



Modern Slavery Statement (2024)

Metallurgy Sector

1. Introduction and Commitment

At METLEN Energy & Metals, we are committed to the prevention, identification and elimination of modern slavery, acknowledging the distinct responsibility of the private sector and subsequently of our Company in global efforts to confront it.

We hold a zero-tolerance stance towards all forms of modern slavery in all our business activities, subsidiaries and supply chains, striving to identify, prevent combat and ultimately eliminate any modern slavery risks that may arise, and to deepen our understanding of such risks in order to enhance the effectiveness of our response and preventative action.

Through a wide range of Company policies, procedures and training, we strive for high professional standards of behaviour during all business activities, while also setting transparency and accountability as key priorities.

We have been steadfast participants in international initiatives such as the UN Global Compact (UNGC) since 2008, reinforcing our commitment to upholding labor standards in their entirety, including the eradication of modern slavery.

In the context of this Statement, Modern Slavery is used as an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power, including human trafficking, forced labour, compulsory labour, child labour, servitude and debt bondage.

2. Organizational Structure and Business

METLEN is an international industrial and energy company operating in two main business sectors: Energy and Metals.

The Company has a dynamic presence in all 5 continents and over 30 countries. As of 31 December 2023, the Company numbers over 6,000 direct and indirect employees and more than 14,000 suppliers.

METLEN is also active in the retail market of electricity and natural gas, serving over 550,000 customers.

The Metallurgy Sector's supply chains include the supply of electricity and natural gas, the purchase of bauxite, other raw materials and scrap, equipment and services as well as procurement and port facilities.

3. Policies and Procedures

The effective prevention and elimination of modern slavery requires a comprehensive set of Policies and Procedures that run through all business activities of the Metallurgy Sector, signaling METLEN's values and establishing in practice its zero-tolerance stance. Therefore, at



METLEN we make an explicit reference to modern slavery – or aspects of modern slavery such as forced labour - and our commitment to its eradication in the following documents:

- Human Rights Policy
- Responsible Supply Chain Policy
- Code of Business Conduct
- Suppliers-Business Partners Code of Conduct

These Policies and documents are revised periodically and, if needed, updated in line with new requirements and best practices from the Metallurgy Sector globally.

4. Risk Assessment and Due Diligence

Understanding our modern slavery risk is critical for targeting our actions towards its prevention, mitigation, minimization and ultimately, termination.

We conduct a Human Rights Self-Assessment for all our business sectors, including the Metallurgy Sector, and countries of operation on an annual basis, to identify any human rights issues or violations, including in the area of forced labour. Through this process, there are no recorded or suspected incidents of forced labour to date. Additionally, starting in 2024 we conducted an Impact Materiality analysis, through which no negative impacts have been identified in relation to modern slavery and/or forced labour.

In parallel, we conduct regular risk assessments of our key suppliers as we expect the latter to share our commitment to ethical, safe and responsible business practices in the conduct of their activities, including the prohibition of forced and compulsory labour, as stated in the Responsible Supply Chain Policy and the Suppliers-Business Partners Code of Conduct. For doing so, beginning in 2025, we will work with external consultants and certification bodies to strengthen the due diligence process through the introduction of comprehensive audits.

Additionally, we analyze risk in our business by mapping our supply chain against existing modern slavery indices, such as the Global Slavery Index, in order to consider region-specific risks associated with modern slavery.

METLEN is committed to implementing a due diligence process in order to identify, prevent, mitigate, minimize and ultimately terminate potential and actual adverse impacts on human rights (including trafficking in human beings and modern slavery), as stated in the Human Rights Policy and the Responsible Supply Chain Policy. Acceptance of the Suppliers-Business Partners Code of Conduct is a prerequisite and a contractual obligation when signing a contract or a Purchase Order with all suppliers, and the Company reserves the right to terminate any form of cooperation if a supplier/ business partner does not comply with its contents. Additionally, suppliers ought to be able to prove that they comply with national legislation and international standards, and that this is the case for their own supply chain as well, including on the topic of forced labour.

5. Training and Awareness

METLEN places great value on learning and development opportunities for its people and commits to train all its employees and key suppliers on human rights, including modern slavery issues.

Since 2020, METLEN has been offering annual training seminars to its key suppliers in Greece including in the Metallurgy Sector, on a range of issues, encompassing human rights and forced labour, while also implementing specialized meetings with the purchasing/ procurement departments of all its Sectors and Subsidiaries to ensure their holistic comprehension of the Responsible Supply Chain Policy and the framework of cooperation. Additionally, we are currently renewing the comprehensive cross-company Human Rights training program in order to ensure full alignment with new international developments and best practices.

6. Effectiveness and Performance Indicators

We measure and publish the effectiveness of our actions through numerical data, and therefore several key performance indicators are in place regarding Modern Slavery, such as:

- Number of incidents identified or reported
- Number of incidents addressed
- Total training hours on modern slavery
- Number of employees and suppliers/ business partners trained
- Number of supplier audits conducted

7. Future Steps and Continuous Improvement

We are committed to the continuous improvement of our efforts and will take further actions so as to deepen our understanding of Modern Slavery risks in order to enhance the effectiveness of our response and preventative action in this area. To ensure accountability and transparency, we also commit to publicizing, on an annual basis, our progress with regards to Modern Slavery and relevant initiatives/ actions, through an updated Modern Slavery Statement. This Statement will be communicated to all employees, business partners and suppliers of the company to enhance awareness and commitment to the elimination of Modern Slavery risks.

As a priority, we are currently developing our due diligence process, while continuing to engage with suppliers and business partners to ensure the holistic implementation of our zero-tolerance stance through cooperation and training.

Our efforts for improvement also draw from the feedback from our employees through Engagement and Pulse Surveys, while we also thoroughly investigate all reports that we receive through our internal reporting channels, such as those available [here](#), which we encourage our people to use in order to report any concerns relating to human rights issues, including modern slavery. This channel is anonymous and confidential and can be utilised by



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employees linked to the Company by any type of current, former, candidate employment relationship, as well as any person working under the supervision and direction of contractors, subcontractors and suppliers of METLEN.

8. Approval and Sign-Off

This statement has been approved by Chief Executive Director, M Metals, underscoring METLEN Metallurgy Sector's commitment to combating modern slavery.

Dimitris Stefanidis

Chief Executive Director, M Metals

30/1/2025