail resistant by manufacture.
- In the Metallurgy Business Unit, studies have already been carried out regarding the risks of flood, accidents and destructions, while existing infrastructures have been improved and new ones have been constructed to address the most extreme weather events. The relevant emergency response plans have also been developed. Moreover, in the context of mining activities no particular impacts have been identified so far in the Company's underground sites requiring the implementation of specific adaptation measures. A climate change risk study related to water has also been conducted. **ASI**
- Regarding the Company's business activity abroad, through the Renewables & Storage Development and Sustainable Engineering Solutions BUs, appropriate protection measures are adopted and implemented within the boundaries of the facilities and work sites, to ensure that all conditions resulting in deviations from the Business Unit's smooth operation are dealt with effectively.

Integration of climate risks in the Enterprise Risk Management System

The Company has developed an Enterprise Risk Management System for the identification, analysis, evaluation, monitoring and reporting of risks, in order to reduce the possibilities and impacts of risks and maximize the benefit of the opportunities presented and applies a risk assessment methodology (**Enterprise Risk Assessment**). The results of the risk assessment are communicated by the Risk Management Division to the Executive Committee and the Audit Committee of the Board of Directors of MYTILINEOS. The methodology applied aims to integrate risk management into the Company's processes and activities. More information is available in the "Enterprise Risk Management" section of this Report

In terms of risks and opportunities related to climate change, MYTILINEOS plans to integrate the most material in the Enterprise Risk Management System, which is managed by the Risk Management Division. Risk Owners in each Company BU are responsible for identifying and evaluating risks and opportunities, in collaboration with the Sustainable Development Division. The general principles for identifying and managing risks are described in the Annual Financial Report 2021.

Climate-related risks may have financial implications for MYTILINEOS, affecting its sales, operating costs mainly due to rising energy costs and emission allowance prices, financing terms, investments required to achieve various objectives etc. Climate-related opportunities mainly concern the increase of the share of sales from low-carbon products or products necessary for the green transition.

Metrics & Targets

The disclosure of the Scope 1, 2 and 3 emissions as well as information concerning the climate targets set by the Company and concern: a) absolute and specific CO₂ targets, b) the relevant time horizon, c) the base year that has been set, and d) the key performance indicators used to assess progress against them are presented in the sections of this report "Energy & Air Emissions" and "Tackling Climate Change" respectively.

Results

[GRI 103-3a-ii]

In 2021, MYTILINEOS submitted for the first time a report to the international **CDP Climate Change initiative (Ranking C)**, disclosing extensive data on the actions it implements related to climate change and comparing its performance with the largest companies in the world.



European Taxonomy of Sustainable Investments

In order to meet the EU's climate and energy targets by 2030 and the European Green Deal targets, it is vital to focus investment on sustainable projects and activities.

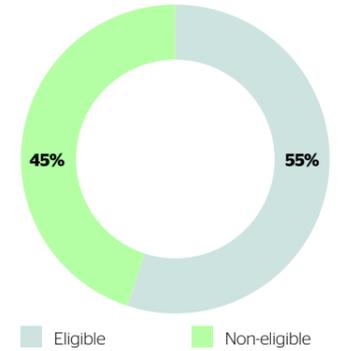
To achieve this requires the development of a common language and a clear definition of what is "sustainable". That is why the action plan to finance sustainable growth has created a common classification system for sustainable economic activities, the European Taxonomy.

In this direction, in 2021, MYTILINEOS proceeded to review its financial activities in order to determine which of them fall within the framework of the European Taxonomy, as defined by Regulation (EU) 2020/852 (art. 8), and then to publish related financial KPIs such as revenue, capital expenditure (CAPEX) and operating expenses (OPEX) related to these activities.

The proportion of the total turnover from the sale of goods or provisions of services, as well as the total CapEx and OpEx of the Group's economic activities that correspond to activities determined to be eligible for EU Taxonomy purposes according to the description of these activities and taking into account the respective NACE activity codes, as these are presented in the Delegated Act 2021/2139/EU, are presented below. Since we are currently in the first period of implementation of the Taxonomy framework (1/1 - 31/12/2022), the Group's economic activities were reviewed and ultimately included/excluded solely on eligibility basis and their alignment with the relevant technical screening criteria provided in the related Delegated Acts has not been reviewed.

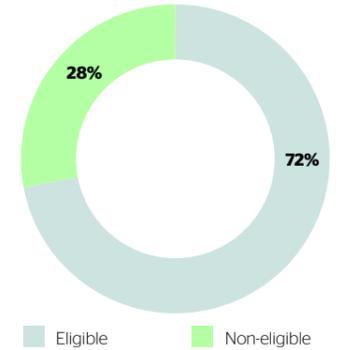
- **Proportion of the total turnover.** It was calculated based solely on the total net turnover from the sale of goods and provision of services. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation and under the condition that said revenue does not include own use and intergroup transactions.

Eligible activities based on turnover



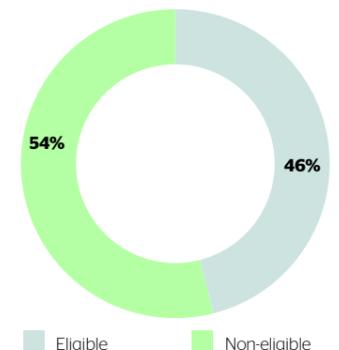
- **Proportion of the total CapEx.** It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation.

Eligible activities based on CapEx



- **Proportion of the total OpEx.** It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation.

Eligible activities based on OpEx



More information on MYTILINEOS activities under the European Taxonomy is available at the MYTILINEOS Annual Financial Report 2021.

Energy & Air emissions



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
In the areas where the aluminium and alumina production plants as well as the Company's thermal power plants operate.

By whom are the impacts caused:
The impacts are caused by the Metallurgy and Power & Gas Business Units of MYTILINEOS and by its subsidiary KORINTHOS Power, while key suppliers of the Company may also be indirectly involved in these impacts.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The increase in the percentage of renewable energy sources in the energy mix nationally.
- The improvement of energy efficiency and the promotion of investments in energy infrastructure and cleaner energy technology.

Topic of increased significance to:

- Employees
- Suppliers
- Customers
- Shareholders / Investors / Financial Analysts
- NGOs
- Press representatives
- Academic community
- Local Communities

in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

Aluminium production and electric power generation from thermal plants are the primary sources of the Company's energy consumption and carbon dioxide (CO₂) emissions, creating an impact on the phenomenon of climate change and representing significant operating costs. Reducing its carbon footprint and achieving a net zero footprint are the most important challenges for the Company under its new Sustainable Development Strategy.

Major risks

[GRI 102-15]

- Any deviations from the applicable legislation on industrial emissions may cause additional air pollution and result in

additional costs due to the need to purchase extra CO₂ emission allowances, affecting the Company's financial results as well as its capacity to retain its existing customers, investors or business partners and attract new ones.

- A further increase in the price of CO₂ emission allowances (€/t), as this may be shaped by the future EU policies on energy and climate, is likely to affect future compliance costs.

Commitment

[GRI 103-2c]

Responsible use of energy and other natural resources, in accordance with the main priority areas of MYTILINEOS' [Environmental Policy](#). To achieve the ambitious targets of reducing CO₂ emission by 30% and achieving a net zero footprint by 2030 and 2050 respectively.

Risk Management / Control Practices

[GRI 103-2a]

MYTILINEOS has adopted specific initiatives to tackle climate change, which are outlined in the section "Adaptation to Climate Change" of this Report. The Company's targets for CO₂ emissions (Scope 1 and 2) are consistent with the emission reductions required to keep global warming below 2°C by 2030, and are in line with the vision of the European Green Deal to achieve climate neutrality by 2050, as well as with the United Nations' Sustainable Development Goals. MYTILINEOS aims, until 2026, to complete a large part of its 1.5GW RES investment plan in Greece, to have made significant progress in the electrification of the Metallurgy Business Unit from renewable energy sources, to have increased the production of secondary aluminium to 26% of its total aluminium production, and to have integrated basic digital industrial methods into the production stages. At the same time, the implementation of relevant initiatives such as the use of electric vehicles in the Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units is ongoing.

As part of the Company's promotion of the use of natural gas as a transition fuel to the "green energy" era, the construction of the new combined cycle gas-fired (CCGT) power plant was completed in late 2021, making the Agios Nikolaos Energy Centre in Viotia a new national energy center. The new plant has a thermal efficiency of over 63%, a capacity of more than 826 MW as well as the possibility of using fuel mixes with hydrogen or biogas instead of natural gas, thus constituting a powerful instrument that can be used in the coming years to achieve the climate goals of MYTILINEOS. Today, it is the most powerful power plant in the country and one of the largest power plants in Europe, strengthening and ensuring electrical sufficiency in the country and the energy transition.

At the same time, MYTILINEOS:

- Closely follows the relevant **developments in the legislation** and takes preventive measures in order to minimize any potential adverse impacts.
- Invests in **renewable energy sources** and in the use of digital industrial methods in the production stage, with the aim of saving energy, reducing dependence on fossil fuels and reducing air emissions. It should be noted that the 10-year collaboration of the Metallurgy Business Unit with General Electric for the development of the world's first Digital Smelter, the

first digital solution introduced in the operation of the electrolysis process, is continuing. **ASI**

- Expands its activities in **recycling aluminium scrap** from end-of-life products and by acquiring the relevant know-how, it greatly strengthens its efforts to substantially reduce the use of raw materials (bauxite) and save energy. More specifically, in 2021 the production of secondary aluminium increased by 20%. **ASI**
- Systematically implements **Best Available Techniques (BATs)** in its production processes and by using more environmentally friendly fossil fuels such as natural gas -recognized as a transition fuel towards decarbonization- in nearly all its industrial units, it aims to improve its energy efficiency and reduce dust emissions.
- Ensures the **proper maintenance** and the best possible operation of the machinery in its industrial plants, while investing in their modernization with new technological equipment, where feasible. In 2021, EPALME S.A., a MYTILINEOS subsidiary active in the production of secondary aluminium, completed its investment in the purchase of a new anti-pollution technology furnace, to ensure that the strict limits of its environmental license are not exceeded. In 2021, a major scheduled maintenance of the power plant of Korinthos Power took place, lasting for 3 months.
- Monitors on a monthly basis its emissions** of CO₂, Fluorine and PFCs (Perfluorocarbons) and implements timely corrective actions and appropriate technical interventions to ensure that the respective annual emissions are below its statutory allowance and are maintained at the lowest possible level.
- Carries out checks of other pollutants emissions** (NO_x, SO_x and particles) by means of continuous and periodic sampling measurements. In the Aluminium production plant, equipment has been installed to monitor and record dust emissions and take measurements in accordance with the environmental legislation and the Company's standards. In the Company's electric power generation plants (Combined Heat and Power plants and thermal plants), an online NO_x emissions measurement system is in operation, which automatically activates alarms if the "high" values set (which in any case are lower than the maximum allowed ones) are exceeded. Measures to suppress diffuse dust are also taken, such as maceration of roads and raw materials, as well as tree-planting. In the Metallurgy Business Unit, emissions of pollutants other than greenhouse gases are systematically calculated, while since 2022, specific targets have been set for further reducing these emissions. The main relevant actions concern the following:
 - Optimization of the fuel mix used in the production process, mainly by replacing all fuel oil with natural gas.
 - Search for and pilot testing of desulphurization solutions.
 - Operation of the new filter in the anodes production process and effective retention and recycling of fluorinated emissions.
 - Constant effort to source low-sulphur coke shipments.
- Has ensured that in all its existing industrial plants all the statutory **greenhouse gas emission licenses** have been obtained. Moreover, appropriate emission monitoring and reporting infrastructure has been deployed and is in operation.
- In electricity generation, due to the nature of the activity, the Company focuses on **maintaining the operation of thermal power plants at the highest efficiency levels** in Greece, making the best use of natural gas as a primary fuel. MYTILINEOS' thermal power plants use natural gas to generate electricity. This is a fossil fuel with a lower carbon content

than other fossil fuels, without release of SO₂ and particulates, lower NO_x emissions (mainly NO₂) compared to the limits allowed by the applicable law, and low CO₂ emissions (by 70%) compared to lignite plants.

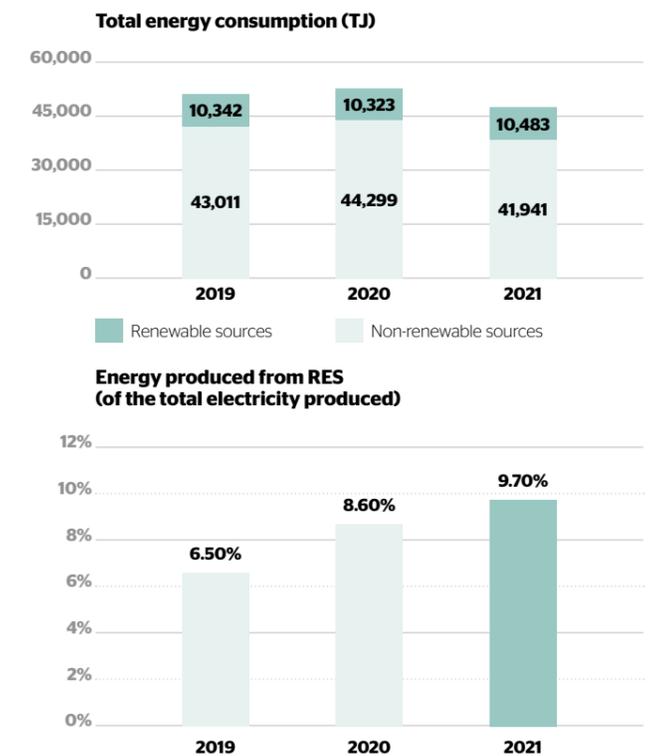
- Participates in the **Emissions Trading Scheme** (EU ETS), through the Metallurgy Business Unit (since 2005) and the Power & Gas Business Unit (since 2012). Since 2020, the new permits have been issued and all procedures for calculating and verifying air emissions are being followed in compliance with the EU ETS Phase IV (2021-2030) regulations, under which compliance costs are higher, due to the allocation of a constantly decreasing number of free allowances relative to the actual emissions. **ASI**
- In 2021, the decision was taken to carry out in the near future a preliminary study for the installation of **carbon capture systems** at the facilities of Aluminium of Greece, in collaboration with a leading company in this field worldwide.

Results

[GRI 103-3a-ii] [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]

In 2021, the **total energy consumption** decreased by 4% due to the maintenance of the Korinthos Power plant. In particular, the total energy consumption from conventional energy sources (natural gas, diesel, gasoline) **decreased by 2.5%**. The quantity of electricity purchased for consumption **increased slightly** (by 1.4%), **with nearly 31% of it coming from renewable sources**.

At the same time, in 2021 there was **an increase in the production of energy from RES**, which represented 9.7% of the total electricity produced.



Total energy consumption (TJ)* [GRI 302-1]	2019	2020	2021
Energy consumption (Non-Renewable sources)	43,010.9	44,298.7	41,940.6
Natural Gas	42,577.9	43,860.3	41,431.5
Mazut (Fuel oil)	280.1	297.0	332.1
Gas oil (Diesel)	138.7	129.5	156.7
Heating oil	7.1	6.0	11.5
Gasoline	6.7	5.4	8.7
Energy purchased (Electric Power)	10,342.1	10,323.2	10,483.1
Non-Renewable Sources	8,093.5	7,457.2	7,219.4
RES (Renewable Energy Sources)	2,248.6	2,866.0	3,263.7
Quantity of energy produced	20,816.5	21,856.6	20,235.6
IPP (Thermal plants)	15,286.4	15,622.7	13,757.6
CHP (Combined Heat and Power Plant)	4,167.4	4,351.3	4,518.3
RES (Renewable Energy Sources)	1,362.7	1,882.6	1,959.7
Quantity of energy exported (sold)	20,816.5	21,856.6	20,235.6
IPP (Thermal plants)	15,286.4	15,622.7	13,757.6
CHP (Combined Heat and Power Plant)	4,167.4	4,351.3	4,518.3
RES (Renewable Energy Sources)	1,362.7	1,882.6	1,959.7
Total energy consumption	53,353.0	54,621.9	52,423.7

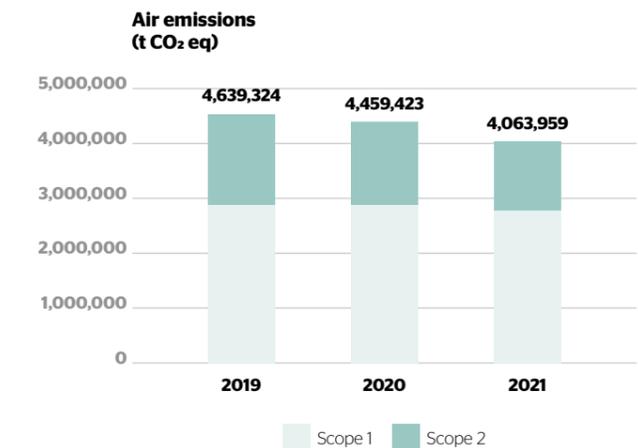
* Total energy consumption = Energy consumption from Non-Renewable sources + Energy purchased for consumption + Energy produced - Energy sold.

In terms of energy intensities in the Metallurgy Business Unit, the specific consumption in the production of bauxite recorded an increase by 6.7%. At the same time, a decrease of 2.6% was observed in the specific consumption in the primary electrolysis aluminium production, while the specific consumptions in the production of anhydrous and hydrated alumina did not record significant changes. In the Power & Gas Business Unit, **the specific energy consumption in production per TJ of electric power remained stable** compared to the previous year. **ASI**

Basic energy intensities [GRI 302-3]	2019	2020	2021
Metallurgy Business Unit			
Specific consumption in bauxite production (GJ/t of production) ¹	0.118	0.134	0.143
Specific consumption in anhydrous alumina production (GJ/t of production) ²	3.21	3.12	3.15
Specific consumption in hydrated alumina production (GJ/t of production) ³	5.76	5.85	5.92
Specific consumption in primary electrolysis aluminium production (GJ/t of production) ¹	51.57	51.76	50.4
Specific consumption in primary smelter aluminium production (GJ/t of production) ²	1.83	2.10	2.16
Specific consumption in anodes production (GJ/t production) ⁴	4.20	4.05	4.01
Power & Gas Business Unit			
Specific production consumption (GJ of natural gas consumption/GJ of electricity production)	165	165	1.60

1. Combined consumption of electric power, gas oil & heating oil.
2. Combined consumption of natural gas, electric power, gas oil & heating oil.
3. Combined consumption of steam, electric power, diesel DFB, gas oil & heating oil.
4. Combined consumption of natural gas, electric power, mazut, gas oil & heating oil.

The MYTILINEOS Metallurgy and Power & Gas Business Units produce over 99% of the Company's direct and indirect carbon dioxide (CO₂) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas), while indirect (Scope 2) emissions correspond primarily to the consumption of electric power for the production activity of the Metallurgy Business Unit. In 2021, **direct CO₂ emissions (Scope 1) recorded a reduction by 5.5%**, due to the scheduled major maintenance of the Korinthos Power plant, while **indirect CO₂ emissions (Scope 2) also recorded a reduction by 15%** due to the further use of RES. The above changes resulted in an overall reduction of Scope 1 & 2 emissions by 8.9% compared to 2020.



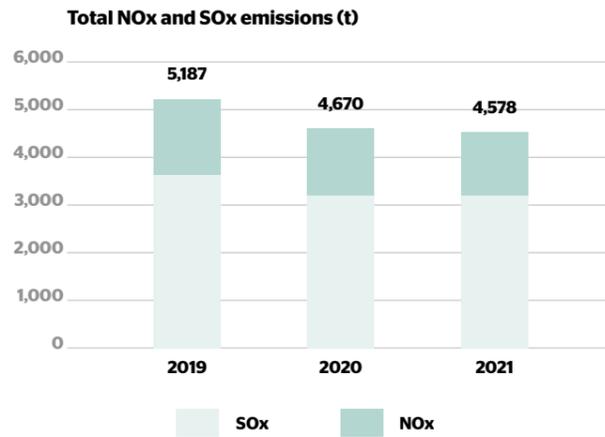
In 2021, MYTILINEOS created an integrated system for recording the sources of **Scope 3 emissions** and for calculating these emissions from all Company Business Units. Through this exercise, the Company calculated for the first time all the categories of indirect Scope 3 emissions, which are presented below. The exercise also helped identify the categories that contribute the most to the Company's overall carbon footprint (C1, C2, C3, C10, C11). At the same time, ways of reducing the Scope 3 carbon footprint are already being examined.

Air emissions (t CO ₂ eq)	2019	2020	2021
Direct greenhouse gas emissions (Scope 1) [GRI 305-1]	2,798,068.3	2,885,465.3	2,726,024.0
Fuels (CO ₂ : 100%)	2,398,364.3	2,467,109.0	2,336,038.2
Processes (CO ₂ : 74% - PFCs: 26%)	396,284.3	412,671.6	383,734.0
Transport (CO ₂ : 100%)	3,419.7	5,684.7	6,251.8
Indirect greenhouse gas emissions (Scope 2) [GRI 305-2]	1,841,255.3	1,573,958.2	1,337,935.2
Electricity (CO ₂ : 100%)	1,841,255.3	1,573,958.2	1,337,935.2
Total (Scope 1 & 2)	4,639,323.6	4,459,423.5	4,063,959.2
Indirect greenhouse gas emissions (Scope 3) [GRI 305-3]	-	6,991,358	5,612,393
C1: Purchased goods and services	-	1,116,996.8	1,074,601.8
C2: Capital goods	-	703,208.2	819,923.4
C3: Fuel- and energy- related activities not included in Scope 1 or Scope 2	-	1,550,852.6	1,231,685.0
C4: Upstream transportation and distribution	-	10,991.0	13,229.7
C5: Waste generated in operations	-	56,755.6	47,239.6
C6: Business travel	-	5,699	8,031
C7: Employee commuting	-	5,169.8	1,914.3
C8: Upstream leased assets	-	1,141.0	1,155.8
C9: Downstream transportation and distribution	-	13,935.6	17,507.9
C10: Processing of sold products	-	1,208,145.3	1,153,014.0
C11: Use of sold products	-	2,271,192.9	1,190,582.1
C12: End-of-life treatment of sold products	-	52,399.2	61,892.0
C13: Downstream leased assets	-	0.0	0.0
C14: Franchises	-	0.0	0.0
C15: Investments	-	0.0	0.0
Total (Scope 1, 2 & 3)	N/A	11,450,781.5	9,676,352.0
Other significant air emissions [GRI 305-7]	5,555.2	5,030.8	4,846.4
SO _x (t)	3,634.0	3,190.1	3,214.3
NO _x (t)	1,553.3	1,480.0	1,363.4
CF ₄ (t)	11.8	13.3	10.8
C ₂ F ₆ (t)	1.4	1.6	1.3
Fluorine (t)	258.3	262.2	210.8
Particulates (t)	94.3	80.5	41.8
Volatile organic compounds - VOC (t)	2.0	3.1	3.9

1. Direct greenhouse gas emissions (Scope 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO₂eq). The figures used are those applicable at the end of the reporting period (the year 2021). The conversion factor values have been obtained using the NIR 2021 methodology.
2. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO₂eq). The figures used are those applicable at the end of the reporting period (the year 2021). The conversion factor values have been obtained using the European Residual Mix 2020 (market-based) methodology.
3. The calculation of Scope 3 emissions is based on the GHG Protocol.

Regarding the other significant air emissions, the most significant changes compared to 2020 were the following:

- The **reduction** of the total quantity **of nitrogen oxide (NOx) emissions by 7.9%**.
- The **significant reduction by 48.3% of the quantity of particulates**. The reduction compared to the respective emissions for 2020 is mainly attributed to the operation of the FTC unit (anode furnace gas treatment), which resulted in concentrations below the maximum permissible limit of 5mg/Nm³.
- The continuous efforts, the regular inspections and the appropriate technical interventions applied for the containment of the **emissions of PFCs** in the anhydrous alumina electrolysis process for the production of primary aluminium, led to a **reduction of about 7%** of these emissions.
- Significant reductions in CF₄, C₂F₆ and fluoride, which stood at approximately 19% respectively.



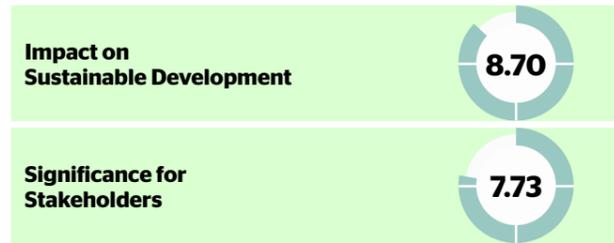
Regarding specific CO₂ emissions (direct and indirect), a slight increase (0.8%) was recorded in the production of hydrated alumina, a reduction by 4.5% was recorded in the production of anhydrous alumina, while a significant reduction by **6.4%** was recorded in the production of primary aluminium. Specific emissions in secondary aluminium production remained at the same level as in 2020. **[GRI 305-4] ASI**

Metallurgy Business Unit Specific air emissions (t CO ₂ eq) [GRI 305-4]	2019	2020	2021
t CO₂ (Scope 1&2) / t of hydrated alumina production	0.401	0.382	0.385
t CO ₂ (Scope 1) / t of hydrated alumina production	0.004	0.002	0.002
t CO ₂ (Scope 2) / t of hydrated alumina production	0.397	0.380	0.383
t CO₂ (Scope 1&2) / t of anhydrous alumina production	0.185	0.177	0.169
t CO ₂ (Scope 1) / t of anhydrous alumina production	0.175	0.169	0.160
t CO ₂ (Scope 2) / t of anhydrous alumina production	0.010	0.008	0.009
t CO₂ (Scope 1&2) / t of primary aluminium production¹	8.70	6.98	6.53
t CO ₂ (Scope 1) / t of primary aluminium production	2.31	2.39	2.15
t CO ₂ (Scope 2) / t of primary aluminium production	6.39	4.59	4.38
t CO₂ (Scope 1&2) / t of secondary aluminium production	0.33	0.33	0.33
t CO ₂ (Scope 1) / t of secondary aluminium production	0.25	0.26	0.26
t CO ₂ (Scope 2) / t of secondary aluminium production	0.08	0.07	0.06

1. Specific emissions of primary aluminium are calculated in the context of the participation of MYTILINEOS' Metallurgy Business Unit 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. Includes electrolysis aluminium, smelter aluminium and anode production activities.



Water management



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

<p>Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]</p> <p>The impacts occur in the areas (e.g., Corinthian Gulf) of the industrial plants, Business Units and subsidiaries of MYTILINEOS.</p> <p>By whom are the impacts caused: The impacts are caused by MYTILINEOS' Metallurgy and Power & Gas Business Units, while the Company's subsidiaries DELPHI-DISTOMON and EPALME, as well as the local settlements adjacent to the Aluminium plant, may also be indirectly involved.</p> <p>The management of the topic by MYTILINEOS contributes to Sustainable Development:</p> <ul style="list-style-type: none"> Ensuring access to safe, accessible drinking water and sanitation facilities for workers and local settlements. Efficient use of water, ensuring its sustainable withdrawal in the context of the Company's industrial activity. Encouraging the participation of the local communities in improving water management. <p>Topic of increased significance to:</p> <ul style="list-style-type: none"> Employees Suppliers Customers Shareholders / Investors / Financial Analysts NGOs Academic community Local Communities <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

MYTILINEOS uses significant quantities of water in specific sectors and areas of activity. Therefore, maintaining the rational withdrawal, use, consumption and discharge of water is a key challenge for the Company in the context of its contribution to the national and global efforts for responsible management of water resources.

Major risks

[GRI 102-15]

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

Commitment

[GRI 103-2c]

Responsible management of the withdrawal, consumption and discharge of water, in line with the main priority areas of MYTILINEOS' [Environmental policy](#).

Risk Management / Control Practices

[GRI 103-2a] [GRI 303-1] [SASB IF-EU-140a.3]

In all of the Company's Business Units:

- Use of water takes place in strict compliance with the Environmental Terms Approval Decisions and the Water Use Licenses of all industrial plants.
- In order to identify and assess the future likelihood of regulatory changes affecting sustainability issues, including water, the Company communicates regularly with the competent authorities and with the regulatory bodies involved.
- The environmental officers in each Business Unit ensure that the progress made towards the targets set is monitored and that water resources are managed responsibly in the context of the activities of all industrial plants.
- Internal water consumption targets are set on an annual basis for each production Unit.
- As regards the management of the water discharges resulting from MYTILINEOS' activity, this is fully controlled and takes place by monitoring the parameters determined by the environmental terms and regulations under which the facilities of the company's Business Units have obtained their environmental licenses.
- Aiming to continuously improve and enrich its practices in this area, the Company participates voluntarily since 2016 in the CDP - Water Security global sustainable development initiative, by disclosing comprehensive data about its practices in the management of water resources and comparing its impact and performance to those of the largest companies globally.

Particularly regarding the Metallurgy Business Unit:

- Water withdrawals from ground water are obtained from a controlled network of wells (boreholes) **which allows water to be replenished naturally after withdrawal (renewable sources)**. More specifically, a recent special study

carried out by the Company in 2021 regarding the management of water withdrawals from the network of wells in relation to the total capacity of the wider area's aquifer, showed that the average quantity of water entering the aquifer on an annual basis (rainfalls, snowfalls etc.) reaches 51.36 million m³. According to the Water Use License issued, the Company has the right to withdraw 10% of this total quantity, **however its actual withdrawal rate is even lower, thus ensuring the preservation of the water level in the aquifer and consequently in the boreholes, something that is also confirmed by the regular checks of the water level at all the wells**. Moreover, in 2020 the Metallurgy Business Unit commissioned a specialist firm to perform a Risk & Impact Assessment of the area's aquifer, as well as a series of hydro-geological studies, which have been completed and whose findings served as inputs to the establishment of an appropriate corrective and preventive action plan. **ASI**

- The needs in water of all facilities in the Aluminium plant, including the needs of the cogeneration (Combined Heat & Power - CHP) plant and the IPP Thermal plant, but also of the adjacent settlements, are covered by a network of 17 boreholes. The quantity of water withdrawn from this network is consumed in industrial use, power generation and for supplying water to the adjacent settlements. Brackish water is withdrawn from 2 boreholes belonging to this network and is used exclusively in the closed-circuit cooling systems of the smelter and the anodes, after which it is discharged to the sea. Seawater is withdrawn for the cooling needs of the CPH plant and the IPP Thermal plant and is discharged to the sea via a closed pipeline.
- Water recycling and reuse programs are implemented to the maximum extent possible in the production processes or in secondary uses of the Metallurgy Business Unit, together with rainwater collection and utilization practices. **ASI**
- The Metallurgy Business Unit produces the largest quantity of liquid waste, the largest part of which is recycled within the production process itself.
- The specifications and maximum water discharge limits for the water resulting from each activity are determined by the applicable Environmental Terms Approval Decision and the Water Use License. To control the quality of the disposal of the treated liquid industrial waste, quantity, pH and temperature measurements are taken on a continuous basis, while analyses are also made once a month, at the exit point of the treatment plant, of the effluent's temperature, suspended solids, total dissolved solids, COD, BOD₅, pH, and content in sulphides and fluorides. Regarding the characteristics of the sea area to which the discharge takes place, its physical and chemical characteristics are monitored for compliance with the Environmental Quality Standards (EQS). **[GRI 303-2]**
- Regarding priority substances, their definition and the determination of the maximum discharge limits are specified by the Environmental Terms Approval Decision of each unit. During 2021 no incidents of non-compliance with the legislation, regarding priority substances occurred. **[GRI 303-4d] ASI**
- Finally, in 2021 a project for using the discharged brackish water as industrial use water replacing the quality water currently used was launched, with the goal of saving 120m³ of water per hour. **ASI**

Results

[GRI 103-3a-ii] [SASB EM-CM-140a.1] [SASB EM-MM-140a.2] [SASB IF-EU-140a.1]



- In 2021, MYTILINEOS was evaluated **for the 6th consecutive year** by the CDP international Sustainable Development organization, in the Water Security category, for its management of water resources in the context of its activity. According to the results of the evaluation, the Company maintained its B score (on a D-/A scale), which ranks it the top tier of the 2nd index category "Management Level". The official report issued for the Company and the relevant evaluation details are available at its corporate website (mytilineos.gr/sustainability/esg-performance/esg-ratings/).
- 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 biodiversity value or important for the local communities**. In 2021, the withdrawal of water from water stress areas was kept to the minimum possible and did not exceed 0.3 ML, representing a minimal percentage of the total quantity of water withdrawals.
- In total, 169 thousand ML of water were withdrawn for use, 1,247 ML less than in 2020, while the quantity of used water returned to the water recipients after quality treatment and in accordance with the approved environmental terms per Business Unit, stood at 162 thousand ML. As a result, **total water consumption stood at 6.95 thousand ML, increasing by almost 5.5%**, while the consumption of fresh water remained almost stable (increasing by just 1%) compared to 2020.
- Concerning the discharge of liquid waste, the efforts to manage them efficiently continued in 2021, to ensure the protection of the environment and human health. It should be noted that the figures presented regarding the quality of discharged water are lower, and in many cases much lower than the statutory ones. The total quantity of pollutants in the treated wastewater discharged to the water recipients stood at 16.1 t, broken down as follows: BOD: 5.6 t, COD: 9.0t, TSS: 1.5 t, TN: 0 and TP: 0.

Water withdrawal sources and quantities 2021 [GRI 303-3]	All areas ¹	Environmentally sensitive areas (water stress areas)
1.Sea (ML)		
Volume of seawater used in the cooling systems of the CHP plant of the Metallurgy Business Unit. The limit to the volume of water withdrawn annually has been determined by the Water Resources Management Directorate of the Sterea Regional Administration. The needs of work sites are also included.	Subtotal	159,824.5
	Fresh water ²	0.0
	Other water types ³	159,824.5
2. Ground water (ML)		
Volume of industrial-use, brackish and drinking water used primarily to meet the manufacturing / processing, energy and water supply needs of the Company's industrial facilities. This quantity is obtained primarily from a network of 17 wells (boreholes), owned by the Metallurgy Business Unit, which the company operates in the wider region of its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. The needs of work sites are also included.	Subtotal	8,599.2
	Fresh water	5,178.3
	Other water types	3,421.3
3. Surface water (ML)		
Volume of water withdrawn from a stream in the vicinity of DELPHI-DISTOMON, and of rainwater which is collected. The needs of work sites are also included.	Subtotal	13.9
	Fresh water	10.0
	Other water types	3.9
4. Water produced (ML)		
Volume of ground water resulting from the bauxite mining process of DELPHI-DISTOMON, a subsidiary of MYTILINEOS, which is collected using pumps and transferred for treatment prior to its final discharge.	Subtotal	216.0
	Fresh water	216.0
	Other water types	0.0
5. Third parties (ML)		
Volume of water from municipal reserves and public water supply services that meets the needs of the buildings and especially of industrial facilities of MYTILINEOS, as well as seawater returned by Motor Oil and used in the desalination process for the production of industrial use water in a thermal power plant of the Power & Gas Business Unit.	Subtotal	426.8
	Fresh water	194.7
	Other water types	232.1
Total water withdrawals (Subtotals 1+2+3+4+5)	169,080.5	0.3
	Fresh water	5,599.0
	Other water types	163,481.5

Water discharge by destination 2021 [GRI 303-4]	All areas	Environmentally sensitive areas (water stress areas)
1.Sea (ML)		
• Metallurgy Business Unit Volume of seawater and brackish water from the cooling process of the CHP plant, of brackish water from wells which is used for cooling the heat exchangers of the smelter in AOG's aluminium production plant, and of wastewater, including rainwater, measured at the point of exit from the primary treatment facilities.	Subtotal	161,795.6
	Fresh water	0.0
• Power & Gas Business Unit Volume of water discharged from the desalination process.	Other water types	161,795.6
2. Ground water (ML)		
Volume of water used in drilling during the bauxite mining process of DELPHI-DISTOMON.	Subtotal	23.0
	Fresh water	15.9
	Other water types	7.1
3. Surface water (ML)		
Discharge of the wastewater produced by the bauxite mining plant, water used for wetting the roads and for watering the surrounding restored area, and waste water from the secondary aluminium processing plant, after primary treatment.	Subtotal	267.8
	Fresh water	267.8
	Other water types	0.0
4. Third parties (ML)		
Household liquid waste discharged to public water supply and sewerage companies, as well as industrial-use water used in the electricity production process, disposed of to a waste treatment plan of Motor Oil, after first having its pH and temperature regulated.	Subtotal	43.7
	Fresh water	13.9
	Other water types	29.7
Total water discharges (Subtotals 1+2+3+4)	162,130.0	0.0
	Fresh water	297.6
	Other water types	161,832.4

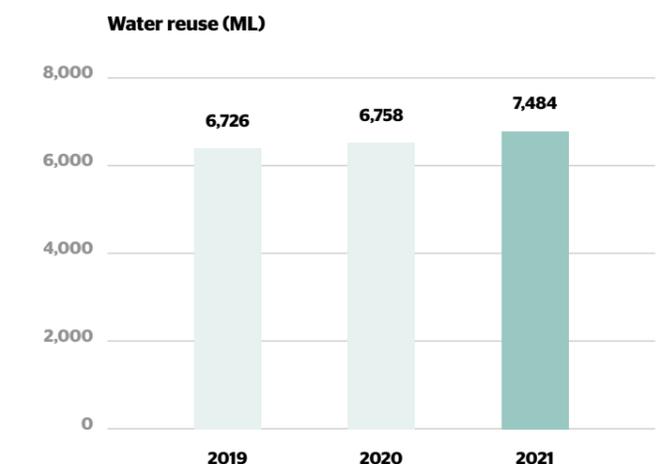
1. Including environmentally sensitive areas (water stress areas).
 2. Water with a concentration of total dissolved solids equal to or less than 1,000 mg/L.
 3. Water types with a concentration of total dissolved solids higher than 1,000 mg/L.

Total water consumption (all activities)	2019	2020	2021
Total water withdrawals (ML)	170,788.2	170,327.5	169,080.5
Total water discharges (ML)	164,254.7	163,724.1	162,130.0
Total water consumption (ML)	6,533.6	6,603.4	6,950.5

Consumption by water type 2021 [GRI 303-5]	All areas	Sources / Areas sensitive in terms of water resources
Total water consumption (ML)	6,950.5	0.3
Fresh water (ML)	5,301.4	0.0
Other water types (ML)	1,649.1	0.3

- Only **2.9%** of total consumption concerned water supplied by the **public water supply company**. At the same time, **1,219.6 ML**, representing **17.5% of total consumption**, concerned the supply of drinking water to the settlements of Aspra Spitia, Antikyra and Agios Nikolaos in Viotia, to meet their needs. The increase in the consumption of drinking water in these settlements by 5.3% compared to 2020 is due to the rise in their population (visitors, contractors for works performed at the plant), as well as to significant leaks of drinking water in the settlements' water supply networks, due to infrastructure issues.
- Regarding the Company's efforts for the effective management of water in the production process and especially in the Metallurgy Business Unit, which handles 99.8% of the total quantity of withdrawn water, **the specific water consumptions showed significant decreases**, both per ton of both hydrated alumina produced (-6.6%) and per ton of primary aluminium produced (-5.8%).

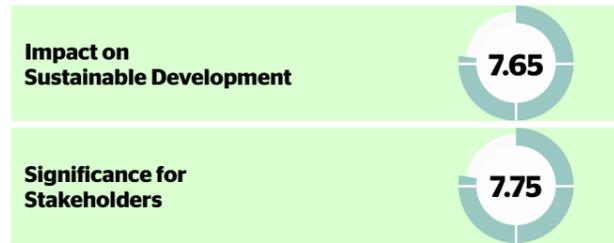
Metallurgy Business Unit - Specific water consumptions ⁴ ASI	2019	2020	2021
Water consumption / ton of hydrate alumina production (m ³)	3.24	3.61	3.37
Water consumption / ton of primary aluminium production (m ³)	1.23	1.37	1.29



- The amount of water reused in other Company plants, **thus preventing an equivalent volume of water withdrawals, amounted to 7,484.3 ML** (2020: 6,757.5 ML), corresponding to **4.4%** of total water withdrawals, **showing an increase by 10.8% from 2020**. Of this total quantity, 99.9% concerns the Power & Gas Business Unit and, in particular: **(a) the reuse of 7,448.1 ML of discharged seawater** from the cooling network of the CHP plant, for cooling the thermal power plant in the area of Ag. Nikolaos, Viotia, and **(b) the recycling of 29.2 ML** of liquid waste from the Heat Recovery Boiler of the combined-cycle thermal power plant in Agioi Theodoroi, Korinthia. The remaining quantity concerns the use of **7 ML of rainwater**, collected as a good practice in the bauxite mining activity.

4. A more accurate procedure for calculating specific water consumptions was applied and therefore the data for 2019 and 2020 have been updated. [GRI 102-48]

Circular Economy



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]
Where the impacts occur: The impacts occur in the industrial units of MYTILINEOS.
By whom are the impacts caused: The impacts are primarily caused by the MYTILINEOS Metallurgy Business Unit and by potential indirect contributions from the Company's business partners.
The management of the topic by MYTILINEOS contributes to Sustainable Development: <ul style="list-style-type: none"> The reduction of waste through prevention, reduction, recycling and reuse. The reuse of materials, expanding the life cycle of products in order to reuse them, creating additional economic value. The reduction of wastewater that does not undergo treatment, and the substantial increase in the recycling and reuse of water at national level.
Topic of increased significance to: <ul style="list-style-type: none"> Employees Suppliers Customers Shareholders / Investors / Financial Analysts NGOs Press representatives Sustainable Development Organizations / Regulatory Bodies Academic community Local Communities in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

The collection, management and reduction of waste are key elements of MYTILINEOS' environmental policy. Bauxite residues resulting from the production process in the Metallurgy Business Unit account for the largest volume of the Company's solid waste. A key challenge for MYTILINEOS is to improve in this area, which depends to a large extent on the utilization of this waste either by itself, through its participation in European pilot programs or by making it available for the production of other industrial materials. This particular type of waste

is accumulated in a specific designated area which, for the purposes of measuring MYTILINEOS' environmental footprint, is considered as a Controlled Landfill for Non-Hazardous Waste operating in accordance with the licensing acts of the Sterea Regional Administration and the Viotia Regional Unit.

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

Major risks

[GRI 102-15]

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

Commitment

[GRI 103-2c]

Control, continuous reduction and proper management of solid and liquid waste using recovery, reuse and recycling techniques where feasible, in accordance with the main priority areas of MYTILINEOS' [Environmental policy](#), using as a reference the application of Best Available Techniques in the production process.

Risk Management / Control Practices

[GRI 103-2a] [GRI 306-1] [GRI 306-2]

- The management and reduction of waste are key elements of the Company's environmental policy. A **network for the collection of waste** for reuse and recycling has been designed and is in operation in every production facility.
- In cases where recycling cannot be completed onsite (i.e., in the Company's facilities), waste is disposed of through the Company's cooperation with **alternative waste management systems** which have the statutory approvals of the Hellenic Recycling Agency, as well as with licensed (per waste category) waste collection, transportation, management and recovery contractors in Greece and abroad.
- Regarding the **management of liquid waste discharges** resulting from MYTILINEOS' activity, this is fully controlled and takes place in accordance with the parameters determined by the environmental terms and regulations under which the facilities of the Company's Business Units have obtained their environmental licenses.

In the Metallurgy Business Unit, which accounts for 99% of the Company's total waste:

- The bulk of the waste produced results from the production process and the processing of raw materials (e.g., bauxite residues, low grade bauxite residue), from maintenance works (e.g., electrolysis basin waste) and from the processing of the metal for casting (e.g., drosses). The management of such waste includes collection, source separation, transport, and recovery / disposal of all waste streams, according to the type of each individual waste and the requirements of the applicable legislation. Approximately 150,000 t of waste are

recovered annually through licensed companies cooperating with MYTILINEOS. Of this total quantity, 70,000-100,000 t are bauxite residues, 30,000-45,000 t are low grade bauxite residue (utilized at 100%) and the rest includes waste such as drosses (utilized at 100%), packaging waste, waste lubricant oils (WLO), etc. In the case of bauxite residues, it is worth mentioning that in tandem with their recovery by companies cooperating with MYTILINEOS (cement industries), MYTILINEOS also participates in and co-funds 12 European research projects for the recovery of bauxite residues, while pilot facilities for the treatment of bauxite residues have been set up within the industrial facilities of Aluminium of Greece (AoG). MYTILINEOS also participates in 2 other European projects for the recycling of waste from the electrolysis basins. **ASI**

- Specially configured sites for the final disposal of waste (Controlled Landfill for Hazardous Waste and Inert Waste Disposal Site) are maintained and used, while bauxite residues (non-hazardous waste representing 95% of the Company's total waste) are deposited at the same gradient with that of the natural relief of the disposal site. **ASI**
- In line with its **voluntary commitment to continuously reduce the quantities of hazardous waste** generated by its production processes, the Metallurgy Business Unit has taken the following actions:
 - Participation in subsidized programs aimed at the treatment and subsequent recovery of hazardous waste resulting from the dismantling of the electrolysis basins at the end of their life (carbonaceous and refractory materials). AoG participated in the "SPL Cycle" research project, which focused on the pulverization of waste materials and their subsequent treatment with appropriate solvents, in order to obtain products that are useful as raw materials in industry. Moreover, the "REMOVAL" research project, in which AoG also participates, explores the recovery of the carbon part of the waste as a reducing agent in the metallurgical process.
 - Study on the "end-of-waste" status (declassification as waste) of soda-rich waste from the alumina production process, within the facilities of AoG. The study is carried out by Zeologic, a subsidiary of MYTILINEOS, and is currently at a final stage. The laboratory analyses performed have returned encouraging results.
 - Actions to further improve the processes for separation of waste at the source, with the aim of separating potential non-hazardous streams, something that is not possible today given the production and collection processes currently in place.
- In 2021 the **Life Cycle Assessment (LCA)** study on the assessment of the possible environmental impacts related to the extraction of bauxite and the production of alumina and aluminium by MYTILINEOS' Metallurgy Business Unit was completed. The LCA study is a process of assessing the impacts on the environment of a product throughout its life-cycle (cradle-to-grave), thus increasing the efficiency in the use of resources. The LCA study identifies the stages in the product's lifecycle that cause the greatest impacts on the environment and the prevailing type of impact. The study was carried out in accordance with the principles of the ISO 14040 and 14044 international standards, with the aim of obtaining all the data required for securing certification with the Performance Standard of the Aluminium Stewardship Initiative (ASI). **ASI**
- To reinforce the circular economy, increase the Company's

recycling rates and support the national efforts for increasing the recycling rate for aluminium, which is 100% recyclable, **ambitious targets have been set regarding the production of secondary aluminium** and the quantity of recycled (scrap) aluminium used. More specifically, for 2022 the targets for the use of recycled aluminium and the production of secondary aluminium are 28,5673 t and 27,049 t respectively, while for 2025 these targets rise to 68,600 t and 65,000 t respectively.

- Regarding the management of wastewater, the **Metallurgy Business Unit** produces the largest amount of this type of waste, most of which is recycled within the production process itself. More specifically, the alumina and aluminium production plant uses an underground system of water or effluents collection pipes, which leads to a liquid industrial waste treatment plant featuring settling basins, an oil separator and multi-layered activated carbon filters. The pH value, temperature and flow are constantly measured and monitored online. There is also a safety tank with a capacity of 1,330 m³, to which waste is fed, when necessary, by an automatic diversion system. **ASI**
- Moreover, **three Biological Treatment Facilities** are in operation, covering the aluminium production plant's and the local communities' needs in water: The Biological Treatment Facility in Aspra Spitia & Antikyra, with a capacity for 10,000 residents, the Biological Treatment Facility in Agios Nikolaos, with a capacity for 200 residents, serving the homonymous settlement, and the Plant's Biological Treatment Facility, with a capacity for 2,000 people, serving the population of the aluminium plant and of the power plants also located within the same industrial complex. The Biological Treatment Facility in Aspra Spitia & Antikyra was the first biological treatment facility for urban wastewater in Greece and was built together with the settlement, by the company Degrémont-France. In accordance with the Environmental Terms Approval Decision, monthly analyses are carried out by a quality control laboratory, accredited by the Hellenic Accreditation System in accordance with the ELOT EN ISO 17025 standard. During the bathing season (May - September), seawater samples are taken at eight (8) locations in the Antikyra Bay, while seawater quality is also assessed annually by an independent external organization. These locations include the sea point exit of the treated water pipe from the Biological Treatment Station of Aspra Spitia & Antikyra. The results related to this location have demonstrated that the samples taken comply with the legally required limits for "exceptional quality" and "good quality" coastal waters. **ASI**

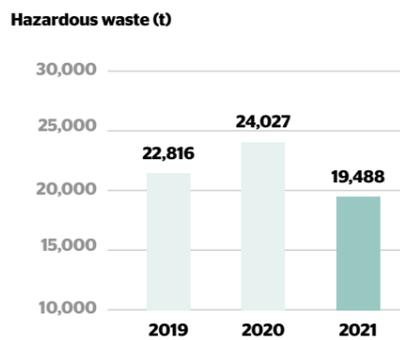
Results

[GRI 103-3a-ii] [GRI 306-3] [GRI 306-4] [GRI 306-5] [SASB EM-CM-150a.1]

- In 2021, the total quantity of the Company's solid waste **amounted to 934.1 thousand tons, increased by 11.3% from 2020** (839.4 thousand tons), which came mainly from the increase in the production of ECDW (Excavation, Construction and Demolition Waste) as a result of the increased construction activity during 2021. It should be noted that the entire quantity of this waste category was recycled.
- Out of the total quantity of generated waste, 84% concerned bauxite and low grade bauxite residues, while the remaining 16% included aluminium, industrial and urban waste and materials that are collected and include various types of



metal scrap (e.g., iron and steel), batteries of vehicles, tires, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, lamps and photocopier consumables. **ASI**



- The percentage of solid waste directed to controlled landfills, as a percentage of the total non-hazardous solid waste produced (excluding bauxite residues, which undergo special treatment), **was further reduced in 2021 and stood at 2.0%** (2020: 2.4%).
- Concerning **hazardous waste, their quantity was significantly reduced (by 18.9%)**, because the number of electrolysis basins that had reached their end of life and required reconstruction was reduced. Such a reconstruction process, when taking place, results in the generation of hazardous waste.
- The percentage of the total solid waste that was **reused, recycled and recovered** in various ways, either by the Company itself or through third parties, increased by 6 percentage units and **reached 25%** (2020: 18.6%) of the total waste produced (including bauxite residues). Of this quantity, **115,000 tons of bauxite residues and low grade bauxite residues** were made available to the cement industry and to other industrial uses. **ASI**

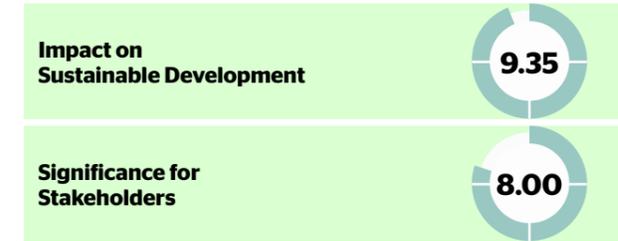
Non-Hazardous Waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2021
Recycling	9094	97,774.2	98,683.6
Reuse	0	26,395.2	26,395.2
Recovery by third parties	0	102,814.0	102,814.0
Controlled Landfill (Accumulation site for Bauxite Residues)	669,683.9	0	669,683.9
Controlled Landfills for Non-Hazardous Waste	3,154.5	1,629.2	4,783.7
Storage for recovery	12,165.2	0	12,165.2
Storage in third-party facilities	0	86.3	86.3
Recovery / Exchange	0	12.3	12.3
Incineration	0	0	0
Total	685,913.0	228,711.2	914,624.3

Hazardous Waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2021
Recycling	0	382.7	382.7
Reuse	0	24.9	24.9
Recovery by third parties	0	4,784.5	4,784.5
Controlled Landfills for Hazardous Waste	13,887.2	0	13,887.2
Storage for recovery	347.6	0	347.6
Storage in third-party facilities	0	1.1	1.1
Recovery / Exchange	0	45.5	45.5
Incineration	0	14.9	14.9
Total	14,234.8	5,253.6	19,488.4

Waste generation by waste category (t) ¹ [GRI 306-3] [GRI 306-4] [GRI 306-5]	Quantity diverted from disposal	Quantity directed to disposal	2021
Waste resulting from exploration, mining, quarrying and physical and chemical processing of minerals	115,005.3	674,091.7	789,097.0
Waste from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), sealants and printing inks	0.3	-	0.3
Waste from thermal processes	7,171.9	1,830.6	9,002.5
Waste from shaping and from chemical and mechanical surface treatment of metals and plastics	157.8	-	157.8
Oil waste and liquid fuels waste (except edible oils)	237.8	-	237.8
Waste packaging: absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	2,470.0	-	2,470.0
Waste not otherwise specified in the list	347.9	10,426.2	10,774.1
Construction and demolition waste (including excavation soil from contaminated sites)	118,851.0	-	118,851.0
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	1,189.2	377.1	1,566.3
Municipal waste (household waste and similar commercial, industrial and institutional waste), including separately collected fractions	326.5	1,629.2	1,955.7
Total	245,757.8	688,354.8	934,112.6

1. Waste types have been classified according to the categories of the European Waste Catalogue (EWC).

Pollution prevention



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
The impacts occur in the areas of operation of MYTILINEOS' industrial plants, Business Units, subsidiaries and main suppliers.

By whom are the impacts caused:
Directly involved in these impacts are the Metallurgy and Power & Gas Business Units of MYTILINEOS and its subsidiaries DELPHI-DISTOMON and KORINTHOS Power, while key suppliers of the Company may be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The prevention of all land and marine pollution.
- The environmentally sound management of all waste in accordance with internationally agreed frameworks and to the reduction of their emissions into the air, the water and the soil, in order to reduce its impact on human health and the environment.
- The reduction of waste production through prevention, recycling and reuse.

Topic of increased significance to:

- Employees
- Suppliers
- Customers
- Shareholders / Investors / Financial Analysts
- NGOs
- Press representatives
- Academic community
- Local Communities

in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

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

Major risks

[GRI 102-15]

- The possible deterioration of the 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.
- Key production and transport activities of the Company involve the risk of spills, following unforeseen malfunctions or accidents, into the marine environment, since they are adjacent to it.
- Failure to prevent and manage the above risks could have a significant impact on the Company's economic and industrial capital, limiting its ability to create value either by increasing the financial costs for dealing with these incidents, or through possible administrative sanctions that may be imposed or the Company's potential inability to continue to smoothly conduct its activities.

Commitment

[GRI 103-2c]

Prevention of all identified risks of pollution from the Company's activities, in accordance with the main priority areas of MYTILINEOS' [Environmental Policy](#).

Risk Management / Control Practices

[GRI 103-2a]

Pollution risk management is directly linked to the safe, socially and environmentally responsible operation of all the Company facilities. The Company's annual target is to avoid any incidents and industrial accidents that could cause pollution to the natural environment, across all its business activities.

To address this risk, preventive and suppressive response measures are implemented in all MYTILINEOS Business Units. In particular:

In the **Metallurgy Business Unit**, 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 their prevention and the avoidance of any incident involving a deterioration of the environment. **ASI**

The main pollution risk prevention measures implemented in the Business Unit consist in the following:

- Strict compliance with the approved Environmental Terms of the activity of Metallurgy.
- Continuous measurement and monitoring of air emissions and suspended particulates.
- Measurement and monitoring of water discharges from point sources.
- Compliance with the measures provided for in the Safety Study (SEVESO III - implementation of Joint Ministerial Decision 172058/2016).
- Conduct of industrial accident response exercises provided for in the Safety Study (SEVESO III - implementation of JMD 172058/2016), which in some cases are carried out in cooperation with external bodies (Fire Service, Civil Protection, etc.)
- Final disposal of non-hazardous waste in insulated areas with the construction of a geological barrier of low water

- permeability, as well as the corresponding disposal of hazardous waste in specially constructed and geomembrane- and geotextile-insulated cells (controlled landfill sites).
- Implementation of Best Available Techniques in the management of infrastructure and industrial waste (electric filters, bag filters, primary industrial waste treatment, biological wastewater treatment, oil basins and safety oil traps, sewer oil traps, tank level meters, waste quality meters, custom-designed waste disposal sites, etc.).
- Performing chemical analyses of wastewater at workshops and facilities, as well as specific analyses of wastewater discharged for various chemical parameters (e.g., Al, Cr, Cr+6, Fe, BODs, COD, etc.).
- Good knowledge of and training in Emergency Response Plans (EPs).
- Storage and use of chemicals by following the instructions of the Safety Data Sheets.
- Systematic visual inspections of facilities.
- Unloading of heavy fuel oil from tankers using as a precaution a floating anti-pollution dam.
- Constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against standard quality values. An example is the discharge of the seawater used in the cooling systems of the cogeneration (Combined Heat and Power - CHP) plant of the Metallurgy Business Unit, where in addition to the strict compliance with the relevant law provisions determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authoritative organization (Hellenic Centre for Marine Research - HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed. The studies carried out by the Company in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change, and the Water Management Directorates of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of the recent studies, carried out in 2019 and 2020, show a stable ecological status, with improvement trends recorded at several observation stations. These studies will be continued for at least five more years.
- Operation of a fire protection department, which is equipped with 3 fire engines, staffed by a permanent fire-fighting team, and coordinates and trains a team of volunteer firefighters.

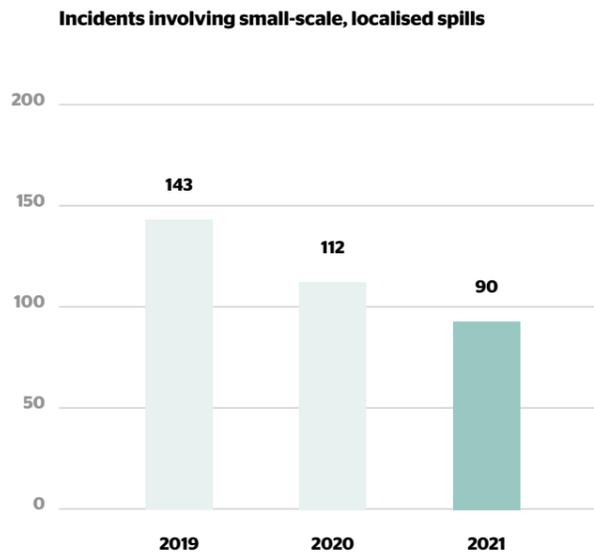
Moreover, in what concerns small-scale, localized incidents involving spills of lubricants in the context of mining activities in the tunnels of underground quarries, which are of a limited extent and affect surface soil only, mainly caused by wear and tear of lubricant pipes and by damages to machinery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

- In the Power & Gas, Sustainable Engineering Solutions (SES) and Renewables and Storage Development (RSD) Business Units**, intensive efforts are made in all production units (thermal plants, RES plants, composite construction plants and work sites), to identify potential risks, so that these are addressed in a timely manner and the consequences of unforeseen malfunctions and accidents are minimized. In particular, the following are implemented:
- All procedures provided for in the Environmental Management Systems and Emergency Response Plans, as well as the operating and maintenance instructions for installations.
 - Monitoring of air emissions.
 - The best available options for the reuse, recycling and disposal of the various types of generated waste.
 - Training of personnel and readiness exercises for handling spills.
 - Preventive maintenance programs.
 - Selection of state-of-the-art equipment.
 - Safety oil basins.
 - Systematic visual environmental facility inspections.
 - Annual audits by independent external organizations for the certification of the implemented Environmental Management Systems.

Results

[GRI 103-3a-ii]

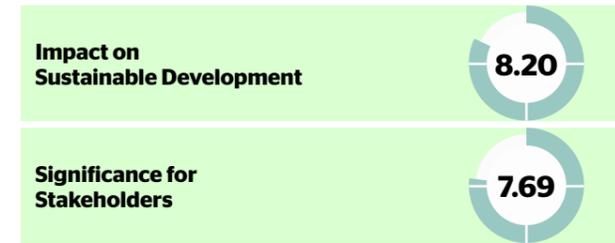
- During 2021, **no incidents occurred involving the pollution of the natural environment from production activities or involving industrial accidents in all Company Business Units. Concerning air emissions, these remained below the statutory maximum limits for yet another year.**
- Regarding the incidents of small-scale, localized oil spills from machine failures in the context of the mining process, a total of 90 incidents occurred in 2021, 20% less than the corresponding number in 2020 (112 incidents), with the total spill volume amounting to 10,308lt¹, decreased by 20% compared to 2019 (12,869lt).



1. The quantity of 10,308 lt corresponds to 0,065 kbls.



Ecological Impacts



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:

In the area where the mining activity of the company DELPHI-DISTOMON takes place, as well as in protected areas of the Natura network where the RES plants of MYTILINEOS' subsidiaries operate.

By whom are the impacts caused:

The impacts are caused by the Metallurgy Business Unit and in particular by the subsidiary company Delphi-DISTOMON, as well as by the wind energy subsidiaries of MYTILINEOS.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The conservation of mountain ecosystems, including biodiversity.
- The restoration of the exploitable land affected by the business activity.
- The increase of forestry and reforestation at local and national level.

Topic of increased significance to:

- Employees
 - Suppliers
 - Shareholders / Investors / Financial Analysts
 - NGOs
 - Academic community
 - Local Communities
- in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

The protection of biodiversity and the restoration of the natural landscape of the land areas used in the Company's business activities, constitute a substantial challenge for MYTILINEOS in the context of the reduction of ecological impacts and its contribution to sustainable development.

Major risks

[GRI 102-15]

Ineffective prevention of any adverse impacts 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 such a case, the consequences for the Company would include the disruption of its business development and growth plans, due to the impact on its reputation and financial position.

Commitment

[GRI 103-2c]

Protection of biodiversity and ecosystems during mining operations and development and operation of RES plants in protected Natura areas, in accordance with the main priority areas of MYTILINEOS' [Environmental Policy](#).

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-160a.1]

In the **Metallurgy Business Unit**, the Aluminium of Greece (AoG) plant, in compliance with the applicable legislation (including the plant's Environmental Terms Approval Decisions), has established a series of prevention and control measures to contain emissions to the natural recipients, thus safeguarding their quality and, consequently, the conditions for the growth of the local flora and fauna. The prevention measures include investments in anti-pollution equipment such as state-of-the-art filters in chimneys and at the discharge points of wastewater treatment plants, installations for the treatment of process gases etc. The Aluminium of Greece plant also undertakes the restoration of the inactive surfaces of the Accumulation Sites for Bauxite Residues and the Inert Waste Disposal Areas, while it has assigned to a specialized external partner the maintenance of the new and old restored waste disposal sites (e.g., old and restored Controlled Landfill for Hazardous Waste, inactive slopes of the Inert Waste Disposal Area and of the limestone quarry). **ASI**

The control measures include:

- Taking regular groundwater and sea water samples, whose results are confirmed by samples and analyses made by independent bodies.
- Operation of the air quality measuring station located in the Holy Monastery of Hosios Luke of Steiris.
- Assessment and ecological evaluation of the wider area of AoG's plant, a study that was carried out in 2021 and also took account of the fact that the plant is developed only on land, which however is in direct contact with a sea area of the NATURA 2000 network (pSCI: GR2530007- CORINTHIAN GULF), which is a proposed Site of Community Importance (SCI).
- The evaluation of the ecological status of the Antikyra Bay, in collaboration with the Hellenic Centre for Marine Research (HCMR).
- The management of all types of hazardous and non-hazardous waste complies with the provisions of the applicable laws, while the disposal of this waste takes place either in the duly licensed sites of the Company or through duly authorized and certified systems / contractors.

Information on the level of operation of critical operating equipment (filters etc.) and measurement equipment (continuous

measurement analysts etc.), as well as the results of studies and checks of the physical recipients of the plant's wider area, carried out by the plant itself and/or by independent bodies, are the subject of regular documented updates that have been requested by the Competent Authorities.

The mining activity of **DELPHI-DISTOMON, a MYTILINEOS subsidiary**, involves primarily underground quarries in the area of Fokida and is carried out with respect for the biodiversity of the area. Before each new mining activity begins, Environmental Impact Assessments and Environmental Rehabilitation Plans are carried out and used as a basis for the mining phase as well as for the rehabilitation phase. The extraction and remediation locations are specified in detail, while all mining operations are planned so as to guarantee the least possible alteration of the natural environment and landscape. **ASI**

Measures taken to prevent significant adverse impacts on the environment and alterations of the natural landscape:

- Use of the existing road network and prohibition of opening up new roads.
- Use of existing access land works and in-site installations.
- Prohibition of depositing on the soil or managing sterile limestone waste from the mining process.
- Systematic wetting of open-air storage areas for bulk materials to suppress dust emission.
- The management of all types of non-hazardous waste complies with the provisions of the applicable laws, while the disposal of this waste takes place only through authorized and certified systems/contractors.

Moreover, a detailed mapping of the form and type of the vegetation is carried out, so that rehabilitation can be based on the unique features of the local ecosystem. **The environmental policy** of DELPHI-DISTOMON (mytilineos.gr/what-we-do/metal-lurgy/aluminium-of-greece/) **emphasizes its commitment** to the protection of biodiversity both in the preparatory construction phase of a project and in the rehabilitation phase, helping to further contain any adverse effects, which are already quite limited in scope and temporary in nature. In this context, an annual monitoring of risks and impacts on biodiversity is carried out in all environmentally licensed sites located in Natura areas. **ASI**

DELPHI-DISTOMON has been systematically active for nearly 50 years in environmental rehabilitation and all its inactive quarries have been restored. Environmental remediation is carried out by systematically planting approximately 10-15,000 trees per year, while during 2021, **11,550 forest seedlings** were planted. **ASI**

Until today, DELPHI-DISTOMON has planted approximately 1,199,977 trees covering a total afforested area measuring over 1.82 km². In addition, 98 km of fencing have been installed (to protect the tree planting areas), together with a 740 km long network of watering - irrigation pipes for those trees. **ASI**

It should also be mentioned that over the last 6 years, on average, 300,000 tons of sterile limestone are produced during the mining process. This quantity is disposed of in already existing sinkholes of surface and underground sites and thus **not a single square meter of land has to be reserved for the disposal of this type of waste.**

In the **Power & Gas Business Unit**, with respect to the activities which concern the construction of wind farms located near or inside areas designated as Special Protection Areas, a key prerequisite is the development of the respective environmental impact studies foreseen (specific ecological assessment, annual monitoring of the protected area), to confirm that there are no impacts or, in cases where there are impacts, to describe the measures which may be adopted in order for these impacts to be avoided. In cases where measures cannot be taken, the project is redesigned. **In line with the above, the movement of animals in the locations of the Company's activities is not obstructed as there is no fencing, and the disturbance to the local population of birds is negligible, while where this is necessary, technical systems for the protection of birds are installed.** Concerning the restoration of the environment in connection with projects for new wind farms, the Company implements the obligation to reforest areas of a size equal to that of the project and, where possible, to also restore illegal or inactive quarries, in accordance with the applicable laws and the instructions of the corresponding Forest Departments. In this context, 617,700 m² of land have been already been afforested. **An additional 37 forestry projects with an equivalent afforestation area of 289,900 m² are expected to be implemented by the end of 2022.**

Regarding the project for the construction of the new thermal plant (CCGT II) and its accompanying interconnection projects, in Agios Nikolaos, Viotia, 89,100 m² of land have already been afforested and an additional 80,900 m² will be afforested in 2022.

For all implemented afforestation projects, there also the obligation to provide maintenance and irrigation for 3 to 5 years depending on the project, which is constantly respected.

At the same time, in the framework of the Environmental Management Systems implemented by the Company (based on ISO 14001), in addition to internal inspections, the Company is also subject to inspections by independent third parties.

Finally, MYTILINEOS is a member of the Business Council for Sustainable Development of the Hellenic Federation of Enterprises (SEV), which is a member of the Business for Nature international coalition for the protection of biodiversity and ecosystems. The SEV Business Council for Sustainable Development, as a member of the World Business Council for Sustainable Development (WBCSD), after co-signing the Lisbon Declaration, paved the way for Greek companies to contribute to tackling the global challenge of environmental balance and sustainability and to highlight the strategies they are implementing, the commitments they have made as well as the good practices they adopt and follow.

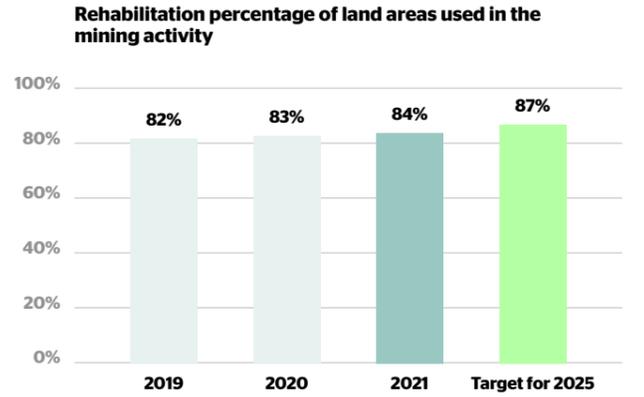
DELPHI-DISTOMON has been systematically active for nearly 50 years in environmental rehabilitation

Results

[GRI 103-3a-ii] [SASB EM-CM-160a.2]

- During 2021, **no incidents occurred involving a deterioration of biodiversity as a result of the Company's activities**, while the work scheduled for the restoration of areas used in mining operations was carried out as planned.
- Concerning mining operations, at the end of 2021: (a) the total area of land used for mining operations stood at 86,000 m², reduced by 28.3% compared with 2020, (b) the total area of land in the process of remediation stood at 153,000 m², decreased by 18.2% from the previous year, while (c) the area of land whose soil has been rehabilitated since the beginning of the mining activity, as a percentage of the total land area of land used for mining operations, stood at 84.34%, increased by 1.24% compared to 2020. **ASI**
- Regarding the construction and operation of the wind farms and the new thermal power plant, the total area of land for which the reforestation process has been completed stood at

706,900 m² (617,700 m² and 89,100 m² respectively), while three avifauna monitoring studies were carried out.



The table below lists the very limited impacts of the construction and operation of the Company's wind farms located in protected areas (e.g., Natura 2000 Network and archaeological sites **ASI**).

Operational sites under lease by MYTILINEOS in protected areas [GRI 304-1] **Biodiversity value of protected area [GRI 304-2]**

1. Wind Farm in the locality "Koryfi" of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 170MW, in operation, owned by the company Eoliki Sidirokastrou, situated at an average distance of 1.5 km from the outer boundaries of the Natura 2000 area "GR 1260001" and at a distance of more than 7.0 km from the area "GR 1260008".

Concerns the lease of 0.802 km² of land from Public Properties Company S.A.
Area of operational site: 0.12 km².

2. Wind Farm in the locality "Koryfi (Expansion)" of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 150 MW, in operation, owned by the company Aeoliki Sidirokastrou, situated at an average distance of 1.0 km from the outer boundaries of the Natura 2000 area "GR 1260001" and at a distance of more than 7.5 km from the area "GR 1260008".

Concerns the lease of 0.027 km² of land from the Municipality of Sintiki. Area of operational site: 0.035 km².

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

Lease of 0.0579 km² from private land owners holding the ownership rights to the "Dafniza-Kalipeti" private forest.
Area of operational site: 0.103 km².

4. Wind Farm in the locality 'Chelona' of the Municipality of Karystos (Regional Unit of Evia) with a power output of 81 MW, in trial operation since October 2019, owned by the company Eoliki Evias Chelona, situated at a maximum distance of 200 m from the outer boundaries of the Special Protection Area (SPA) for Birds 'Mt Ochi, Coastal Zone and Islets', with code number "GR 2420012", belonging to NATURA 2000 network. Seven (7) Wind Turbines are located within this area.

Area of operational site: 0.130 km².

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

As was the case in 2018, 2019 and 2020, an annual avifauna monitoring study was carried out in the area of the Wind Farms in 2021 and is pending submission (usually within the first six months of the next year), to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management of the Ministry of Environment, Energy and Climate Change. No impacts on the protected area, as the operation areas of the Wind Farms are located in the area's peripheral zone, away from the Priority Habitats.

An automated bird collision avoidance system has been installed in the second one of these Wind Farms.

No bird killing incident has been observed.

In the Natura area "GR2120012" (Mt Ochi, Coastal Area and Islets), 55 avifauna species listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The protected area "GR2420001" (Mt Ochi - Karystos Plain - River - Cape Kafireas - Marine coastal area) is mainly mountainous, with a relatively wild and difficult to access coastline in the north-eastern foothills of Mt Ochi. 16 habitats in this area are listed in Annex I of Directive 92/43/EEC, of which Habitat 1120* - Marine vegetation areas with Posidonia (Posidonion oceanicae) is a priority habitat. Four (4) species of reptiles, two (2) of invertebrate and two (2) of mammals are listed in Annex II of Directive 92/43/EEC and in article 4 of Directive 2009/147/EC. The two species of mammals (Mediterranean seal and otter) are priority species. As was the case in 2018, 2019 and 2020, an annual monitoring study of avifauna was carried out in 2021, which assesses the limited effects of the test operation of the Wind Farm on the avifauna of the area.

Limited impacts on the avifauna of the area due to the operation of the Wind Farm.
No bird killing incident has been observed.

The Natura area "GR24200012" (Mt Ochi, Coastal Zone and Islets) is mainly mountainous, with a relatively wild and difficult to access coastline in the steep northern and eastern foothills of Mt Ochi. 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The species that characterize the Special Protection Area (SPA) are Puffinus yelkouan (Yelkouan shearwater), Larus audouinii (Audouin's gull), Hieraaetus fasciatus (Bonelli's eagle), Bubo Benelli's (Eurasian eagle-owl) and Emberiza caesia (Cretzschmar's bunting), whereas its delimitation species are Phalacrocorax aristotelis (great cormorant), Circaetus gallicus (short-toed snake eagle), Falco eregrinus (peregrine falcon), Apus melba (pallid swift), Lullula arborea (woodlark), Anthus campestris (tawny pipit). As was the case in 2018 and in 2020, an annual avifauna monitoring study was carried out in 2021 and is pending submission (usually within the first six months of the next year), to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management of the Ministry of Environment, Energy and Climate Change.

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.
No bird killing incident has been observed.

Other significant Environmental topics

Raw & other materials

Regarding the use of primary natural resources in the production of the main products of MYTILINEOS, the quantity of bauxite used in the Metallurgy Business Unit to produce aluminium and alumina in 2021 was slightly increased compared to 2020 (4.5%), while the total quantity of natural gas used in the Power & Gas Business Unit decreased by 10.9%. The Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units do not manage primary natural resources, but instead use semi-ready or finished products.

In detail:

In the **Metallurgy Business Unit**, approximately 2.6 million tons of raw materials were used in 2021, to produce alumina and primary and secondary aluminium products, a quantity increased compared to 2020. Of this total quantity, 74% was bauxite, while the remaining 26% regarded the use of other raw materials from non-renewable sources.

MYTILINEOS, in its effort to limit the consumption of natural resources and to reduce the energy required in aluminium production, has adopted in its production process the practice of recasting aluminium waste (scrap) that replaces the use of raw materials. Furthermore, in this direction, the Company has also expanded its activities in the industrial production, processing and trading of metals and in particular of aluminium alloys and their products, investing in the know-how for the optimal treatment of aluminium scrap, so as to be able, in the years to come, to produce raw materials again, spending a much lower quantity of energy and thus significantly cutting costs and mitigating the impact on the environment. **ASI**

The Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units do not manage primary natural resources, but instead use semi-finished or finished products, according to the detailed plans and procedures for each project, which specify with great accuracy each material to be used, its manufacturing method and its exact position and operation. Additionally, a key criterion in the design stage of the projects that the Business Unit is carrying out is the use of recyclable materials. The Company's requests for proposals and contracts with suppliers of materials and equipment contain a specific clause regarding their compliance with the requirements of the ISO 14001 standard, specifically referring to the prohibition of using environmentally hazardous materials and the obligation to make the maximum possible use of recyclable materials.

In the Power & Gas Business Unit, the raw material used in power plants is natural gas, which is the transition fuel towards an economy with lower greenhouse gas emissions. The annual consumption of natural gas in the Company's thermal units is linked to the fluctuations in the generation of electricity on an annual basis, and in 2021 recorded a slight decrease by 10.9% compared to 2020, due mainly to the scheduled maintenance of power plant of Korinthos Power. Regarding the materials used in the production process and not incorporated in the end product, such as lubricating oils and chemicals, in 2021 these remained close to their 2020 levels.

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

	2019	2020	2021	Basic materials
Metallurgy Business Unit ASI				
Raw materials	2,265,428	2,278,815	2,373,121	Bauxite, Alumina, Aluminium Scrap
Materials (not incorporated in the end product)	237,655	250,133	264,995	Anodes, Lime, Soda, Coke, Tar
Packaging materials	1,309	1,192	1,125	Pine planks, Rings
Total	2,504,392	2,530,140	2,638,928	
Recycled materials	39,922	49,012	50,181	Aluminium scrap
Percentage of recycled input materials [GRI 301-2]	1.59%	1.94%	1.90%	

Composite Construction and Steel Treatment Units

Materials (used in the production process but not incorporated in the end product)	256.0	309.9	313.3	Oxygen, Argon, Nitrogen
Semi-finished products	649.3	1,043.2	1,301.1	Steel
Packaging materials	4.5	8.2	8.1	Nylon
Total	909.8	1,361.3	1,622.5	
Recycled materials	235.2	372.6	440.8	Recycled steel
Percentage of recycled input materials [GRI 301-2]	25.8%	27.4%	27.2% ¹	

¹ Of the 1,309.2 tons of total weight of materials used and incorporated in the end products, steel (in the form of plates, merchant bars or other project materials) accounted for approximately 1,102 tons. Around 40% of the EU's total steel production comes from electric arc furnaces, in which steel is produced from 100% recycled raw material (scrap) (Source: eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EN:PDF, Strasbourg, 11.6.2013, COM (2013) 407 final, p.11). Thus, 440.8 tons (40% of the 1,102 tons of steel materials) correspond to recycled steel.

Research & Development

Research & Development is not just another business choice but a modern-day necessity in the context of the Sustainable Development Goals (SDGs). To this end, MYTILINEOS invests in research and development with the aim of contributing, acknowledging its share of the relevant responsibility, to strengthening scientific research, upgrading the technological capabilities of the country's industrial sector, and encouraging innovation, thus ensuring industrial diversification and the added value of its products and services.

In the **Metallurgy Business Unit**, the Company continues to consistently invest in the installation of pilot units for the development of research in the following areas:

- Utilization of bauxite residues: The Company both participates in and conducts pilot tests in the framework of European programs on the use of efficient "green" technologies in the production of useful products and materials (iron, alumina, cement additives and construction products), as well as on the development of technologies for the extraction of rare earths.
- New aluminium recycling technologies: The Company participates in research programs on the design and control of the production of recycled aluminium products with a low energy and environmental footprint.

At the same time, the Company continues to consistently invest in research for the development of know-how in new technologies, and is actively participating in research activities in the following fields:

- Utilization of carbon-rich by-products of the alumina electrolysis production process, exploring a recycling technology within the aluminium production cycle.
- Heat recovery and utilization from exhaust gas flows of the aluminium production process.
- Use of RES in alumina / aluminium production: The Company participates in a Study Network exploring the possibilities of direct application of RES in the industry.
- Digitization alumina and aluminium production processes.
- Education and lifelong learning: The Company participates in programs aimed at developing new tools and training courses for engineers and technicians working in the raw materials and metallurgy sector.

In this direction, the Research and Sustainable Development activity was established under the Innovation Division of the Company's Metallurgy Business Unit. The Company participates in **24 research projects** co-funded by the EU or the Greek State under the Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET Cofund on Raw Materials (ERA-MIN 2) programs, and under programs of the Greek General Secretariat for Research and Technology (GSRT). MYTILINEOS participates in these programs with a view to increasing competitiveness and exploring the application of an industrial circular economy.

The total financing of the programs for the period 2017-2025, exceeds €120 million, of which €8.7 million are related to investments of the Metallurgy Business Unit of MYTILINEOS, while the applied research is carried out in collaboration with industrial partners, research bodies and universities in Greece and Europe.

In summary, in 2021, the Unit's Research and Sustainable Development activity announced the following research results on a

pilot scale, while the two pilot units continued to operate for testing new metallurgical processes at the aluminium plant:

- **Production of 1st scandium concentrate from bauxite residues.**



Under the SCALE project (scale-project.eu), 10 m³ of bauxite residue extract solution were treated using the SIR technology of the company II-VI. The treatment resulted in the production of 200 g of solid concentrate containing 34% by weight of scandium oxide. The overall process has succeeded in upgrading the scandium concentration from the bauxite residues to the concentrate by 3000 times (youtu.be/qFE8nr-cRDHY). The technology will be further optimized in the SCALE-Up program which starts in 2022 and will be co-funded under the EIT Raw Materials program.

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

ASI

- **Recovery of soda from bauxite residues.**



Under the RemovAl program (removal-project.com), 600 kg of bauxite residues underwent hydrometallurgical treatment in order for their soda content to be recovered. The new "dealkalized" bauxite residues contain less than 0.5% by weight soda and will be tested as a raw material for the production of mixing cement under the ReActiv program. Today, bauxite residues are used to a limited extent as a raw material for the production of the cement raw meal ("farin"). Their conversion into an "active ingredient" (the so-called supplementary cementitious material) is the main objective of the ReActiv program (reactivproject.eu) coordinated by the company Holcim in collaboration with MYTILINEOS.

- **Recovery of alumina from bauxite residue slag.**



Under the RemovAl program, 300 kg of bauxite slag, which had been produced by the Research and Sustainable Development Department activity in 2020, underwent hydrometallurgical treatment in order for their alumina content to be recovered. 70% of the alumina was extracted in the solution and then precipitated using CO₂ gas, producing about 40 kg of hydrated alumina as the final product.

- **Treatment of Greek bauxite using the Pedersen method.**



Under the ENSUREAL programme (ensureal.com), 2 tons of Greek bauxite (from MYTILINEOS' subsidiary DELPHI-DISTOMON) underwent pyrometallurgical treatment for obtaining a cast iron product, while the slag produced underwent hydrometallurgical treatment for producing hydrated alumina. This process is an alternative to the Bayer method for the treatment of bauxites, which leads to fewer and more easily usable by-products.

The above technologies are intended for use in developing the know-how of the Metallurgy Business Unit for the production of new products, investigating technical solutions to sustainability problems, and exploring the possible future activity of MYTILINEOS in new markets if and when these are considered profitable.

In addition, DELPHI-DISTOMON launched a **pilot project on the digital monitoring of ventilation at an underground work site**. The solution used (Ventilation-on-Demand) had been designed to ensure air quality in underground mining sites and reduce the energy consumption of the ventilation system. It combines cutting-edge technologies such as Internet of Things, Cloud big data, Sensors.

In the **Power & Gas Business Unit**, an Applied Research & Development and Innovation Department is in operation. In 2021, more than 10 projects were underway in this Department, including the following:

- Energy Blockchain - Green PPAs: Green Power Purchase Agreements (PPAs), which constitute a contract between the two parties and certify the provider of "green" energy, the amount of energy, the value of the energy, the geographical information of the place of origin of the agreed energy, etc.
- Digital Innovations: New mobile apps, marketplaces and innovative digital processes to upgrade the digital customer engagement and on-boarding of Retail customers (Protergia ON).
- AI Factory: creation of processes, know-how and organization of an internal AI structure and Data Factory for introducing an Artificial Intelligence strategy at MYTILINEOS.
- Prediction of the electric power produced by wind turbines - quantification of uncertainty.
- Approval in 2021 for participation in the new Hellenic Energy Centre, whose primary purpose is to promote innovation in domestic entrepreneurship, with emphasis on the production of energy in the post-lignite era, RES projects, decentralized production and savings, smart cities and communities, and energy transmission and distribution networks.

In 2021, total investments in research and development by the Metallurgy and Power & Gas Business Units stood at €2.5 million, while the Company's Research & Development departments employed 17 people in total.



ESG KPIs

E Environmental KPIs	2019	2020	2021
Environmental management			
Percentage of industrial units & RES units with ISO 14001:2015 certification	84%	87.5%	89.3%
Environmental expenditures (mio €) ¹	61.0	71.6	82.8
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)	2,798.0	2,885.5	2,276.0
Indirect GHG emissions (Scope 2 - CO ₂ thousand tons)	1,841.3	1,573.9	1,337.9
Other emissions (Scope 3 - CO ₂ thousand tons) ²	N/A	6,991.4	5,612.4
Total NO _x emissions (t)	1,553.3	1,480.0	1,363.4
Total SO _x emissions (t)	3,634.0	3,190.1	3,214.3
Particulate emissions (t)	94.3	80.5	41.8
Fluorine emissions (t)	258.3	262.2	210.8
CF ₄ emissions (t)	11.8	13.3	10.8
C ₂ F ₆ emissions (t)	14	16	1.3
Specific NO _x emissions (t/Tj electricity production) ³	0.054	0.046	0.042
Specific SO _x emissions (t/Tj electricity production) ³	0	0	0
Total energy production (Tj)	20,816.5	21,856.6	20,235.6
Energy production from RES (% of total energy production)	6.5%	8.6%	9.7%
Total energy consumption (Tj)	53,353.0	54,621.9	52,423.7
Electricity consumption (% of total energy consumption)	19.4%	18.9%	20.0%
Specific energy consumption in secondary aluminium production (Gj/t of production)	4.82	5.05	5.02
Specific product consumption (Tj /Tj of electricity produced)	1.7	1.6	1.6

E Environmental KPIs	2019	2020	2021
Water Management			
Total water consumption (ML) ⁴	6,533.6	6,603.4	6,950.5
Total water withdrawal (ML)	170,788.2	170,327.5	169,080.5
Total water withdrawal from surface waters (ML)	162,296.5	161,162.0	159,838.4
Total water withdrawal from groundwater (ML)	8,223.6	8,564.8	8,599.2
Total water withdrawal from public water supply companies (ML)	74.6	146.1	194.7
Water savings in the production process (% of total water withdrawals)	3.9%	3.9%	4.4%
Water consumption / ton of hydrated alumina production (m ³) ASI	3.24	3.61	3.37
Water consumption / ton of primary aluminium production (m ³) ASI	1.23	1.37	1.29
Circular Economy			
Total solid waste generation (thousand tons)	849.1	839.4	934.1
Total hazardous waste (thousand tons)	22.8	24.0	19.5
Total non-hazardous waste (thousand tons)	826.3	815.4	914.6
Solid waste reused or recycled (% of total solid waste generated)	17.8%	18.6%	25.0%
Solid waste landfilled ⁵ (% of total non-hazardous solid waste generated)	3.9%	2.4%	2.0%
Ecological Impacts			
Rehabilitation percentage of total land areas used in the mining process ASI	82.3%	83.3%	84.3%
Raw & Other Materials			
Total bauxite consumption (t) ASI	1,871,395	1,878,949	1,963,041
Total natural gas consumption (mio Nm ³)	1,133.7	1,177.0	1,106.8

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 the emissions and electricity production of the Power & Gas BU.
 4. The difference between the total quantity of water withdrawals and the total quantity of water discharges.
 5. Includes the emissions and electricity production of the Power & Gas BU.



Society



Alignment to UN Global Compact Principles

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

Material Topics

- Occupational Health and Safety
- Employment
- Human Rights
- Equal Opportunities
- Sustainability of local communities
- Responsible Supply Chain
- Business Continuity

Alignment to UN Sustainable Development Goals

1 NO POVERTY 	2 ZERO HUNGER 	3 GOOD HEALTH AND WELL-BEING 	4 QUALITY EDUCATION
5 GENDER EQUALITY 	8 DECENT WORK AND ECONOMIC GROWTH 	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	10 REDUCED INEQUALITIES
11 SUSTAINABLE CITIES AND COMMUNITIES 	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	

Occupational Health & Safety



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
To the employees and their families but also to third parties who work or visit the work areas of the Company's Business Units, subsidiaries and permanent contractors and suppliers.

By whom are the impacts caused:
The impacts are caused by the Company's Business Units and its subsidiaries, as well as by the independent contractors and key suppliers who cooperate with the Company.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The promotion of safe working conditions for all employees without discrimination.
- The reduction of fatalities and work accidents, and reduction of road accidents at national level.
- Decent work and the creation of quality jobs.

Topic of increased significance to:

- **Employees**
- **Suppliers**
- **Customers**
- **Shareholders / Investors / Financial Analysts**
- **NGOs**
- **Local Communities**

in the context of their cooperation with MYTILINEOS.

Management Approach

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

The purpose of this disclosure is to help MYTILINEOS' Stakeholders establish the best possible understanding of how the Company is managing this particular material topic, whose contribution to its responsible and sustainable development is crucial.

[GRI 103-2b]

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

- The elimination of accidents and occupational disease incidents at the workplace and especially at MYTILINEOS' production facilities, promotes continuous, sustainable, productive employment and decent work, while it also places a decisive role in bolstering the Company's competitiveness.

- The positive contribution of MYTILINEOS to the well-being of the local communities in which it operates, by protecting the health and safety of its direct and indirect employees.

Major risks

[GRI 102-15]

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

Commitment

[GRI 103-2c]

MYTILINEOS continues to work relentlessly, in all its Business Units, to achieve the goal of "ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES AT WORK", which is one of the main challenges in the industrial sector, in accordance with the main priority areas of MYTILINEOS' [Occupational Health and Safety Policy](#).

Goal [GRI 103-2c-iii]

The Company's targets, on an annual basis, are to achieve zero fatalities, zero accidents with serious consequences for the lives of employees, and zero occupational diseases, as well as to maintain the total recorded accidents rate at the lowest possible level.

Risk Management / Control Practices

[GRI 103-2a]

- In all its Business Units, the Company, in addition to complying with the minimum statutory requirements, also implements an integrated and certified Occupational Health & Safety Management System voluntarily, designed to minimize risk, by allowing the continuous adoption of measures to prevent accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture. The system is based on and **certified in accordance with the ISO 45001:2018 international standard and, at the end of 2021, covered almost 90% of the Company's production and RES plants in operation.** The Health & Safety system covers all direct and indirect employees in the Company's Business Units and in its subsidiaries that have in place an ISO 45001 certified Occupational Health & Safety Management System. In addition, 99% of employees are covered by a Health & Safety system that is subject to external audit, while 84% of employees are covered by a Health & Safety System that is audited or certified by an independent external body. [GRI 403-1] [GRI 403-8]
- MYTILINEOS **adheres strictly to the applicable Greek and European laws in force** and the regulatory provisions on Occupational Health & Safety. In many cases, the compliance of the operation of the Company's Business Units with the relevant legislation is achieved by the Company

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

- The systematic and continuous efforts to foster and promote a corporate **Health and Safety culture**, encourages all personnel to act responsibly for their own personal safety as well as for the safety of those around them and is a long-standing commitment in daily operations.
- Occupational Health and Safety is a **line of responsibility** that begins from the Management and the General Divisions and extends across all stages of production of all MYTILINEOS Business Units. To address the relevant risks, the Company has established and is **strictly implementing security systems and safety measurements** to assess their impact on the employees and to identify any need for interventions in all its work areas (offices and industrial facilities). At the same time, continuous progress and self-improvement depends greatly on both the **preventive actions** undertaken and the broader experience that the Company gains from every individual incident and near miss accident it analyses, while educating and training its personnel is crucial in order to maintain and further develop an accident prevention mentality.
- **Hazards are identified** using safety tools, whose purpose is to prevent hazardous actions and situations that could lead to accidents or occupational diseases and are described in a series of internal procedures in every Business Unit, both for direct employees and for indirect employees and business partners. Relevant examples include Management Safety Visits, Risk Identification and Inspections of Health and Environmental Safety Plans (HESP) for indirect employees, Occupational Risk Assessment (ORA), which is prepared in accordance with the respective procedure and is in place for every job position, risk management for the energy center, and work instructions for RES plants. Reporting of risks and hazardous situations takes place through the hazardous situations reporting process and the risk identification process, as well as through the reporting system of the Company's Code of Business Conduct. Regarding the procedure used to **investigate work-related accidents**, the Company has established and follows procedures for recording accidents in the accident log, for reporting and analyzing incidents, and for characterizing and investigating events, while at a higher level, selected incidents are analyzed using the "Root Cause Analysis" method. Through this procedure, appropriate **corrective actions** are determined so as to identify the required improvements to the OHS management system. At the same time, conducting **internal inspections and external audits** ensures the quality of procedures and the continuous improvement of the Occupational Health & Safety system. Employees may remove themselves from working conditions which they believe might cause injury or illness and are protected against potential retaliation, in accordance with the relevant provisions of the Code of Business Conduct. The Health & Safety Officers may recommend the removal of employees, where appropriate. Finally, Health and Safety issues are integrated into the **central Enterprise Risk Management system (ERM)**, in order to further ensure their prioritization, as well as the required allocation of relevant resources for their improvement. [GRI 403-2] [GRI 403-7]
- MYTILINEOS implements **occupational health practices** that help identify and minimize Health & Safety risks. These practices include, among others, the operation of a clinic with the continuous presence of nurses and the regular presence

of physicians, regular visits and inspections of the work areas by a specialist Occupational Physician, and medical services provided on a daily basis at the office clinic at no cost to all employees. In 2021, due to the SARS-CoV-2 pandemic, additional occupational health practices were implemented, the most important of which were conducting free COVID-19 tests for all personnel on the basis of an established schedule or in the case of emergencies, enabling remote work as a precaution for vulnerable and other employee groups, regular distribution of a special personal COVID protection kit to all employees, as well as special trainings and updates regarding the prevention measures adopted by the Company and regular disinfections of all premises. [GRI 403-3]

- To safeguard the health of its employees, in addition to access to public health structures, the Company provides them with an additional private health and medical care program. It also provides them with general medical services on a daily basis, at the clinic operating in its facilities, and implements a targeted vaccination programme for specific categories of personnel. Voluntary blood donation programs are also organized in the Company's facilities at regular intervals. In 2021, actions focused on strengthening the mental health of employees and their families were introduced. In the framework of the **Employee Assistance Program**, the Psychological Support Hotline was created. This service provides 24-hour counselling support to employees and their families, delivered by a network of experienced psychologists and specialists in personal, family and employment-related matters, as well as free personalized in-person or remote (online) sessions. At the same time, on the occasion of the Mental Health Awareness Month, a series of experiential lectures was organized for information and discussion on a number of issues related to emotional and mental health, as well as, more generally, to the adoption of daily habits that promote health and well-being. [GRI 403-6]
- **Health and hygiene issues** are key to the quality of life of the employees and of the communities in which the Company operates. MYTILINEOS has been consistently investing in this area, monitoring, assessing and controlling all work environment parameters in an effort to constantly improve the good health of employees and ensure healthy living conditions at the workplace. Exposure to dust, noise, high temperatures and substances such as fluorine compounds, sulphur dioxide, carbon monoxide and aromatic polycyclic hydrocarbons, are the main parameters monitored systematically.
- MYTILINEOS develops and implements processes and actions that **further improve the level of Health and Safety**, by building on the findings of planned or unannounced safety inspections carried out by specially trained Company personnel, customers, business partners, public bodies and independent organizations.
- In addition, every three months the CEO and the Executive Committee **are informed of and assess the Company's progress** and performance regarding Health & Safety and provide appropriate guidance.

In terms of the organization of the Occupational Health and Safety function, relevant Departments operate at each MYTILINEOS Business Unit. Moreover, the Company ensures that the employees exercise their right to communicate comments, proposals and views on the procedures, policies and management practices for safeguarding and developing a positive culture promoting the

safety and health of MYTILINEOS' human capital. In line with this approach, special **Health & Safety Committees operate in key activities** in the Metallurgy and Sustainable Engineering Solutions (SES) Business Units. These Committees cover all employees, and both direct and indirect employees are represented and take active part in the procedures to determine how health and safety are managed at the workplace. **[GRI 103-2c-iv]**

In the **Metallurgy Business Unit**, an official Plant Health & Safety Committee (PHSC) is established, representing 100% of the employees. The Committee consists of 6 members who are elected by the Business Unit's employees. The PHSC has extended responsibilities and its members participate in all key procedures, committees or working groups. Most of all, however, it is the employees themselves, from all levels in the management hierarchy, who take active part in the continuous, systematic and methodical process that involves them in the formulation of safety rules and regulations. Moreover, the following additional Safety Committees have also been established, led by Management Executives and composed of representatives from all Plant departments: Work at Heights Committee, Lockout/Tagout & Confined Spaces Committee, Circulation Committee, Contracting and Training Committee. The issues discussed by the Committees cover those related to the Plant's main processes, while proposals for the improvement or revision of these processes are also discussed. At the Volos Plant a three-member Health & Safety Committee is in place, set up in accordance with the provisions of the Greek law and consisting of employees, trade union representatives and members of the Management. **[GRI 403-4] ASI**

In the **Sustainable Engineering Solutions (SES) Business Unit**, the Health & Safety Committees operate at facility level (in every work site or plant) and represent 100% of the Company's direct employees and over 90% of the employees of independent contractors. Additionally, the Safety Technician and the Occupational Physician work closely and are in constant communication with the Committee regarding issues related to hygiene, safety and the protection of employees. The Committee members, the Safety Technician, the Occupational Physician and the Company's representatives, participate in training programs on Health & Safety and in relevant official information days.

In the **Renewables & Storage Development (RSD) Business Unit**, the Health and Safety Officers, Safety Technicians and Safety Coordinators hold consultations with the employees, in the framework of the Occupational Health & Safety Management System. Moreover, in every work site facility, specialized personnel are constantly present for handling Health & Safety issues, First Aid services (personnel & equipment) are in place, while an ambulance and an Occupational Physician are present to offer first aid and deal with emergencies. **[GRI 403-4]**

In the **Power & Gas Business Unit**, no official Occupational Health & Safety (OHS) Committee has been set up. A consultation process on these issues is however applied, with the active participation of personnel from the Company's Energy Centers, in the context of the Occupational Health & Safety Management System. Relevant consultations take place at least once per year, in order to promote the implementation of the applicable Company OHS policy, to communicate information on OHS actions and programs and to involve the employees, through their active participation in the consultation process, in the management of occupational risk. Moreover, in the context of the OHS audits carried

out in accordance with the established OHS Management System, a mechanism has been established to monitor the enforcement of the OHS regulations in the facilities and activities of the Company's Energy Centers, Head Offices, retail stores and RES plants. **[GRI 403-4]**

Results

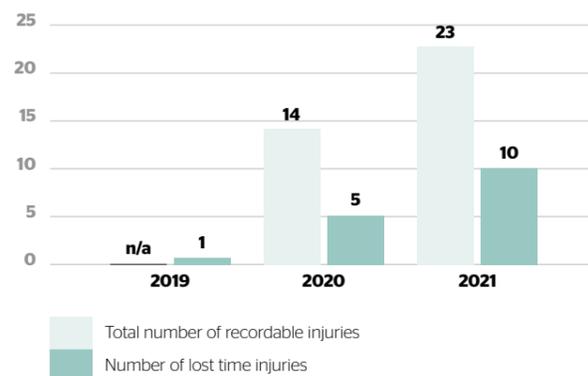
[GRI 103-3a-ii] [SASB EM-CM-320a.1] [SASB EM-MM-320a.1] [SASB IF-EU-320a.1] [SASB IF-EN-320a.1]

- The Business Units and subsidiaries of MYTILINEOS, in addition to the regular internal audits that they carry out, are subject to frequent external inspections by customers, government bodies and independent auditors, conducted to evaluate and improve the established Occupational Health & Safety Management Systems. In 2021, **57 internal audits and 76 external inspections were carried out.**
- A total of 85 (2020: 88) incidents involving both direct and indirect employees -which, if not investigated, could pose a potential risk for employees (**near misses**) - were reported and investigated in production processes, representing a reduction by 3%.

Direct employees

- The targets for zero work-related fatalities and zero serious incidents from occupational diseases were achieved. [GRI 403-10]**
- The total number of recorded accidents stood at **23 and the corresponding frequency rate per 200,000 work hours was 0.85 accidents.**
- Ten lost time accidents were recorded, **resulting in a rate of 0.37 accidents per 200,000 work hours.** More specifically, one serious accident occurred, involving the amputation of an employee's upper limb, while the other less serious accidents involved cases of fractures, sprains, dislocations and burns. All incidents were analyzed using the "Root Cause Analysis" method, in order to establish their causes and communicate the results of their investigation, so as to ensure that they will not happen again.
- The total number of visits to the medical stations stood at **15, increased by 40% compared to 2020.**
- No employees were involved in activities with a risk of exposure to work-related diseases. **[GRI 403-10]**

Number of occupational accidents
(direct employees)



For yet another year, particular attention was also paid to the prevention of serious accidents through training. A total of **6,608 man-hours of training** in Health and Safety were implemented in all Business Units, **attended by 61% of direct employees.** The training, which covers both general and specialized Health & Safety topics, focused on the following topics: **[GRI 103-2c-vii] [GRI 403-5]**

- Identification of Risks
- Fire protection, fire safety
- Work at heights, in confined areas, in underground work sites
- Hazard Assessment
- Safe movement of pedestrians, machinery & vehicles
- Musculoskeletal risks
- Emergency Plans
- Safe performance of electrical work
- Lockout/Tagout of Facilities
- Health & Safety in the offices
- Emergency First Aid at Work
- "Safety at Work" introductory training
- Cleanliness of premises
- Information updates about COVID-19
- Mental health at the workplace (COVID-19)

In addition, in 2021 the Company organized experiential lectures on psychosocial risks, employee resilience, health and well-being. The program of the lectures, which consisted of 11 modules, was attended by 151 employees who participated in trainings in the following topics:

- Introduction to the Well-being program
- "Correct body posture"
- "Giving up smoking"
- "The ability to concentrate under stressful conditions"
- "Psychological First Aid"
- "Management of psychosocial risks"
- "Management of Emergencies"
- "Professional Burnout"
- "Depression"
- "Behavior analysis as a method to defuse phobias and panic attacks"
- "Nutrition & its 4 Keys (Thinking, Emotion, Physical response, Behavior)"

Health & Safety Indicators [GRI 403-9]	2019	2020	2021
Fatality Rate (FR) / 200,000 work hours			
FR (Total)	0.00	0.00	0.00
FR (Men)	0.00	0.00	0.00
FR (Women)	0.00	0.00	0.00
High Consequence Injury Rate (HCIR) / 200,00 work hours			
HCIR (Total)	n/a	0.00	0.07
HCIR (Men)	n/a	0.00	0.09
HCIR (Women)	n/a	0.00	0.00
Total Recordable Injury Rate (TRIR) / 200,000 work hours			
TRIR (Total)	n/a	0.53	0.85
TRIR (Men)	n/a	0.60	1.01
TRIR (Women)	n/a	0.21	0.20
Lost Time Injury Rate (LTIR) / 200,000 work hours			
LTIR (Total)	0.04	0.19	0.37
LTIR (Men)	0.05	0.18	0.41
LTIR (Women)	0.00	0.22	0.20

• FR (Fatalities Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate)
 • The Lost Time Injury Rate (LTIR) includes lost time accidents involving the loss of ≥ 3 work days.

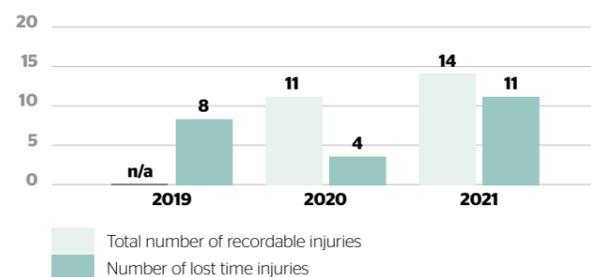
Indirect employees

Managing the safety of the personnel of independent contractors is a particular challenge for MYTILINEOS. The Company is consistent in its efforts in this area and focuses on the need to alter everyone's behavior and mentality about accident prevention. For example, contractors who employ a significant number of personnel at the facilities of the Metallurgy Business Unit's aluminium plant, are required to have in place an ISO 45001 certified Occupational Health & Safety Management System, while the Company evaluates regularly their performance

using specific criteria. Similarly, the management of Health and Safety issues in the Sustainable Engineering Solutions (SES) Business Unit is governed by a series of actions that must be implemented by associated contractors, so as to ensure that the Occupational Health & Safety Management System, which is drawn up separately for each project, is correctly implemented, and that they take the appropriate measures in the context of the specific work that they undertake. **ASI**

- Despite the efforts made, we regret to report one fatality due to fall from a height, involving an employee of a contractor in the Sustainable Engineering Solutions (SES) Business Unit.
- The total number of accidents recorded **stood at 14** and the **accident frequency rate per 200,000 work hours was 0.29 accidents.**
- Eleven **lost time accidents** were recorded, **resulting in a frequency rate of 0.22 accidents per 200,000 hours worked.**
- A total of **41 visits of employees to the medical (first aid) stations** were recorded, increased compared to 2020.
- With a view to strengthening and consolidating a common safety culture among all MYTILINEOS' business partners, **28,000 man-hours of training** were implemented, in topics similar to those for direct employees. **[GRI 103-2c-vii] [GRI 403-5]**

Number of occupational accidents
(indirect employees)



Health & Safety Indicators [GRI 403-9]	2019	2020	2021
Fatality Rate (FR) / 200,000 work hours			
FR (Total)	0.00	0.03	0.02
FR (Men)	0.00	0.04	0.02
FR (Women)	0.00	0.00	0.00
High Consequence Injury Rate (HCIR) / 200,00 work hours			
HCIR (Total)	n/a	0.03	0.00
HCIR (Men)	n/a	0.04	0.00
HCIR (Women)	n/a	0.00	0.00
Total Recordable Injury Rate (TRIR) / 200,000 work hours			
TRIR (Total)	n/a	0.38	0.29
TRIR (Men)	n/a	0.38	0.30
TRIR (Women)	n/a	0.41	0.00
Lost Time Injury Rate (LTIR) / 200,000 work hours			
LTIR (Total)	0.19	0.14	0.22
LTIR (Men)	0.19	0.11	0.24
LTIR (Women)	0.00	0.41	0.00

• FR (Fatalities Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate)
• The Lost Time Injury Rate (LTIR) includes lost time accidents involving the loss of ≥ 3 work days.

MYTILINEOS' response to the SARS-CoV-2 pandemic

From the first moment the pandemic broke out, MYTILINEOS responded swiftly and effectively, implementing a multifaceted action plan that ensured the protection and safety of its employees, maintaining all its production units in operation and contributing to the national effort to address the pandemic crisis. The primary objectives of MYTILINEOS in 2021, for which the Company allocated over €4 million, were the following:

1. To safeguard the health of its employees and their safety at work, as well as the health of their families.

Since 2020, MYTILINEOS took a number of steps that included the following:

- Establishment of a special Covid Management Team tasked with monitoring the pandemic and with assessing and managing related risks, in order to protect its employees.
- Development of a comprehensive preventive action plan two weeks before the first confirmed case occurred in the country, which is constantly updated according to developments.
- Constant provision to its employees and business partners of information updates on the application of the personal hygiene regulations, accompanied with clear instructions obtained from the competent international and domestic bodies.
- Enabling teleworking already from the first month of the pandemic.
- Creation of a special "SARS-CoV-2 - What I need to know" microsite, and establishment of an "HR Call Centre" for keeping employees up-to-date.
- Regular distribution of a special personal kit per employee, containing face masks and antiseptics.
- Implementation of regular disinfections in all facilities.
- Carrying out molecular (PCR) and rapid diagnostic tests with a total cost of almost **€1.8 million** (for 2021) for its employees in Athens, Volos and the Aluminium of Greece plant.

2. To ensure its uninterrupted operation.

One of MYTILINEOS' primary objectives was to maintain its smooth operation. In this context, relevant activities included the following:

- Maintaining Business Continuity plans, with targeted measures that were adapted to support the Company's production units that may remained in full operation.
- Maintaining the operation of a communication and management network consisting of special teams in all the Company's facilities in Greece and abroad.
- Constantly reviewing the need for business trips and visits to production units.
- Implementing special precautionary measures for sales agents and customers at the Protergia retail stores.
- Continuing the implementation of the Company's investment program.

In conclusion, the holistic approach that MYTILINEOS applied and continues to apply for mitigating the impacts of the pandemic and ensuring its business continuity, maintains the guarantees required by its investors. With ambitious business decisions, the Company is taking advantage of the opportunities emerging from the public health crisis and accelerates its progress towards an even stronger green economy.



Employment



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
In all work areas of MYTILINEOS' Business Units, subsidiaries and suppliers.

By whom are the impacts caused:
The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/ suppliers may also be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- Curbing unemployment and poverty at local and national level.
- Strengthening the economy of local communities.
- Enhancing employability in the industrial sector.

Topic of increased significance to:

- **Employees**
- **Suppliers**
- **Shareholders / Investors / Financial Analysts**
- **NGOs**
- **Local Communities**

in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

• Employment is an internationally recognized goal linked to economic and social progress. It is considered an extremely important issue for MYTILINEOS' Business Units, because of the high localization and large number of their employees. Creating opportunities for the employees' long-term employment and development benefits not only the Company's business activities but also has a positive impact on its local communities, contributing to their sustainability.

• In addition, focusing on issues concerning decent working conditions (such as, for example, working environment, wages, benefits, working time, rest periods, leaves of absence, disciplinary and redundancy practices, protection of motherhood, mental health and other welfare issues) is a top priority for the Company, as they affect the satisfaction of its employees and are key factors for their retention. In particular, mental health began to emerge as a priority since March 2020, when the Covid-19 pandemic reached Greece.

Commitment

[GRI 103-2c]

Development, management and human resource retention, by implementing practices that promote a working environment without discriminations, offering equal opportunities and respecting Human Rights, in line with the main priority areas of MYTILINEOS' [Human Rights Policy](#).

Major risks

[GRI 102-15]

Increasing competition in the labor market and growing employee mobility may result in reduced productivity due to employee departures, loss of valuable knowledge and expertise gained through the employment of the departed employees, as well as in loss of the financial investment made and of the time dedicated to their training. The Company may also incur increased costs due to the need to replace specialized personnel.

Risk Management / Control Practices

[GRI 103-2a]

To address these risks, the Company has implemented employee retention systems and practices that involve:

- The development of programs for formulating a uniform corporate culture, based on the employees' shared values and their behaviors.
- The implementation of employee training and development programs aimed at strengthening personal and technical skills and capabilities required to address the current and future challenges in the Company's business activities, while at the same time supporting the personal development of employees.
- The provision of incentives, in terms of compensations and benefits as well as in terms of opportunities for advancement and development, aimed at increasing the employees' commitment and retention.
- The timely and continuous provision of information to employees about changes in structures and processes due to the growth of the Company's activities and to the adoption of best practices in its operating model.

Key elements of the Company's approach to Employment

- Attraction and retention of competent executives, continuous improvement of employer-employee relations and implementation of modern systems for employee performance evaluation.
- Establishment of an attractive compensations and benefits framework on the basis of market data and specialized surveys for critical areas of the Company's activity.
- Promotion of the Code of Business Conduct to all personnel, ensuring that the latter are fully familiar with it, and avoidance

of direct or indirect discrimination in all work practices.

- Recognition of the importance of healthy and secure employment for all personnel and business partners and continuous improvement in this area, placing emphasis on mental health.
- Focus on offering local opportunities, giving priority to the recruitment of employees from the Company's local communities, and bolstering local employment at domestic and international level based on the Company's activities.
- Ensuring the flow of information and the timely communication of organizational changes, through the appropriate communication channels, including the corporate intranet, e-mails, SharePoint and non-electronic means of communication, such as consultation events with members of top Management, written announcements posted in production work areas and, more generally, open communication with employees through the HR-Business Partner role in each Business Unit.
- Protection of employee personal data, allowing their use only by authorized persons and only in cases where this is required by law in the context of business relations and the Company's business activity.
- Ensuring, through the individual Labor Regulations and the Code of Business Conduct, the elimination of all arbitrary or discriminatory practices in terminating employment relationships with employees.
- The Human Resources General Division of MYTILINEOS is responsible for establishing and implementing the framework for the management and development of the relevant policies and practices, as well as for providing professional support to the Business Units for dealing with issues regarding human resources.

Management - Employee relations

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

Indicatively: [GRI 402-1a]

- In the Metallurgy Business Unit, the Plant Steering Committee (PSR) holds weekly meetings to discuss matters concerning Safety, the Environment, Production and Finance, as well as organizational / operational changes (if any), with the participation of all Company Directors. The results of these meetings are immediately communicated to all other employees by the Company's Executives. **ASI**
- In parallel, a reasonable notice period applies, depending on the circumstances and in consultation with the employees' elected representatives, to ensure that employees are informed in the best possible way. Management meets regularly with the Board of the Employees' Union to inform them

of any issues that may concern them. In extraordinary cases, the meeting and the provision of information by the Company to the Board of the Employees' Union precedes the implementation of any positive or negative change that affects employees, with provisions made for the time necessary to disseminate the information and hold consultations.

- The Company's Executive Committee holds monthly meetings. The information on issues that require dissemination and concern the employees, are communicated to the corporate organization by each General Manager.

Moreover, the Company's Human Resources Committee has been established and is holding its meetings at regular intervals. The Committee is tasked with planning and obtaining approval for initiatives designed to effectively address issues relating to the attraction, development, retention, empowerment and rewarding of human resources, as well as with presenting updates on related "good practices" and with decision-making.

The Company is currently following the new, revised **recruitment policy and procedure**. The purpose of the policy is to ensure adherence to meritocracy and equal treatment in the selection of personnel, based on the candidate's capabilities and their suitability given the requirements of the particular jobs, as well as optimal leverage of the employees' potential with regard to their development and career path prospects in the Company. At the same time, in 2021 MYTILINEOS issued and adopted a policy on the protection of Human Rights. The **Human Rights Policy** sets out the basic principles governing the respect for human rights and sets out the framework for managing employment. In 2021, the **Performance Management Program** was redesigned, aimed at consolidating it and ensuring that it is inextricably linked to the corporate objectives and corporate results. The redesigned Program will be implemented gradually, starting with the top and senior Management levels of the Company's hierarchy.

Employee benefits

In all regions where MYTILINEOS operates, the compensation and benefit plans offered to its employees are as a minimum in full compliance with the labor legislation and with the corporate collective bargaining agreements, where applicable. Any compensations over and above the statutory ones are based on the employees' individual performance, which is reviewed and assessed annually. Moreover, MYTILINEOS provides a number of benefits to permanent employees in all levels of its hierarchy. These benefits vary between Business Units and include medical care, life insurance, disability / incapacitation coverage, retirement provision, maternity / paternity leave, and the granting of loans in cases of emergency. These benefits are non-discriminatory and are governed by the principles of equal treatment and transparency, setting clear policies per category of personnel.

[GRI 401-2]

Results

[GRI 103-3a-ii]

Workforce data
(direct employees) [GRI 102-8]

	2019	2020	2021
Total	2,436	2,455	2,889
Men	1,996	1,987	2,348
Women	440	468	541

Analysis / Gender

	2019	2020	2021
Permanent	2,147	2,161	2,406
Men	1,779	1,760	1,975
Women	368	401	431
Fixed-term	289	294	483
Men	217	227	373
Women	72	67	110

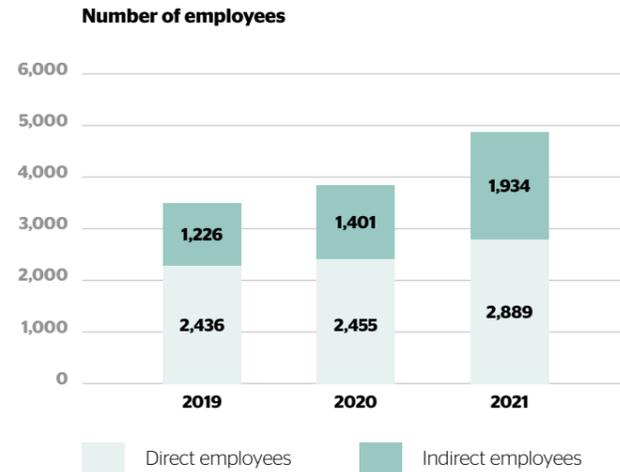
Analysis / Employment contracts by country

	2019	2020	2021
Permanent	2,147	2,161	2,406
Greece	2,001	2,058	2,182
Libya	-	-	64
United Kingdom	25	31	44
Spain	20	16	36
Australia	11	10	27
Chile	44	29	25
Korea	-	6	7
Italy	-	-	6
Turkey	4	5	5
Romania	-	-	4
Mexico	-	2	2
Ghana	2	2	1
Saudi Arabia	1	1	1
Slovenia	-	1	1
Singapore	-	-	1
Kazakhstan	36	-	-
Uganda	3	-	-
Fixed-term	289	294	483
Greece	163	133	202
Chile	-	26	116
Ghana	56	59	57
Australia	-	15	30
Kazakhstan	-	17	21
Spain	47	25	16
Uzbekistan	-	-	14
United Kingdom	-	-	6
Algeria	6	5	5
Nigeria	8	8	5
Slovenia	-	2	5
Uganda	-	2	2
Korea	6	1	1
Tunisia	3	1	1
Georgia	-	-	1
Italy	-	-	1

Analysis / Employment types by gender

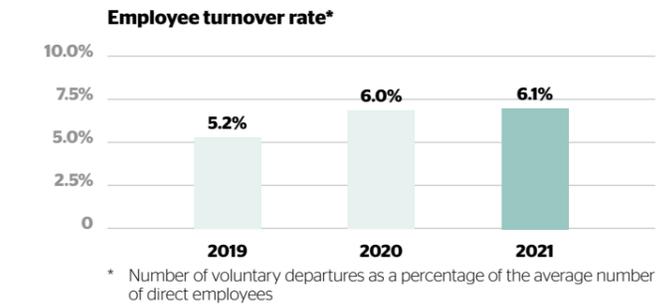
	2019	2020	2021
Full-time	2,420	2,442	2,872
Men	2,002	1,984	2,345
Women	418	458	527
Part-time	17	13	17
Men	4	3	3
Women	13	10	14

- Starting in 2021, Candidate Evaluation Centers were included as the final stage in the personnel selection process. This stage is carried out by a panel of evaluators using tests designed to evaluate the candidates' capabilities and skills of before the final decision on recruitment is made.



- Direct employment **increased significantly by 17.7%**. The total number of the Company's direct employees stood at **2,889 persons** (2020: 2,455), of which 83% are employed in Greece.
- The total number of indirect employees (permanent independent contractors and persons employed by MYTILINEOS under long-term work contracts or project contracts) stood at **1,934 persons** (2020: 1,401), raising the number of direct and indirect employees of the Company to 4,823 persons, **thus increasing total employment by 25.1% from 2020**.
- The Company **maintained its very high rates of sourcing employees locally for yet another year, as 9 out of 10** of its direct and indirect employees come from the communities in the immediate vicinity of its industrial units as well as from the wider local area.
- The participation of women in direct employment rose to 18.7%**, increased by 3.7% compared to the base year (2019).
- Total new hires reached 915**, of which 21% involved women, while nearly 36% of the new hires involved young employees under the age of 30.
- MYTILINEOS **created 92 internship and vocational training quality positions**, with the aim of supporting skills development and transforming many of these positions into permanent jobs.
- The retention rate of full-time employees stood at 90.6%** (2020: 91.0%).
- The high rate (83%) of employees working under a **permanent employment contract was maintained** (2020: 88%).
- The low **rate of part-time employees (0.6%)** was maintained.
- More than 4 out of 10 employees **are covered by corporate collective bargaining agreements**. [GRI 102-41] [SASB EM-MM-310a.1]
- The return-to-work rate of employees who took **parental leave** stood at 99%, while the retention rate of these employees after 12 months from their return stood at 96%. [GRI 401-3]

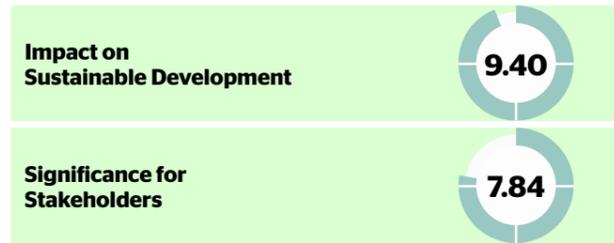
- A total of **489 new jobs were created**, covering the needs in all Company Business Units.
- Concerning employee turnover:
 - the voluntary departures rate** stood at 6.1% (2020: 6.0%);
 - the non-voluntary departures rate** was 1.7% (2020: 1.3%).
- In 2021, 34 posts were filled by internal candidates.



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

	Recruitment (New hires)			Departures		
	2019	2020	2021	2019	2020	2021
Analysis / Gender						
Total	665	395	915	384	361	426
Men	507	315	720	301	280	333
Women	158	80	195	83	81	93
Analysis / Age group						
<30 years old	299	169	327	193	150	150
30 - 50 years old	321	190	444	147	157	217
>50 years old	45	36	144	44	54	59
Analysis / Employee category						
Executives	-	-	49	-	-	175
Administrative employees	-	-	354	-	-	50
Workers & technical staff	-	-	512	-	-	201
Analysis / Employment contracts by country						
Greece	441	324	556	310	290	314
Chile	49	37	126	5	21	37
Libya	-	-	60	-	-	-
United Kingdom	15	7	35	11	4	13
Australia	11	3	43	-	2	11
Spain	62	4	32	-	28	20
Uzbekistan	-	-	19	-	-	7
Ghana	40	14	16	42	11	16
Kazakhstan	33	1	10	10	1	4
Italy	-	-	7	-	-	-
Slovenia	-	2	4	-	-	1
Romania	-	-	4	-	-	-
Korea	6	1	1	-	-	-
Georgia	-	-	1	-	-	-
Singapore	-	-	1	-	-	-
Nigeria	-	-	-	-	-	3
Algeria	1	-	-	2	1	-
Iran	-	-	-	-	-	-
Uganda	3	-	-	-	1	-
Puerto Rico	-	-	-	-	-	-
Turkey	1	2	-	4	1	-
Tunisia	3	-	-	-	1	-
Jordan	-	-	-	-	-	-

Human Rights



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]
Where the impacts occur: In all work areas of the Business Units and subsidiaries of the Company and of its contractors and suppliers.
By whom are the impacts caused: The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/suppliers may also be indirectly involved.
The management of the topic by MYTILINEOS contributes to Sustainable Development: <ul style="list-style-type: none"> The protection of labor rights. Strengthening social and economic integration for all, irrespective of age, gender, disability, race, nationality, origin, religion, economic situation or other characteristic. The elimination of any form of child or forced labor (modern slavery).
Topic of increased significance to: <ul style="list-style-type: none"> Employees Suppliers Shareholders / Investors / Financial Analysts NGOs Local Communities in the context of their cooperation with MYTILINEOS.

Management Approach

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

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholders, so that they can understand how the Company is managing its Human Capital in the context of its operation. [GRI 103-2b]

MYTILINEOS aims to safeguard labor relations that promote mutual trust, constructive collaboration, 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 International Labour Organisation's (ILO) Declaration on the Protection of Fundamental Labour Rights including: (a) respect for the freedom of association and the effective recognition of the right to collective bargaining, (b) elimination of all forms of forced or compulsory labor; (c) effective abolition of child labor, and (d) the elimination of all discriminations at work.

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

The key challenge for the Company is to maintain its strong focus on the protection of Human Rights and especially of the labor and social rights related to its activity. The protection of labor rights helps further strengthen a working environment that promotes the

development of employees and also ensures that the Company is not involved in circumstances of violation of these rights, which may be caused by another company or by State bodies, natural persons or other groups with which the Company cooperates in the countries where it operates.

Major risks

[GRI 102-15]

MYTILINEOS, due to its activity in developing countries abroad, primarily mainly through the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, identifies risks related to human rights, both within its working environment and in the business environment of its main suppliers and business partners. Such potential risks include activities that may affect or involve children, a culture of corruption, inequalities in the workplace, limitation of human rights at the level of local communities etc. These risks may affect the Company's financial, human and social capital, through their likely impact on its reputation and its "social license to operate", and may also lead to legal sanctions as well as to emergency measures beyond those imposed by normal business conditions.

Commitment

[GRI 103-2c]

Zero tolerance of violations of Human Rights, in accordance with the main priority areas of the MYTILINEOS' [Human Rights Policy](#), [Code of Business Conduct](#) and [Suppliers / Business Partners Code of Conduct](#).

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-210a.3]

- MYTILINEOS is committed to the first six Principles of the UN Global Compact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights (UDHR). The Company's commitment to monitoring and disclosing the impacts of its activity in this area, together with the MYTILINEOS Code of Business Conduct and the Suppliers / Business Partners Code of Conduct, which are addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's work environment.
- MYTILINEOS monitors the relevant labor legislation (national, European, ILO), including reports on child labor, respect for human rights and work conditions, and is fully aligned with the collective bargaining agreements and the relevant international conventions. The Company's employees may without any restriction whatsoever participate in trade unions and professional associations.
- Labour rights are an issue of major significance for all employees. The Company's direct employees are covered by business or collective bargaining agreements, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. Furthermore, Employees' Unions are established in the Metallurgy Business Unit and in the Sustainable Engineering Solutions (SES) Business Unit. In the latter, a first-degree trade union body is established and functions at business-unit level (Volos plant), whose members are elected by the general assembly of the plant's employees, with

representatives also elected to the second-degree trade union organization (Volos Labour Centre) and to the Panhellenic Metal Workers' Federation (POEM).

- The Company, through the main grievance mechanism provided for in its Code of Business Conduct and in the Suppliers / Business Partners Code of Conduct for reporting Code violations (anonymous or named reports by phone, fax, post, as well as by e-mail to the Regulatory Compliance Division), enables its employees and its suppliers / business partners to raise any concerns, as well as to report incidents of Human Rights violations. Moreover, the Company warrants that no action shall be taken against any person reporting in good faith any actual or alleged inappropriate conduct. This mechanism is being enriched to reflect the provisions of Directive 1937/2019 of the European Parliament and of the Council and, following the enactment of the relevant local legislation, its revised version will enter into effect.
- Regarding its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that must be followed by all, to ensure that the Health & Safety system for employees is properly implemented and the appropriate measures are taken. At the same time, the contracts signed with contractors and suppliers include an explicit provision about the Company's Code of Business Conduct, to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.
- Finally, the Company is committed to conducting regular risk assessments of its main production plants and its Business Units, to identify potential impacts on key Human Rights protection areas, in accordance with the methodology proposed by the Global Compact (Global Compact Self-Assessment Tool - Human Rights section), and to publish the relevant findings. This process is supported by both daily communication and employee management procedures and systems implemented by the Human Resources General Division.

Results

[GRI 103-3a-ii]

- In 2021, as part of employee training on the Code of Business Conduct, the Company provided to its Executives a

special e-learning training programme which also covered Human Rights topics, during which 730 employees were informed about the respect for the freedom of association, the elimination of all forms of forced or compulsory labor, the identification and elimination of child labor, and the elimination of any discrimination related to the workplace and to employment.

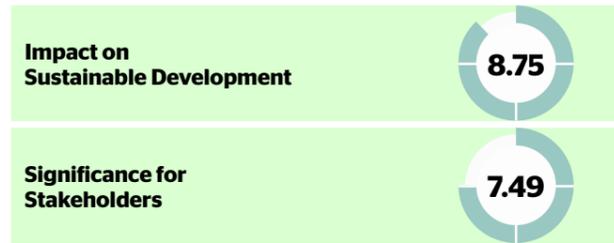
- During 2021, no incident of Human Rights violation was reported to the Human Resources General Division or to the Regulatory Compliance Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. **Thus, the Company's permanent target of zero tolerance of Human Rights violations was achieved.**
- In 2021, the Company implemented for the 5th consecutive year the self-assessment process regarding the protection of Human Rights, in all its Business Units and in all countries of operation referred to in section "Countries of Activity 2021". **According to the results of the self-assessment process, no areas were identified in which the deficiencies observed could jeopardize the protection of Human Rights in the Company's activities.** The main areas investigated according to the above procedure are presented in the following table. [GRI 412-1]



Assessment areas	Results
Occupational Health & Safety	<p>During the self-assessment exercise, no deficiencies were observed in terms of procedures or policies regarding the Health and Safety of employees.</p> <ul style="list-style-type: none"> The Company guarantees that its employees are provided with safe and healthy work facilities. It also ensures that its employees are supplied with the necessary protective equipment and training to perform their tasks safely. The Company promotes the active participation of its employees in the Health and Safety procedures at the workplace. In 2021, the Company highlighted the importance of promoting and strengthening the mental health of employees and their families by providing a 24-hour Psychological Support Hotline. In 2021, the Company organized experiential lectures on psychosocial risks, employee resilience, health and well-being. The program of lectures, which consisted of 11 modules, was attended by 151 employees. Further information is available in the "Occupational Health & Safety" section of this Report. Overall, the policy, the planned actions for the achievement of the targets set and the initiatives adopted voluntarily by the Company to ensure the Health and Safety of employees, are rigorously applied, as presented in the relevant section of this report.
Employee Work Hours, Wages and Leave	<p>For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates.</p> <ul style="list-style-type: none"> The Company confirms that all employees have a formal employment status. It also ensures that weekly work is limited to 40 hours; however, due to the workload in various activities, groups of employees may be called upon to work beyond 40 hours. The Company has procedures in place for planning, recording and monitoring each employee's work hours to check any overtime, while also providing employees with a reasonable break time during work (as laid down by the law and the industrial standards). The Company ensures the wages of its employees in all cases of sick or parental leave and vacation leave, in accordance with the international standards. No incident of a violation of these rights was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct.
Fair Treatment of Employees	<p>In accordance with the Code of Business Conduct and the Internal Regulation Code, the Company:</p> <ul style="list-style-type: none"> Protects its employees from harassment at the workplace, as well as from physical, verbal, sexual or psychological harassment or threats of any kind. Respects the privacy of its employees' personal data whenever it collects personal information or checks work areas. <p>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. A study has been carried out on the formulation of a Policy for Preventing and Combating Violence and Harassment at Work, which is still in progress. In the Metallurgy Business Unit, an employee survey was carried out in order to further investigate issues concerning the respect for human rights and women's rights in the workplace. At the same time, with assistance from an external business partner, 35 Executives attended seminars on Discrimination and Violence & Harassment in the workplace.</p>

Assessment areas	Results
Freedom of Association	<p>The legal framework on labor includes provisions on the identification and safeguarding of the employees' right to freedom of association and collective bargaining, which MYTILINEOS fully respects. The employees' right to freedom of association is recognized in all its Business Units. During 2021, no areas were identified and no incidents were reported in connection with a threat to or violation of this right. This has been the result of the implementation of a specific social negotiation process, whose fundamental prerequisite is the commitment of the Company's Management and of its employees to detailed arrangements on social and labor issues, taking into consideration the rights and interests of both sides.</p> <p>No incident of a violation of this right was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 407-1]</p>
Impact on Local Communities	<p>The Company, through the mechanisms for formal and informal interactions with local communities which it maintains in each one of its Business Units, except in the case of industrial units located in demarcated Industrial Areas, ensures that the concerns of local communities regarding any general impact of its activity are recorded and takes, where necessary, appropriate measures.</p> <p>It also takes the necessary measures to ensure that the security system of its premises or such arrangements in place are consistent with the international law enforcement principles and the use of power.</p> <p>In this respect, in 2021 no circumstances were identified to justify the likelihood of incidents of human rights violations at community level. The Company's activity does not restrict but, on the contrary, ensures access by the citizens to resources or various other methods of living. At the same time, the consultation process and the cooperation with the local Municipalities during the development and operation of RES projects is systematic, with the Company investing significant funds in the development and improvement of local infrastructure with mutual benefits.</p>
Child Labour	<p>MYTILINEOS does not employ persons under the age of 15 or 18 for work.</p> <p>As a result, no Company activity in Greece presents any risk (significant or non-significant) of child labor incidents or of conditions likely to drive young employees to hazardous work. [GRI 408-1]</p>
Forced Labour	<p>In compliance with the Constitution of Greece (art. 22 par. 4), which protects the freedom of work, MYTILINEOS prohibits, via its Code of Business Conduct and its Suppliers / Business partners Code of Conduct, all forms of forced or compulsory in its work areas and in the work areas of its suppliers / business partners. As a result, no Company activity in Greece presents any significant risk of conditions that may lead to incidents of forced labor.</p> <p>In 2021, no complaint or incident of forced or compulsory labor was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 409-1]</p>
Discrimination	<p>MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.</p> <p>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 406-1]</p>

Equal Opportunities



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
In all work areas of the Company's Business Units, subsidiaries and contractors / suppliers.

By whom are the impacts caused:
The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors / suppliers may also be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- Strengthening employability in the industrial sector and enhancing corporate culture with the elements of diversity and equality.
- Ensuring meritocracy and equal treatment in the selection of personnel.
- Promoting equality regardless of particular characteristics such as age, gender, etc.

Topic of increased significance to:

- Employees
- Suppliers
- Shareholders / Investors / Financial Analysts
- NGOs
- Local Communities

in the context of their cooperation with MYTILINEOS.

Management Approach

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

The provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to their ability to respond to their assigned roles, is a core practice of MYTILINEOS, as stipulated in the Company's Human Rights Policy. The Human Rights Policy was formally issued in 2021 and lays down a number of commitments on Equal Opportunities, such as the following:

- MYTILINEOS is committed to offering equal opportunities and prohibits discrimination and harassment. The corporate procedures for attracting and recruiting workforce, for access to education and training, rewards, performance appraisal and termination of cooperation, are free from discriminations based on race, gender, color, national or social origin, religion, age, disability, sexual orientation and political beliefs.
- The Company does not tolerate any kind of offensive or inappropriate behavior, unfair treatment or retaliation. According to its Code of Business Conduct, physical or verbal harassment of a sexual, racist or defamatory nature is prohibited in the workplace as well as in all work-related situations outside the workplace.
- In the context of gender equality at work, the Company is committed to taking appropriate measures in order to eliminate all kinds of discrimination against women in the areas of employment,

equal pay for equal work, vocational education and training, as well as in decision-making processes.

- The Company respects the privacy of its workforce personal data (GDPR) when collecting personal information or inspecting work areas.

In addition, the Company, faithful to its commitment to apply best practices of Corporate Governance, intends to apply the Diversity principle (the basic parameters being, inter alia, gender, age, experience, skills and knowledge) in the composition of its Board of Directors, in its senior executives and in all direct employees across its activities, where feasible.

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

With the main part of the Company's activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the requirements of each Business Unit) are the two main issues in promoting equal opportunities and diversity at the workplace.

In this respect, the key challenge for the Company is to ensure equal opportunities, by eliminating discriminatory policies and practices (on the grounds of wage, age, gender, disability, race, nationality, origin, religion, sexual identification or other status) and by promoting actions to provide a working environment where every employee has exactly the same rights and is treated fairly and in accordance with their abilities to fulfil their respective roles.

Commitment

[GRI 103-2c]

Provision of equal opportunities without discrimination, in accordance with the main priority areas of MYTILINEOS' [Human Rights Policy](#).

Major risks

[GRI 102-15]

Risks include inequalities primarily in terms of pay, education and training, as well as in terms of the opportunities for the advancement and development of human resources. Such risks may impact the morale and productivity of employees, while inequalities in terms of pay may be an obstacle to the retention of qualified employees and may jeopardize the Company's reputation as a responsible employer.

Risk Management / Control Practices

[GRI 103-2a]

In 2021, priority was given to gathering and analyzing data and information on education, salary grades etc. from the Company's individual Business Units, in order to gain a deeper understanding of these issues and formulate an action plan. The following are some initial studies and ongoing actions:

- Apart from the Code of Business Conduct and the Human Rights Policy, in which explicit provisions are made for the prohibition of discrimination at the workplace, MYTILINEOS evaluates the human resources policies in place and will formulate new ones, in order to reinforce, among other things, equality at work.
- An **evaluation is under way for the revision of the Human Resources Policies**, such as the Human Resources Sourcing,

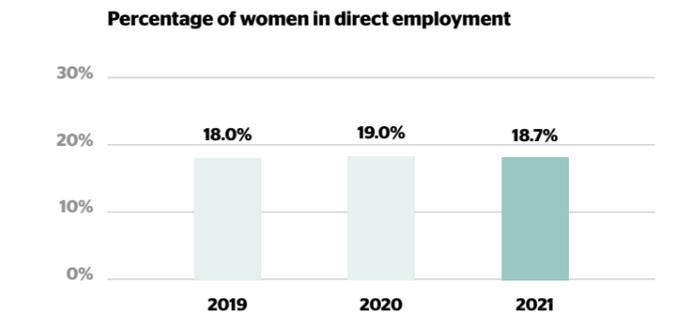
Selection and Recruitment Policy and the Training and Development Policy, to ensure that the topic of Equal Opportunities is included in them.

- In 2021, the scope of application and the framework for the formulation of the Policy on Diversity, Equal Opportunities & Inclusivity, was explored. This policy is currently under development.
- Following the training in the identification of psychosocial risks at work, as part of the actions to promote mental health, the training of MYTILINEOS' Management Executives in issues of unconscious bias at work, by specialized business partners, is also planned.
- MYTILINEOS reviews and adopts the **United Nations Women's Empowerment Principles** (UN WEPs) and plans to join the WEPs community as a signatory.
- An analysis and evaluation of salary grades is carried out on an annual basis, in order to identify areas in need of corrective actions in the short term and eliminate the gender pay gap over the long term. The objective of this study is to establish an action plan by the end of 2023.

Results

[GRI 103-3a-ii]

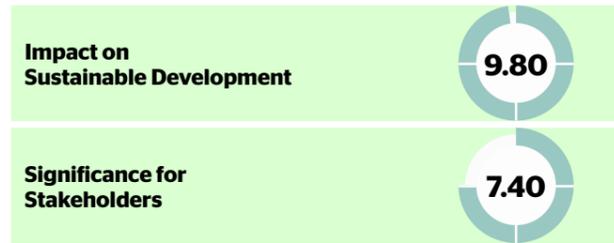
- In 2020, work had already begun on the formulation of a data collection and analysis methodology that will allow a better understanding of the **gender pay gap indicator**. The average deviation was calculated 2021 and according to the preliminary analyses, the difference between men's and women's earnings in the category of Executives appears to be less than 10%. Because of the geographic dispersion and complexity of MYTILINEOS' operations and the diverse nature of its activities, the Company's priority, before disclosing specific indicators, is to identify the various reasons that cause these deviations in each personnel category, namely Executives, Management employees and Workers and technical staff. [GRI 405-2]
- In 2021, no employees with disabilities were employed at MYTILINEOS. [GRI 405-1]
- In the revenue generating Divisions, the **percentage of women** participating in the Company's team of Executives stood at 18.3%. [GRI 405-1]



Diversity of MYTILINEOS' Governance bodies and executive / management personnel [GRI 405-1]

	2019	2020	2021
Board of Directors			
Men	80.0%	86.3%	72.7%
Women	20.0%	13.7%	27.3%
<30 years old	0.0%	0.0%	0.0%
30-50 years old	20.0%	31.5%	18.2%
>50 years old	80.0%	68.5%	81.8%
Executive Committee			
Men	83.3%	86.7%	92.9%
Women	16.7%	13.3%	7.1%
<30 years old	0.0%	0.0%	0.0%
30-50 years old	33.3%	26.7%	14.3%
>50 years old	66.7%	73.3%	85.7%
Executives			
Men	82.2%	80.6%	78.9%
Women	17.8%	19.4%	21.1%
<30 years old	0.0%	1.7%	6.1%
30-50 years old	70.6%	60.6%	59.6%
>50 years old	29.4%	37.7%	34.3%
Employees of nationalities other than Greek	2.5%	0.0%	0.0%
Management employees			
Men	65.8%	62.7%	63.1%
Women	34.2%	37.3%	36.9%
<30 years old	15.9%	13.0%	14.8%
30-50 years old	65.4%	65.6%	63.4%
>50 years old	18.7%	21.4%	21.8%
Employees of nationalities other than Greek	2.7%	0.0%	0.0%
Workers & technical staff			
Men	98.4%	96.7%	96.1%
Women	1.6%	3.3%	3.9%
<30 years old	10.3%	9.5%	11.8%
30-50 years old	73.8%	71.6%	68.9%
>50 years old	15.9%	18.0%	19.3%
Employees of nationalities other than Greek	4.0%	0.7%	0.0%

Sustainability of local communities



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]
Where the impacts occur: Mainly in the communities adjacent to the Company's industrial units and work sites, both in Greece and abroad.
By whom are the impacts caused: Impacts are caused by the Business Units of MYTILINEOS, as well as by Voluntary & Non-Governmental Organizations and the municipalities, in the context of their cooperation with the Company for the implementation of its social policy.
The management of the topic by MYTILINEOS contributes to Sustainable Development: <ul style="list-style-type: none"> Upgrading local infrastructures and paying particular attention to the needs of those who are in a vulnerable situation, such as women and children. Strengthening the local and national economy and development. The protection and preservation of the cultural and natural heritage.
Topic of increased significance to: <ul style="list-style-type: none"> Local Communities Employees Suppliers NGOs Shareholders / Investors / Financial Analysts in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

Social engagement reinforces the preventive approach policy adopted by MYTILINEOS, mitigating the unpredictable non-financial risks and contributing to the preservation of its "social license to operate" along with its good reputation. A key challenge for the Company is to ensure a sustainable future for its local communities, which hinges upon the dialogue with its Stakeholder groups and requires collective action, taking into account local issues as well as national priorities of Sustainable Development. Information exchange, consultation and negotiation are useful tools in fostering a participatory approach to the identification and implementation of MYTILINEOS' social

investments. This is a constantly evolving effort taking various forms, whose combination results in the Company's commitment to respond, acknowledging its share of the relevant responsibility, to the diverse expectations of its local communities, contributing to the protection of the Natural environment, to the promotion of health and safety, to the efforts to combat poverty, to strengthening social inclusion and ensuring access to education, and to assist in the development of the professional skills of the young generation.

Major risks

[GRI 102-15]

The Company's failure to promptly identify and manage the often changing social, economic and cultural characteristics of its local communities compromise the Company's place as fully integrated member of these communities with shared interests. This may affect the preservation of the Company's "social license to operate", and may possibly restrict its future growth.

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-210b.1]

- The General Divisions each Business Unit of MYTILINEOS are responsible for managing relationships with the local communities where that Business Unit operates. The main objective is to identify any negative impacts from the Company's business activity and to minimize them through its responsible business conduct and activity.
- A Sustainability/ESG team has been established and is operating in each Business Unit. This team is managing the implementation of the Company's social policy, the annual Stakeholder engagement process, the cooperation with local media and the organization of visits of members of the local community to the Company's facilities, when this is requested.
- The Company communicates with its local communities in a clear and transparent way, opting for an "open door" policy applying primarily in the areas where the Company's industrial plants are located.
- The collaboration of MYTILINEOS with the wider society as well as with the local communities where it operates is ongoing, multi-dimensional and substantial. The initiatives taken by the Company are linked to the needs of each community and of the wider region, and are shaped through open dialogue with the local Stakeholders, by conducting surveys for the identification of material topics as well as opinion surveys, and by organizing annual thematic or general open consultations with representatives of the local communities for following up and discussing specific topics of local interest.

Commitment

[GRI 103-2c]

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

Goal

[GRI 103-2c-iii]

A standing goal of MYTILINEOS over time in connection with its social investments (initiatives and programs) is to give priority to projects that are sustainable in the long term and contribute both to the improvement of the social aspects of life in its local communities as well as to Sustainable Development in general.

Key elements of MYTILINEOS' social policy

[GRI 103-2c-i]

- Strengthening local employment:** As the core activities of MYTILINEOS are primarily located in the Greek regions, the Company acknowledges and accepts its share of the responsibility to contribute to the development and preservation of the prosperity of the local communities. In all the geographical regions where the Company's operations are located, its human resources come in their majority from the local population.
- Supporting local economic growth:** All Business Units of the Company subscribe to the same principle of giving priority to the selection of local suppliers for the purchase of products and services, provided that these meet their specific needs and particular requirements. More information on this topic is available within the 3rd study on MYTILINEOS' Socio-economic Impact in Greece, at the following address: <https://www.mytilineos.gr/sustainability/how-we-create-value/mytilineos-socio-economic-impact-in-greece/>.
- Making a substantial contribution through the annual Social Investment Program, under which social programs and initiatives are implemented:** The Company aspires to help strengthen social cohesion, strategically seeking to maximize its mobilization by participating in selected actions in sectors directly connected to: (a) its culture and corporate values, (b) the impacts of its business activity, (c) the basic social needs that have emerged during the financial crisis and the consequences of the COVID-19 pandemic, and (d) the Sustainable Development Goals. More information is available at the following address: sdactionsmap.mytilineos.gr/en/.
- Further enhancing the constructive relationship it has established with social bodies over the years,** by applying an electronic system of managing and evaluating social requests, which reinforces transparency, ensures the sustainability of its social investments and offers opportunities for the development of new partnerships. In 2021, the Company created an Evaluation and Management Procedure for Social Requests, Corporate Social Programs and Initiatives, which describes in detail the individual stages of the process for the establishment of strategic goals, the preparation of the budget and the management of social demands, as well as of the initiatives taken by the Company. In addition, a new Requests and Complaints Management Procedure was created in the Metallurgy Business Unit, to improve the Company's communication with the local Stakeholder groups as well as to effectively manage all requests (queries, requests for cooperation, applications for sponsorships / donations, requests for information material, requests related to the planning of visits), comments, complaints etc. regarding ESG and Responsible Entrepreneurship issues. More information is available at the following address: [mytilineos.gr/sustainability/in-practice-social-requests-management-system/](https://www.mytilineos.gr/sustainability/in-practice-social-requests-management-system/).

- Specialized executives in each Business Unit manage the Company's relations with its local communities and, in collaboration with the Sustainable Development Division of MYTILINEOS, implement the annual stakeholder and local communities consultation process at local level, in order to record local needs and explore new partnership opportunities.

Results

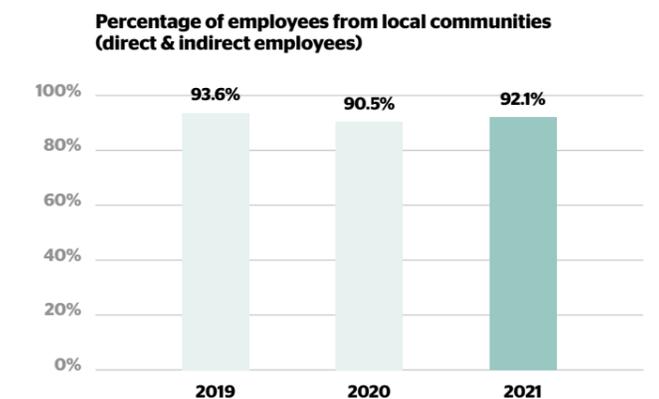
[GRI 103-3a-ii]

Stakeholder Engagement

For the last 12 years, MYTILINEOS has been consistently holding its established Open Social Dialogue events with its Stakeholder groups. The Company is one of Greece's pioneers in this field, as this approach has created the conditions for defining new attitudes and practices in its relationships with the various social groups. In line with the above, in 2021 the Metallurgy Business Unit held the Company's 7th consecutive thematic consultation with its Stakeholders, entitled: **"Covid-19: Measures and actions for the effective management of the pandemic - Health Protection and Business Continuity"**. Relevant details are presented in the corresponding section of this Report.

Local employment and growth

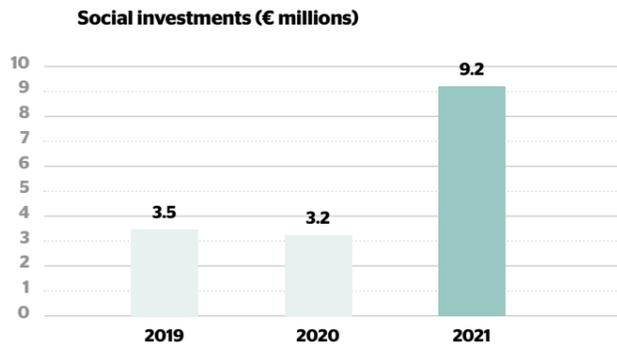
Over the last 12 years, MYTILINEOS has created nearly 1,480 new jobs, taking also into account the Company's employment figures for 2021. Moreover, the Company, acknowledging its significant share of the responsibility to generate income in its local communities, maintains recruitment from its local communities at a very high level, **with more than 9 out of 10 direct and indirect employees coming from the local population.** The Company also supported the national and local supply chain by sourcing income-generating products, services, jobs **(more than 1,900 indirect jobs in all Company activities during 2021)**, creating wages consumed in the market and in turn generating induced jobs, wages and taxes paid to the State.



Social Investments

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

In 2021, the Company, continuing to implement its **social policy**, **invested over €9.1 million** in the implementation of actions in main social sectors that contribute to the Sustainable Development Goals (SDGs). All social investments are made through benefits in kind (products and services) in cooperation with competent organizations. Most notable was its contribution to SDG 3 (Good Health and Well-Being), to which over 45% of the total amount invested was allocated, with a strong focus on addressing and mitigating the impacts of the SARS-CoV-2 pandemic. The amount invested in local infrastructure and services of general interest exceeded €4 million, as MYTILINEOS contributed significantly to the efforts of the Fire Service and the Civil Protection to extinguish the fires that the country faced to the maximum extent. Specifically, the Company strengthened the air fleet by granting the Greek State **4 top-quality BELL 214BI helicopters** of the USA-based Erickson Inc. for 60 days, fully staffed with aircrew and support staff consisting of more than 20 pilots, engineers and translators, for extinguishing the fires in **Western & Central Greece, the Peloponnese, the north-easter Aegean and of course in Attica**. The helicopters completed **155 flight hours and made 986 water drops**.



Social benefits from the development of RES projects

The added value created by the Company's business operation over time, through the development of Renewable Energy Sources (RES) projects by its Power & Gas Business Unit, refers not only to its contribution to the achievement of the national environmental goals but also to the significant associated benefits offered to the local communities. Thus, in 2021, the total investment in supporting infrastructure and services projects aimed at improving the lives of local residents in Municipalities where **new RES projects are in operation or are to be developed, reached €550,000**. Over the years, these investments have mainly involved the following: Asphalt paving and maintenance of main and rural roads, extension of water supply networks of settlements, supply and installation of LED street lighting, repair or construction of municipal buildings and facilities in cooperation with the municipalities concerned and according to their needs, as well as donations of vehicles and equipment necessary for the operation of municipal services and fire protection.

Analysis of Social Investments in 2021		
Social Sectors	Relevant Sustainable Development Goals	% of total social investments
Local infrastructure & services	SDG 11	45.9%
Access to health services	SDG 3	45.4%
Support of culture/sports	SDG 11	5.2%
Alleviation of poverty and unemployment	SDG 1	1.1%
Reduction of food insecurity	SDG 2	1.1%
Reinforcing quality education	SDG 4	0.9%
Reduction of inequalities	SDG 10	0.4%

Key Social Initiatives & Programs

PROGRAM

"#HoMellon", in cooperation with the "Know!" Social Entrepreneurship Network

Impact: MYTILINEOS implemented, for the 2nd consecutive year, a holistic and personalized 6-month training program based on the Mellon skills accelerator methodology, to support the Reintegration of Homeless people in the Labor Market. The program's **25 beneficiaries attended an Intensive Professional Skills Program, receiving 1,337 hours of online and face-to-face training in 35 thematic areas thanks to the valuable assistance of 17 trainers**, and were also provided with clothing and personal care, technological equipment and advice for connecting with the labor market. Currently, **15 beneficiaries are already employed, 4 have their own residence, while the remaining 10, empowered and motivated by the program, continue to improve their lives**.

PROGRAM

"DIATROFI" ("NUTRITION"), in cooperation with the PROLEPSIS Institute.

Impact: MYTILINEOS ensured the distribution of **18,509** healthy meals in total, for the 4th consecutive year, to **225 students of 7 schools in the Prefectures of Attica and Viotia**, reducing the individual high food insecurity indexes while at the same time helping the students improve their dietary habits.

PROGRAM

"Emergency Food Fund-for kids", in cooperation with the "Food Bank" Institution against Hunger and Food Waste

Impact: MYTILINEOS launched its cooperation with the "Food Bank" aiming to cover the needs of children with special needs living in orphanages and of children from large families in **25 organizations all around Attica**. Specifically, the Company **secured 61,338 glasses of milk and cereals for 3,784 children of which 149 live in 6 foundations and 1,448 are children with impairments and disabilities**.

INITIATIVE

In 2021, MYTILINEOS continued to provide financial support to **305 families** that have joined the "AROGI" (ASSISTANCE) foundation of the Holy Metropolis of Thebes & Levia, facing serious financial and health problems. The Company supported their daily subsistence needs, offering **595 vouchers for purchases from a Retail Food Chain**.

PROGRAM

"Surgical operations reinforcement program for destitute children", in cooperation with "Coeurs pour Tous Hellas" organization

Impact: MYTILINEOS covered the costs of **3 urgently required cardiac surgeries** for destitute and uninsured children, aged 7 months, 16 months & 11 years, with congenital or acquired heart disease. Specifically, the Company covered the costs of surgery, hospitalization (ICU & 10 day-stay in the hospital), medicines, medical examinations and special medical equipment.

PROGRAM

"Upgrading of Emergency Departments in Hospitals and Pediatric Clinics in the country", in cooperation with the "Pediatric Trauma Care" Organization.

Impact: By offering the necessary medical equipment (**38 medical devices**), MYTILINEOS has helped upgrade **3 new Emergency Departments** at: (1) the "Tzaneio" General Hospital of Piraeus, (2) the General Hospital - Health Center of Kymi-Evia, and (3) the General Hospital of Agrinio, which now treat 7631 children on an annual basis. The Company also **printed 2,231 custom-designed leaflets** entitled **"Beware when Choosing Toys"**, which were distributed during **92 presentations** of the "Child Accident Prevention" program, **providing information to 2,231 individuals (children, teachers and parents)** about how to identify child accident risks and how to avoid them. Moreover, 24,100 leaflets of the Association were distributed in Kindergartens and Primary Schools with advice on how to prevent various accident categories ("Safety at School", "Safety at Home", "Safety in Sports", "Beware of Burns" and "Beware when Choosing Games"), while more than 42,000 leaflets were sent to the hospitals that have supported the Association throughout the duration of the program.

PROGRAM

"Fulfilling the wishes of vulnerable children", in cooperation with the "Make a Wish" organization.

Impact: Research has shown that children whose wishes have been fulfilled can regain the physical and emotional strength they need to cope with a very serious illness. MYTILINEOS fulfilled the **wishes of 2 children** (10 and 12 year old) and made a commitment to support the implementation of wishes of 2 additional children during the first semester of 2022.

PROGRAM

"Provision of medical equipment", in cooperation with the Association "PNOI - Friends of Intensive Child Therapy"

Impact: MYTILINEOS provided the Neonatology Clinic - Neonatal Intensive Care Unit of the University General Hospital of Larissa with an SLE 6000 Neonatal volume, pressure and high frequency square waveform oscillation (HFO) Ventilator necessary for the hospitalization of more than **700 newborns** who require mechanical support annually.

PROGRAM

"The Tipping Point", in cooperation with the Organization "The Tipping Point"

Impact: The program was implemented in **30 schools around Greece**, where by using technology mentoring, **2,624 students, assisted by 53 teachers**, regardless of geographical area, economic and social status, were able to join a 30 minute online mentoring session in order to speak with successful professionals and obtain answers to questions about their future.



PROGRAM

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

Impact: 35 packages with educational robotics equipment (LEGO Education Wedo2 packages) were offered to an equal number of Primary and Secondary schools, giving the opportunity to **1,131 students** to develop their imagination as well as their technological and scientific skills. **The equipment will remain with the schools permanently, to be used by as many students wishing to do so as possible.**

PROGRAM

“**S.T.E.M. Education - Renewable Energy Sources**”, in collaboration with the Educational Robotics & Science Organization “WRO Hellas”

Impact: 10 “**Gigo Light and Solar Energy**” and “**Gigo Wind Power**” kits were offered to an equal number of Lower Secondary Schools in the regions of Aitolokarmania, Evia and Serres, enabling **536 students to experiment as modern engineers** with various applications of renewable energy sources, namely photovoltaics and wind turbines, with valuable assistance from their **32 teachers.**

PROGRAM

“**Scholarships**” and “**School electronic equipment renewal**”

Impact: Actively contributing to the **modernization of schools with appropriate technological equipment**, the Company strengthened **4 schools** in Athens, Thessaloniki and Arta with computers and ink sets, giving the opportunity to **635 students to have access to quality education.**

At the same time, MYTILINEOS secured **30 scholarships** to students of its employees in the framework of its collaboration with the Athens University of Economics and Business for the implementation of the **12th “Yes Program” Summer School of Youth Entrepreneurship**, while also offered **4 scholarships** to the Scholarship Program of the Postgraduate Program of Studies in Energy “**Strategy, Law & Economics**”, at the **Department of International & European Studies of the University of Piraeus.**

PROGRAM

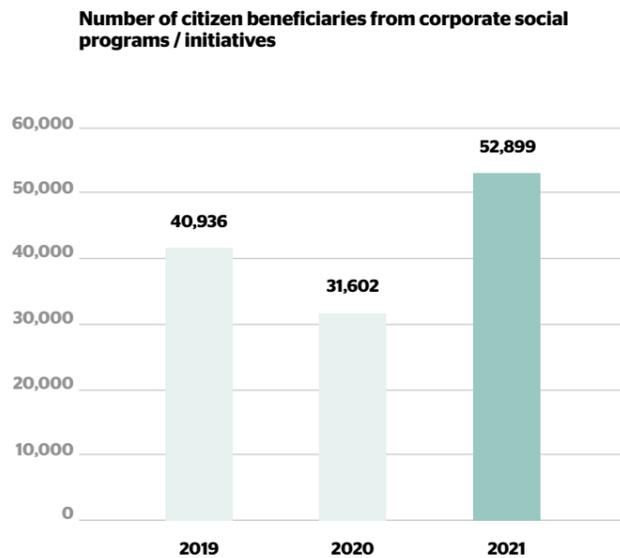
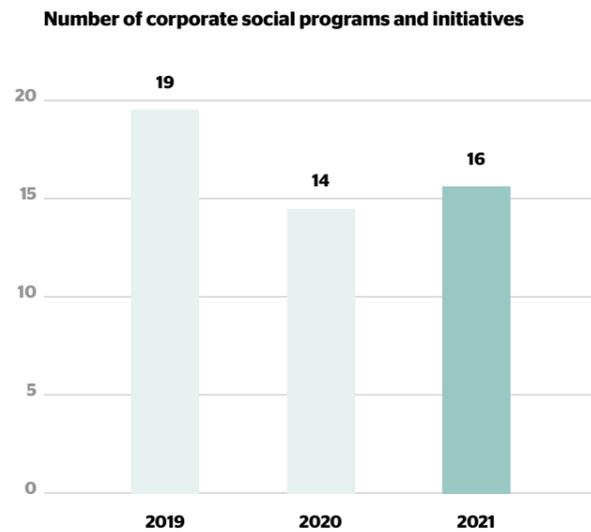
“**ENGINEERS IN ACTION**”

Impact: Implementation of the successful **12-month paid internship program “ENGINEERS IN ACTION”**. We created **48 new quality** vocational training / traineeship / apprenticeship positions, giving the opportunity to young engineers to take the first step of their career by acquiring unique professional experiences, benefiting from in exciting opportunities. The 48 participants were allocated to the Company’s Business Units as follows: **11 in the Metallurgy Business Unit, 4 in the Renewables & Storage Development (RSD) Business Unit, 5 in the Power & Gas Sector and 27 in the Sustainable Engineering Solutions (SES) Business Unit, while 1 person joined the MYTILINEOS Central Functions.**

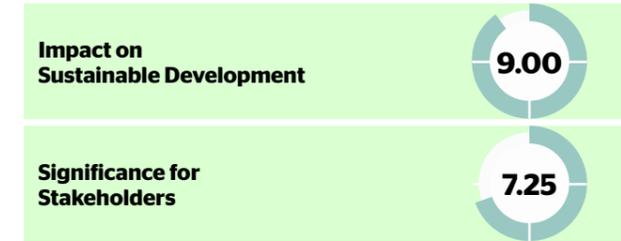
PROGRAM

“**Mellonabilities**”, in collaboration with the “Knowl” Social Entrepreneurship Network.

Impact: MYTILINEOS, aiming to provide **personalized professional skills development to people with mobility, vision and hearing impairments**, designed the “Mellonabilities” program, giving the opportunity to **25 beneficiaries** to attend a training programme based on modern models and new technologies, achieving a balanced connection of their professional profile with their desired jobs. 12% of participants are already working, while the rest continue to be empowered and motivated to improve their lives. **1,418 hours** of online training were offered in **24 thematic areas** with the invaluable contribution of **21** trainers, while 16% of the trainees received **professional certification** of useful knowledge and skills they acquired.



Responsible Supply Chain



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
In all work areas of the Company’s Business Units, subsidiaries, contractors and suppliers.

By whom are the impacts caused:
MYTILINEOS’ Business Units and subsidiaries, as well as its contractors / suppliers, are directly involved in these impacts.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The promotion of policies geared to job creation, entrepreneurship and the development of micro, small and medium-sized enterprises.
- The promotion of responsible environmental and social practices in the supply chain.
- Raising awareness of sustainable development among the employees of MYTILINEOS’ broader value chain.

Topic of increased significance to:

- **Suppliers**
- **Shareholders / Investors / Financial Analysts**
- **Local Communities**

in the context of their cooperation with MYTILINEOS.

Management Approach

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

The purpose of this disclosure is to inform MYTILINEOS’ Stakeholders about the responsible practices applied by the Company in its broader supply chain. The main objectives of the Company, until 2025, are the strengthening of the level of maturity and integration of Sustainable Development in its supply chain, the inclusion of ESG criteria in the selection process for new suppliers and the commitment of existing ones to good and responsible practices, with a view to developing responsible partnerships to better understand impacts and harmonize goals and expectations.

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

Responsible supply chain management is gradually integrated into the regulatory framework at European and national level. Through due diligence processes, partnerships with supply chain members can provide better risk management, help exploit business opportunities, ensure business continuity, and, along the way, could transform the supply chain into a value chain capable of generating extended economic and social value.

1. The term “local suppliers” generally refers to suppliers of materials, products or services, both industrial and non-industrial, operating in Greece.

Commitment

[GRI 103-2c]

Development of a responsible supply chain based on ESG criteria and in accordance with the Company’s [Suppliers / Business Partners Code of Conduct](#).

Major risks

[GRI 102-15]

The lack of responsible practices in the Company’s supply chain can be a source of various risks, such as problems in the supply of raw and other materials and of services, increased environmental impacts, health and safety risks, risks of human rights violations, and ethical and compliance risks, with consequences for the reputation and credibility of MYTILINEOS as well as potential financial sanctions.

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-210b.1]

MYTILINEOS seeks to develop strong, long-standing and mutually beneficial relationships of trust with its suppliers and business partners. The Company’s priority is to support its local communities, by establishing partnerships with local suppliers and contractors, while, in the context of its sustainable development strategy, it has launched specific initiatives that are also aimed at expanding responsible practices to its supply chain.

MYTILINEOS typically develops long-term partnerships with a large number of suppliers. Depending on the scope and nature of a specific purchase, priority is given to local suppliers, who are selected on the basis of their solvency, reliability in terms of quality and punctuality in terms of delivery, cost of products or services, available capacity to ensure the quantities required, and capability to meet the requirements of the particular purchase in accordance with the specifications set by the Company’s Business Units.

Moreover, MYTILINEOS has developed a dedicated “**Suppliers / Business Partners Code of Conduct**”, which sets out the Company’s minimum requirements / expectations from its supply chain actors regarding issues related to responsible entrepreneurship and sustainable development, as a key precondition for entering into any commercial association with them. The Code is structured according to the ESG criteria and is aligned with the United Nations’ Sustainable Development Goals.

To strengthen the level of awareness, maturity and integration of Sustainable Development in the supply chain, the Company organizes **annual training cycles** for its main suppliers in Greece, in cooperation with the CSR Hellas network (a member of CSR Europe).

Supplier evaluation process using ESG criteria

MYTILINEOS aims to promote the integration of the principles of sustainable development in its supply chain and to support its business partners in the improvement of their performance in the management of the material ESG topics that concern them. More specifically, MYTILINEOS intends to create, by 2025, a list of suppliers that meet the ESG criteria set by the Company.

In this context, the Company has prepared a **custom supplier evaluation questionnaire**, which is fully aligned with the requirements of MYTILINEOS' Suppliers / Business Partners Code of Conduct. The evaluation process of new and existing suppliers is gradually being integrated in the Purchases / Procurement units of all Business Units of the Company.

The evaluation of the ESG performance of MYTILINEOS' suppliers and business partners focuses on material sustainable development topics which are directly related to the Sustainable Development Goals and include, among other things, the evaluation of compliance with environmental requirements, the management of health and safety issues, the protection of human rights, as well as ethical and integrity issues.

A basic description of the MYTILINEOS supply chain is presented below:

Basic description of the MYTILINEOS supply chain [GRI 102-9]	
Main business activities requiring services or products from the supply chain	<ul style="list-style-type: none"> • Production & Maintenance of the alumina chemical industry and of primary aluminium metallurgy. • Plant production for the purchase of raw or other materials. • Production of secondary aluminium from recycled aluminium (scrap). • Construction for the purchase of equipment for the implementation of EPC and RES projects. • Logistics regarding the methods and time of products' delivery in various countries. • Operation and maintenance of Energy Centers (thermal power stations). • Development, construction and maintenance of Renewable Energy Sources projects (wind farms, solar parks, hydroelectric projects). • Retail activity. • Studies - Investments. • Administrative, Financial, Legal and other services.
Main supplier categories	<ul style="list-style-type: none"> • Raw material producers • Energy and Natural Gas suppliers • Subcontractors • Manufacturers • Distributors/Forwarders • Suppliers of spare parts/materials • Wholesalers • Suppliers of consultancy services & studies

Results

[GRI 103-3a-ii]

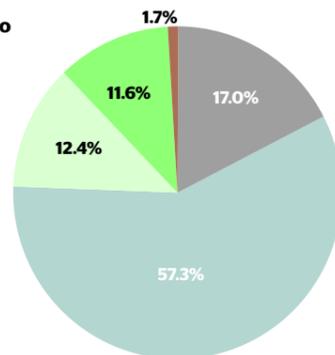
- At the end of 2021, the number of MYTILINEOS' active suppliers and business partners in Greece and abroad exceeded 10,000. Compared to 2020, no significant changes affecting the Company's activity were recorded in the basic structure of its supply chain. [GRI 102-10]
- MYTILINEOS' total expenditures to its suppliers in Greece for the production of its products, the supply of services and the development of its projects amounted to nearly **€1.6 billion**, with the share of the total amount being allocated to domestic suppliers standing at **59.6%**, thus indirectly contributing for yet another year to the preservation of jobs and the creation of incomes. [GRI 204-1]
- In 2021, almost 14% of all new suppliers with which MYTILINEOS entered into a commercial relationship were evaluated using environmental criteria, while almost 16% were evaluated using social criteria. [GRI 308-1] [GRI 414-1]
- In 2021, the evaluation of key suppliers using ESG criteria was launched. The information submitted by the suppliers is reviewed in order to estimate whether action should be taken

in cases of suppliers' non-compliance, so as to mitigate the risk in the Company's supply chain.

- In the Power & Gas Business Unit, 18 key suppliers have been evaluated.
- In the Metallurgy Business Unit, 6 suppliers have been evaluated in the evaluation carried out in 2021. The evaluation continues during 2022 and, by April 2022, 13 suppliers had been evaluated.
- The evaluation process will be completed in 2022 and actions will be taken as necessary.
- Concerning the total number of environmental inspections of contractors / suppliers, 69 such inspections were carried out, resulting in 49 confirmed cases of non-compliance for which appropriate measures were taken. Regarding the total number of inspections related to health and safety issues, 120 such inspections of contractors / suppliers were carried out, resulting in 33 confirmed cases of non-compliance.
- In addition, the Company completed the 2nd training cycle of key suppliers on corporate responsibility topics, increasing the number of suppliers that have already been trained to 85, of which 10 completed an additional in-house training on sustainable development topics.
- The figure below presents the allocation of expenditures to suppliers in 2021 per Business Unit of the Company. The largest expenditure, which also showed a large increase in 2021 (by 84%), concerns the Power & Gas Business Unit. The increase observed is primarily due to the purchase of increased quantities of natural gas and to the price increases that took place during the year. A significant increase was also observed in the expenditures to suppliers in the Sustainable Engineering Solutions (SES) Business Unit, which was to purchases necessary for the construction of the new thermal power plant.

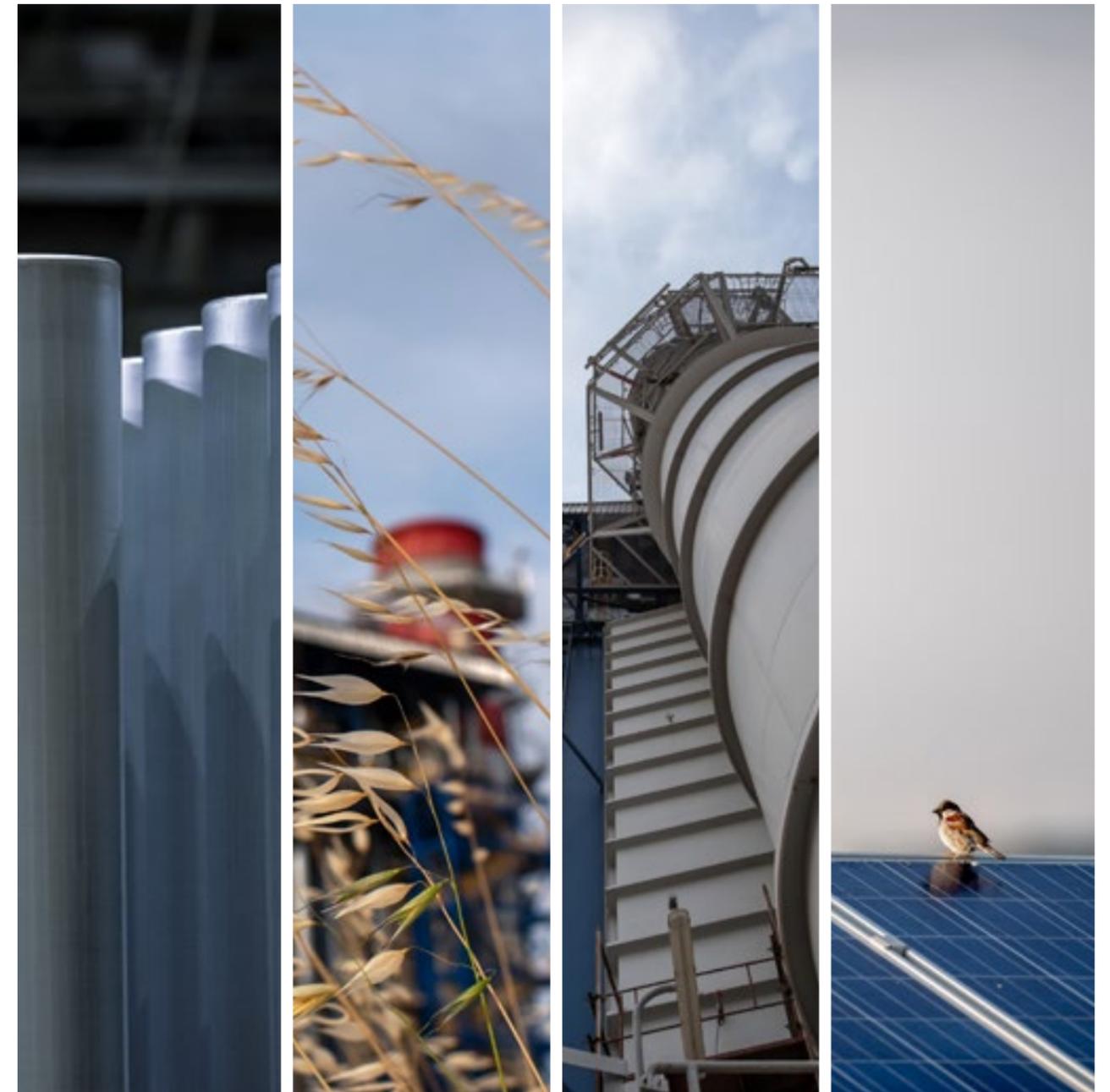
Breakdown of expenditures to suppliers per Business Unit

- Metallurgy BU
- Power & Gas BU
- SES BU
- RSD BU
- Central Functions

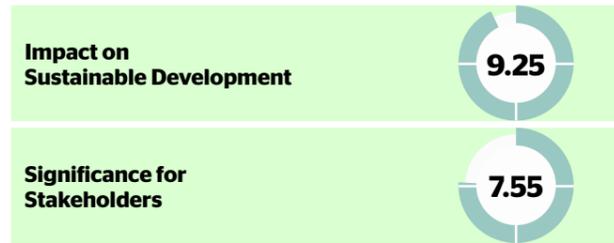


Data on the number of suppliers, their geographical distribution and the expenditures to them per Business Unit are presented below.

Supply Chain Data	2019	2020	2021
Total number of suppliers	9,639	9,543	10,277
Geographical distribution	Greece: 82.6% Abroad: 17.4%	Greece: 52.3% Abroad: 47.7%	Greece: 73.7% Abroad: 26.3%
Total expenditure	€1,954,923,114	€1,661,972,526	€2,632,552,530
Geographical distribution [GRI 204-1]	Greece: 40.0% Abroad: 60.0%	Greece: 52.5% Abroad: 47.5%	Greece: 59.6% Abroad: 40.4%



Business Continuity



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
The impacts can occur in the Company's industrial plants and facilities as well as in the nearby local communities.

By whom are the impacts caused:
The impacts may be caused by MYTILINEOS' Business Units, its subsidiaries and the strategic suppliers and contractors working with them.

The management of the topic by MYTILINEOS contributes to Sustainable Development:
The implementation and promotion of integrated policies and plans to effectively manage emergencies at all levels, so as to protect the natural environment and the well-being of society at local and national level.

Topic of increased significance to:

- **Employees**
- **Suppliers**
- **Shareholders / Investors / Financial Analysts**
- **NGOs**
- **Local Communities**

in the context of their cooperation with MYTILINEOS.

Management Approach

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

The purpose of this disclosure is to inform MYTILINEOS' Stakeholders about how the Company responds to emergencies in its facilities and areas of activity, and about the ways in which it ensures its uninterrupted operation.

The Company's objective is to effectively respond to emergencies while protecting the environment, ensuring the Health & Safety of all those present within its facilities and areas of activity, and the well-being of neighboring local communities. [GRI 103-2b]

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

The development of an organization's capacity to ensure the uninterrupted provision of its products / services (without affecting their quality / availability) under abnormal operating conditions, such as natural disasters, epidemic / pandemic crises or other adverse events (and combinations thereof), as well as the continuation of the organization's internal operation and functioning, such as for example in cases involving loss of critical IT applications, failures of suppliers / subcontractors, shortages in human resources, etc.

Major risks

[GRI 102-15]

The low degree of preparedness and response to emergency incidents (fires, explosions, land subsidence, release of chemicals to the environment, transportation of products, waste, natural hazards such as climatic and seismic events, health and safety incidents and other hazards), with serious consequences for the employees, the local community and the natural environment but also for the smooth operation of the Company's activities and thereby for its reputation and its financial results.

Commitment

[GRI 103-2c]

Safeguarding business continuity, environmental protection and health and safety in emergencies, in accordance with the main priority areas of MYTILINEOS' [Occupational Health & Safety Policy](#) and [Environmental Policy](#).

Risk Management / Control Practices

[GRI 103-2a]

Managing emergencies and ensuring business continuity is of the highest priority for MYTILINEOS. Therefore, all Business Units of the Company have established appropriate Emergency Prevention and Response Plans (for fire, explosion, leakages, natural phenomena, extreme weather conditions etc.), in order to effectively deal with all incidents that result in deviations from their normal operation with serious consequences for the environment and for the health and safety of employees and the local communities.

- In the **Metallurgy Business Unit**, an Emergency Response System has been developed in the facilities of Ag. Nikolaos, Viotia, consisting in the following: (a) an integrated Internal Emergency Plan (IEP) which also includes special evacuation plans of the facilities, (b) regular training of personnel, and (c) planning and implementation of emergency preparedness exercises in accordance with the annual plan and their adaptation to the requirements of the IEP. Regarding in particular the risks related to the use of industrial substances, both the prevention measures and the response plans in place follow the provisions set out in the SEVESO III Directive and described in the relevant Plant Safety Study, which is registered in the National Registry established for such facilities. **ASI**
- In the **Power & Gas Business Unit**, a package of emergency response measures is applied in the Unit's Energy Centers, RES plants and offices, comprising the following: (a) Emergency Team or Emergency Manager, (b) documented Emergency Incident / Accident Response Procedures, (c) implementation of Emergency Management Plans, and (d) implementation of personnel exercises and trainings in accordance with the special Evacuation Plans and the Building Emergency Instructions.
- In the **Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit**, appropriate Emergency Prevention and Response Plans are in place to effectively address all emergencies identified as such by the system. In order to protect the workforce and the environment in the event of such an incident, Emergency Plans have been prepared and are applied. Each construction site has its own emergency plan, appropriate to the nature of its activities and to the risks identified

and assessed. The emergency plans are documented, accessible and clearly communicated to all personnel, who are trained -by means of regular emergency preparedness exercises- to understand these plans and to thoroughly familiarize themselves with their roles and responsibilities in the event of an emergency.

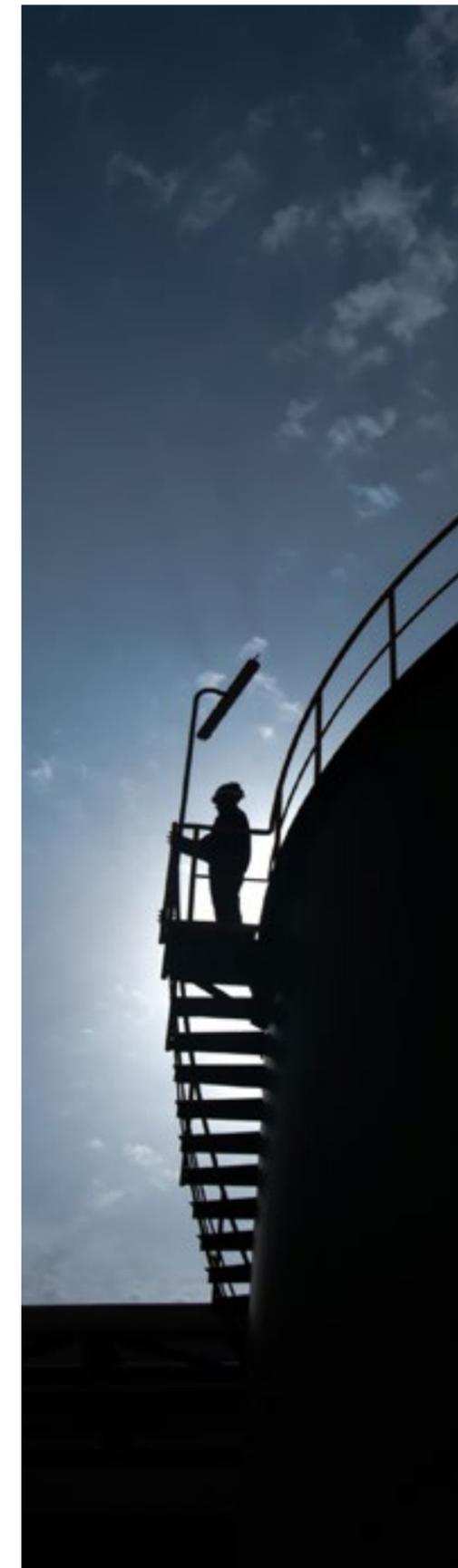
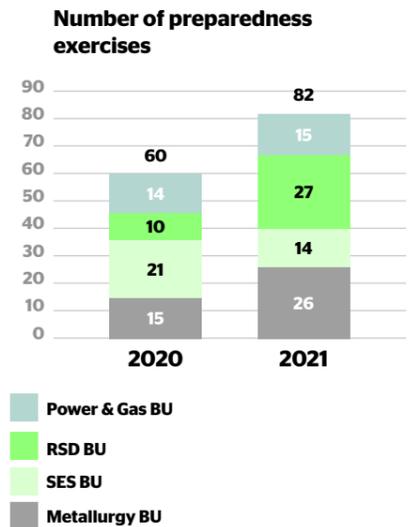
Results

[GRI 103-3a-ii]

- In 2021, there were no industrial accidents or environmental incidents with an impact on the natural environment or on public health.
- A total of 82 emergency preparedness exercises were carried out in all production units, construction sites and office buildings of the Company. In particular:
- In the **Metallurgy Business Unit**, a total of 26 exercises were carried out covering fire emergencies (in facilities, onboard ships, in fuel tanks) and rescue operations in enclosed areas and at heights, as well as the evacuation of offices and of the Chemical Laboratory facilities. The exercises were carried out in the context of the operation of the "Mobile Emergency Response Unit", which consists of Fire Protection Team employees. The staff is well-trained in fire safety and facility maintenance and this team is actively supported by approximately 100 volunteer firefighters from the Plant's other units, who receive proper training and are periodically retrained. In addition to conducting and analyzing emergency response exercises, the Fire Protection Team uses appropriate certified mobile equipment and the related means of assistance to help local authorities address incidents in the wider area, offering effective and prompt assistance as needed. The particular circumstances of the pandemic did not affect the preparedness of the Team, which responded promptly to all events inside and outside the Plant. In addition, evacuation / preparedness (alarm) exercises were carried out in the aluminothermic process, as well as exercises related to the explosion of natural gas and the treatment of polluted fire water, as well as exercises covering a rescue operation at height in the IPP II construction site and putting out a fire in a high-voltage transformer of the Plant's substation.
- In the **Sustainable Engineering Solutions (SES) Business Unit**, 14

emergency preparedness exercises were conducted, involving general evacuation exercises as well as exercises involving the evacuation of a building due to an explosives threat, fire and earthquake response exercises, and rescue at height / in an enclosed space exercises.

- In the **Renewables & Storage Development (RSD) Business Unit**, 27 preparedness exercises were conducted, involving fire, lightning strikes, earthquake and flood response exercises.
- In the **Power & Gas Business Unit**, 15 preparedness exercises were conducted, involving the evacuation of a building in case of earthquake and (forest) fire and evacuating a station due to severe weather phenomena and lightning strikes.



Other significant Social topics

Labor Practices

Employee training

The activity of MYTILINEOS in diverse sectors creates to differing training needs, while offering to employees a wide range of knowledge and giving them the opportunities to develop managerial and problem-solving skills, as they are confronted with new challenges each day. The Company's vocational training and development program for its personnel continued in 2021, aimed at improving the employees' professional skills and capabilities required to cope with the current and future business challenges for the Company as well as with the demands of their personal life.

In particular, within 2021, €414,741 were invested for the implementation of 41,879 training man-hours (2020: 38,476), an amount decreased by 8.8% compared to the respective number of hours in 2020.

The Company's training program, which was attended by 54% of its direct employees, focused primarily on the following key areas: **[GRI 404-2]**

- Induction program
- Foreign languages
- Development of skills and personal capabilities
- Development of technical skills
- Occupational Health & Safety
- Internal procedures & Management Systems
- Corporate compliance program
- Management & Leadership development
- Cybersecurity

Workforce data (direct employees)	Average training man-hours per employee [GRI 404-1]		
	2019	2020	2021
Analysis / gender			
Total	246	157	14.5
Men	261	162	14.5
Women	173	137	14.3
Analysis / age			
<30 years old	n/a	n/a	39.5
30 - 50 years old	n/a	n/a	12.4
>50 years old	n/a	n/a	6.4
Analysis / employee category¹			
Executives ²	24.5	14.6	29.0
Management employees	16.7	12.8	12.8
Workers and technical staff	29.1	18.2	13.7

Employee performance evaluation

Moreover, the employee performance evaluation procedure was continued in 2021, in accordance with the Company's uniform evaluation system, with almost 80% of the employees from all categories of personnel who met the conditions for inclusion in the annual performance evaluation procedure, participating in it. In 2021, the revision of the Performance Management System was also completed, which involved optimizations and adaptations in a number of key points, as well as with the development

of a training plan for the Company's employees, scheduled for implementation in 2022. The objectives of the Performance Management System are the following:

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

Workforce data (direct employees) ³	Percentage of employees who received a performance evaluation review ^{4,5} [GRI 404-3]		
	2019	2020	2021
Analysis / gender			
Total	55.9%	51.9%	50.2%
Men	59.2%	53.9%	51.8%
Women	40.8%	43.4%	43.4%
Analysis / employee category			
Executives	48.2%	61.1%	53.2%
Management employees	48.6%	47.9%	47.8%
Workers and technical staff	64.1%	54.0%	44.1%

At the same time, since 2021, **Skills Development Centers** are organized, in which Company Executives participate, in order to (a) identify and develop employees as candidates for succession in critical positions, (b) select the most suitable employees for promotion, and (c) identify and accelerate talent development.

Employee skills development programs [GRI 404-2]

Virtual Advance Negotiation Skills (strategic & selling)

The objective of this program was to introduce employees to negotiating skills and approaches, and to equip them with the means and tools to apply in their daily life the knowledge that they acquired. The program focused on training employees who specialize in complex or strategic negotiations, as well as employees who are active in sales and deal with customers on a daily basis. Among other situations, the program covered training in negotiation strategies and techniques, dealing successfully with refusals, dead ends, maneuvering and misleading tactics, and preventing dead ends and conflict situations. The percentage of employees who attended the programme reached 97%.

Communication and Collaboration

Because of the large size and dispersion of the MYTILINEOS activities and, therefore, of its people, in many countries, communication and collaboration are catalysts for the success of the organization, representing two key skills included in the Performance Dialogue system. In collaboration with Dynargie, targeted trainings were conducted to develop these two skills. Using the micro-site my-spark.gr, as well as the interactive gamification that rewards the effort, all participants had the opportunity to expand their knowledge, as well as the interactions and the collaboration between them. The program included, among other topics, training in understanding the value of effective communication, different types of communication, the value of collaboration and cross-departmental teamwork. The percentage of employees who attended the programme reached 93%.

1. Data for 2020 have been updated due to more accurate calculation. **[GRI 102-48]**
 2. The increase of the average hours is due to the implementation of specialized performance management training to all managers of MYTILINEOS.
 3. The above data do not include training in Personal Data Protection (GDPR). More information about this training can be found in the Legal Compliance section of this Report.
 4. Percentage of the total number of direct employees. The corresponding percentage for employees who met the conditions for inclusion in the annual performance evaluation procedure (i.e., those working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work) is almost 80%.
 5. Refers to an evaluation carried out within the calendar year (1/1/2021 - 31/12/2021).

Product Quality & Safety

MYTILINEOS focuses on safeguarding the quality of its products, so that they are safe, over and above compliance with the applicable legal and regulatory safety requirements. Any deviation from the quality specifications of the Company's products and services affects its responsible operation, which in turn impacts its customers' satisfaction levels, its good reputation and credibility and, by extension, its financial results.

Because of the diverse nature of the Company's activities, each Business Unit is faced with different challenges:

- In the Metallurgy Business Unit, the impacts of the Company's primary products on health and safety specifications are related to the **end use of the secondary products that result from the processing carried out by its clients**. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accordance with the expectations and requirements of its clients. **ASI**
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, in addition to taking into account the internationally applicable regulations on the **design of all manufacturing and RES projects**, the Company monitors their quality metrics and characteristics in detail, during the supply of materials and the construction of the final product, in order to ensure that the clients' stated requirements are met.
- In the Power & Gas Business Unit, it is very important for MYTILINEOS to ensure the highest possible availability and **reliability of its thermal plants** for the generation of electric power, as well as the continuous improvement of the quality of the services accompanying it, while at the same time taking advantage of new developments in areas such as electromobility, energy efficiency and net metering.

All Business Units of the Company implement an **ISO 9001:2015** certified Environmental Management System, which is supported by individual Quality policies specific to each Business Unit. In particular:

- In the Metallurgy Business Unit, the Company's laboratories, whose role in the quality program is pivotal, systematically control all production stages, from raw materials to finished products. In this respect, the officially issued **Safety Data Sheets (SDS)** describe the risks associated with the products, as well as all necessary precautions which must be taken to avoid / address these risks. The Company is committed and takes steps to ensure the best quality in its products, in response to the expectations and requirements of its clients, providing them with products (alumina and primary aluminium) and related services that fully meet their quality requirements. In this respect, for the purposes of monitoring performance in product safety, any customer complaints that may be related to product safety are regularly collected, analyzed and addressed by means of concrete corrective actions, with the aim to eliminate such complaints. Moreover, the sector's activities have been aligned with the **requirements of the EU "REACH" Regulation** on the effective management of the chemical substances used in industrial processes. In the framework of ISO 9001:2015, methodologies for the identification and analysis of operational risks as well as of opportunities for improvement, such as risk assessment, are applied, while independent quality audits covering product safety are also performed. **The**

Unit's quality control laboratory has been accredited by the Hellenic Accreditation System S.A. (ESYD) in accordance with the requirements of the ISO 17025:2017 International Standard, for the chemical analysis of bauxites, alumina and aluminium and its alloys. Finally, it is noted that the Unit's products do not contain harmful chemical substances. **ASI**

- In the Sustainable Engineering (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the strictest international quality criteria and the requirements of specialized international specifications and codes are applied, in order to ensure the quality of the heavy and/or composite metal structures which the BU produces. For every construction project undertaken by the Company and prior to the start of construction, a **Hazard and Operability Study (HAZOP) or Risk Assessment Study** is carried out. The purpose of the HAZOP study is to identify and resolve problems which may represent risks to personnel or equipment and which have not been identified at the project study and design stages.
- In the Power & Gas Business Unit, the target is to ensure the reliable supply of electricity to the Independent Power Transmission Operator (IPTO) and of natural gas to businesses, professionals and households, meeting the customers' needs for competitive prices through a range of specially configured, modern and reliable procedures, advice and energy conservation services. In addition, in order to enhance the efficiency of the Unit's Commercial Division and identify the potential for improvements, Customer Satisfaction Surveys are conducted on an annual basis, to **measure the satisfaction of retail customers**. In 2021, two such surveys were assigned to a consumer research company and were carried out via telephone calls, applying specific statistical criteria. The customer satisfaction rates obtained from the customers who responded to the two surveys were 80% and 76% respectively. It should be noted that the percentage of customers who are using the electronic services provided by the Company (e.g., online payments, mobile apps, internet services, etc.) stood at 55% in 2021.

During 2021:

- There were no cases of non-compliance with regulations and voluntary codes related to the impact on health and safety of the MYTILINEOS products and services. **[GRI 416-2]**
- In the Metallurgy Business Unit, where labelling requirements apply to the aluminium and alumina products for sale, a "Certificate of Conformity" was issued for each consignment, containing all necessary information. **ASI**
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the Company's projects and services are in full agreement with the terms of the respective contracts and with the Company's contractual obligations to its customers, to whom all Health, Safety and Environment related information is delivered, such as: (a) Use, maintenance and disposal instructions for the entire equipment (Operation & Maintenance Manuals) and for all the materials supplied, (b) clearly visible labelling of all materials and equipment (trademarks, warnings and related instructions), and (c) instructions for use-recycling, in the form of Safety Data Sheets (SDS) for all hazardous materials.

Communication & Marketing

Due to the broad scope of its activities, MYTILINEOS is communicating on multiple levels and for a variety of purposes, which include, among others, the disclosure of stock market information, the announcement of new activities and projects, and the provision of information to consumers and of updates to its other Social Partners, such as for example local communities. At the same time, the Company's international activity in 30 countries in all 5 continents, increases the level of difficulty and the challenge of providing timely and accurate information, as each country of activity has different morals, culture, mentality and institutional framework, to all of which the Company must align itself. Consequently, the Company's many and varied audiences, in combination with its multiple activities, are an important challenge in the first place.

Recognizing these aspects, the Company designs and carries out its Communication and Marketing Strategy by **implementing an annual communication strategy plan** and individual sub-plans, depending on the business objectives. These plans are in turn evaluated, in order to examine whether corrective or updated actions are required. Communication and marketing plans are designed and implemented by the Communication and Marketing Strategy General Division, yet their scope is of relevance to all Company General Divisions and activities. For this reason, mechanisms have been developed for cooperation between all General Divisions and Committees of the Company, as well as with the Company's Management.

At the same time, MYTILINEOS **monitors developments** in the relevant legislation and voluntary codes of conduct, in order to ensure the lawfulness of its communication and promotions. In this respect, the Company's communication associates are bound by the Greek Code of Advertising-Communication Practice, compliance with which is established on an advisory, preventive and/or suppressive basis by the Communication Control Board, in line with Greek laws. The Code's principles require all promotions to be lawful, decent, honest and truthful, prepared with a due sense of social responsibility and in line with the principles of fair competition, as this is generally accepted in the market.

The Company also participates in institutional bodies such as the Greek Federation of Enterprises (SEV), the Hellenic Capital Market Commission (HCMC) and the Hellenic Advertisers Association, membership of which is conditional on the acceptance of obligations, commitments and rules which MYTILINEOS embraces and takes into account for its Communication and Marketing activities.

Finally, the CEO and the Executive Committee are kept informed and evaluate the progress and performance of the Communication and Marketing Strategy General Division at regular intervals.

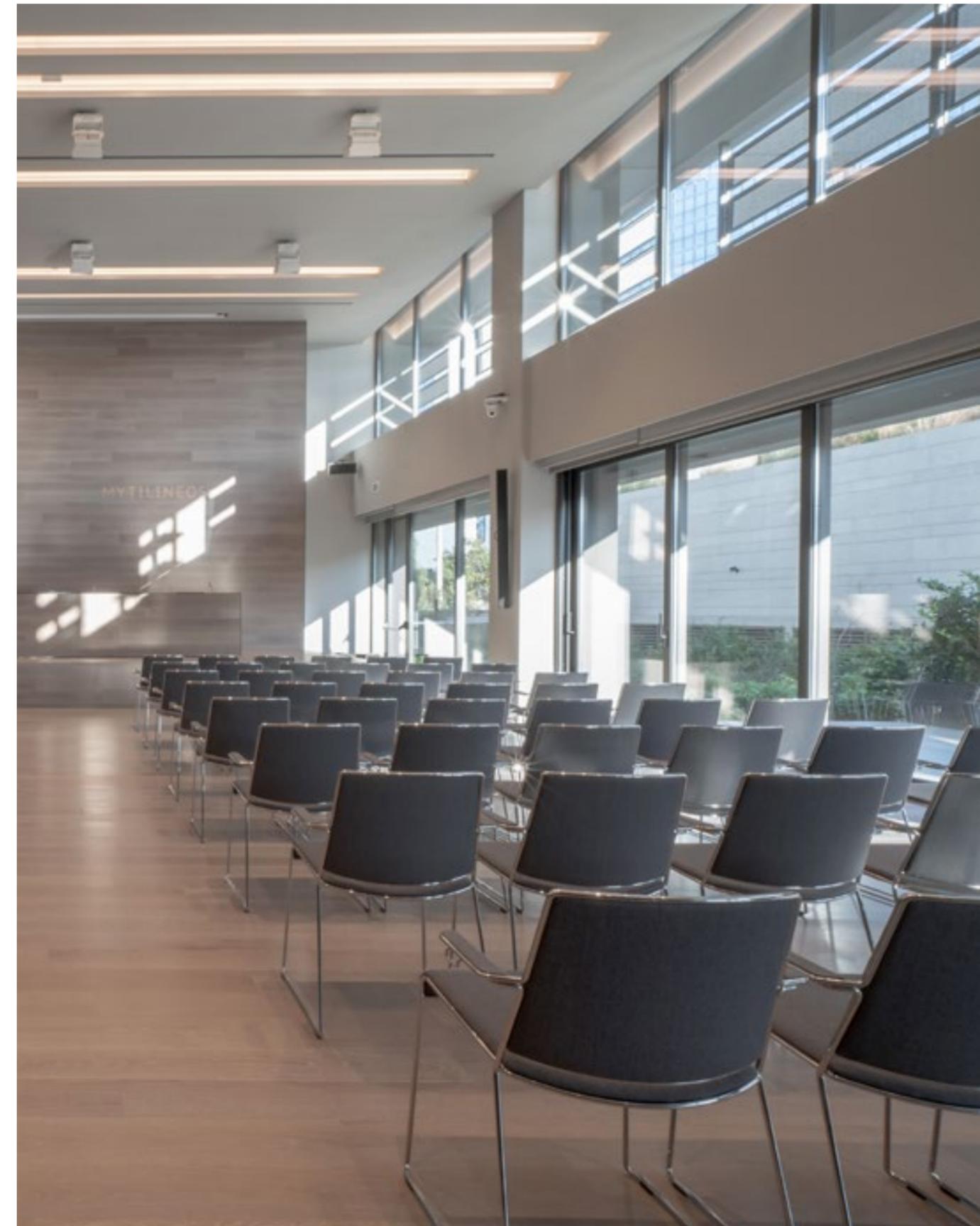
Regarding the results for 2021:

- **During the implementation of MYTILINEOS' communication strategy, there were no incidents of non-compliance** with the regulations and voluntary codes on marketing communications, including product promotion and sponsorships. **IGRI 417-31**
- **The Company's products are not subject to any restrictions as regards their sale to specific markets and no significant issues of concern were raised by the Company's Stakeholder groups** in connection with products and their marketing communication.
- Regarding the provision of verifiable and clear information on its products for the purposes of labelling, MYTILINEOS complies fully with the relevant requirements. In all cases, customers have at their disposal the tools allowing them to check all significant information provided and to proceed to the corresponding tests, if they so wish. **In 2021, there were no incidents of non-compliance with the regulations regarding information and labelling of the Company's products.** **IGRI 417-21**

Type of information related to product labelling **IGRI 417-11 ASI**

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

In the Metallurgy Business Unit, the above labelling requirements apply to all end products for sale (aluminium billets and slabs), as well as to calcined and hydrated alumina. For each aluminium or alumina cargo, a "Certificate of Conformity" is issued containing the necessary quality specifications for that cargo, and the Safety Data Sheet (SDS) of each product is also available.



ESG KPIs

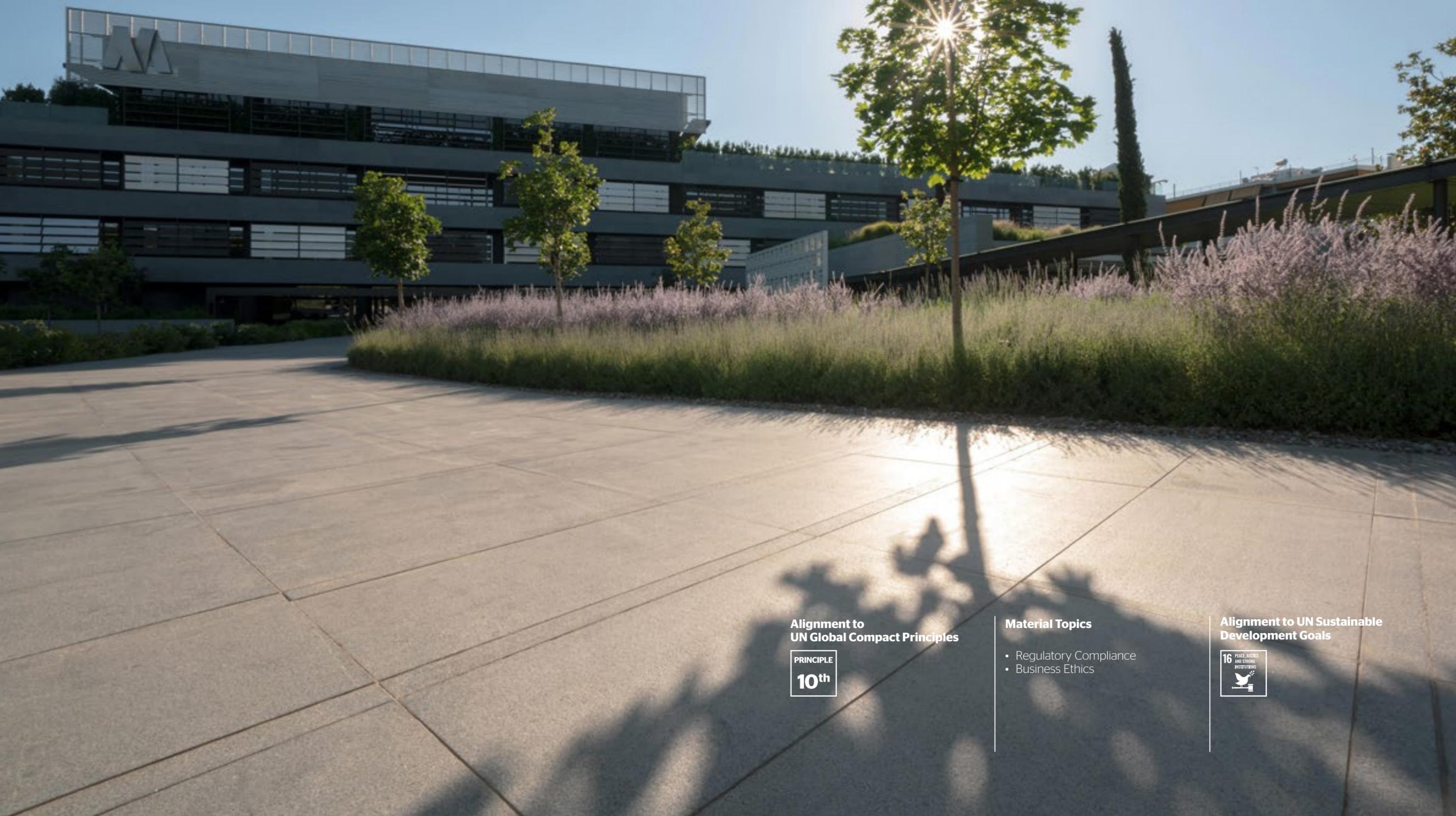
S Social KPIs	2019	2020	2021
Employment			
Direct employees	2,436	2,455	2,889
Indirect employees	1,226	1,401	1,934
Employee turnover ¹	5.2%	6.0%	6.1%
Percentage of full-time employees covered by business collective bargaining agreements	53%	52%	44%
Retention rate of full-time employees	93%	91.5%	90.6%
Percentage of women (direct employees)	18%	19%	18.7%
Percentage of women in management positions ²	17.8%	19.4%	21.1%
Percentage of employees <30 years old (direct employees)	12.0%	10.4%	12.6%
Percentage of employees 30-50 years old (direct employees)	69.6%	68.9%	65.8%
Percentage of employees >50 years old (direct employees)	18.3%	20.7%	21.7%
New job positions ³	281	34	489
Employment Practices			
Number of employees who received formal performance evaluation review ⁴	55.9%	51.9%	50.2%
Average training man-hours (Executives)	24.5	14.6	29.0
Average training man-hours (Management)	16.7	12.8	12.8
Average training man-hours (Workers and technical staff)	29.1	18.2	13.7
Training man-hours (direct employees)	59,794	38,476	41,879
Average training man-hours per employee	24.6	15.7	14.5
Total training cost (€)	406,322	247,859	414,741
Training cost per employee (€)	166.7	101.0	143.6
Human Rights			
Human Rights Policy	No	Yes	Yes
Human Rights violation incidents ⁵	0	0	0
Discrimination incidents	0	0	0

S Social KPIs	2019	2020	2021
Occupational Health & Safety			
Percentage of industrial plants & RES units with ISO 45001:2018 certification	83.3%	83.3%	89.3%
Number of fatalities (direct & indirect employees)	0	1	1
Lost-Time Injury incidents (direct employees)	1	5	10
Lost-Time Injury incidents (indirect employees)	7	4	11
Total number of recordable accidents ⁶ (direct employees)	n/a	14	23
Total number of recordable accidents ⁶ (indirect employees)	n/a	11	14
Total Recordable Injury Rate per 200,000 working hours (direct employees)	n/a	0.53	0.85
Total Recordable Injury Rate per 200,000 working hours (indirect employees)	n/a	0.38	0.29
Lost-Time Injury Rate per 200,000 work hours (direct employees)	0.04	0.19	0.37
Lost-Time Injury Rate per 200,000 work hours (indirect employees)	0.17	0.14	0.22
Training man-hours on Occupational Health & Safety (direct & indirect employees)	47,017	23,547	34,619
Sustainability of local communities			
Percentage of employees from local communities (direct & indirect employees)	93.6%	90.5%	92.1%
Social investments (mio €)	3.5	3.3	9.2
Incidents of non-compliance with laws and regulations on labor and social issues	0	0	0

- Number of voluntary departures to the average number of direct employees of the Company in the specific year. (Terminations of fixed-term contracts are not considered as voluntary departures for the purposes of calculating this index).
- Percentage of the total number of Company Executives.
- The difference between the total number of new hires and the total number of departures in the specific year.
- Percentage of the total number of direct employees. The corresponding percentage on the total number of eligible employees is nearly 80%. 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.
- 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.
- 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



Governance



Alignment to
UN Global Compact Principles

PRINCIPLE
10th

Material Topics

- Regulatory Compliance
- Business Ethics

Alignment to UN Sustainable
Development Goals



Corporate Governance

[GRI 102-18]

This section briefly describes the MYTILINEOS Corporate Governance framework. Detailed data are presented in the "Corporate Governance Statement" section of the Company's Annual Financial Report 2021. The corresponding indicators are reported in the GRI Content Index (pages 134-146), which also includes references to the Company's Annual Report and to this Report.

Corporate Governance Code

The Board of Directors sets the tone regarding the corporate governance standards. To this end, the Board of Directors decided to voluntarily adopt the UK Corporate Governance Code as of 01.01.2019, acknowledging that this code is widely recognized as the best model of corporate governance. The Code, together with its translation into the Greek language, is posted on the Company's website [mytilineos.gr/who-we-are/governance/corporate-governance/corporate-governance-code/] and on the website of the UK Financial Reporting Council (FRC), at frc.org.uk/directors/corporate-governance-and-stewardship/uk-corporate-governance-code.

Board of Directors

The Company is managed by a Board of Directors consisting of eleven (11) members, of which (a) three members, namely the Chairman & CEO, the Vice Chairman B' and one more member, are Company Executives, (b) the Vice Chairman A is a non-executive member, and (c) seven members are independent non-executive members. The Board of Directors continues to consider the separation of the roles or the dual role of the CEO. Further information on this matter is available in the Corporate Governance Statement (Clause 9). The two committees of the Board of Directors, namely the Audit Committee and the Remuneration and Nomination Committee, are fully independent. The Board of Directors has appointed the Company's Corporate Governance Director as Corporate Secretary, in order to receive the necessary guidance and advice on corporate governance issues.

The shareholders approve the independence of the Board's non-executive members when the latter submit their candidacy for being considered for election to the Board of Directors.

The Company applies a Diversity Policy, in which it acknowledges that diversity in the workplace in the broadest sense can increase the potential for accessing a broader range of business strategy solutions and thus increase its competitive advantage. The Company had set measurable targets, to be achieved by 2020, regarding the representation of women on the Board of Directors. In 2021, the Company exceeded the target set, as the new Board members elected on 15.06.2021 brought the number of women on the Board of Directors up to three, i.e., 27% of the total members.

The Board of Directors is responsible for managing (administering and disposing of) the Company's assets as well as for representing it, with the aim of strengthening its economic value and profitability and of safeguarding the Company's interests. The Board of Directors holds regular meetings at least once per month, and extraordinary meetings whenever important issues arise or decisions need to be made, except in cases of personal impediment. The regular meetings of the Board of Directors are usually attended by all Board members. Until today, there has never been a case in which the Board of Directors could not adopt a resolution due to lack of quorum.

The Company has clearly allocated responsibilities between the Management and the Board of Directors, as described in the Articles of Association. The roles and responsibilities of the Chairman, the CEO, the Lead Independent Director and the Board committees are included in the Company's Articles of Association approved by the shareholders at the 2019 Annual General Meeting. Further information is available in the Corporate Governance Statement (Clause 12 and Chapter 1.2).

Committees of the Board of Directors

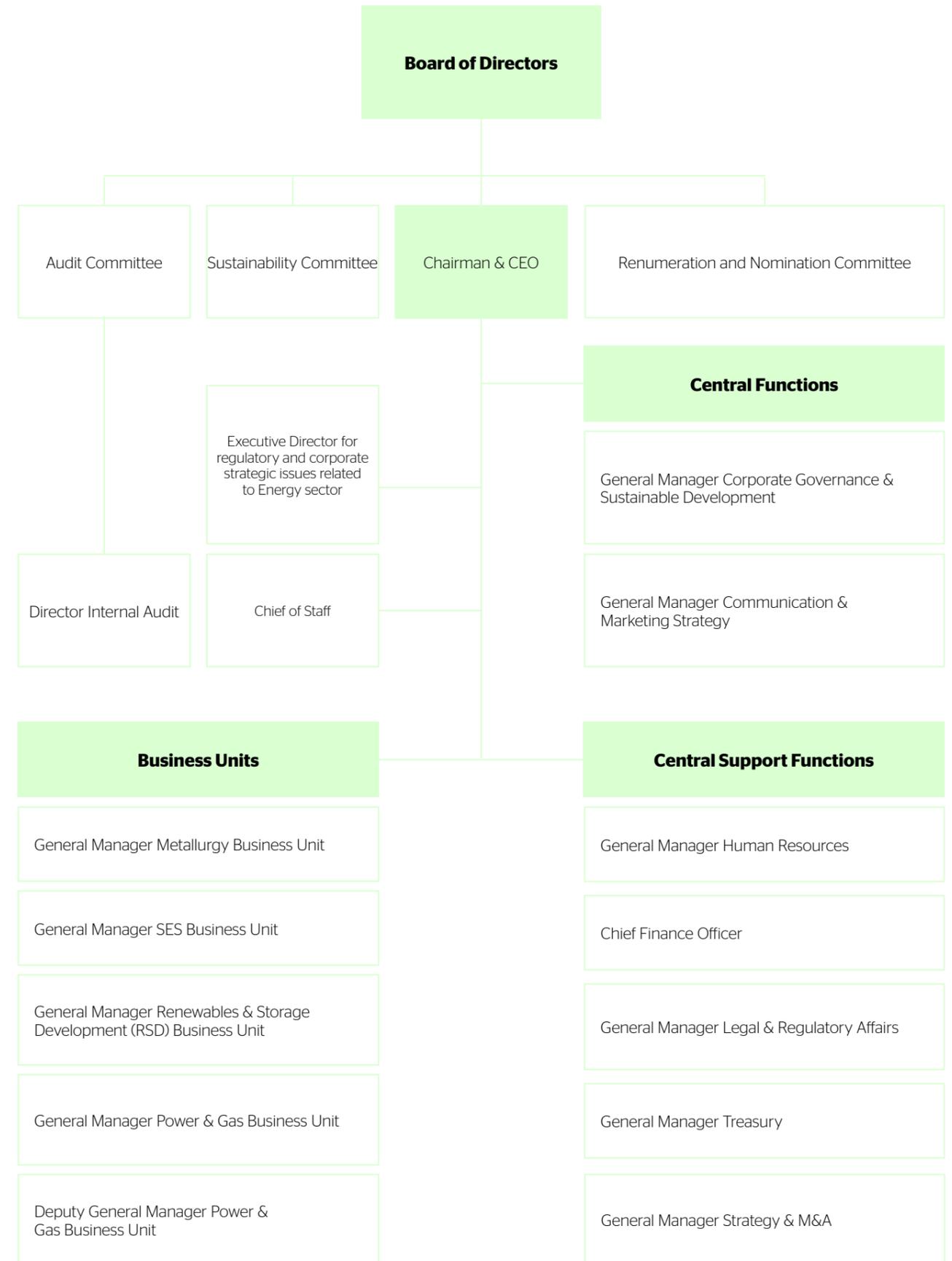
As mentioned above, the Audit Committee and the Remuneration and Nomination Committee, are fully independent. In particular:

The Company has established a dual-role **Remuneration and Nomination Committee**, which examines and addresses issues regarding (a) the remuneration of Board members and of the senior and other executives, and (b) the suitability of the Board's in-office and candidate members, within the Committee's remit and in accordance with its Terms of Reference. The Remuneration and Nomination Committee is responsible to examine the independence of candidate non-executive Board members, before their nomination as candidates for election to the Board is submitted.

The **Audit Committee** of the Company has been established with the purpose of assisting the Board of Directors to fulfil its supervisory responsibilities in the audit procedures, in compliance with the legal and regulatory framework regarding (a) financial information (b) internal control, (c) the internal control system and the risk management system, and (d) the supervision of the (regular) statutory audit of the Company's individual and consolidated financial statements.

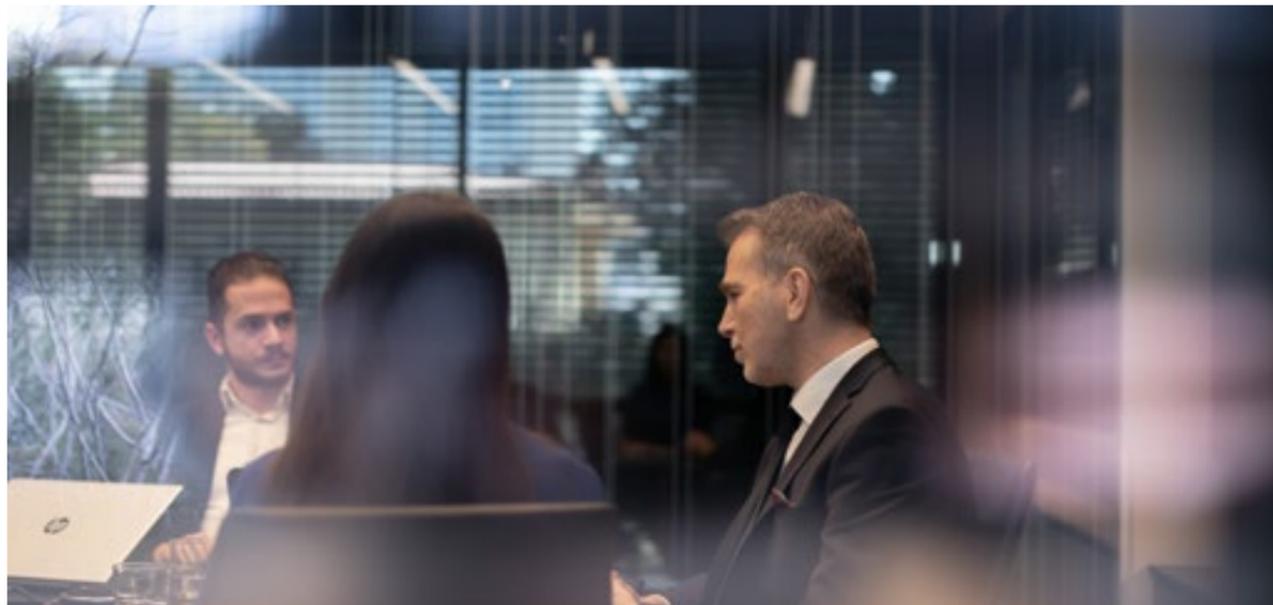
In 2021, the Board of Directors established the **Sustainability Committee**, whose purpose is to assist the Board in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, and is evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) issues. The Committee assists the Company's Board of Directors in integrating the Sustainable Development policies and procedures into the Company's core decision-making processes and operations.

The Company's organizational chart was revised by resolution of the Board of Directors on 04.02.2020 and is available at: mytilineos.gr/who-we-are/leadership/organizational-chart/.



Major developments in 2021

- In 2021, the Board of Directors established the Sustainability Committee.
- The Board of Directors approved and ratified MYTILINEOS' Conflict of Interest policy and procedure, which applies both to the Board of Directors itself and to all Company employees.
- Since February 2021, the Company has achieved a percentage of 27% in the representation of women in the Board of Directors, in accordance with the target it has set itself, while in Greek law 4706/2020 the relevant percentage is 25%.
- Compliance with the UK corporate governance code reached 75%, according to an independent reviewer.
- In order to fill two independent non-executive member vacancies on the Board of Directors, the Remuneration and Nomination Committee, taking into account (a) the policy for the Suitability Assessment of the Board Members, (b) the Company's strategy and (c) the results of the Board of Directors' assessment, described the role, the competences and the required personal characteristics that will enhance the knowledge and skills of the Board as a whole.
- The Remuneration and Nomination Committee discussed and adopted the Policy for the Suitability Assessment of the Board Members, which was approved by the General Assembly by its resolution of 15.06.2021, following its approval by the Board of Directors' resolution of 12.05.2021, and which sets out the set of principles and criteria to apply during the selection, replacement and renewal of the tenure of Board members, in the context of the assessment of their suitability at individual and collective level. The Policy aims to ensure the quality of staffing, effective operation and fulfilment of the role of the Board of Directors, based on the Company's overall strategy and medium to long-term business goals, with the aim of promoting the corporate interest.
- The first official succession planning project was completed at the end of 2021, with support from an external consultant. The evaluation framework for Executives adopted a holistic approach to calibrating the leadership skills that are critical to the Company's success, through face-to-face interviews as well as by using management evaluation tools. Critical competences examined included strategic orientation, results orientation, collaboration and influence, team leadership, change leadership and organizational capacity building.
- The effectiveness of the Board was addressed through two initiatives: the first one involved an external review of the Board's collective capabilities and was discussed by the Board in 2020, and the second one involved a follow-up review launched in 2021 and completed in 2022, which focused on each Board member's individual capabilities and contribution. The two Board evaluation exercises reinforced the Board's progress towards continuous improvement, while the initiatives adopted have already led to a substantial improvement in the Board's capacity to add value through enhanced and more permanent participation.
- The Board approved the Policy on the Independence of its Members, according to which the Company must ensure that the composition of the Board of Directors includes an appropriate number of independent members (at least 60% of the Board's total members).
- In 2021, the second Corporate Governance Road Show was organized for the investor stewardship teams. The Board Remuneration Report describes how the views of major institutional shareholders of the Company were taken into account, as they emerged from the consultation with the investor stewardship teams.



Sustainable Development Governance

[GRI 102-18]

The management of Sustainable Development is exercised by at senior management level at MYTILINEOS. It is steadily integrated into the Company's organizational structure and operational model through the regular review of all material topics, the planning of appropriate actions, target setting and the implementation of environmental, social and governance practices. The management of the Sustainable Development topics is implemented through the Company's corporate Sustainable Development governance system, with the following objectives:

- I. to highlight the importance of Sustainable Development, with the ultimate goal of preventing business, social and environmental risks.
- II. to adopt initiatives and actions that substantially contribute to the Global Sustainable Development Goals (2030 Agenda) and to the respective national priorities, and
- III. to balance the economic, social and environmental implications of MYTILINEOS' activities and, at the same time, enhance the value created for all its key Stakeholder groups.

The Sustainable Development governance system of MYTILINEOS has the following structure:

Sustainability Committee of the Board of Directors [GRI 102-32]

The purpose of the Committee is to assist the Board of Directors in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) issues.

The Sustainability Committee was established by resolution of the Company's Board of Directors of 02.04.2021. The Committee's members are in their majority Independent Non-Executive members of the Board. The Chair is appointed by the Committee members. More information is available in the [Terms of Reference of the Sustainability Committee](#).

General Division for Corporate Governance and Sustainable Development

With its crucial coordinating role, the General Division for Corporate Governance and Sustainable Development sets 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 submits, via the Sustainability Committee, information to the Board of Directors, including updates on the progress made towards the achievement of climate-related targets. It cooperates directly with the Central Functions on sustainability issues, and is responsible for supporting all the newly established Sustainability / ESG teams in each Business Unit regarding Sustainable Development standards and MYTILINEOS targets. Moreover, it coordinates, monitors, aggregates and synthesizes the sustainable development actions carried out across the entire Company, ensuring that, collectively, they produce the best possible results based on the ESG criteria and the relevant ratings, and that the Company's ESG performance remains at the highest possible level and meets the increasing requirements of the investors community in this field.

Enterprise Risk Management System

The operation of MYTILINEOS' Enterprise Risk Management System seeks to limit the likelihood and the impacts of risks and to maximize the benefit from the opportunities that are presented and are related, inter alia, to the Company's material for Sustainable Development topics. In this context, an Enterprise Risk Assessment methodology has been adopted, which is based on best international practices and is tailored to the needs of MYTILINEOS, promoting a unified culture that integrates risk management into processes, activities and decision-making at all levels of the organization.

Business Units

The General Divisions of the Business Units define the directions to their respective Sustainability / ESG teams, in cooperation with the General for Division for Corporate Governance and Sustainable Development, ensuring that the Key Performance Indicators (KPIs) are aligned with the strategic objectives of MYTILINEOS. Moreover, the new Sustainability / ESG teams, with the newly created roles of "BU Sustainability leaders" and "BU Sustainability / ESG initiative owners", are responsible for the organization and implementation of sustainable development initiatives in each Business Unit of the Company.

Consultations with Stakeholders & Local Communities

The institution of Consultation with Stakeholders and Local Communities is a long-established principle of MYTILINEOS' responsible operation, contributing to greater transparency, solidifying the Company's "social license to operate" and helping further improve its responsible entrepreneurship and sustainable development initiatives.

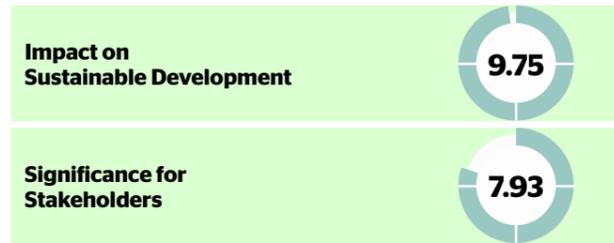
Codes of Conduct

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

(a) The MYTILINEOS **"Code of Business Conduct"**, which refers to the rules of acceptable conduct regarding the conduct of the Company's Management towards employees, the principles of professional ethics and the rules that govern the conduct of employees between themselves and towards third parties.

(b) The **"Suppliers and Business Partners Code of Conduct"**, which describes the Company's minimum requirements / expectations of its supply chain actors regarding environmental, social and governance (ESG) related issues as one of the main prerequisites for the establishment of a commercial cooperation with them.

Regulatory Compliance



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
The impacts of non-compliance with laws and regulations occur primarily within the operational boundaries of the Company and of its subsidiaries, strategic partners and suppliers. They can also extend to the entire economy and to the environment, in the context of sustainable development, as well as to society as a whole.

By whom are the impacts caused:
The impacts may be caused by MYTILINEOS' Business Units, employees, subsidiaries, business partners and supply chain.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The enforcement of and compliance with non-discriminatory laws aimed at promoting Sustainable Development.

Topic of increased significance to:

- Employees
- Suppliers
- Shareholders / Investors / Financial Analysts
- NGOs
- Press representatives
- Local communities

in the context of their cooperation with MYTILINEOS.

Management Approach

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

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

Maintaining regulatory compliance at environmental, social and product level, in order to ensure that the overall corporate activity is lawful and corresponds to high standards of responsible entrepreneurship, strengthening the environment of trust between the Company and its Stakeholders in their interactions with it (customers, employees, suppliers, administrative authorities etc.).



Cases of non-compliance could have a significant impact on the profitability, financial position and cash flows of MYTILINEOS and, consequently, on its ability to meet its obligations.

Commitment

[GRI 103-2c]

Operation in full alignment, compliance with and conformance to the applicable legislation and the principles of operation in each region or country where the Company operates, in accordance with the main priority areas of the [Code of Business Conduct](#) and the [Suppliers / Business Partners Code of Conduct](#).

Major risks

[GRI 102-15]

- Financial risks, which may arise from possible negative outcomes of legal disputes regarding non-compliance with the legislation in general.
- Potential non-compliance of the Company with its obligations under the environmental legislation and, more specifically, with the terms of the environmental licenses of its industrial plants. In such cases, the competent authorities may impose fines or sanctions, and may also withdraw or refuse to renew permits and approvals in the event of a breach of the applicable regulations.
- The Company operates in countries with emerging economies, where institutional functions may be affected by political conditions and changes thereto. This could negatively affect the Company's activities.

Risk Management / Control Practices

[GRI 103-2a]

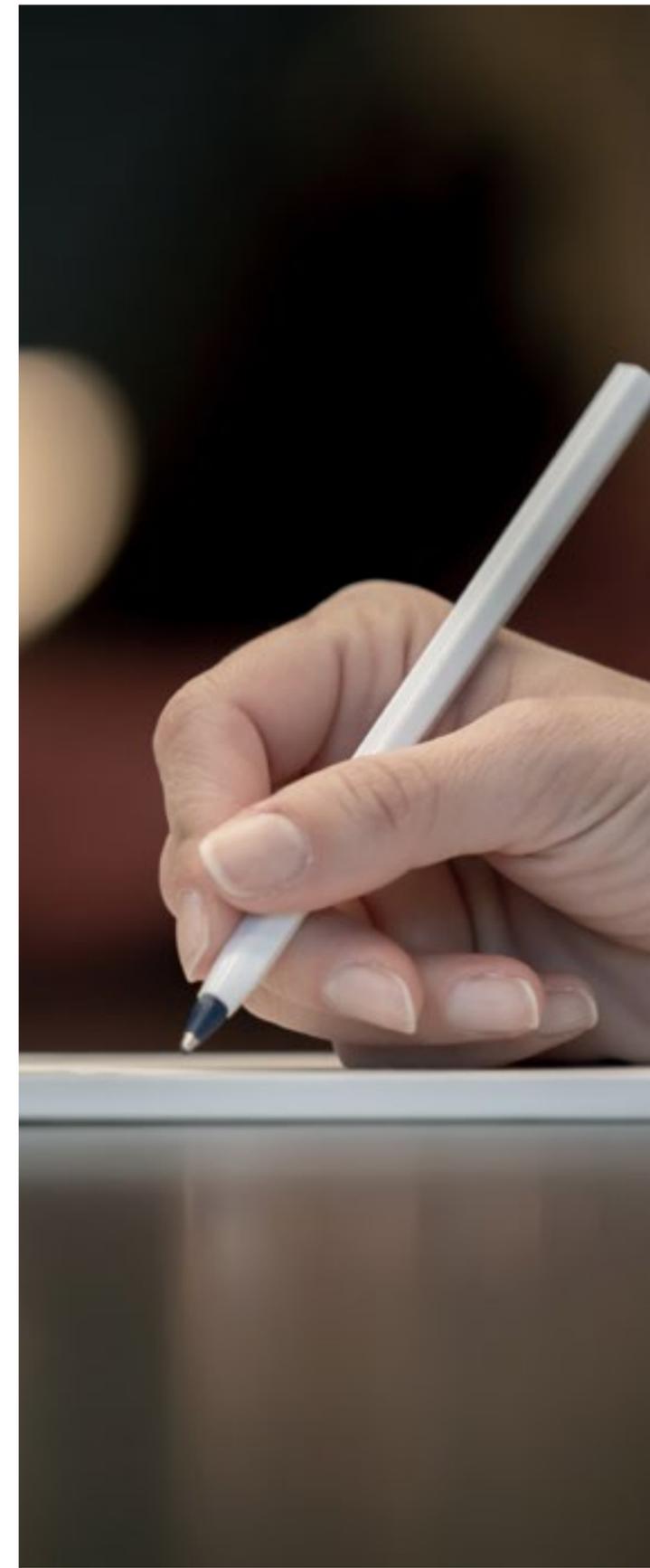
- In order to prevent the aforementioned risks, the Company: (a) complies with the legal and regulatory requirements of the geographical regions in which it operates, (b) ensures that its relations and activities comply with the established and applicable institutional framework, (c) is kept informed of its applicable legal obligations, and (d) has established procedures for monitoring developments in the legislation concerning its sectors of activity, and is reviewing and assessing its compliance with the applicable laws and regulations on a regular basis.
- Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) of the Company's operational units, is a process conducted internally, on a regular basis, in each Business Unit, by qualified personnel, as well as annually, by a recognized independent organization which audits and certifies the Company's environmental management system.
- As a member of the UN Global Compact, the Company strives to ensure that its business practices are fully aligned with the Compact's internationally recognized Ten Principles. Furthermore, under its Corporate Social Responsibility Policy in place, MYTILINEOS commits to adopting a responsible, sustainable and ethical business conduct that is regularly evaluated on the basis of the achieved results, and to improve its environmental and social performance, as well as its performance regarding transparency and corporate governance.
- During tendering for a project, policies and procedures (management system or due diligence procedures) are applied to prevent bribery and corruption as well as anti-competitive behavior.

- The Regulatory Compliance Division has developed two training programs for the Company's personnel, which cover training in personal data protection (GDPR) and in MYTILINEOS' Code of Business Conduct. Both trainings make use of remote access (distance learning), given the requirements for teleworking and limiting face-to-face meetings, and are implemented online in asynchronous mode, checking that the employees have fully attended them and are fully familiar with the issues covered. The trainings combine references to the theoretical background, analyses of case studies from everyday work, awareness-raising of upcoming risks, and incident response and escalation methodology, where required. All employees, including the employees of MYTILINEOS' subsidiaries, were classified in terms of the nature of their work and duties, forming a target group whose members attended the relevant trainings according to their risk exposure. In addition, material has been developed and thematic trainings are taking place for specific employees in the following areas:
 - Initial training in Regulatory Compliance for new employees.
 - Healthy competition law.
 - Thorough screening of third parties using the in-house integrity screening platform.
 - Complaints platform management and investigation of complaints.

Results

[GRI 103-3a-ii] [SASB EM-MM-140a.2] [SASB IF-EU-140a.2]

- In 2021, the Company's compliance with the applicable legislation, coupled with the application of controls to ensure observance of the rules concerning its activity, **resulted in the absence of incidents of non-compliance with the legislation and with the applicable regulations at environmental, social and economic level.** [GRI 307-1] [GRI 419-1] [SASB IF-EN-160a.1]
- The Regulatory Compliance Division continued the implementation of trainings in personal data protection (GDPR) and in MYTILINEOS' Code of Business Conduct. In 2020, these trainings were held for Directors, employees whose responsibilities include the supervision of personnel, employees in positions where the nature of their duties involves a risk of non-compliance, and employees who perform the processing of personal data. **A total of 500 employees completed the training successfully** (83% completion rate). In 2021, the trainings were held for the remaining employees in the target group, with 90 employees successfully completing them (98% completion rate). The trainings are scheduled to be completed in 2022.
- In 2021, **there were no incidents of legal action against the Company or of financial sanctions imposed on the Company** for anticompetitive conduct, antitrust or monopolistic practices, corruption, bribery, cartel activities or price fixing. [GRI 206-1] [SASB IF-EN-510a.2] [SASB EM-CM-520a.1]



Business Ethics



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

Management Approach

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

MYTILINEOS acknowledges that ensuring transparency in all transactions arising in the context of its business activities is a key issue for sustainability and for the Company's further growth in the context of its international activity. The purpose of this disclosure is to inform MYTILINEOS' Stakeholders about the way in which the Company manages the need for both limiting its exposure to corruption and bribery and strengthening the culture of compliance with the anti-corruption legislation. [GRI 103-2b]

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

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

MYTILINEOS acknowledges that corruption, bribery, fraud, violations of healthy competition, and money laundering undermine the moral environment of businesses and have a wide range of negative effects that include violations of Human Rights, adverse impacts on the environment, distortion of healthy competition and impediments to the distribution of wealth and to economic development. These impacts are a serious obstacle to

Sustainable Development, have a disproportionate impact on poor communities, and erode the very fabric of society.

Commitment

[GRI 103-2c]

Zero tolerance of situations of corruption and bribery, in accordance with the main priority areas of the MYTILINEOS' [Code of Business Conduct](#) and [Suppliers / Business Partners Code of Conduct](#).

Major risks

[GRI 102-15]

By operating in developing countries with high energy needs, which according to the Corruption Perception Index annual survey of Transparency International are countries with a high risk of corruption, MYTILINEOS may be exposed to risks involving facilitation payments or the extension of other benefits to the local business partners in order to ensure the continuation of the projects' smooth operation.

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

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-510a.1] [SASB IF-EN-510a.3]

Addressing corruption and bribery is a key element of the MYTILINEOS "Code of Business Conduct" and "Suppliers / Business Partners Code of Conduct." **For the Company, the reference point when it comes to addressing corruption and bribery is the principle of integrity, which relates to its long-standing commitment to zero tolerance of these issues. This commitment is fulfilled with the rigorous screening of third parties before entering into any agreement with them or making any payments to them, as well as by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging conditions giving rise to corruption, extortion or bribery.**

To fulfil this commitment, MYTILINEOS takes action in a number of ways:

- The Company's operation as a "Responsible Corporate Citizen", is reflected by its participation in international transparency advocacy initiatives (UN Global Compact), national working groups and, more generally, its commitment to ethical business practices and sound corporate governance. MYTILINEOS has been formally committed to the 10th principle of the UN Global Compact, according to which "Businesses should work against corruption in all its forms, including extortion, bribery and facilitation payments". This principle acts as a catalyst in establishing a culture of ethics across the Company.
- As part of the Enterprise Risk Management activities, MYTILINEOS conducts on an annual basis a study on its potential exposure to corruption and bribery risks in its various business activities, and specifies measures to minimize these risks.
- In countries with a high risk of corruption, the Company ensures that a Grievance Mechanism is put in place, to which all employees (direct or indirect) have access in order to submit, either in their name or anonymously, complaints of violations



in connection with the policies on personal data protection, bribery and corruption, human rights or violations of the Company's Code of Conduct. The Company protects the complainants from retaliations, on condition that the complaint is made in good faith, even if it is not corroborated by the result of the investigation undertaken in response to it. In addition, the Company operates a central complaints mechanism for the submission of reports of violations to the Compliance Division Director. This mechanism is being enriched to reflect the provisions of Directive 1937/2019 of the European Parliament and of the Council and, following the enactment of the relevant local legislation, its revised version will enter into effect.

- In 2021, the Regulatory Compliance Division of MYTILINEOS issued the corporate policy on the conflicts of interest of its employees and business partners, and collected the relevant declarations of commitment from Management Executives and employees in key Management positions.
- The Company ensures that its personnel is regularly trained, by category of exposure to regulatory risk, in the issues covered by the Code of Business Conduct, with in-depth analyses of corruption and bribery, healthy competition, fraud, rigorous screening of business partners and conflicts of interest.

Business ethics in MYTILINEOS' cooperation with third parties

- MYTILINEOS places particular emphasis on the analysis of the prevailing conditions and identification of potential risks or threats which may encourage the occurrence of such incidents in the corporate environment, through a third-party screening and due diligence process. This practice covers corporate activities that involve the risk of occurrence of incidents of corruption and bribery, such as charitable contributions, sponsorships, gifts and hospitality, third-party audits in relation to lists of individuals or entities subject to restrictions in connection with the financing of terrorism and human rights violations, brokering services and advisory services, with a view to establishing respective prevention procedures where these are not in place. The Regulatory Compliance Division has developed an in-house application to support the rigorous screening of third parties and the decision-making process of the Company on whether or not to cooperate with them. The application supports the classification 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 interactions between the commercial departments, the Regulatory Compliance Division and the Management with the necessary documentation, and the retention of all the supporting documents supplied and the responses given by the third party.
- MYTILINEOS' Suppliers / Business Partners Code of Conduct aims at tackling conditions of corruption and bribery in the supply chain. MYTILINEOS carries out Supplier Integrity Checks prior to the commencement of the cooperation, while the Code provides for audits whose purpose is to ensure the implementation of the Code and to provide recommendations for corrective measures, where required.
- The Company ensures that all transactions carried out on its behalf by its shareholders, employees and major business partners and suppliers, are characterized by a high level of integrity. Through established procedures, applied primarily in the Purchases / Procurement Departments and in project management for the selection of suppliers and other business partners, controls are carried out annually on the conditions under

which every single transaction takes place, in order to identify and eliminate those that may possibly give rise to incidents of corruption or fraud.

- The Company applies prevention and detection systems and controls to ensure that suppliers comply with the standards of MYTILINEOS, disputed payments are avoided and the payments due are made correctly and are entered in the Company's accounting books in an accurate and transparent manner.

The Legal and Regulatory General Division, in which the Regulatory Compliance Division belongs, has been entrusted with the creation and implementation of mechanisms to safeguard the Company's protection at both preventive and control levels. Specifically, the Regulatory Compliance Director reports to the General Manager for Legal & Regulatory Affairs and to the Audit Committee of the Board of Directors, which approves and monitors the Regulatory Compliance work plan.

According to its Code of Business Conduct, MYTILINEOS does not make any donations to political formations or related persons.

Results

[GRI 103-3a-ii]

- In 2021, MYTILINEOS applied all necessary internal procedures to safeguard its policy. Through the screening mechanisms applied in the Purchases-Procurement Departments of the Company's Business Units, which have investigated both the process for the selection of business partners and all types of transactions, **no confirmed incidents of corruption were identified** that could possibly lead to dismissal or disciplinary action against employees on the grounds of corruption, nor any corruption-related incidents resulting in the termination or non-renewal of cooperation with business partners or public judicial cases against the Company or its employees for corruption. [GRI 205-3]
- The Regulatory Compliance Division has distributed the updated Code of Business Conduct (November 2019) to all employees and subsidiaries of the Company, against the recipients' signed proof of receipt and commitment to the Code. This procedure, which applies to every new employee, is expected to be repeated for existing employees also, in the event of major revisions/ renewals of the Code.
- The Metallurgy Business Unit of MYTILINEOS does not have production activity in the 20 countries with the lowest ranking in the Corruption Perceptions Index published by Transparency International. [SASB EM-MM-510a.2]

Other significant Governance topics

Cybersecurity

Possible breaches in the security of networks, information systems and operational systems, threaten the integrity of the Company's data and other sensitive information, and disrupt business operations. The occurrence of such events could negatively impact the Company's reputation and its competitive position. Moreover, the Company's possible involvement in litigations with third parties, the award of damages, the imposition of fines or the loss of business (including remediation costs), could have a significant negative impact on its financial situation and operating results. In addition, the management of cybersecurity attacks or breaches may require considerable Management involvement and significant resources.

MYTILINEOS has developed an **Information Security Framework** and is committed to the implementation of a **holistic Information Security Management System**, through which the effective and efficient protection of the Company's information systems and data is achieved.

The Information Security Framework sets out a continuous cycle of improvements in the Information Security Management System, specifying activities for assessing risk, developing and implementing information security policies and cybersecurity risk mitigation standards, procedures and guidelines, and monitoring their effectiveness and efficiency.

MYTILINEOS periodically works with **independent organizations** and consultants, who evaluate the adequacy and effectiveness of the Information Security Management System and verify that an information resource or management system meets the necessary requirements specified by the respective policies for the protection of information systems and their data.

Moreover, a **regular and structured information security awareness-raising** and training program has been developed and is implemented across the entire Company on a continuous basis. The aim of the program is to ensure that all employees, contractors and relevant third parties with access to information and information systems, understand the need for information security, acknowledge the responsibilities assigned to them under the Information Security Framework, and perform their duties demonstrating a high level of professional ethics. This program is evaluated and revised, if appropriate, at regular intervals through exams, as well as through exercises simulating actual cybersecurity attacks.

Finally, to ensure business continuity and minimize the impact of a cybersecurity breach or natural disaster, a **business continuity and disaster recovery plan** has been designed and implemented, which is tested and updated on a regular basis. At regular intervals or if issues arise in the wider cybersecurity environment in which the Company operates, relevant presentations are made at the Senior Management or Audit Committee level. The Senior Management is responsible for taking appropriate measures that will guarantee business continuity according to the business needs.

Customer privacy

The protection of natural persons against the processing of personal data is a fundamental right and is of the utmost priority for MYTILINEOS. Therefore, the collection and processing of personal data is carried out only in accordance with the law and only where required in connection with business relationships and with the Company's business activity. The Company allows access to such data by authorized persons only and takes increased data security measures.

Although MYTILINEOS does not basically process special categories of data (sensitive data), the business activity of Protergia in the retail sales of electricity and natural gas as well as the size of MYTILINEOS in terms of the number of its employees and active business partners, require the processing of personal data on a large scale. MYTILINEOS remains responsible for the processing of data ("data processor") and has specific obligations and responsibilities, which also apply in cases where such processing is outsourced to third parties. In addition, transactions with business partners outside the European Union, especially in countries with less rigorous data protection legislation, create the need for transferring personal data whose protection should be ensured.

The Company may face various risks related to the protection of personal data, which may be financial in nature, such as from possible sanctions imposed by European data protection authorities or from claims of personal data subjects that have suffered damage, as well as risks related to negative publicity and reputational damage, in cases of improper retention and processing of its customers' personal data.

For this reason, MYTILINEOS has taken a number of steps to ensure, as far as possible, the protection of the personal data it manages. More specifically:

- has a **Data Protection Officer** (full-time employee) since 2018 and has duly notified the competent Authority of the details of this person,
- has carried out a **study on the deviations** from the General Data Protection Regulation and has taken appropriate corrective action since 2018,
- has established a **data protection policy** for all its employees and subsidiaries, as well as for its business partners, and has communicated it to all the parties concerned,
- has completed **impact studies** (Data Privacy Impact Assessments) regarding the processings required,
- has established and operates a **mechanism for recording any breaches** of personal data and for notifying them to the competent Data Protection Authority as well as to the affected data subjects, if required, while
- in terms of **training**, it has provided by the end of 2021 face-to-face as well as online trainings to over 850 employees who either process personal data or supervise their processing.

In addition, the risks related to the protection of personal data are included in the Company's Risk Management System and are continuously monitored. In 2021, the audits for the protection of personal data in the Metallurgy and Power & Gas Business Units were completed by the Company's internal audit function without significant findings. During 2021, the Company carried out a total of 10 in-depth checks of processors to verify their compliance with the General Data Protection Regulation (GDPR). **ASI**

MYTILINEOS' compliance with the applicable legislation and the implementation of controls to confirm observance of the rules concerning its activity, **resulted in the absence of significant incidents involving a breach of personal data during 2021**. Moreover, in 2021, eight (8) incidents involving the mailing of contracts / bills to the wrong recipients occurred in the Power & Gas Business Unit, in response to which additional technical and organizational measures were implemented to eliminate such occurrences altogether. These incidents, which are not considered significant, were reported to the competent Authority within the prescribed deadline and the data subjects were immediately informed, where required. In addition, there have been three (3) confirmed cases of promotional calls from external business partners of MYTILINEOS to telephone numbers of subscribers falling under Article 11 of Law 3471/2006 on "unsolicited communication". Finally, three complaints were forwarded to the Company by the competent Authority. **[GRI 418-1]**



Enterprise Risk Management

[GRI 102-11] [GRI 102-15]

The activities of MYTILINEOS are affected by multiple risks, whose occurrence may impact its activities, its business presence, its financial performance and the achievement of its strategic goals.

In 2021, MYTILINEOS, considering the nature and extent of the risks it is faced with in an ever-changing economic and business environment, **proceeded to reassess the main business risks**, which it classified in the following main categories:

- Financial risk
- Market risk
- Legal & Regulatory Compliance risk
- Operational risk
- Strategic risk

MYTILINEOS implements an **Enterprise Risk Management System** for the identification, analysis, assessment, monitoring and reporting of risks, in order to limit the likelihood and the impacts of risks and to maximize the benefit from the opportunities presented. In this context, an **Enterprise Risk Assessment** methodology has been adopted, which is based on best international practices and is tailored to the needs of MYTILINEOS, promoting a unified culture that integrates risk management and decision-making in its procedures and activities.

This methodology (top-down & bottom-up) is **followed by all Business Units**. Central Services and Support Services of MYTILINEOS and consists of the following steps:

- Identification and classification of key risk factors
- Assessment of the risk's likelihood of occurrence and impacts
- Assessment of the adequacy of risk mitigation mechanisms
- Assessment of residual risk
- Risk monitoring

The responsible Executives of the General Divisions are involved in the systematic identification and assessment of risks affecting business activities, as well as in the assessment of the adequacy of the risk mitigation mechanisms. They also supervise the formulation and timely implementation of the risk management plans. For every risk, a Risk Owner has been assigned, whose responsibilities are the implementation of the risk assessment methodology and the formulation of the risk response plan. In addition, in each General Division the role of Risk Partner has been established, whose responsibilities are the development and updating of the Risk Register, as well as the monitoring of the progress made in the implementation of each risk management plan.

The risk assessment results are communicated by the Enterprise Risk Management Division to the Executive Committee and the Audit Committee of the Board of Directors of MYTILINEOS.

Finally, **internal audits** are carried out at MYTILINEOS to ensure the proper and effective implementation of the risk management procedures.

ESG KPIs

G Governance KPIs	2020	2021
Corporate Governance		
Corporate Governance Code	UK Corporate Governance Code - 2018	UK Corporate Governance Code - 2018
Diversity Policy	Yes	Yes
Board Members	10	11
Board Members' term of office (years)	4	4
Average age of Board Members (years)	60.9	59.6
Chairman's duality	Yes	Yes
Appointment of Lead Independent Director	Yes	Yes
Executive Members on the Board	3	3
Non-Executive Members on the Board	7	8
Independent, Non-Executive Members on the Board	5	7
Women on the Board	2	3
Voting standard	Majority	Majority
Number of Board Meetings	56	63
Number of Board Members present in <75% of Board meetings	0	0
Remuneration & Nomination Committee	Yes	Yes
Independent Board Members on the Remuneration & Nomination Committee (%)	100%	100%
Audit Committee	Yes	Yes
Independent Board Members on the Audit Committee (%)	100%	100%
Sustainability Committee	Yes	Yes

G Governance KPIs	2020	2021
Corporate Conduct		
Code of Business Conduct	3 rd Edition 2019	3rd Edition 2019
Suppliers & Business Partners Code of Conduct	3 rd Edition 2019	3rd Edition 2019
Publication of business model & value creation process	Yes	Yes (pp. 28-29)
Materiality process	Yes	Yes (pp. 40-41)
Political contributions	Not allowed	Not allowed
External assurance of published information	Yes	Yes (pp. 128-131)
Financial sanctions imposed for violations of the Code of Business Conduct (€)	0	0
Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	0
Confirmed incidents of corruption and bribery	0	0
Confirmed incidents of anti-competitive behavior	0	0



Sustainability Standards & Assurance



Independent Assurance Statement

[GRI 102-56]



ERNST & YOUNG (HELLAS)
Certified Auditors-Accountants S.A.
88 Chimarras str., Maroussi
151 25 Athens, Greece

Tel: +30 210 2886 000
Fax: +30 210 2886 905
ey.com

Independent accountant's assurance report

To the management of MYTILINEOS S.A.

Scope

We have been engaged by MYTILINEOS S.A. (hereafter "MYTILINEOS") to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on the following (hereafter the "Subject Matter"):

1. All the available General Disclosures of the GRI Standard 102 applicable for the "in accordance: Core option",
2. All available Disclosures on Management Approach (GRI Standard 103),
3. Fifty (50) GRI topic specific disclosures associated with the Material Topics (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report),

as included in the Greek version of 2021 MYTILINEOS Sustainable Development Report (hereafter the "Report") covering the financial year 2021 (1 January 2021 – 31 December 2021).

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by MYTILINEOS

In preparing the Subject Matter, MYTILINEOS applied the following criteria:

1. GRI Standards including the GRI reporting principles for report quality; accuracy, balance, clarity, comparability, reliability, and timeliness and the criteria set in the GRI standard 101 for "in accordance: Core option".
2. UN Sustainable Development Goals (UN SDGs) and the GRI organization's publication named "SDG Compass Linking the SDGs and GRI", developed by the GRI, the UNGC and the World Business Council on Sustainable Development (WBCSD).
3. The requirements of the criteria for the "Advanced" level, mentioned in the "GC Advanced COP Self-assessment" document.
4. AccountAbility's AA1000 Principles Standard ('AA1000APS').

MYTILINEOS's responsibilities

MYTILINEOS's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.



We conducted our engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000') and the requirements of a Type 2 assurance engagement, as defined by AA1000AS. Those standards require that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Control 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

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.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

1. Performed interviews with certain MYTILINEOS's managers to understand the current status of sustainability activities and processes for the reporting period.
2. Checked MYTILINEOS's processes for determining material issues to be included in the Report, as well as the coverage of material issues within the Report.



Page 3

3. Interviewed 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 (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report).
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 (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report), 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.

We also performed such other procedures as we considered necessary in the circumstances.

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. For the Sustainable Development Report the scope excludes assurance of financial data.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to Subject Matter in order for it to be in accordance with the Criteria.

Adherence to the AccountAbility Principles of Inclusivity, Materiality, Responsiveness and Impact against the relevant criteria found in the AA1000AS

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

We are not aware of any matters that would lead us to conclude that any key stakeholder groups have been excluded from stakeholder engagement activities of MYTILINEOS or to conclude that MYTILINEOS has not applied the Inclusivity principle in developing its approach to sustainability.

- ▶ **Materiality:** Has MYTILINEOS provided a balanced representation of material issues concerning its sustainability performance?

We are not aware of any matters that would lead us to believe that MYTILINEOS's materiality determination approach does not provide a balanced representation of material issues concerning its sustainability performance.

- ▶ **Responsiveness:** Has MYTILINEOS responded to stakeholder concerns?

We are not aware of any matters that would lead us to conclude that MYTILINEOS has not applied the responsiveness principle in considering the matters to be reported.

- ▶ **Impact:** Has MYTILINEOS been measuring, monitoring and evaluating its impact?

We are not aware of any matters that would lead us to believe that MYTILINEOS has not been measuring, monitoring and evaluating the impact it has on its broader ecosystem.



Page 4

Restricted use

This report is intended solely for the information and use of MYTILINEOS in accordance with the terms of reference agreed between us and is not intended to be and should not be used by anyone other than MYTILINEOS.

Athens, 20 May 2022

For and on behalf of

ERNST & YOUNG (HELLAS)
Certified Auditors Accountants S.A.



Kostas Stathopoulos



TCFD Content Index

<p>Governance</p> <p>Disclose the organization's governance around climate-related risks and opportunities.</p>	<p>Disclose the organization's governance around climate-related risks and opportunities.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 48-49)
	<p>Describe management's role in assessing and managing climate-related risks and opportunities.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 48-49)
<p>Strategy</p> <p>Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.</p>	<p>Describe the climate related risks and opportunities the organization has identified over the short, medium, and long term.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 49-51)
	<p>Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 49-51)
	<p>Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 49-51)
<p>Risk Management</p> <p>Disclose how the organization identifies, assesses, and manages climate-related risks.</p>	<p>Describe the organization's processes for identifying and assessing climate-related risks.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 51-52) Annual Financial Report 2021: Management / Risks control practices (p. 59-60); Materiality process (p. 83-85); Principle O: Determining and managing risks (p. 162-163)
	<p>Describe the organization's processes for managing climate related risks.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 51-52) Annual Financial Report 2021: Management / Risks control practices (p. 59-60); Principle O: Determining and managing risks (p. 162-163)
	<p>Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.</p>	<ul style="list-style-type: none"> Adaptation to Climate Change (p. 51-52) Annual Financial Report 2021: Management / Risks control practices (p. 59-60); ESG Approach (p. 80-82); Principle O: Determining and managing risks (p. 162-163)
<p>Metrics & Targets</p> <p>Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.</p>	<p>Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</p>	<ul style="list-style-type: none"> Energy & Air emissions (p. 54-58) Tackling Climate change (p. 38-39)
	<p>Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.</p>	<ul style="list-style-type: none"> Energy & Air emissions (p. 54-58) Adaptation to Climate Change (p. 53)
	<p>Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.</p>	<ul style="list-style-type: none"> Energy & Air emissions (p. 54-58) Tackling Climate change (p. 38-39)

GRI STANDARDS Content Index - General Disclosures

[GRI 102-55]

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
GRI 101 Foundation 2016	[GRI 101 does not include any disclosures]				
General Disclosures					
GRI 102 General Disclosures 2016	Organisational Profile				
	102-1 Name of the organization	(p. 18)			•
	102-2 Activities, brands, products, and services	(p. 18)			•
	102-3 Location of headquarters	(p. 21)			•
	102-4 Location of operations	(p. 20)			•
	102-5 Ownership and legal form	Shareholder Information - MYTILINEOS Website			•
	102-6 Markets served	(p. 18)			•
	102-7 Scale of the organization	(p. 19)			•
	102-8 Information on employees and other workers	(p. 88)	8,10		•
	102-9 Supply chain	(p. 102)			•
	102-10 Significant changes to the organization and its supply chain	(p. 102) Annual Report (p. 25-50)			•
	102-11 Precautionary Principle or approach	(p. 48, 54, 60, 64, 67, 69, 80, 86, 90, 94, 96, 101, 104, 118, 120, 123)			•
	102-12 External initiatives	(p. 24) - Commitments to Sustainable Development initiatives			•
	102-13 Membership of associations	(p. 24) - Commitments to Sustainable Development initiatives			•
	Strategy				
	102-14 Statement from senior decision-maker	(p. 12-15)			•
	102-15 Key impacts, risks, and opportunities	(p. 48, 49, 54, 60, 64, 67, 69, 80, 86, 90, 94, 96, 101, 104, 118, 120, 123)			•
	Ethics & Integrity				
	102-16 Values, principles, standards, and norms of behavior	(p. 17)	16		•
	Governance				
	102-18 Governance structure	(p. 114-115, 117) Annual Report a: (p. 141, 142, 155, 156, 163, 187, 188, 203) b: (p. 142, 203-205)			•
	102-19 Delegating authority	Annual Report (p. 143)			•
	102-20 Executive-level responsibility for economic, environmental and social topics	Annual Report a,b.(p. 203-205)			•
	102-21 Consulting stakeholders on economic, environmental, and social topics	(p. 44) Annual Report a,b: (p. 143)	16		•
	102-22 Composition of the highest governance body and its committees	Annual Report a-a-i, a-ii, a-iii, a-iv, a-v, a-vii: (p. 150-164, 186-205, 206-210, 217-225)	5, 16		•
	102-23 Chair of highest governance body	Annual Report a:(p.143) b:(p. 143, 187-189)	16		•
	102-24 Nominating and selecting the highest governance body	Annual Report a:(p. 150-164, 186-203, 217), b-i, b-ii, b-iii, b-iv: (p. 143, 156-163, 187-203, 217-229)	5, 16		•

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
	102-25 Conflicts of interest	Annual Report a: a: (p. 148-149), b-i, b-iii: (p. 138, 178)	16		•
	102-26 Role of highest governance body in setting purpose, values, and strategy	Annual Report (p. 143, 156)			•
	102-28 Evaluating the highest governance body's performance	Annual Report (p. 157-167)			•
	102-32 Highest governance body's role in sustainability reporting	(p. 117)			•
	102-35 Remuneration policies	Annual Report a-a-i, a-ii, a-iii, a-v: (p. 180-186), b: (p. 183)			•
	102-36 Process for determining remuneration	Annual Report a:(p. 184) b:(p.184) c: (p. 184)			•
	102-37 Participation of interested parties in the determination of fees	Annual Report a: (p. 185)	16		•
	Stakeholder Engagement				
	102-40 List of stakeholder groups	(p. 11, 42, 43)			•
	102-41 Collective bargaining agreements	(p. 88)	8		•
	102-42 Identifying and selecting stakeholders	(p. 42)			•
	102-43 Approach to stakeholder engagement	(p. 42, 43, 44) Stakeholder consultation 2021			•
	102-44 Key topics and concerns raised	(p. 42, 43)			•
	Reporting Practice				
	102-45 Entities included in the consolidated financial statements	(p. 10)			•
	102-46 Defining report content and topic Boundaries	(p. 40, 54, 60, 64, 67, 69, 80, 86, 90, 94, 96, 101, 104, 118, 120, 123)			•
	102-47 List of material topics	(p. 11, 40)			•
	102-48 Restatements of information	(p. 26, 63, 106)			•
	102-49 Changes in reporting	(p. 11)			•
	102-50 Reporting period	(p. 10)			•
	102-51 Date of most recent report	June 2021			•
	102-52 Reporting cycle	(p. 10)			•
	102-53 Contact point for questions regarding the report	(p. 11)			•
	102-54 Claims of reporting in accordance with the GRI Standards	(p. 10)			•
	102-55 GRI content index	(p. 134-143)			•
	102-56 External assurance	(p. 128-131)			•

GRI STANDARDS Content Index - Material Topics

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
How we create value					
GRI 201 Economic performance	201-1 Direct economic value generated and distributed	(p. 26)	8, 9		•
	201-3 Defined benefit plan obligations and other retirement plans	Annual Report (p. 355)			
Environment					
Adaptation to Climate Change					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 48) b. Boundaries: (p. 48) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 51) b. The purpose of the management approach: (p. 48) c. Management Approach: (p. 48)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 52) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 201 Economic performance	201-2 Financial implications and other risks and opportunities for the organization's activities due to climate change		13	The Company has already started the implementation of a study to identify the risks and opportunities from the consequences of climate change in its activity, following the recommendations of the Task Force on Climate - Related Financial Disclosures (TCFD). At the same time, it has joined the international initiative CDP Climate Change in 2021. The available data on the GRI 201-2 are presented in the section "Adaptation to climate change". Extensive data for full compliance with GRI 201-2 are expected within the next Sustainable Development Report.	
Energy & Air emissions					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 54) b. Boundaries: (p. 54) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 54) b. The purpose of the management approach: (p. 54) c. Management Approach: (p. 54)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 55) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 302 Energy	302-1 Energy consumption within the organization	(p. 56)	7, 8, 12, 13		•
	302-3 Energy intensity	(p. 56)	7, 8, 12, 13		•

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
GRI 305 Emissions	305-1 Direct (Scope 1) GHG emissions	(p. 57)	3, 12, 13, 14, 15		•
	305-2 Energy indirect (Scope 2) GHG emissions	(p. 57)	3, 12, 13, 14, 15		•
	305-3 Other indirect (Scope 3) GHG emissions	(p. 57)	3, 12, 13, 14, 15		
	305-4 GHG emissions intensity	(p. 58)	13, 14, 15		•
	305-6 Emissions of ozone-depleting substances (ODS)	There are no such emissions.	3, 12		
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	(p. 57)	3, 12, 14, 15		•
Ecological Impacts					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 69) b. Boundaries: (p. 69) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 69) b. The purpose of the management approach: (p. 69) c. Management Approach: (p. 69)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 71) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 304 Biodiversity	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	(p. 72)			•
	304-2 Significant impacts of activities, products, and services on biodiversity	(p. 72)			•
Circular Economy					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 64) b. Boundaries: (p. 64) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 64) b. The purpose of the management approach: (p. 64) c. Management Approach: (p. 64)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 65) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 306 2020 Waste	306-1 Waste generation and significant waste-related impacts	(p. 64-65)	3, 6, 12		•
	306-2 Management of significant waste-related impacts	(p. 64-65)	3, 6, 12		•
	306-3 Waste generated	(p. 65, 66)	3, 6, 12		•
	306-4 Waste diverted from disposal	(p. 65, 66)	3, 6, 12		•
	306-5 Waste directed to disposal	(p. 65, 66)	3, 6, 12		•

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
Water Management					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 60) b. Boundaries: (p. 60) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 60) b. The purpose of the management approach: (p. 60) c. Management Approach: (p. 60)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 61) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 303 Water	303-1 Interactions with water as a shared resource	(p. 60-61)	6, 12		•
	303-2 Management of water discharge-related impacts	(p. 61)	6, 12		•
	303-3 Water withdrawal	(p. 62)	6		•
	303-4 Water discharge	(p. 61, 62)	6		•
	303-5 Water consumption	(p. 63)	6		•
Pollution Prevention					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 67) b. Boundaries: (p. 67) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 67) b. The purpose of the management approach: (p. 67) c. Management Approach: (p. 67)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 68) a-iii. Major Adjustments: Development of a dedicated management approach			
MYTILINEOS - Internal index	Incidents involving small-scale, localised spills	(p. 68)	3, 6, 12, 14, 15		
Other significant Environmental topics					
GRI 301 Materials	301-1 Materials used by weight or volume	(p. 73)	8, 12		•
	301-2 Recycled input materials used	(p. 73)	8, 12		•

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
Society					
Occupational Health and Safety					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 80) b. Boundaries: (p. 80) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 80) b. The purpose of the management approach: (p. 80) c. Management Approach: (p. 80, 82, 83, 84)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 82) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 403 Occupational Health and Safety 2018	403-1 Occupational health and safety management system	(p. 81)	8		•
	403-2 Hazard identification, risk assessment, and incident investigation	(p. 81)	8		•
	403-3 Occupational health services	(p. 81)	8		•
	403-4 Worker participation, consultation, and communication on occupational health and safety	(p. 82)	8, 16		•
	403-5 Worker training on occupational health and safety	(p. 83, 84)	8		•
	403-6 Promotion of worker health	(p. 81)	3, 8		•
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	(p. 81)	8		•
	403-8 Workers covered by an occupational health and safety management system	(p. 81)	8		•
	403-9 Work-related injuries	(p. 83, 84)	3, 8, 16		•
	403-10 Work-related ill health	(p. 82, 83)	3, 8, 16		•
Employment					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 86) b. Boundaries: (p. 86) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 86) b. The purpose of the management approach: (p. 86) c. Management Approach: (p. 86)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 88) a-iii. Major Adjustments: Development of a dedicated management approach			

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
GRI 401 Employment	401-1 New employee hires and employee turnover	(p. 89)	5, 8, 10		•
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	(p. 87)	3, 5, 8		•
	401-3 Parental leave	(p. 88)	5, 8		
GRI 402 Labor/ Management Relations	402-1 Minimum notice periods regarding operational changes	(p. 87) a. (p. 87)	8		
Human Rights					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 90) b. Boundaries: (p. 90) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 90) b. The purpose of the management approach: (p. 90) c. Management Approach: (p. 90)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 91) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 406 Non - discrimination	406-1 Incidents of discrimination and corrective actions taken	(p. 93)	5, 8		•
GRI 407 Freedom of Association and Collective Bargaining	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	(p. 93)	8		
GRI 408 Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor	(p. 93)	8, 16		
GRI 409 Forced or Compulsory Labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	(p. 93)	8		
GRI 412 Human Rights Assessment	412-1 Operations that have been subject to human rights reviews or impact assessments	(p. 91)			•
Equal Opportunities					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 94) b. Boundaries: (p. 94) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 94) b. The purpose of the management approach: (p. 94) c. Management Approach: (p. 94)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 95) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 405 Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	(p. 95)	5, 8		•
	405-2 Ratio of basic salary and remuneration of women to men	(p. 95)	5, 8, 10		

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
Sustainability of local communities					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 96) b. Boundaries: (p. 96) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 96) b. The purpose of the management approach: (p. 96) c. Management Approach: (p. 97)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 97) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 203 Indirect Economic Impacts	203-1 Infrastructure investments and services supported	(p. 98)	5, 9, 11		•
GRI 413 Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	(p. 98)			•
GRI 415 Public Policy	415-1 Political contributions	Not allowed under the Company's Code of Conduct https://www.mytilineos.gr/media/hwdhvhaw/kodikas_deontologias_omilou_2019_en_web.pdf (p.14)	16		
Responsible Supply Chain					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 101) b. Boundaries: (p. 101) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 101) b. The purpose of the management approach: (p. 101) c. Management Approach: (p. 101)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 102) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 204 Procurement Practices	204-1 Proportion of spending on local suppliers	(p. 102-103)	8		•
GRI 308 Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	(p. 102)	12		
GRI 414 Supplier Social Assessment	414-1 New suppliers that were screened using social criteria	(p. 102)	12		
Business Continuity					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 104) b. Boundaries: (p. 104) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 104) b. The purpose of the management approach: (p. 104) c. Management Approach: (p. 104)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 105) a-iii. Major Adjustments: Development of a dedicated management approach			

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
MYTILINEOS - Internal Index	Implementation of Emergency Preparedness Exercises	(p. 105)			
Other significant Social topics					
GRI 404 Training & Education	404-1 Average hours of training per year per employee	(p. 106)	4, 5, 8, 10		•
	404-2 Programs for upgrading employee skills and transition assistance programs	(p. 106)	8		
	404-3 Percentage of employees receiving regular performance and career development reviews	(p. 106)	5, 8, 10		•
GRI 416 Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	(p. 107)	16		•
GRI 417 Marketing and Labeling	417-1 Requirements for product and service information and labeling	(p. 108)	12		•
	417-2 Incidents of non-compliance concerning product and service information and labeling	(p. 108)	16		•
	417-3 Incidents of non-compliance concerning marketing communications	(p. 108)	16		•
Governance					
Regulatory Compliance					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 118) b. Boundaries: (p. 118) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 118) b. The purpose of the management approach: (p. 118) c. Management Approach: (p. 118)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 119) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 307 Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	(p. 119)	16		•
GRI 419 Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	(p. 119)	16		•
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	(p. 119)	16		•
Business Ethics					

GRI Standard	Disclosure	Disclosure	SDGs	Omission	External Assurance
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 120) b. Boundaries: (p. 120) c. Specific limitation regarding the topic Boundary: None			
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 120) b. The purpose of the management approach: (p. 120) c. Management Approach: (p. 120)			•
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 121) a-iii. Major Adjustments: Development of a dedicated management approach			
GRI 205 Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	(p. 121)	16		•
Other significant Governance topics					
GRI 418 Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	(p. 123)	16		•

SASB Content Index

SASB Standard	Metric Code/Industry	Disclosure	Pages and/or URL(s)	SDGs
Greenhouse Emissions				
(1) Gross global Scope 1 emissions, percentage covered under (2) emissions-limiting regulations, and (3) emissions-reporting regulations	EM-CM-110a.1 - Construction Materials	Energy & Air emissions	(p. 55-58)	3, 12, 13, 14, 15
	EM-MM-110a.1 - Metals & Mining IF-EU-110a.1 - Electric Utilities & Power Generators	Zero hydrofluorocarbons (HFCs), sulfur hexafluoride (SF ₆), and nitrogen trifluoride (NF ₃).		
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	Tackling Climate change	(p. 38-39)	3, 12, 13, 14, 15
	EM-MM-110a.2 - Metals & Mining			
Air Quality				
Air emissions of the following pollutants: (1) NOx (excluding N ₂ O), (2) SOx, (3) particulate matter (PM10), (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	Energy & Air emissions	(p. 55-58)	3, 12, 14, 15
	EM-MM-120a.1 - Metals & Mining	Apart from the emissions stated within the chapter "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	Energy & Air emissions	(p. 55-58)	7, 8, 12, 13
	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. 61-63)	6
	EM-MM-140a.1 - Metals & Mining	Water Management		
	IF-EU-140a.1 - Electric Utilities & Power Generators	Water Management		
Number of incidents of non-compliance associated with water quality permits, standards, and regulations	EM-MM-140a.2 - Metals & Mining	Regulatory Compliance	(p. 119)	6
	IF-EU-140a.2 - Electric Utilities & Power Generators	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. 60-61)	6, 12
Waste & Hazardous Materials Management				
Amount of waste generated, percentage hazardous, percentage recycled	EM-CM-150a.1 - Construction Materials	Circular Economy	(p. 65-66)	3, 6, 12
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			
Ecological Impacts				
Description of environmental management policies and practices for active sites	EM-CM-160a.1 - Construction Materials	Environmental Policy	(p. 69-70)	
	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. 71)	15

SASB Standard	Metric Code/Industry	Disclosure	Pages and/or URL(s)	SDGs
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. 119)	
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.		16
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			
Discussion of process to manage risks and opportunities associated with community rights and interests	EM-MM-210b.1 - Metals & Mining			11
Number and duration of non-technical delays	EM-MM-210b.2 - Metals & Mining	There were no non-technical delays during the reporting period.		
Employment Practices				
Percentage of active workforce covered under collective bargaining agreements	EM-MM-310a.1 - Metals & Mining	Employment	(p. 88)	8
Number and duration of strikes and lockouts	EM-MM-310a.2 - Metals & Mining	There were no strikes or lockouts during the reporting period.		8
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. 82-84)	3, 8, 16
	EM-MM-320a.1 - Metals & Mining			
	IF-EU-320a.1 - Electric Utilities & Power Generators			
	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.		3
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. 120-121)	16
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. 121)	16
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. 119)	16
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. 120-121)	16

SASB Standard	Metric Code/Industry	Disclosure	Pages and/or URL(s)	SDGs
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. 119)	16
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			

Accountability Principles Standard AA1000 Index

Principle applied	Methods	Reference in the Report
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	How we create value (p. 26-27) Sustainable Development Strategy (p. 32-37) Stakeholder engagement (p. 42-45) Materiality process (p. 40-41)
Materiality	Identification of issues which are important to the company and its stakeholders	Materiality process (p. 40-41) Stakeholder engagement (p. 42-45)
Responsiveness	Responsiveness to key issues and transparency on performance	MYTILINEOS' response to the SARS-CoV-2 pandemic (p. 85) Strategic priorities (p. 22-25) How we create value (p. 26-27) Business Model (p. 28-29) Sustainable Development Strategy (p. 32-37) Stakeholder engagement (p. 42-45) Human Rights (p. 90-93) Sustainability of local communities (p. 96-100) Equal Opportunities (p. 94-95) Business Continuity (p. 104-105) Responsible Supply Chain (p. 101-103)
Impact	Analysis of direct and indirect impact of the company's actions	ESG Performance Statement (p. 6-7) Strategic priorities (p. 22-25) How we create value (p. 26-27) Business Model (p. 28-29) Sustainable Development Strategy (p. 32-37) Materiality process (p. 40-41) Adaptation to Climate Change (p. 48-53) Energy & Air emissions (p. 54-59) Ecological Impacts (p. 69-72) Circular Economy (p. 64-66) Water Management (p. 60-63) Pollution Prevention (p. 67-68) Occupational Health and Safety (p. 80-85) Employment (p. 86-89) Human Rights (p. 90-93) Equal Opportunities (p. 94-95) Business Continuity (p. 104-105) Sustainability of local communities (p. 96-100) Business Ethics (p. 120-121) Regulatory Compliance (p. 118-119)

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 Classification	ID	Metric Title	References (Sustainable Development Report 2021)
Environment	C-E1	Scope 1 emissions	
	C-E2	Scope 2 emissions	Material topic: Energy & Air emissions (p. 54-59)
	C-E3	Energy consumption and production	
	A-E1	Scope 3 emissions	
	A-E2	Climate change risks and opportunities	Material topic: Adaptation to Climate Change (p. 48-53)
	A-E3	Waste management	Material topic: Circular Economy (p. 64-66)
	A-E4	Effluent discharge	Material topics: Water Management (p. 60-63) Circular Economy (p. 64-66)
	A-E5	Biodiversity sensitive areas	Material topic: Ecological Impacts (p. 69-72)
	SS-E1	Emission strategy	Tackling Climate change (p. 38-39) Material topic: Energy & Air emissions (p. 54-59)
	SS-E2	Air pollutant emissions	Material topic: Energy & Air emissions (p. 54-59)
	SS-E3	Water consumption	Material topic: Water Management (p. 60-63)
	SS-E4	Water management	
	SS-E8	Critical materials	Raw and other materials (p. 73) The Company does not use the 27 critical raw materials identified by the European Commission ¹
	SS-E9	Chemicals in products	Product Quality & Safety (p. 107)
Society	C-S1	Stakeholder engagement	Stakeholder engagement (p. 42-45)
	C-S2	Female employees	
	C-S3	Female employees in management positions	ESG KPIs (p. 110-111)
	C-S4	Employee turnover	
	C-S5	Employee training	Employment Practices (p. 106)
	C-S6	Human rights policy	Material topic: Human Rights (p. 90-93)
	C-S7	Collective bargaining agreements	ESG KPIs (p. 110-111)

1. European Commission (2019). [Critical raw materials](https://ec.europa.eu/euro-observatory/) (europa.eu)

ESG Classification	ID	Metric Title	References (Sustainable Development Report 2021)	
	C-S8	Supplier assessment	Material topic: Responsible Supply Chain (p. 101-103)	
	A-S1	Sustainable economic activity	How we create value (p. 26-27)	
	A-S2	Employee training expenditure	ESG KPIs (p. 110-111)	
	A-S3	Gender pay gap	Material topic: Equal Opportunities (p. 94-95)	
	SS-S1	Product quality and safety	Product Quality & Safety (p. 107)	
	SS-S2	Customer privacy	Customer Privacy (p. 122)	
	SS-S4	Labor law violations	Material topic: Regulatory Compliance (p. 118-119)	
	SS-S5	Data security and privacy fines	Customer Privacy (p. 122)	
	SS-S6	Health and Safety performance	Material topic: Occupational Health and Safety (p. 80-85)	
	SS-S7	Marketing practices	Communication & Marketing (p. 108)	
	SS-S8	Customer satisfaction	Product Quality & Safety (p. 107)	
	SS-S9	Customer grievance mechanism	Material topic: Business Ethics (p. 120-121)	
	Governance	C-G1	Board composition	Board of Directors
		C-G2	Sustainability oversight	Sustainability Governance (p. 117)
C-G3		Materiality	Materiality process (p. 40-41)	
C-G4		Sustainability policy	Corporate Social Responsibility Policy	
C-G5		Business ethics policy	Material topic: Business Ethics (p. 120-121) Code of Business Conduct	
C-G6		Data security policy	Privacy Policy	
A-G1		Business model	How we create value (p. 26-27)	
A-G2		Business ethics violations	ESG KPIs (p. 124-125)	
A-G3		ESG Targets	Key ESG Targets (p. 8-9)	
A-G4		Variable pay	Board of Directors Remuneration Report	
A-G5		External assurance	Independent Assurance Statement (p. 128-131)	
SS-G1		Whistleblower policy	ESG KPIs (p. 124-125)	
SS-G2		Critical risk management	Material topics: Business Continuity (p. 104-105) Pollution prevention (p. 67-68)	

UN Global Compact Communication Progress (Advanced level)

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

MYTILINEOS has declared 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, while its independent report about the fulfilment of the 21 criteria under the UNGC Advanced COP Self-Assessment 2020 (Updated 19 August 2016) is available at the address: mytilineos.gr/sustainability/reports/.



The 10 Principles of the UN Global Compact		Reference (Sustainable Development Report 2021)
1st	Businesses should support and respect the protection of internationally proclaimed human rights.	Society <ul style="list-style-type: none"> Occupational Health & Safety (p. 80-85) Employment (p. 86-89) Human Rights (p. 90-93) Equal Opportunities (p. 94-95) Business Continuity (p. 104-105) Sustainability of local communities (p. 96-100) Responsible Supply chain (p. 101-103) Regulatory Compliance (p. 118-119) Other significant Social topics (p. 106-109)
2nd	Businesses should make sure that they are not complicit in human rights abuses.	
3rd	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	
4th	Businesses should uphold the elimination of all forms of forced and compulsory labour.	
5th	Businesses should uphold the effective abolition of child labour.	
6th	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	
7th	Businesses should support a precautionary approach to environmental challenges.	Environment <ul style="list-style-type: none"> Environmental Policy Adaptation to Climate Change (p. 48-53) Energy & Air emissions (p. 54-59) Ecological Impacts (p. 69-72) Circular Economy (p. 64-66) Water Management (p. 60-63) Pollution Prevention (p. 67-68) Corporate Governance (p. 118-119) Other significant Environmental topics (p. 73-75)
8th	Businesses should undertake initiatives to promote greater environmental responsibility.	
9th	Businesses should encourage the development and diffusion of environmentally friendly technologies.	
10th	Businesses should work against corruption in all its forms, including extortion and bribery.	Governance <ul style="list-style-type: none"> Corporate Governance (p. 114-117) Business Ethics (p. 120-121) Regulatory Compliance (p. 118-119)



The Greek Sustainability Code

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 2021)
Strategy	Strategic Analysis & Action	<ul style="list-style-type: none"> ESG Performance Statement (p. 6-7) Discussion with the Chairman & CEO on Sustainable Development topics (p. 12-15) Strategic Priorities (p. 22-23) Sustainable Development Strategy (p. 32-37) Tackling Climate Change (p. 38-39) Materiality Process (p. 40-41)
	Materiality	<ul style="list-style-type: none"> Materiality Process (p. 40-41)
	Objectives	<ul style="list-style-type: none"> Sustainable Development Strategy (p. 32-37) Key ESG Targets (p. 8-9)
	Supply Chain Management	<ul style="list-style-type: none"> Responsible Supply Chain (p. 101-103) Stakeholder Engagement (p. 42-45)
Management Procedure	Responsibility & Accountability	Governance <ul style="list-style-type: none"> Business Ethics (p. 120-121) Corporate Governance (p. 118-119)
	Rules & Processes	<ul style="list-style-type: none"> Sustainable Development Strategy (p. 32-37) Materiality Process (p. 40-41) Corporate Governance (p. 114-117)
	Monitoring	<ul style="list-style-type: none"> ESG KPIs (p. 76-77, 110-111, 124-25) Sustainable Development Strategy (p.32-37) Participation in Socially Responsible Investment indexes Sustainable Development commitments ESG Ratings ESG Scorecard Integrated Value Creation Scorecard Parameters of the Sustainable Development Report (p. 10-11)
	Remuneration policies & incentives for Sustainable Development	<ul style="list-style-type: none"> Annual Report 2021 (Remuneration Policy and Remuneration of Board Members) (p. 158-164)
Environment	Stakeholder Engagement	<ul style="list-style-type: none"> Stakeholder Engagement (p. 42-45)
	Product responsibility and innovation	Society <ul style="list-style-type: none"> Other significant Social topics (p. 106-109)
	Natural resource use	Environment <ul style="list-style-type: none"> Environmental Policy Adaptation to Climate Change (p. 48-53) Energy & Air emissions (p. 54-59) Ecological Impacts (p. 69-72) Circular Economy (p. 64-66) Water Management (p. 60-63) Pollution Prevention (p. 67-68) Other significant Environmental topics (p. 73-75)
	Resource Management	
Society	Air emissions & Climate Change	Society <ul style="list-style-type: none"> Occupational Health and Safety (p. 80-85) Employment (p. 86-89) Human Rights (p. 90-93) Equal Opportunities (p. 94-95) Business Continuity (p. 104-105) Sustainability of local communities (p. 96-100) Responsible Supply Chain (p. 101-103) Other significant Social topics (p. 106-109)
	Labor rights	

ASI Content Index Metallurgy Business Unit

The Aluminum Stewardship Initiative (ASI) is an international standardization and certification body that encourages and aligns companies in the aluminum industry with a view to sustainable development and responsible manufacturing. The acquisition of the ASI Performance Standard is related to the creation and maintenance of responsible environmental and social standards as well as Governance criteria, 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 Business Unit is presented. **ASI**

Environmental Metrics	AoG Aluminium Plant	DELPHI-DISTOMON
Direct GHG emissions (Scope 1 - CO ₂ e thousand tons) ¹	1,275.2	4.5
Fuels (CO ₂ : 100%)	887.9	4.4
Processes (CO ₂ : 74% - PFCs: 26%)	383.7	0.0
Transport (CO ₂ : 100%)	3.6	0.1
Indirect emissions (Scope 2 - CO ₂ e thousand tons) ²	1,321.5	2.8
Indirect emissions (Scope 3 - t CO ₂ / t Al ingot) ³	0.358	-
Total NOx emissions (t)	709.6	0.0
Total SOx emissions (t)	3,214.3	0.0
Particulate emissions (t)	41.6	0.0
Fluorine emissions (t)	210.8	0.0
CF ₄ emissions (t)	10.8	0.0
C ₂ F ₆ emissions (t)	1.3	0.0
Total energy consumption (TJ)	26,226.2	81.6
Energy consumption from non-renewable sources (TJ)	15,872.0	59.6
Natural Gas	15,490.8	0.0
Mazut	332.1	0.0
Gas Oil	46.7	57.1
Heating Oil	2.4	1.8
Gasoline	0.0	0.7
Energy purchased (Electric Power) (TJ)	10,354.2	22.1
Non-Renewable sources	7,130.6	15.2
Renewable Energy Sources (RES)	3,223.6	6.9
Total water withdrawals (ML)	168,541.5	238.1
Total water withdrawal from surface waters (ML)	159,820.0	10.1
Total water withdrawal from groundwater (ML)	8,578.3	12.1
Total water withdrawal from mining operations (ML)	-	216.0
Total water withdrawal from public water supply companies (ML)	143.2	0.0
Water discharges (ML)	161,660.6	238.1
Water consumption (ML) ⁴	6,880.9	0.0
Water consumption (m ³ / ton of hydrated alumina production)	3.37	-

Environmental Metrics	AoG Aluminium Plant	DELPHI-DISTOMON
Water consumption (m ³ / ton of primary aluminium production)	1.29	-
Non-hazardous solid waste (t)	793,410.5	13.2
Controlled Landfill (Accumulation site for Bauxite Residues)	669,683.9	0.0
Controlled Landfills for Non-Hazardous Waste	3,340.4	4.4
Recycling / Reuse internally and at third-party facilities	108,221.0	8.8
Storage for recovery	12,165.2	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)	19,281.9	27.5
Controlled Landfills for Hazardous Waste	13,887.2	0.0
Recycling / Reuse internally and at third-party facilities	5,047.1	3.3
Recovery / Exchange	0.0	9.3
Storage for recovery	347.6	0.0
Incineration	0.0	14.9
Storage in third-party facilities	0.0	0.0
Solid waste reused or recycled (% of total waste produced)	13.9%	29.7%
Total volume of spills (lt)	-	10,308
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 (€)	44,133,123.9	1,005,422.8
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 2021) are used. The NIR 2021 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 2021) are used. The European Residual Mix 2020 methodology has been used for the values of the conversion factors.
3. A preliminary estimation of the scope 3 according to EIB Project Carbon Footprint Methodologies (July 2020) from the LCA study is at the level of 0.358 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

Direct employees

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

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.

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.

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.

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.

Wind Farm

Wind Power Plant

Self-assessment of human rights

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

Sustainable development

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

Parental leave

Leave granted to male and female employees due to childbirth.

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.

Leakage

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

Fatality

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

Indirect employees

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

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.

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.

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.

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.

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.

HS Committees

Occupational Health and Safety Committees

Supply chain

Sequence of activities or parties that provide products or services to the Company.

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.

Occupational disease rate

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

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.

Injury Rate

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

Carbon Dioxide Equivalent (CO₂ eq)

Equivalent to CO₂ (carbon dioxide) is the global unit of measurement used to compare greenhouse gas emissions, based on 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.

Forced labor

Any work or service required by a person under the threat of punishment and for which that person has not been voluntarily offered (DOE 29, Forced Labour Convention).

Water consumption

The amount of water that results by subtracting the amount of water that is returned to the original withdrawal source (after treatment) from the total amount of water withdrawn.

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.

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.

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.

Non-renewable materials

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

Non-renewable energy sources

Energy sources that cannot be 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.

NGOs

Non-Governmental Organizations

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.

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.

Water stress areas

Areas that are significantly affected by water withdrawals either in terms of water availability, quality or accessibility.

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.

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.

Reporting period

Specific time span covered by the information reported. For MYTILINEOS, the reporting period is the year that begins in January and ends in December.

Global Sustainable Development Goals (SDGs)

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

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.

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.

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.

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.

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.

BU

Business Unit

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.

Fresh water

Water with a total of dissolved solids concentration equal to or less than 1,000 mg / l.



mytilneos.gr

