



Communication on Progress – 2021

UN Global Compact Advanced Level

(Updated 19 August 2016)

The present Communication on Progress (CoP) report refers to the period from 1ST of January 2021 to 31ST of December 2021 and should be read in conjunction with the MYTILINEOS Sustainable Development Report 2021.



Chairman's statement of Continued Support

In 2021, the world continued to face the consequences of the Covid-19 pandemic. Despite showing a strong pace of growth, the Greek economy is still recovering from a very low level, owing to the prolonged recession followed by the pandemic. In this unprecedented health emergency, which acted as an accelerator in adopting speedily sustainability goals regarding decarbonization, electrification, and digitalization, sustainable companies showed the highest levels of flexibility and competitiveness and recognized the need to look beyond financial impacts in order to create shared value. Implementing comprehensive Environmental, Social and Governance (ESG) strategies has become increasingly more pressing, taking into account the growth opportunities, greater resilience and lower risk that sustainable companies exhibit in the face of sudden disruptions. In this context, MYTILINEOS continued in 2021 to work across the ESG pillars in order to implement its sustainable development strategy, enhance its resilience and address the enduring ESG ripple effects of the pandemic.

During 2021, we continued to work on our strategic goal to contribute to tackling climate change. We have laid the foundations for 100% sustainable and green industrial activity by committing to reduce by 30% our greenhouse gas emissions across all our business activities by 2030, and to achieve a carbon-neutral footprint by 2050. To achieve these goals, we have developed and have started to implement a set of specialized initiatives to reduce emissions within each individual Business Unit. These ambitious goals are defining our strategies, our investment decisions, and our business operations.

Creating long-term value for all our Stakeholders and contributing to the Sustainable Development Goals and the respective national priorities is at the core of the MYTILINEOS Sustainable Development strategic framework. MYTILINEOS, in the context of its responsible operating model, focuses on areas around which it can innovate and enhance collaboration to address critical local, national, and global sustainability challenges.

Having been a signatory of the UNGC since 2008, MYTILINEOS is proud of the continued progress made in working towards all the Compact's Principles which are universally accepted and cover the areas of human rights, labor, health and safety, the environment and anti-corruption. The ongoing climate crisis and the enduring impacts of the pandemic highlight the need for decisive corporate action to implement these Principles and integrate them in corporate business models.

Our Communication on Progress report below, highlights our actions for the year 2021. We commit to share this information with our stakeholders through our website and our annual Sustainable Development Report. I am proud to be re-confirming our support for the United Nations Global Compact.

We are committed to dedicating considerable efforts to support the UNGC Principles and to engaging in collaborative projects that advance the broader United Nations Sustainable Development Goals.

Evangelos G. Mytilineos
Chairman of the Board & CEO
MYTILINEOS S.A.

UN Global Compact Advanced COP 2021 Advanced Level

All information in MYTILINEOS's Communication on Progress 2021 is compiled from the Company's:

- Sustainable Development Report 2021
- Annual Report 2021
- Sustainable Development strategy
- CSR policy
- Vision – Mission and set of Business Values
- Code of Business Conduct
- Suppliers & Partners Business Code of Conduct
- Human Rights policy
- The Sustainable Development section in the Company's official website and
- All the DMAs* of material topics

*DMA: Disclosure Management Approach

All the publications listed above are available on our website.

The following pages are our self-assessment on how we have set the GC Advanced Level criteria and references to our implementation of best practices. According to UNGC CoP policy, we consider a criterion is met when we communicate on its implementation (at least one best practice) or planned implementation. Concerning the independent assurance letter, this can be found in our Sustainable Development Report 2021 (pages 128-131).



With respect to your company's actions to advance the Sustainable Development Goals (SDGs), the COP describes:

Best Practice 1:

Opportunities and responsibilities that one or more SDGs represent to our business.

The SDGs aim to create a viable model for the future in which all economic growth is achieved without compromising our environment or placing unfair burdens on societies.

MYTILINEOS argues that businesses can play a decisive role in the achievement of the SDGs, through responsible business operation, new entrepreneurship models, investments and leveraging new technologies and synergies, thus promoting sustainable development in a comprehensive way.

The Company, following the key steps of the SDG Compass tool, in order to decide in which SDGs it can meaningfully contribute to, mainly on local and national level, took under consideration the following factors: a) the key impacts of the activity of its Business Units, b) the results of the Materiality analysis process, c) its core business goals and d) its CSR strategic directions.

Through this process, MYTILINEOS can communicate clearly around how its business helps the local and national economy and employment as well as protects the environment and contributes to the community well-being, in the SDGs spectrum. Also, it can consolidate a strong license to operate and to differentiate itself from its competitors.

Moreover, as a company with a wide supply chain and different customer segments, we recognize that we cannot achieve any one of the SDGs on our own. We have a potentially significant role to play in meeting many of these ambitious aims. In this direction, we are trying to develop specific collaborations with NGOs, local communities and the academic community as well as to engage our suppliers and business partners and our industry peers.

On the other hand, as a responsible company, we see an opportunity in the fact that Agenda 2030, as the only globally agreed sustainability framework, can support our potential investors in understanding the sustainability trends relevant to investment activity and their fiduciary duties.

Finally, we consider the SDGs as a risk framework because the challenges put forward by the SDGs reflect specific regulatory, ethical and operational risks which can be financially material across our business and the countries where we operate.

Best Practice 2:

Where the company's priorities lie with respect to one or more SDGs.



Please advise:

<https://www.mytilineos.gr/sustainability/reports/>
<https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility>


<p>Best Practice 3:</p> <p><i>Goals and indicators set by our company with respect to one or more SDGs.</i></p>	<p>Please advise:</p> <p>MYTILINEOS CSR Policy: www.mytilineos.gr/sustainability/key-sustainable-development-policies/</p> <p>MYTILINEOS Sustainable Development Report 2021 (“Sustainable Development Strategy” pages 32-33): https://www.mytilineos.gr/sustainability/reports/</p> <p>MYTILINEOS ESG Scorecard: https://www.mytilineos.gr/sustainability/esg-performance/esg-scorecard/</p> <p>Please advise our tool: Integrated Value Creation Scorecard 2021: https://scorecard.mytilineos.gr/index-en.html</p>
<p>Best Practice 4:</p> <p><i>How one or more SDGs are integrated into the company's business model.</i></p>	<p>We consider the SDGs a risk framework because the challenges put forward by the SDGs reflect specific regulatory, ethical and operational risks which can be financially material across our business and the countries where we operate.</p> <p>SDGs with relevance to the MYTILINEOS material topics:</p> <p>Please advise our Sustainable Development Report 2021 (“Business Model - pages 28-29 and Materiality process – pages 40-41): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 5:</p> <p><i>The (expected) outcomes and impact of your company's activities related to the SDGs.</i></p>	<p>MYTILINEOS Sustainable Development Report 2021 (“Sustainable Development Strategy” pages 32-37): https://www.mytilineos.gr/sustainability/reports/</p> <p>Please advise our tool: Sustainability Actions Map: https://sdactionsmap.mytilineos.gr/en/</p>
<p>Best Practice 6:</p> <p><i>If the companies' activities related to the SDGs are undertaken in collaboration with other stakeholders.</i></p>	<p>MYTILINEOS Sustainable Development Report 2021 (“MYTILINEOS's contribution to the Global Sustainable Development Goals (Agenda 2030)” page 34): https://www.mytilineos.gr/sustainability/reports/</p> <p>Please advise our Sustainable Development Report 2021 (“Sustainability of Local Communities” Results section - pages 96-100): https://www.mytilineos.gr/sustainability/reports/</p>

Implementing the Ten Principles into Strategies & Operations

Criterion 1: The CoP describes mainstreaming into corporate functions and business units.

<p>Best Practice 1:</p> <p><i>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives.</i></p>	<p>Sustainable Development is an integral part of the long-term business strategy of MYTILINEOS. 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.</p> <p>Please advise our Sustainable Development Strategy outlined in our Sustainable Development Report 2021: https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2:</p> <p><i>Align strategies, goals and incentive structures of all business units and</i></p>	<p>Our ESG approach, as a main practice to achieve sustainability, is a multifaceted and complex process characterized by our conscious self-commitment to continuous improvement. It is linked to all our business activity sectors and operations and defines the way in which we choose</p>

<p><i>subsidiaries with corporate sustainability strategy.</i></p>	<p>each time to move forward, taking steady steps towards achieving our continuous responsible development, guided by our mission and business values.</p> <p>In this context:</p> <ul style="list-style-type: none"> • We developed a new Human Rights policy with focus on zero tolerance to Human Rights violations. • We created and published specific DMAs according to the new GRI Standards for all material topics with relevant specific targets, where available, to ensure the proper disclosure of our performance. • We have adopted the UN Sustainable Development Goals as an additional framework for measuring our impact. • <u>We have established an open dialogue with our Stakeholders at local level.</u> • <u>We are participating in Sustainability related standards and initiatives, challenging ourselves to the continuous improvement of our operations</u> (e.g. UN Global Compact, ISO 26000, CDP-Water Security, CDP-Climate Change, GRI Standards, ISO 14001, ISO 14064, ISO 45001, ESG International Indexes). <p>Also, our <u>“Code of Business Conduct”</u>, the <u>“Suppliers and Business Partners Code of Conduct”</u>, Human Rights, Environmental, Occupational Health & Safety and Quality Policies, are part of our Sustainable Development governance system and applied across all our business activity sectors.</p> <p>Moreover, the Heads of our Business Units are actively involved in the management of social and environmental issues, providing the respective Sustainability/ESG teams of their Unit with the necessary directions and ensuring that the Key Performance Indicators (KPIs) are in line with the Group’s strategic goals. The individual Sustainability/ESG teams operate within specific and clearly defined duties and responsibilities, to implement the central strategic goals and policies, as well as the CSR programs at local level.</p>
<p>Best Practice 3: <i>Design CSR strategy to leverage synergies between and among issues areas and to deal adequately with trade-offs.</i></p>	<p>Sustainable Development is an integral part of the long-term business strategy of MYTILINEOS. 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.</p> <p>You may advise our new Sustainable Development Strategy in our Sustainable Development Report 2021: https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 4: <i>Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.</i></p>	<p>A new Board Sustainable Development Committee was established which has the overall oversight of the implementation of the Company’s sustainable development strategy. The <u>MYTILINEOS Sustainability Committee</u> supervises and monitors the implementation of the Sustainable Development Policy, in accordance with the Company’s strategy in this respect. In addition, it approves the content of the Company’s annual Sustainable Development report. It assists the Board of Directors of the Company in integrating Sustainable Development policies and procedures in the Company’s basic decision-making processes and operations and assists 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, evaluated regularly on the basis of its results and its performance in ESG matters.</p> <p>Also, MYTILINEOS has established Sustainability/ESG teams in each Business Unit. In each Business Unit, the new special roles of “Sustainability leader” and “Sustainability / ESG initiative owner” were</p>
<p>Best Practice 5: <i>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.</i></p>	

	<p>created, for the organization, implementation and monitoring of the individual action plans of sustainability initiatives in collaboration with the General Division of Corporate Governance & Sustainable Development.</p> <p>For more information, please see our Sustainable Development Report 2021 ("Sustainable Development Governance: section, page 117) https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 6: <i>Other established or emerging practices.</i></p>	<p>Spotlight: SUSTAINABILITY ACTIONS MAP</p> <p>MYTILINEOS' strategic line is to be an active member of its local communities and to make a positive difference where it operates. In this dedicated website, the sustainability vision of MYTILINEOS can be seen in action through the following online tool:</p> 

Criterion 2: The COP describes value chain implementation

<p>Best Practice 1: <i>Communicate policies and expectations to suppliers and other business partners.</i></p>	<p>As part of our efforts to communicate more effectively our values in our sphere of influence, we have published our "Suppliers and Business Partners Code of Conduct" which sets out more clearly our policies and expectations for a responsible supply chain management and aims to focus on communicating and promoting the principles of the UN Global Compact to our principal associates and suppliers.</p> <p>The Company's main objectives, by 2025, are to enhance the level of maturity and integration of Sustainable Development in its supply chain, the inclusion of ESG criteria in the selection process of new suppliers as well as the commitment of existing ones to good and responsible practices, with the aim of developing partnerships to better understand the effects and mutually harmonize objectives and expectations. In this context, please advise the Responsible Supply Chain section in our Sustainable Development Report 2021 (pages 101-103):</p> <p>https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Implement monitoring and assurance mechanisms (e.g. audits/ screenings) for compliance within the company's sphere of influence.</i></p>	<p>According to our Suppliers & Business Partners Code of Conduct, MYTILINEOS may request to confirm the compliance of its key Suppliers / Business Partners with the ESG criteria in one of the following ways:</p> <p>Evaluations: The key Suppliers / Business Partners of MYTILINEOS may be requested to complete a questionnaire on the coverage of the above ESG criteria. In the context of the integration of ESG criteria in its supply chain, the Company has designed a dedicated supplier self-evaluation questionnaire, while integrating the process of evaluation of new and existing suppliers in the departments / procurement and supplies divisions of its Business Units.</p>

	<p><u>Onsite verifications:</u> MYTILINEOS representatives or an authorised business partner of the Company acting on its behalf may contact key Suppliers / Business Partners to request permission to visit their premises to verify on-site the level of coverage of the ESG criteria.</p> <p><u>Compliance certificates:</u> Company's key Suppliers / Business Partners may be requested to submit relevant certificates or other official documents confirming their compliance with the ESG criteria.</p>
<p>Best Practice 3: <i>Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners.</i></p>	<p>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 process of selection of new suppliers as well as the commitment of the existing ones to the responsible partnerships, to better understand the impacts and harmonize goals and expectations.</p> <p>In this context, the Company in 2021 took the initiative and implemented the 2nd round of specialized training webinars on the 10 Principles of the UN Global Compact, enabling 35 key suppliers to understand the multifaceted challenges facing the world today in relation to climate change, human rights, corruption, and bribery. These challenges are becoming more prevalent than ever, due to the impact on business and economic activity because of the pandemic. MYTILINEOS committed to the implementation of the 3rd corresponding training cycle in 2022, actively supporting its suppliers in achieving sustainable business operation.</p>

Robust Human Rights Management Policies & Procedures

Criterion 3: The COP describes robust commitments, strategies, or policies in human rights

<p>Best Practice 1: <i>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights).</i></p>	<p>MYTILINEOS respects all internationally recognized human rights as stated in its policy. The Company complies with:</p> <ul style="list-style-type: none"> • The United Nations Universal Declaration of Human Rights. • The Fundamental Conventions of the International Labour Organisation (ILO). • The Principles of the UN Global Compact. • The Global Sustainable Development Goals (2030 Agenda). • The UN Guiding Principles on Business and Human Rights. • The Organisation for Economic Cooperation and Development (OECD) Guidelines. <p>The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment).</p> <p>We promote the respecting of human rights in the following ways:</p> <ul style="list-style-type: none"> - In our business sectors by upholding our standards. - In our relationships with our significant suppliers. - By implementing social programs with NGOs.
<p>Best Practice 2: <i>Integrated or stand - alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p>	<p>MYTILINEOS's Human Rights policy expresses our commitment to respect and support Human Rights. The Policy has been approved by the Sustainability and Executive Committees and is available to our internal and external stakeholders through our website and our Sustainable Development Report.</p>

<p>Best Practice 3:</p> <p><i>Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products, or services</i></p>	<p>MYTILINEOS's Human Rights policy reflects its zero tolerance as regards the violation of Human Rights. It is implemented both in the form of non-participation (direct, passive or silent) of the Company in such violations, and of avoidance of any transaction and contact with third parties that may have caused or are reasonably suspected as possibly involved in creating conditions that may encourage violations of said rights.</p> <p>The main objective of the Human Rights Policy is to contribute to the overall Sustainable Development Strategy of MYTILINEOS, through its connection with processes and policies that govern the broader business activities of the Company. These include:</p> <ul style="list-style-type: none"> - policies and procedures related to work practices (recruitment, training, staff evaluation), - procurement practices (evaluation of new and existing suppliers), - integration in the due diligence process implemented by the Company during the acquisition and merger procedures, - integration in the identification process implemented by the Company regarding the general situation and position of a country (mainly concerning developing countries) where the Company aims to operate by undertaking new projects and where human rights may be threatened, - integration into the process of making new investments (notification and consent prior to the approval of any project that may affect the rights of local communities), - integration in the Acquisition & Merger process, - response, in order to meet the funding criteria set by domestic and international financial institutions, and - integration, in the form of a separate category, in the Company's annual plan of social investments (in the light of the Global Sustainable Development Goals 5 & 10).
<p>Best Practice 4:</p> <p><i>Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.</i></p>	<ul style="list-style-type: none"> - MYTILINEOS "Human Rights Policy" - MYTILINEOS "CSR Policy" - MYTILINEOS "Code of Business Conduct" - MYTILINEOS "Suppliers & Business partners Code of Conduct" <p>are publicly available on our website.</p>

Criterion 4: The COP describes effective management systems to integrate the human rights principles

<p>Best Practice 1: <i>Process to ensure that internationally recognized human rights are respected.</i></p>	<p>MYTILINEOS establishes labour relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promotes the fundamental principles of the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) the respect of the freedom of association; (b) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; and (d) the elimination of all discrimination in respect of employment and occupation.</p> <p>The company also subscribes to and complies with the Principles of the UN Global Compact, which are based on the internationally recognised principles on the protection of Human Rights. In this direction an internal Human Rights Self - Assessment process, using the Global Compact related tool, takes place continuously.</p> <p>Moreover, MYTILINEOS "Code of Business Conduct" applies to all employees and management teams (by signing a Consensus Form).</p> <p>The Company's "Suppliers and Business Partners Code of Conduct", includes a description of its minimum conditions and expectations from its supply chain, on ESG topics, as a prerequisite of commercial cooperation between the two parties. The Code applies to all suppliers and business partners and its sections cover matters such as Health and Safety, Working conditions and Human Rights, Ethics and Anti-Corruption, Environmental protection and management.</p> <p>Please advise the MYTILINEOS "Human Rights Policy".</p>
<p>Best Practice 2: <i>Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement / advocacy; partnerships and/or other forms of collective action.</i></p>	<p>Such programs are presented within our Sustainable Development Report 2021 (Social Investments section, pages 98-100):</p> <p>https://www.mytilineos.gr/sustainability/reports/</p> <p>Also, the Company conducts training of Executives on Human Rights, focusing on 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.</p>
<p>Best Practice 3: <i>Allocation of responsibilities and accountability for addressing human rights impacts.</i></p>	<p>The MYTILINEOS Human Resources Central Function is responsible for elaborating and applying a management and development framework for the relevant policies and practices and for the provision of professional support to each company's Business Activity Sector in coping with human resources and human rights related issues. Please advise the MYTILINEOS "Human Rights Policy".</p>
<p>Best Practice 4: <i>Internal awareness-raising and training on human rights for management and employees.</i></p>	<p>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.</p> <p>https://www.mytilineos.gr/sustainability/reports/</p>

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

<p>Best Practice 1: <i>Leadership review of monitoring and improvement results.</i></p>	<p>As has been defined according to MYTILINEOS:</p> <p>Sustainable Development Governance system: Sustainable Development Report 2021 (page 117): https://www.mytilineos.gr/sustainability/reports/</p> <p>MYTILINEOS's Occupational Health & Safety, Employment, Human Rights and Equal Opportunities policies and DMAs within our Sustainable Development Report 2021 (pages 80-95): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders.</i></p>	<p>In 2021, no Human Rights incidents have been identified across the Company. The process to deal with incidents, is presented within our Code of Conduct where the management of Code violations is assigned to the Administration Board of each Business Unit, which is composed of the Business Unit's General Manager, the immediate supervisor of the employee who has committed the violation, the Legal and Regulatory General Manager, the Compliance Manager and the Human Resources General Manager. The Administration Board must inform the Company's Audit Committee of the progress made in connection with any matters that arise.</p> <p>The Company has established a grievance mechanism under the responsibility of the Regulatory Compliance Division, enabling its employees to express any concerns, as well as cases of human rights violations. Moreover, the Company warrants that no action shall be taken against any employee who reports in good faith any actual or alleged inappropriate conduct.</p>
<p>Best Practice 3: <i>Outcomes of integration of the human rights principles.</i></p>	<p>Outcomes of the internal self-assessment: Please refer to our Sustainable Development Report 2021 (pages 90-93 internal self-assessment outcomes): https://www.mytilineos.gr/sustainability/reports/</p> <p>Disclosure of main incidents involving the company: In 2021, no Human Rights incidents have been identified across the Company.</p> <p>Outcomes of remediation processes of adverse human rights impacts: In 2021, there were no grievances related to human rights filed, addressed by internal or external stakeholders and resolved through formal mechanisms.</p>

Robust Labour Management Policies & Procedures

Criterion 6: The COP describes robust commitments, strategies, or policies in the area of labour

<p>Best Practice 1: <i>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies.</i></p>	<p>MYTILINEOS's Occupational Health & Safety policy, Employment disclosure management approach, Human Rights policy as well as its "Code of Business Conduct" are aligned with international references such as the Universal Declaration of Human Rights, the ILO relative to the principles and fundamental rights at work, ISO 45001 International Standards and the principles of the Global Compact, among others. Also, our suppliers, subcontractors and other business partners are required</p>
---	--

	to comply with the Company's "Suppliers and Business Partners Code of Conduct", which includes respect for the Fundamental Conventions of the International Labour Organization and local legislation, particularly in terms of the minimum wage, working time and health and safety.
Best Practice 2: <i>Reflection on the relevance of the labour principles for the company.</i>	<p>According to our Materiality process the main social topics (concerning the Human capital) that may influence the assessments and decisions of our stakeholders are: 1) Occupational Health & Safety, 2) Employment 3) Human Rights 4) Equal Opportunities. Please refer to our Sustainable Development Report 2021 ("Materiality process" section (pages 40-41): https://www.mytilineos.gr/sustainability/reports/</p>
Best Practice 3: <i>Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and engage in dialogue with representative organization of the workers (international, sectoral, national).</i>	<p>Please advise:</p> <p>MYTILINEOS's Occupational Health & Safety, Employment, Human Rights and Equal Opportunities DMAs within our Sustainable Development Report 2021 (pages 80-95): https://www.mytilineos.gr/sustainability/reports/</p> <p>The Occupational Health & Safety section in our website: https://www.mytilineos.gr/sustainability/society/occupational-health-and-safety/</p>

Criterion 7: The COP describes effective management systems to integrate the labour principles.

Best Practice 1: <i>Risk and impact assessments in the area of labour.</i>	<p>We are applying specific assessment schemes such as: 1) the annual Materiality process, 2) the annual employee performance review system and 3) the annual Stakeholders Dialogue Forum. In addition, risk assessments in all company's business sectors are implemented, in the framework of the Occupational Health & Safety Management System, certified by ISO 45001 International Standards. This system is designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture.</p>
Best Practice 2: <i>Allocation of responsibilities and accountability within the organization.</i>	<p>The MYTILINEOS Human Resources General Division is responsible for elaborating and applying a management and development framework for the relevant policies and practices and for the provision of professional support to the Business Units in coping with human resources related issues.</p> <p>Also, according to the Company's EHS structure a designated person is responsible for EHS issues in each Business Unit. In addition to that, the Corporate HSE sets the HSE policies for the entire Group incorporating feedback from the BU HSE and the BUs. The Corporate HSE acts as an advisor to the BU HSE, providing expertise and recommendations and influencing the BU HSE strategy. The Corporate HSE in MYTILINEOS also has the Central Functions HSE activities within its remit.</p>
Best Practice 3: <i>Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.</i>	<p>Main engagement & communication channels with employees:</p> <ul style="list-style-type: none"> • Formal Stakeholder Engagement process. • Formal Materiality process. • Established annual employee performance and skills review process. • Open and daily communication with all employees through the role of HR-Business Partner. • Regular and ad hoc meetings between the Management and representatives of employees. <p>The reporting of Code of Conduct violations: www.mytilineos.gr/en-us/codes-and-policies/of-mytilineos#tab-code-of-conduct</p>

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration.

<p>Best Practice 1:</p> <p><i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>Please advise:</p> <p>MYTILINEOS's Occupational Health & Safety, Employment, Human Rights and Equal Opportunities DMAs within our Sustainable Development Report 2021 (pages 80-95) https://www.mytilineos.gr/sustainability/reports/</p> <p>The Occupational Health & Safety section in our website: https://www.mytilineos.gr/sustainability/society/occupational-health-and-safety/</p> <p>The MYTILINEOS CSR Policy is available on the following address: https://www.mytilineos.gr/media/tpynuav0/mytilineos_csr_policy_0_6_2020_en.pdf</p> <p>Regular reviews ensure that we adhere to all applicable labour laws and regulations and internal standards. Also, we are committed to implementing and integrating international standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • ISO 45001:2018 International Standard. • The International Labour Organisation convention. • The Global Reporting Initiative (GRI Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard.
<p>Best Practice 2:</p> <p><i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p>	<p>Regular meetings with union representatives are conducted with the management throughout the year at the Metallurgy Business Unit. Main topics cover among else wages and additional benefits, proposals to improve health and safety conditions at work and other topics raised by employees.</p> <p>Please advise our Sustainable Development Report 2021 ("Management - Employee relations" section (page 87): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 3:</p> <p><i>Outcomes of integration of the Labour principles.</i></p>	<p>Please advise our ESG Performance statement in our Sustainable Development Report 2021 (pages 6-7, 110-111): https://www.mytilineos.gr/sustainability/reports/</p> <p>Please advise our Social Performance section in our Sustainable Development Report 2021 (pages 110-111): https://www.mytilineos.gr/sustainability/reports/</p> <p>Also, MYTILINEOS received no fines for non-compliance with labour laws and regulations in 2021.</p>

Robust Environmental Management Policies & Procedures

Criterion 9: The CoP describes robust commitments, strategies, or policies in the area of environmental stewardship.

<p><u>Best Practice 1:</u></p> <p><i>Reference to relevant international conventions and other international instruments.</i></p>	<p>The adoption and implementation of international standards related to the environmental protection is a dynamic approach in the consideration of potential risks. We are committed to implementing and integrating these standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • The EU Emissions Trading System (EU ETS). • International Aluminum Stewardship Initiative (ASI). • ISO 14001:2015 International Standard. • ISO 14064 International Standard. • The EU's environmental regulations and Best Available Techniques (BATs). • Carbon Disclosure Project (Water Security and Climate Change). • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard.
<p><u>Best Practice 2:</u></p> <p><i>Reflection on the relevance of environmental stewardship for the company.</i></p>	<p>According to our Materiality process the main environmental topics that may influence the assessments and decisions of our stakeholders are: 1) Pollution prevention, 2) Ecological Impacts, 3) Energy & Air emissions, 4) Water management, 5) Circular economy, 6) Climate Change adaptation. Please advise our Sustainable Development Report 2021 - "Materiality process" section (pages 40-41): https://www.mytilineos.gr/sustainability/reports/</p>
<p><u>Best Practice 3:</u></p> <p><i>Written company policy on environment stewardship.</i></p>	<p>Please advise our Environmental Policy: https://www.mytilineos.gr/sustainability/environment/environmental-policy/</p> <p>Our environmental policy:</p> <ul style="list-style-type: none"> • is included in our new Code of Conduct. • is included in our Suppliers Code of Conduct. • is presented on our website through the new dedicated section on Sustainable Development. • is considered as a main discussion topic in annual Dialogue Forums with our Stakeholders groups. • is applied to all our subsidiaries and to all employees, irrespective of their position within the Group's hierarchy and promoting best practices, aiming at shaping the corporate image in the market.
<p><u>Best Practice 4:</u></p> <p><i>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct (pages 7-8).</p>
<p><u>Best Practice 5:</u></p> <p><i>Specific commitments and goals for specified years.</i></p>	<p>In terms of commitments and goals please advise the following:</p> <ul style="list-style-type: none"> • Our ESG Performance statement and Key ESG Targets in our Sustainable Development Report 2021 (page 7-9) https://www.mytilineos.gr/sustainability/reports/

- MYTILINEOS is one of the first Greek industrial companies that set in 2020 ambitious targets for the reduction of its carbon footprint, following a special study that used the latest available scientific data on climate change forecasts, as well as the relevant European and national strategy, and to further incorporate sustainability into its strategy. The Company's strategic priorities in this area are in line with the European Green Deal, contributing substantially to the transformation of the country's energy model, with a view to capitalizing on the opportunities offered by the European framework. In particular, MYTILINEOS is committed, through the implementation of the specific initiatives to the following:

(a) **By 2030, to reduce by 30% its total CO₂e (scope 1 & 2) emissions, compared to the 2019 level, and to achieve Net-Zero emissions in its development and construction activities.**

(b) **By 2050, to achieve Net-Zero emissions across its entire business activity.**

These ambitious targets represent the aggregation of the individual commitments taken at the level of the Company's Business Units.

These are as follows:

METALLURGY BU:

"To become the benchmark for Green Metallurgy worldwide."

- ✓ **Reduction of total CO₂e emissions (scope 1 & 2) by 65% by 2030 compared to 2019 levels**
- ✓ **Reduction of specific emissions (t CO₂e/t Al) by 75% by 2030 compared to 2019 levels**
- ✓ **Achieve Net-Zero emissions of the Business Unit by 2050 compared to 2019 levels**

POWER & GAS BU:

"Becoming a catalyst for a low-emission Greek electricity sector via our Power & Gas business"

- ✓ **Reduction of specific emissions (kg CO₂e/MWh) by approximately 50% by 2030 compared to 2019 levels**
- ✓ **Achieve Net-Zero emissions of the Business Unit by 2050 compared to 2019 levels**

SUSTAINABLE ENGINEERING SOLUTIONS BU & RENEWABLES & STORAGE DEVELOPMENT BU:

"To play, through our new activities, an important role in the decarbonization of the global energy system"

- ✓ **Achieve Net-Zero emissions of the Business Units by 2030 compared to 2019 levels**

In 2021, the Company committed to the global **"Science Based Targets"**¹ initiative. As part of this commitment, the climate targets of the Company will be submitted within 2022 to the organization for scientific validation. MYTILINEOS is one of the first Greek industrial companies to commit to this initiative, reaffirming its commitment to the goals of the Paris

¹ The Science Based Targets initiative (SBTi) promotes ambitious climate action in the private sector by mobilizing companies to set science-based greenhouse gas emission reduction targets.

	<p>Agreement and helping to address and mitigate climate change impacts nationally and globally.</p> <p>Also, please advise the MYTILINEOS ESG Targets in our Sustainable Development Report 2021 (pages 8-9): https://www.mytilineos.gr/sustainability/reports/</p>
--	--

Criterion 10: The CoP describes effective management systems to integrate the environmental principles

<p>Best Practice 1: <i>Environmental risk and impact assessments.</i></p>	<p>Core elements of the MYTILINEOS Environmental policy: https://www.mytilineos.gr/sustainability/environment/environmental-policy/</p> <p>We assess and prioritize environmental risks as part of our overall risk management process. Our Environmental Management System, aligned with the ISO 14001:2015 environmental standard, outlines our obligation to “manage the environmental risks of our activities” and stipulates that “environmental risk is part of the overall risk assessment which business units are required to complete on an annual basis.” We conduct environmental risk assessments in our production operations units. These include conservation and rehabilitation of nature and biodiversity, water and air pollution prevention, noise prevention, greenhouse gas stabilization & reduction, natural resource and water use and waste management. In addition, our Sustainability/ESG teams maintain ISO 14001:2015 certifications. Such compliance includes annual audits performed by external auditors, as well as preparatory internal audits.</p>
<p>Best Practice 2: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>According to the Company’s EHS structure a designated person is responsible for EHS issues in each Business Unit. In addition to that, the Corporate HSE sets the HSE policies for the entire Group incorporating feedback from the BU HSE and the BUs. The Corporate HSE acts as an advisor to the BU HSE, providing expertise and recommendations and influencing the BU HSE strategy. The Corporate HSE in MYTILINEOS also has the Central Functions HSE activities within its remit.</p>
<p>Best Practice 3: <i>Assessments of lifecycle impact of products, ensuring environmentally sound management policies</i></p>	<p>In 2021, a Life Cycle Assessment (LCA) study was completed, in order to assess the possible environmental impacts related to the extraction of bauxite and the production of alumina and aluminium by MYTILINEOS’ Metallurgy Business Unit. The LCA study is a process of assessing the impacts on the environment of a product throughout its lifecycle (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).</p>

Criterion 11: The CoP describes effective monitoring and evaluation mechanisms for environmental stewardship

<p>Best Practice 1:</p> <p><i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>The 100% of Company's Business Units have in place an Environmental Management System certified in accordance with the ISO 14001:2015 international standard. To manage and control our environmental impacts, we establish goals, targets and timetables for environmental performance improvement, which are supported by performance measure indicators and reporting processes. These are monitored and managed by the relevant departments in each activity sector, while in the Company level we have placed KPIs aligned with GRI Standards. In addition, regular reviews are conducted to confirm compliance to all applicable environmental laws, regulations & internal standards. Environmental management systems and data are audited by independent parties.</p>
<p>Best Practice 2:</p> <p><i>Leadership review of monitoring and improvement results.</i></p>	<p>MYTILINEOS's Environmental performance per Business Unit is among the top (after the topic Occupational Health & Safety) on the Executive Committee's agenda (on a monthly basis), which is led by the CEO of the company.</p>
<p>Best Practice 3:</p> <p><i>Process to deal with incidents.</i></p>	<p>According to our Environmental Management System, all concerns are thoroughly investigated, and appropriate action is taken in case of non-compliance with the MYTILINEOS environmental measures and principles. We have contingency plans (with trial application or application of emergency response procedures) and strategies in case of all types of pollution risks including accidental ones, or of other large-scale accidents such as significant spill or an uncontrolled and/or a controlled spill. As part of these plans, which are updated periodically, we identify the main weak points in the operated fields that require immediate attention if an event occurs.</p>
<p>Best Practice 4:</p> <p><i>Audits or other steps to monitor and improve the environmental performance of companies in the supply chain.</i></p>	<p>The Company completed the 2nd training cycle of key suppliers on corporate responsibility topics, increasing the number of suppliers that have already being trained to 85, of which 10 completed an additional in-house training on sustainability/ESG topics.</p>
<p>Best Practice 5:</p> <p><i>Outcomes of integration of the environmental principles.</i></p>	<p>The integration of environmental principles in our operations has resulted the absence of any incidents involving a deterioration in the quality of the environment. Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the Company's operational units, is a process conducted internally on a regular basis and by specialized personnel in each Business Unit, as well as annually, by a recognised independent organisation that audits and certifies the environmental management system in place. Within 2021, no cases of non-compliance with environmental rules and regulations were recorded.</p> <p>More specifically, we are reporting our performance according to GRI and more particularly in the following Standards: Energy, Materials, Water, Emissions, Waste, Biodiversity, Pollution prevention and Climate Change adaptation.</p> <p>Please advise our Sustainable Development Report 2021 (pages 76-77): https://www.mytilineos.gr/sustainability/reports/</p>

Robust Anti-Corruption Management Policies & Procedures

Criterion 12: The CoP describes robust commitments, strategies or policies in the area of anti-corruption

<p>Best Practice 1: <i>Publicly stated formal policy of zero-tolerance of corruption.</i></p>	<p>Please advise our Business Ethics DMA within our Sustainable Development Report 2021 (pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p> <p>Our zero-tolerance against corruption:</p> <ul style="list-style-type: none"> - is included in our Code of Business Conduct. - has been published in our annual Sustainable Development Report. - is presented by our website through the dedicated section on Sustainable Development. - is applied to all our employees, irrespective of their position within the Company's hierarchy.
<p>Best Practice 2: <i>Policy on anti-corruption regarding business partners.</i></p>	<p>Through our "Suppliers and Business Partners Code of Conduct" we expect from our new and significant partners to comply with the applicable national laws, regulations and the international anti - corruption conventions, as in force and to the extent to which the relevant provisions apply to the work that they provide on behalf of MYTILINEOS. Our detailed policies for our suppliers and business partners are specified within the relevant Code.</p>
<p>Best Practice 3: <i>Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</i></p>	<p>Please advise our Business Ethics DMA within our Sustainable Development Report 2021 (pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p>

Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle

<p>Best Practice 1: <i>Internal checks and balances to ensure consistency with the anti-corruption commitment</i></p>	<p>Please advise our Sustainable Development Report 2021 (pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p> <p>The Legal and Regulatory General Central Function, part of which is the Compliance Division, has been entrusted with the creation and implementation of a system of safeguards to protect the Company from corruption and bribery.</p>
<p>Best Practice 2: <i>Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice</i></p>	<p>The Company expects its employees to report serious violations of the Code of Conduct, when they become aware of them or when these are brought to their attention. This will allow the Company to address and rectify the matter – ideally, before it becomes a violation of the law or a health and safety risk or jeopardises the Company's reputation. In cases involving violations of the Code, the competent bodies of the Company shall investigate thoroughly the reports made, while at the same time observing the confidentiality of the relevant information, unless otherwise provided for by the law.</p> <p>The Company's employees must be aware of the following:</p>

	<ul style="list-style-type: none"> - They are encouraged to report freely any activity of which they have become aware of and which deviates from the Code's principles and may give cause for concern. - Such reporting is crucial for avoiding or mitigating a potential negative impact on the Company, while also supporting its culture of transparency, responsibility and integrity. - Reporting a violation with mention of the reporting person's identity is more credible and at the same time allows direct communication with the person making the report, for obtaining clarifications and additional information during the report verification procedure. - The Management of the Company warrants that no action shall be taken against any employee who reports in good faith any actual or alleged inappropriate conduct. - The reporting procedure should not be abused with the submission of ill-considered accusations or personal complaints. To prevent the submission of malicious or unsubstantiated reports, sanctions may be imposed to employees who have acted in bad faith. In such cases, the laws on defamation in force in the countries where the Company operates shall apply. - Where employees wish to seek advice, raise a related issue or report a violation of the Code, a number of options are available. Thus, they may contact their Supervisor, Section Manager, or General Manager or communicate directly with the Company's Compliance Department. - Cases involving violations of the Code may also be reported by phone, fax or post, as well as by electronic mail (mentioning the reporting person's identity or made anonymously), to compliance@mytilineos.gr
<p>Best Practice 3:</p> <p><i>Actions taken to encourage business partners to implement anti-corruption commitments</i></p>	<p>In 2021 MYTILINEOS completed successfully the 2nd cycle of the educational initiative in order to train 35 key suppliers on the 10 Principles of the UN Global Compact (UN Global Compact). The initiative was implemented in collaboration with the network CSR HELLAS, in which the Company participates as a main member for more than 10 years.</p> <p>MYTILINEOS also expects the strengthening of the level of maturity and integration of the Corporate Social Responsibility of its main suppliers, through the adoption of the Suppliers & Business Partners Code of Conduct. Please advise our Suppliers & Business Partners Code of Conduct.</p>
<p>Best Practice 4:</p> <p><i>Management responsibility and accountability for implementation of the anti-corruption commitment or policy.</i></p>	<p>The Legal and Regulatory Affairs General Division, in which the Company's Compliance Division belongs, has been entrusted with the creation and implementation of mechanisms to safeguard the Company's protection from corruption and bribery at both preventive and control levels. Specifically, the Director of the Regulatory Compliance Division reports to the General Manager for Legal & Regulatory Affairs.</p>
<p>Best Practice 5:</p> <p><i>Support by the organization's leadership for anti-corruption.</i></p>	<p>Please advise our Sustainable Development Report 2021 (page 120-121): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 6:</p> <p><i>Carrying out risk assessment of potential areas of corruption.</i></p>	

Criterion 14: The CoP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

<p>Best Practice 1: <i>Process to deal with incidents.</i></p>	<p>Even though the transparency due diligence process is under development, all possible concerns are thoroughly investigated, and appropriate action is taken (administrative and legal measures are available in accordance with the Company's internal working regulations), in case of non-compliance with the Company's anti-corruption policy. Also, MYTILINEOS's financial statements are independently audited on an annual basis which will continue to be audited annually also in the future.</p>
<p>Best Practice 2: <i>Public legal cases regarding corruption.</i></p>	<p>During the reporting period, there were no public legal cases regarding corruption or bribery.</p>
<p>Best Practice 3: <i>Outcomes of integration of the anti-corruption principle.</i></p>	<p>Please advise our Sustainable Development Report 2021 (page 120-121): https://www.mytilineos.gr/sustainability/reports/</p>

Taking Action in Support of Broader UN Goals and Issues

Criterion 15: The COP describes core business contributions to UN goals & issues

<p>Best Practice 1: <i>Align core business strategy with one or more relevant UN goals/issues.</i></p>	<p>From the early beginning of 2017, in the framework of the corporate transformation, the Company has entered a new era of evolution which presents improved prospects for growth, to the benefit of all its Stakeholders. In moving forward to the next decade, the elements that define the framework for the achievement of the Company's objectives in the domain of Sustainable Development comprise continuous learning and self-improvement, response to Stakeholder concerns, and transparency and accountability in connection with Company policies, decisions and performance, together with the recently enacted legislation. With its renewed, strong system of corporate governance and a new operational structure in place, the Company will work systematically and with enhanced effectiveness in order to promote sustainable practices across its value creation chain and develop partnerships that will promote the United Nations' 17 Sustainable Development Goals.</p> <ul style="list-style-type: none"> • Please advise MYTILINEOS Business Model within our Sustainable Development Report 2021 (pages 28-29): https://www.mytilineos.gr/sustainability/reports/ • Please advise MYTILINEOS new Sustainable Development Strategy within our Sustainable Development Report 2021 (pages 32-33): https://www.mytilineos.gr/sustainability/reports/ • Please advise the MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • MYTILINEOS CSR issues and their connection with the Sustainable Development Goals (SDGs) https://www.mytilineos.gr/sustainability/our-main-policies/ • We participate actively in the UNGC Greece Local Network working groups and events such as the Human Rights Working Group, the Local Network meetings and expert group activities. • Since December 2017, our sponsoring & donations plan is officially aligned with SDGs and it is materialized through strategic alliances with
---	--

	<p>local communities, NGOs and other associations aiming at sustainable communities. Please advise: https://www.mytilineos.gr/sustainability/in-practice-social-requests-management-system/</p>
<p>Best Practice 2:</p> <p><i>Develop relevant products and services or design business models that contribute to UN goals/issues.</i></p>	<p>Under our Power & Gas Business Unit we have RES operating (gross) capacity of 211 MW (including projects in which we hold a non-controlling stake), including 193 MW of wind, 12 MW of solar and 6.06 MW of hydro capacity, with ongoing RES capacity expansions in progress, including, for example, the ongoing construction of a 43 MW wind farm. In accordance with our long-term strategy to become a modern “green utility”, we have agreed to invest, subject to due diligence and other customary conditions, in a pipeline of Solar PV projects that is under development in Greece with total capacity of approximately 1,500 MW, together with a portfolio of storage projects under development. The acquisition of these Solar PV projects will facilitate the increase of our market share in the retail electricity segment, while the storage projects will enable us to optimize the operation of our RES asset portfolio from an energy management perspective.</p> <p>Also, MYTILINEOS, actively participates in two research projects, funded by the European Commission through “HORIZON 2020” Program. Both projects concern the development of an innovative suite of software applications and solutions designed to introduce the concepts of #EnergyEfficiency and #DemandResponse to end users.</p> <p>Energy Efficiency (“UtilitEE” project) The “UtilitEE” project, which is expected to be implemented within the next three years, will provide a Behavioural Change Framework, oriented to the end user, via an open Information and Communications Technology (ICT) ecosystem. The “UtilitEE” project focuses on discovering, quantifying, and revealing energy-consuming activities, while sending meaningful feedback to the end user, to engage them into a continuous process of learning and improving their energy behavior. Furthermore, it will incorporate human-centric intelligent control features that use occupants’ everyday habits, to minimize energy waste and keeping occupants comfortable while preserving a healthy indoor environment.</p> <p>Demand Response (Holisder project) The “HOLISDER” project, will introduce a Holistic Demand Response Optimization Framework that aims to significant energy costs reduction for the end user. “HOLISDER” combines a wide range of state of the art technologies, and integrates them into an accessible and interoperable framework, which constitutes of a suite of tools, to ensure the end user’s empowerment into an “active market” player, through the deployment of a variety of implicit and hybrid Demand Response schemes.</p> <p>Net Metering services The Power & Gas Business Unit undertakes the installation and all the necessary procedures for the connection to a net metering system using solar panels, while making a tangible contribution to protecting the environment and combating pollution.</p> <p>Net metering allows to generate your own electricity by offsetting your electricity usage as well as:</p> <ul style="list-style-type: none"> - To decrease your electricity bill - To “save” electricity of the grid by exporting the excess electricity back to the distribution grid - To “store” the excess production from your net metering facility to consume it at other later time - To actively participate in protecting the environment, by producing “cleaner” electricity, regarding CO₂ emissions <p>Electromobility</p>

For more information, please visit the following address
<https://protergiacharge.gr/>

In our Metallurgy Business Unit, the production of primary cast Aluminium products, made of one of the most environmentally friendly metals, thus ensuring a safe work environment and the application of responsible and sustainable practices in the extraction process. In addition, we have entered the recycled aluminium market increasing our annual aluminium production capacity by 40,000 tonnes and enhancing our environmental credentials, as the production of aluminium using recycled materials consumes materially less energy than primary aluminium production. We expect to reach an annual production capacity of 250,000 tonnes of aluminium by 2022 by expanding our recycled aluminium footprint while, as a result, decreasing our electricity consumption by approximately 25.0% per tonne of aluminium produced. Within 2021, a series of investments was completed to increase the levels of production capacity of Alumina and recycled Aluminum, aiming for the Company to respond to both the growing demand and the ambitious environmental targets it has set.

Our Renewables and Storage Development Business Unit was established as a new, autonomous business unit in order to capitalise on rapidly increasing demand for renewable energy. Our Renewables and Storage Development business unit focuses on renewable energy and storage development projects worldwide, including projects we are implementing as a contractor for third party customers and our own “Build-Own-Transfer” (“BOT”) platform. With an established global presence and a leading role in the utility scale solar photovoltaic energy generation and energy storage EPC industry, our Renewables and Storage Development business unit benefits from strong partnerships with leading equipment providers and functions as a preferred contractor for leading global solar developers. We have successfully completed more than 2,500 MW of utility scale solar power projects, as well as more than 500 MW / 700 MWh of energy storage facilities, in more than two dozen countries on five continents, and with a recurring customer base, including, among others, Lightsource/BP, Sonnedix, Total and Gresham House. We believe this experience positions our Renewables and Storage Development business unit to capitalise on the increasing adoption of cutting-edge solar technologies around the world, in particular as countries and market participants target faster integration of green energy in order to reduce their carbon footprint in accordance with environmental and climate change targets and commitments. The total capacity of mature and in operation BOT projects amounts to 1,963 MW while the total capacity of the BOT portfolio for projects that are in the early stages of development amounts to ~ 3.0GW.

Our Sustainable Engineering Solutions business unit, provides solutions to address national and global energy transition goals, including the development of sustainability projects and the implementation of new energy technologies. This business unit operates four distinct business segments: (i) the **Conventional Business segment**, which focuses on the construction of natural gas-fired thermal power plants and the implementation of electrical sub-station projects; (ii) the **New Energy Solutions** segment, which focuses on hybrid and off-grid energy projects; (iii) the **Environmental Solutions** segment, which focuses on solid waste treatment projects; and (iv) the **Infrastructure segment**, which focuses on high value-added construction works for civil infrastructure and industrial projects. The Sustainable Engineering Solutions business unit operates a value-centric (over volume), asset light, flexible and scalable business model with a lean cost structure that allows us to adapt to changing market conditions and focus on pursuing high value-added and higher margin activities.

<p>Best Practice 3:</p> <p><i>Adopt and modify operating procedures to maximize contribution to UN goals / issues</i></p>	<p>We have in place an annual social investment plan which is based on the local communities needs such as: Quality in Education, Bolstering Employment, Good Health, Culture, and local infrastructure projects.</p> <p>We have established strong relationships with NGOs to contribute to Children's Rights and Health programs.</p> <p>We have in our project pipeline the development of the due diligence process regarding Anti-corruption and Human Rights protection.</p> <p>Our "Code of Business Conduct", new Human Rights policy and our "Suppliers and Business Partners Code of Conduct" are based on the 10 principles of the UNGC, the Universal Declaration of Human Rights, the United Nations Convention Against Corruption, ISO 26000 and the ILO International Labor Standards.</p> <p>In our Sustainable Development Report 2021 a detailed presentation of MYTILINEOS' contribution to the achievement of the Global Sustainable Development Goals and the respective National Priorities (period 2016-2021) is presented (pages 35-37): https://www.mytilineos.gr/sustainability/reports/</p>
--	--

Criterion 16: The CoP describes strategic social investments & philanthropy

<p>Best Practice 1:</p> <p><i>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS CSR Policy <p>https://www.mytilineos.gr/sustainability/our-main-policies/</p> <p>MYTILINEOS's strategic focus areas concerning its social contribution are defined by the following SDGs: SDG-1: No poverty, SDG-2 Zero hunger, SDG-3 Good Health, SDG-4 Quality Education, SDG-10 Reduced Inequalities and SDG-11 Sustainable cities & communities. In 2021, the Company, continuing to implement its social policy, invested €9.2 million, implementing actions in basic social sectors that contribute to the prementioned Sustainable Development Goals. All social investments are presented in the Company's Sustainable Development Report 2021 (pages 98-100). https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2:</p> <p><i>Coordinate efforts with other organizations and initiatives to amplify - and not negate or unnecessarily duplicate - the efforts of other contributors.</i></p>	<ul style="list-style-type: none"> • «In Practice»: Social Requests Management System <p>www.mytilineos.gr/sustainability/in-practice-social-requests-management-system/</p> <p>MYTILINEOS, in line with its commitment to operate responsibly, is continuing steadfastly to take initiatives that contribute to society. During the last 12 years (2010-2021), the company has invested €25m covering a wide range of social issues, responding to its role as integral member of the Greek society, actively contributing to mitigating the impacts of the economic crisis.</p>

Criterion 17: The CoP describes advocacy & public policy engagement

<p>Best Practice 1:</p> <p><i>Publicly advocate the importance of action in relation to one or more UN goals/issues.</i></p>	<p>We work with industry associations to inform public policy on sustainability challenges, sharing our experience and advancing practical solutions. Also, MYTILINEOS is engaging in activities that could either directly or indirectly influence public policy on climate-related issues. We have direct engagement with policy makers in terms of cap & trade, clean energy generation and climate finance. We engage with trade associations such as: Eurometaux, European Aluminium, Business Europe and COGEN Europe. We engage also with funding research organizations.</p>
---	--

	<p>In 2008, MYTILINEOS become one of the first members of the SEV Business Council for Sustainable Development (BCSD) which promotes business models in line with global sustainability goals. Through the Council initiatives, the Company's Sustainable Development Director and other directors participated in key actions related mainly to SDG's promotion to further advocate our commitment to the goals.</p> <p>Since 2008, our CEO has been communicating publicly our commitment to the implementation of the principles of the Global Compact.</p> <p>MYTILINEOS is an ambassador of the Greek Sustainability Code since 2015. The company was actively involved in Code's development, either by submitting its views and initiatives, through the open consultation or by participating in the relevant working groups.</p> <p>Since 2016, the Company has been a voluntary participant in the global sustainable development initiative CDP - Water, by disclosing extensive quantitative and qualitative information on the management of water resources in the context of its business activity. In addition, in 2021, MYTILINEOS submitted for the first time a report to the international CDP Climate Change initiative (Ranking C), disclosing extensive data on its initiatives related to climate change and comparing its performance with the largest companies in the world.</p> <p>Our "Code of Business Conduct" and our "Suppliers and Business Partners Code of Conduct" are publicly available to all our Stakeholders groups and are aligned with international references such as the Universal Declaration of Human Rights, the Universal Declaration of the ILO relative to the principles and fundamental rights at work and the principles of the Global Compact.</p>
<p>Best Practice 2:</p> <p><i>Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues</i></p>	<p>We execute a plan by reaching to investors and general public with a concrete storyline and messaging. We organize year-round agenda of key events around sustainability and prepare content illustrating targets and progress against targets (e.g., Climate Week New York, World Economic Forum in Davos).</p>

Criterion 18: The CoP describes partnerships & collective action

<p>Best Practice 1:</p> <p><i>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.</i></p>	<ul style="list-style-type: none"> • #HoMellon program in collaboration with the "Know!" Social Entrepreneurship Network. Impact: MYTILINEOS, implemented for the 2nd consecutive year the holistic and personalized training program based on the Mellon skills accelerator for the Reintegration of the Homeless in the Labor Market, lasting 6 months. The 25 beneficiaries participated in an Intensive Vocational Skills Program, received 1,337 hours of online and in-service training on 35 topics with the invaluable contribution of 17 speakers, clothing-care, technological equipment and connection to the labor market. Already 15 beneficiaries are working, 4 have acquired their own housing, while the remaining 10 continue empowered and mobilized to improve their lives. • "The Tipping Point", in collaboration with the Organization "Tipping Point". Impact: The program was implemented in 30 schools throughout Greece, where with the use of technology, through live mentoring lasting 30 minutes, 2,624 students and with the help of 53 teachers,
---	---

	<p>regardless of geographical area, economic and social status had the opportunity to talk to successful professionals and get answers to questions about their future.</p> <ul style="list-style-type: none"> • In the context of the environmental R&D of the Metallurgy Business Unit, the Company continued its efforts in the development of technologies for the exploitation of bauxite residues as well as for the implementation of innovative methods to produce alumina from alternative sources. In 2021, the Metallurgy Business Unit participated in a total of 24 research projects (such as, indicatively: “SCALE”, “REMOVAL”, “ENSUREAL”, “AISiCal”, “BIORECOVER” and “ReActiv”), representing almost €2.2 million of investments in total. These projects focus on the exploitation of bauxite residues for producing scandium, iron, alumina, cement additives and construction products, on the production of alumina from alternative (secondary) sources, on heat recovery and the use of RES in aluminium production, on new tools and training courses for engineers and workmen employed in the raw materials / metallurgy sector, as well as on new aluminium recycling technologies. <p>The above partnership projects are indicative. More projects can be found within our Sustainable Development Report 2021 (pages 98-100): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain</i></p>	<p>Multi-stakeholder partnerships are critical to solving many sustainability challenges. To this end, MYTILINEOS is developing initiatives and is participating as an active member in voluntary national and international organizations, seeking to promote CSR and the SDGs, to exchange views on sustainability-related issues, to improve its social and environmental contribution and to develop responsible practices in the broader business community.</p> <p>Participation in Socially Responsible Investment Indexes: MYTILINEOS by disclosing its performance on an annual basis, respond to specific analysts or companies' assessments, in sustainable investing area.</p> <p>Please advise our Sustainable Development Report 2021 (ESG Performance Statement page 6): https://www.mytilineos.gr/sustainability/reports/</p> <p>Sustainable Development commitments: MYTILINEOS voluntarily participates, cooperates, and supports the following Corporate Social Responsibility / Sustainable Development initiatives.</p> <p>Please advise our Sustainable Development Report 2021 (page 24): https://www.mytilineos.gr/sustainability/reports/</p>

Corporate Sustainability Governance and Leadership

Criterion 19: The CoP describes CEO commitment & leadership

<p>Best Practice 1: <i>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN GC.</i></p>	<ul style="list-style-type: none"> • Chairman's statement of Continued Support (CoP 2021) • Discussion with the Chairman & CEO on Sustainable Development topics (Sustainable Development Report 2021): https://www.mytilineos.gr/sustainability/reports/
<p>Best Practice 2: <i>CEO leads executive management team in development of corporate</i></p>	<p>The CEO leads the Executive committee which takes place on a monthly basis. The issues that come first on the Committee's agenda are the Environmental as well as the Health & Safety performance in all MYTILINEOS Business Sectors.</p>

sustainability strategy, defining goals and overseeing implementation.

Criterion 20: The CoP describes Board adoption & oversight

<p>Best Practice 1: <i>Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS's Board of Directors supports the UN Global Compact. • The Executive Committee quarterly reviews and guides sustainability performance (mainly on Health & Safety, Environmental and Human Resources issues). The chairman is Mr. Evangelos Mytilineos, Chairman & CEO of the Company. • The Sustainability Committee of MYTILINEOS assists the Board of Directors of the Company in integrating Sustainable Development policies and procedures in the Company's basic decision-making processes and operations. The purpose of the Committee 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, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) matters.
<p>Best Practice 2: <i>Board (or committee), where permissible, approves formal reporting on corporate sustainability (CoP).</i></p>	<p>The Sustainability Committee approves the process of determining the material issues of Sustainable Development, validating its results annually, as well as their main disclosures for the formal non-financial reporting purposes (e.g. Sustainable Development Report, UNGC CoP, and ISO 26000 international standard).</p>
<p>Best Practice 3: <i>Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.</i></p>	<p>Apart from the Sustainability Committee, the General Manager of Corporate Governance and Sustainable Development Division (member of the BoD and member of the Executive committee) is responsible for regularly communicating to members of the Board and the Executive Committee about key sustainability issues and their potential (or realized) business impact. More information about Sustainability Governance can be found within our Sustainable Development Report 2021 (page 117): https://www.mytilineos.gr/sustainability/reports/</p>

Criterion 21: The CoP describes Stakeholder engagement

<p>Best Practice 1: <i>Publicly recognize responsibility for the company's impacts on internal and external stakeholders.</i></p>	<p>Proactively engaging with our key stakeholders is an important part of defining the issues that are material to our business, current and potential. The engagement with internal and external Stakeholders practically puts in place the long-standing commitment of MYTILINEOS for responsible entrepreneurship and open, systematic and sincere social dialogue, as a key element of the social capital that the company uses, to ensure its sustainability and the added value creation for society.</p> <p>For more information, please advise our:</p> <ul style="list-style-type: none"> • Stakeholder Consultation process: Stakeholder Engagement • Sustainable Development Report 2021 ("Materiality" section pages 40-41): https://www.mytilineos.gr/sustainability/reports/ • Sustainable Development Report 2021 ("Stakeholder engagement" section pages 42-45): https://www.mytilineos.gr/sustainability/reports/
--	---

<p>Best Practice 2: <i>Define sustainability strategies, and policies in consultation with key stakeholders.</i></p>	<p>Proactively we are engaging with our key stakeholders as an important part of defining the sustainability issues that are material to our business, current and potential.</p> <p>Policies in consultation with key stakeholders (Metallurgy Sector):</p> <ul style="list-style-type: none"> • COVID-19 (Stakeholder Consultation 2021) • Human Rights policy (Stakeholder Consultation 2020) • Training and skill development practices (Stakeholder Consultation 2019) • Suppliers' policy & Business Partners code of Conduct (Stakeholder Consultation 2018) • Social Contribution policy (Stakeholder Consultation 2017) • Environmental policy (Stakeholder Consultation 2016) • Health & Safety Policy (Stakeholder Consultation 2015)
<p>Best Practice 3: <i>Consult stakeholders in dealing with challenges and invite them to take active part in reviewing performance.</i></p>	<p>Stakeholder engagement is an important element of our approach to sustainability. It builds trust, improves understanding of the impacts from our operations and addresses stakeholder concerns, while providing input to our materiality analysis process.</p> <ul style="list-style-type: none"> • Sustainable Development Report 2021 ("Materiality process" section pages 40-41): https://www.mytilineos.gr/sustainability/reports/ • Sustainable Development Report 2021 ("Stakeholder Engagement" section pages 42-45): https://www.mytilineos.gr/sustainability/reports/
<p>Best Practice 4: <i>Establish channels to engage with stakeholders to hear their ideas and address their concerns and protect 'whistle-blowers'.</i></p>	<p>The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders' specific needs and expectations.</p> <p>More information can be found within our Sustainable Development Report 2021 ("Stakeholder Engagement" section and "Business Ethics" pages 42-45 and 120-121): https://www.mytilineos.gr/sustainability/reports/</p>