

# 1. Introduction

## 1.1 Background

MYTILINEOS S.A. (the "Company" or "MYTILINEOS") is a leading international industrial and energy company with a dynamic presence in all 5 continents. It is active in the sectors of Electric Power & Gas Trading, Metallurgy, Renewables & Storage Development, and Sustainable Engineering Solutions. It is listed on the Athens Stock Exchange, with a consolidated turnover of approximately €1.9 bn and more than 3,800 direct and indirect employees and 9,500 suppliers (in Greece and abroad). Over the past 10 years, MYTILINEOS has focused on maximising financial returns to its shareholders while also retaining a solid commitment to sustainability. The Company has cultivated a corporate culture that considers environmental, social and governance (ESG) issues, and sustainability in general, as one of the major pillars of its long-term growth strategy. Our focus on ESG and sustainability has helped us reduce our emissions per unit of revenue by >15% p.a. over the last four years.

## 1.2 MYTILINEOS's Socio-Economic impact in Greece<sup>1</sup>

Every year, MYTILINEOS generates a remarkable economic and social value for the country, as a responsible enterprise interacting with its stakeholders. In this context, in May 2020, the Climate Change and Sustainable Development services department of Ernst & Young carried out MYTILINEOS' second annual socio- economic impact study (2019 data). The study confirmed once again the MYTILINEOS' broader contribution to the national economy and employment, with significant contribution to the specific UN SDGs 8 & 9, pertaining to economic growth and the boosting of employment in the industrial sector, respectively. MYTILINEOS socio-economic impact in Greece derives from its economic activity across its value chain, from production until the promotion and sale of its products. For its operation, MYTILINEOS is supplied with raw materials, products and services from Greek suppliers, supporting thus various Greek economy's business sectors, such as electricity and gas sector, construction and metallurgy.

## **MYTILINEOS Socio-economic impact in Greece (2019)**

# MYTILINEOS CONTRIBUTION TO GREEK ECONOMY AND EMPLOYMENT (BROAD PICTURE)

MYTILINEOS with its activity:

Creates total\*
value added of
€1.06 bn.
equal to 0,6%
of the total national GDP

includes direct, indirect & induced impact

Offers total\*
tax contribution at
€301 mn.
equal to 0.39% of total
tax revenue of the State

It supports in total\*

13,802

jobs equal to 0.36% of total employment in Greece

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







SUSTAINABLE DEVELOPMENT: MAY 202

mytilineos.gr/en-us/csr-reports/publications

## 1.3 MYTILINEOS' Sustainability Strategy

MYTILINEOS' business model combines economic stability with social and environmental sustainability. The protection of the environment and the commitment to sustainable development has been key priorities over the past years. This is rooted in MYTILINEOS' corporate mission: "We rely on our people's potential and we create value for our customers, our shareholders, our employees and the Greek economy." This mission statement inspires the entire sustainability strategy and the focus on long term and sustainable value for all stakeholders contributing to the UN Sustainable Development Goals and the respective

MYTILINEOS' Sustainability strategy is implemented on three interrelated layers 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.

SUSTAINABLE DEVELOPMENT



- New Sustainable Development strategic framework contribute to Sustainable Development. strategy implementation. performance • The 1st layer focuses on 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 the planet is facing for the next decade. Considering the high CO2 emission intensity in both aluminium production and electric power generation processes, climate change is a key element for the sustainability of its activities. In this context, the Company has designed a 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. MYTILINEOS was the first Greek industrial to set specific, measurable and ambitious CO2 emission reduction targets for 2030 and 2050, thus making the reduction of its carbon footprint a priority of its new Sustainable Development Strategy. In addition, the creation by the Company of new Business Units oriented towards the dynamic
- leading companies in the global market in this area. The 2<sup>nd</sup> layer highlights MYTILINEOS' systematic approach to the monitoring, optimal management and disclosure of information about the ESG risks and opportunities that affect its performance, as well as about 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 emerging sustainability requirements of investors, capital markets and financial institutions, as well as to society's expectations of commitment and transparency regarding these issues, whose significance keeps increasing.

development of sustainable projects internationally (Renewables & Storage Development BU, and Sustainable Engineering Solutions BU), is predicted to play, in the next critical decade, an important role in the energy transition and in the reduction of greenhouse gas emissions globally, giving MYTILINEOS the opportunity to scale up its positive impact and become one of the

The 3rd layer expresses the responsible operation of MYTILINEOS, which has been systematically cultivated over the last 12 years through the implementation of its Corporate Social Responsibility (CSR) policy and the Company's commitment to the 10 Principles of the UN Global Compact.

**In terms of Sustainability Governance,** MYTILINEOS, on top of having a Corporate Governance and Sustainable Development General Division directly reporting to the CEO, also has a "Sustainability Committee" aimed to assist the Board of Directors in the assessments and decisions relating to sustainability, by carrying out preparatory work for the purpose of making proposals and providing advice.

#### **MYTILINEOS Sustainability Development Initiatives**



- MYTILINEOS supports the United Nations Sustainable Development Goals
- Focus of business operations on the SDGs highlighted below















- Since 2008 MYTILINEOS is a United Nations Global Compact signatory demonstrating its commitment to the 10 principles on human rights, labour, environment and anticorruption.
- MYTILINEOS pledged to publish annual progress report updating on the implementation of these 10 Principles and to collaborate with stakeholders to drive progress.



- MYTILINEOS Metallurgy Business Sector, since November 2019, has become a Production & Transformation member of Aluminium Stewardship Initiative (ASI). ASI is a global multistakeholder, non-profit standards setting and certification organization that aims to recognize and foster the responsible production, sourcing and stewardship of aluminium.
- MYTILINEOS' participation in this initiative, represents a creative challenge as well as its solid commitment to dramatically reduce its carbon footprint in Metallurgy Sector by 2030.



 MYTILINEOS, since 2016 participates voluntarily in the Global Sustainable
 Development <u>CDP - WATER</u> <u>Security</u> Initiative by publishing extensive quantitative and qualitative data on the management of water resources in the framework of its activity.

## 1.4 Tackling climate change & Energy transition

Globally, a rise in temperature by approximately 1°C compared to pre-industrial levels has already been observed, while according to the findings of recent studies, such as for example those published by the Climate Change Impacts Study Committee (CCISC) in Greece, this rise in temperature could reach up to 6°C in 2100 if there is no concerted action to halt climate change by reducing greenhouse gas emissions. The EU therefore aims to reduce greenhouse gas emissions by at least 55% by 2030, in line with the Paris Agreement and the European Green Deal. Greece is one of the most climate-ambitious countries and supports all European initiatives to drastically reduce greenhouse gas emissions.

In this respect, MYTILINEOS was one of the first Greek industrial companies to set in 2020 ambitious targets for the reduction of its carbon footprint, following a specific 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 corporate DNA.

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.

Particularly, MYTILINEOS is committed, through the implementation of the specific initiatives:

(a) by 2030, to **reduce by more than 30%** its total  $CO_2e$  (scope 1 & 2) emissions, compared to 2019 level, and to achieve Net-Zero emissions in its development and construction activities, and

(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:

- MYTILINEOS development and construction businesses (SES & RSD) commit to reach net zero emissions by 2030
- MYTILINEOS Metallurgy BU commits to reduce its total CO<sub>2</sub>e emissions (scope 1 & 2) by 65% and its specific emissions (CO<sub>2</sub>e/t Al) by 75% by 2030
- MYTILINEOS Power & Gas BU commits to reducing its specific emissions (CO₂e/MWh) by approximately 50% by 2030

MYTILINEOS, in the coming years, will continue to deploy its business model, with more investments to strength its presence in the renewable energy, with further implementation of a significant portfolio of over 2.5GW of RES projects, in Greece and abroad. Also, the Company will invest in the electrification of its metallurgical activities exclusively from renewable sources and in the significant increase in the amount of secondary aluminium produced, and in the application of state-of-the-art technologies and the exploitation of digital industrial processes in production stages, to improve energy efficiency. In this context, the Company in order to meet the ambitious commitments described above, and finance projects that will deliver benefits to support its business strategy and vision, has elected to create a green bond framework the "MYTILINEOS Green Bond Framework" (the "Framework"), under which it can issue Green Bond(s).

<sup>2.</sup> In 2021, MYTILINEOS renamed its CSR Committee into a Sustainability Committee and made it a board committee which now comprises of 5 members in its composition with Special Advisor to the CEO as the chair of the Sustainability Committee

# 2. Scope

This Framework sets the basis for the identification, selection, verification and reporting of the sustainable financing that is eligible for being directly or indirectly financed by amounts equivalent to the proceeds of the Green Bonds issued by MYTILINEOS or Mytilineos Financial Partners (referred together as "MYTILINEOS") and the management of such proceeds.

# 3. Application of Green Bond Principles

The Green Bond Principles (GBP) 2018 published by International Capital Markets Association ("ICMA") are voluntary process guidelines for best practices when issuing Green Bonds. The GBP recommend transparency, disclosure and promote integrity in the Green Bond Market. In alignment with these Principles, for each Green Bond(s) issued, MYTILINEOS asserts that it will adopt the following, as set out in this Framework: **Use of Proceeds, Process for Evaluation and Selection, Management of the Proceeds and Reporting.** 

• Green Bond(s) - bonds where an amount equivalent to the bond proceeds is used to finance 'Eligible green projects' as defined in section 3.1 'Use of Proceeds'.

## 3.1 Use of proceeds

An amount equivalent to the net proceeds of any MYTILINEOS Green Bond will be used to finance, or refinance, in whole or in part, Eligible Green Projects (including other related and supporting expenditures) or equity investments<sup>3</sup> that are aligned with the ICMA GBP and contribute to the specific SDGs targets, as described below.

#### Eligible Green Projects are included in the following categories:

Alignment with ICMA GBP <sup>4</sup>	Alignment with the EU Environmental Objective <sup>5</sup>	Eligibility criteria
Renewable energy	Climate change mitigation  4. Production of Electricity from Solar PV, Wind Power and Hydropower	<ul> <li>Investments in / expenditures for the acquisition, conception, construction, development, and installation of renewable energy production units</li> <li>Eligible renewable energy sources: solar, wind and small hydro (&lt;10 MW)</li> </ul>
Eco-efficient and/or circular economy adapted products, production tech- nologies and processes	<b>Climate change mitigation</b> - 3.3 Manufacture of Aluminium	<ul> <li>Investment in / expenditures in the manufacturing of recycled/secondary aluminium</li> <li>Investment in primary aluminium production where direct emissions are below the value of the related EU-ETS benchmark (1.514 tCO₂e/t as of Feb 2020) and either (a) Electricity consumption for electrolysis is at or below 15.29 MWh/t or (b) Average carbon intensity of the electricity that is used for primary aluminium production (electrolysis) is at or below 100g CO₂e/kWh</li> </ul>

#### **Exclusions**

For the avoidance of doubt, the following activities are excluded from any financing by MYTILINEOS Green Bond(s): projects related to fossil fuel activities and large hydro (>10MW).

Equity participations in entities where at least 95% of the revenues can be attributed to one or more of the Eliaible Green Project Categories described in section 3.1 Use of Proceeds

<sup>4. 2018</sup> Green Bond Principles: icmagroup.org/green-social-and-sustainability-bonds/green-bond-principles-gbp/

<sup>5.</sup> MYTILINEOS has additionally included a high level alignment with the provisions included in the latest published versions of the EU Taxonomy draft delegated acts: ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12302-Climate-change-mitigation-and-adaptation-taxonomy#ISC\_WORKFLOW

#### Eligible Green Projects categories also contribute to the UN SDGs.

The Sustainable Development Goals (SDGs) were set in September 2015 by the United Nations General Assembly and form an agenda for achieving sustainable development by the year 2030. MYTILINEOS' Green Bond Framework advances the following SDGs and related targets:

Use of Proceeds	SDG	SDG target	
Use of Proceeds	Environmental objectives		
Renewable energy	<b>7.</b> Affordable and Clean Energy	<b>7.2</b> By 2030, increase substantially the share of renewable energy in the global energy mix	
Eco-efficient and/or circular economy adapted products, production technologies and processes	<b>12.</b> Responsible Consumption and Production	<b>12.5</b> By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse	

## 3.2 Project Evaluation and Selection Process

The eligible Green Projects will be subject to the following due diligence process, which ensures that they meet the criteria set out above in section 3.1 ('Use of Proceeds'). The projects must be eligible, as defined in the present Framework, which means that they must be aligned with both the selection and exclusion criteria.

The process for the evaluation and selection of eligible Green Projects has the following main steps:

- 1. A list of potential Green Projects is prepared, in terms of use of proceeds requirements, and is evaluated by the relevant Business Units and the Treasury/Financial Divisions.
- 2. The Sustainable Development Division evaluates the projects against the following criteria: alignment with the requirements of the present Framework, alignment with MYTILINEOS' Sustainable Development strategy, contribution to the relevant emissions reduction targets (where applicable) and absence of any ESG controversies. Once the aforementioned criteria are met the project and its characterization as Green are approved by the Sustainable Development Division.
- 3. The environmental teams of the company's Business Units and other relevant departments examine the projects' alignment with the selection criteria (as described in Appendix 1) to identify and manage potential material environmental and social risks associated with each project. In parallel, the expected impacts of the projects are assessed via specific KPIs (as referred to the reporting section 3.4).
- 4. The list of selected eligible Green Projects is compiled by the relevant Business Units and submitted to the Treasury/Finance Divisions for final validation and addition to the allocated proceeds balance. The list is finally submitted to the Green Financing Committee for approval and assessment of funding allocation.
- 5. Allocation and impact reporting is performed by Finance/Treasury and Sustainable Development Divisions on a yearly basis based on the inputs from relevant BUs.

The responsibility and coordination of the process described above lies with MYTILINEOS Treasury Division and is graphically described below

Overview of process for Green Projects selection

	Primary selection	Primary assessment	Evaluation and validation	Allocation of proceeds	5 Reporting
Activities	List of potential Green Projects is compiled	Assessment of alignment of each of the projects in the list of potential Green Projects against the following criteria:     MYTILINEOS Green Bond Framework     MYTILINEOS SD Strategy     Emissions reduction targets	Examination of the projects' alignment with MYTILINEOS' selection criteria to identify and manage potential material environmental and social risks     Assessment of the expected benefits of the projects to the EU taxonomy environmental objectives     Selection of projects that contribute to at least one objective doing no harm to others	List of projects are submitted to Treasury/Finance divisions for final validation and addition to the allocated proceeds balance List is submitted to the Green Financing Committee for approval and financing Approval of projects and definition of funding allocation by the Green Financing Committee	Allocation and impact reporting is performed on a yearly basis
eliverable(s)	<ul> <li>List of potential Green Projects</li> </ul>	<ul> <li>List of filtered projects for further evaluation</li> </ul>	<ul> <li>List of projects for final validation</li> </ul>	<ul><li>Approved projects</li><li>Allocation of funds</li></ul>	<ul><li>Allocation report</li><li>Impact report</li></ul>
)wner(s)	BU teams     Treasury/Finance Divisions	<ul> <li>Sustainable Development Division</li> </ul>	<ul> <li>BU Environmental teams</li> <li>Sustainable</li> <li>Development Division</li> <li>Other relevant divisions</li> </ul>	<ul><li>Treasury/Finance Divisions</li><li>Green Financing Committee</li></ul>	<ul><li>Treasury/Finance Divisions</li><li>Sustainable Development Division</li></ul>

MYTILINEOS has established a Green Financing Committee (GFC) with responsibility for governing selection and monitoring of the Eligible Green Projects.

The GFC is composed of the following members and will be chaired by the Treasury:

- Treasury
- Sustainable Development
- Finance
- Relevant BU

The GFC meets once a year and ad-hoc when investment projects arise for evaluation.

The objectives of the GFC in regards to the Green Bond Framework are the following:

- To review the project list and assess project eligibility for Green financing in accordance with the pre-determined Eligibility Criteria set out in Section 3.1 Use of Proceeds of this Framework.
- To review the allocation of an amount equivalent to the proceeds to Eligible Green Projects and determine if any changes are necessary (for instance, in the event that projects have been completed, sold off or otherwise become ineligible). While any MYTILINEOS Green Bonds are outstanding, in the case of divestment or cancellation of a project to which an amount equivalent to the proceeds have been allocated, MYTILINEOS will reallocate the proceeds to other eligible projects.
- To oversee the arrangements established in order to ensure that Green Bond(s) remain in alignment with the GBP.
- To oversee the arrangements established to ensure that an amount equivalent to the Green Bond proceeds is utilised in accordance with the uses specified in the Framework.
- To oversee the arrangements established to guarantee that the information required for the production of periodic Green Bond Reports, in accordance with the Framework and the GBP, is generated; and
- To validate the annual reporting referring to Eligible Green Project and to ensure the appointment of an independent auditor who will provide an annual assurance report.

The list of Eligible Green Projects related to the contemplated MYTILINEOS Green Bond will be disclosed with their main features.

## 3.3 Management of Proceeds

To manage the equivalent amount of the proceeds of each MYTILINEOS Green Bond and avoid any double counting, MYTILINEOS will establish a Green Bond Register.

An amount equivalent to net proceeds of each MYTILINEOS Green Bond will be earmarked towards Eligible Green Projects as stated in section 3.1 Use of Proceeds of this Framework and will be identified in the Green Bond Register by the Green Financing Committee.

The Green Bond Register will contain the following relevant information:

- 1. Details of the Bond(s): key information including transaction date, principal amount of proceeds, settlement date, maturity date, and interest margin or coupon, ISIN number etc.;
- 2. Details of Use of Proceeds, including:
  - a. Summary detail of eligible projects/expenditures to which the equivalent amount of the proceeds of the Green Bond(s) have been earmarked in accordance with this Framework;
  - b. Amount of allocation made;
  - c. Any unallocated equivalent amount of the Green Bond proceeds yet to be earmarked against eligible projects/expenditures;
  - d. Other necessary information

In the event that funds cannot be immediately and fully allocated, or in the event of any early repayment, an amount equivalent to the proceeds will be held in line with MYTILINEOS' general liquidity guidelines until allocation to Eligible Green Projects. MYTILINEOS intends to allocate an equivalent amount of the proceeds of a given Green Bond issuance to Eligible Green Projects originated no more than three years prior to the issuance. An amount equivalent to the proceeds will be allocated within three years from the date of issuance.

## 3.4 Reporting

Annually, and until the full allocation of the amount equivalent to the proceeds and as necessary thereafter in the event of new developments, MYTILINEOS will provide to investors on its website, <a href="mailto:mytilineos.gr">mytilineos.gr</a>, a Green Bond Report, including:

(i) annual updates to brief project descriptions and the amounts allocated to the eligible green projects such as:

- The total equivalent amount of proceeds allocated to the Eligible Green Projects
- Breakdown of allocation by eligible project category
- Breakdown of allocation by project location
- Breakdown of refinancing versus new financing (share of refinancing)
- The outstanding equivalent amount of net proceeds yet to be allocated to projects at the end of the reporting period (The balance of unallocated proceeds)

(ii) Where feasible, MYTILINEOS will publish annually a set of reporting indicators, with the relevant methodologies and/or assumptions used in the quantitative determination, to describe the achieved impacts. The type of KPIs will depend on the type of project financed by the MYTILINEOS Green Bond.

Next table include a description of the reporting indicative impact indicators per project category

Eligible Green Project Category	Key Performance Indicators (KPIs)
Renewable energy	<ul> <li>Annual renewable energy produced (MWh/year)</li> <li>Annual GHG emissions avoided (tCO<sub>2</sub>e/year)</li> <li>Capacity of renewable energy plant(s) constructed (MW)</li> </ul>
Eco-efficient and/or circular economy adapted products, production technologies and processes	<ul> <li>Recycle Aluminum produced (tons)</li> <li>Avoided resource waste (m³ or tonnes)</li> <li>GHG emissions avoided per year (tCO₂e/year)</li> </ul>

The Company could substitute any of the proposed impact KPIs, where appropriate, to facilitate the reporting on the amount equal to the net proceeds to the selected green projects. An independent auditor appointed by MYTILINEOS will review that the allocation of the Green Bonds is done in accordance with its Green Bond Framework.

#### 3.5 External Review

#### **Second Party Opinion**

MYTILINEOS has engaged ISS to provide a second party opinion on the present Green Bond Framework. ISS has reviewed MYTILINEOS' Green Bond Framework for its sustainable and green qualities as well as its alignment with the Green Bond Principles 2018. The objective of the Second Party Opinion is to provide investors with an independent assessment. The Second Party Opinion, as well as the Green Bond Framework hereof, will be published in the MYTILINEOS' website.

#### **Annual Assurance Report (Post issuance external verification)**

An external reviewer will be appointed by MYTILINEOS to provide an annual assurance report, until all amounts equal to the proceeds of the green bond(s) have been allocated, confirming that the allocated amount has financed Eligible Green Projects, in compliance with all material respects of the Eligible Green Projects criteria set forth in the Green Bond Framework and with the "3.1 Use of Proceeds" section of the final bond documentation. Moreover, the assurance report will also confirm the unallocated amounts. The external auditor's report will be published on MYTILINEOS' website.

# 4. Amendments to this Framework

The Green Financing Committee or the Treasury will review this Framework on a regular basis, including its alignment to updated versions of the GBP as and when they are released, with the aim of adhering to best practices in the market. Such review may result in this Framework being updated and amended. The updates, if not minor in nature, will be subject to the prior approval of MYTILINEOS and ISS. Any future updated version of this Framework that may exist will either keep or improve the current levels of transparency and reporting disclosures, including the corresponding review by an External Reviewer. The updated Framework, if any, will be published on MYTILINEOS website and will replace this Framework.

# **Appendix 1: Environmental and Social criteria**

The ESG assessment on potentially eligible green projects will consider the following criteria (the criteria may vary per project):

Criteria	Commitment / Supporting documentation
Environmental management at design, construction, and operational phase	<ul> <li>Environmental Impact Assessment based on local regulation, and implementation of appropriate measures to limit, mitigate or compensate negative impacts (environmental specifications)</li> <li>Project operated within an environmental management system implemented, audited, with targets, guidelines and appropriate monitoring to report (i.e. ISO 14001)</li> </ul>
Environmental accidents prevention and control	Existence of accidental pollution emergency plans
Quality of Health & Safety and Employment conditions	<ul> <li>Safety risk assessment, implementation of appropriate measures for employees and contractors</li> <li>Existence of H&amp;S monitoring indicators (i.e. Frequency index, Incidence index)</li> <li>Training hours in prevention of occupational risk</li> <li>Project operated within an H&amp;S management system implemented, audited, with targets, guidelines and appropriate monitoring to report (i.e. ISO 45001)</li> </ul>
Local stakeholders' engagement	Consultation with local stakeholders (in accordance with the requirements brought forward by the relevant legislation in force)
Fight against climate change by producing clean energy	• Contribution of the project to avoid/reduce CO <sub>2</sub> emissions
Human Rights	Assessment based on MYTILINEOS Human Rights Policy
Suppliers	Acceptance of MYTILINEOS Suppliers & Business Partners     Code of Conduct in the contracts with suppliers
Protection of biodiversity	Mitigation or corrective actions implemented in case of biodiversity incident
Supporting local communities and their economies	Promotion of local purchases and/or local employment (expenditures on local suppliers, where feasible)

# Appendix 2: Corporate Social Responsibility (CSR) Policy<sup>6</sup>

#### **Preface**

Corporate Social Responsibility (CSR) is a multi-faceted and complex practice for MYTILINEOS, mainly characterized by the company's conscious self-commitment to responsible entrepreneurship and continuous improvement. Moreover, it is directly related to the business operations, as it defines how the company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values.

## The CSR philosophy at MYTILINEOS

Through CSR, MYTILINEOS expresses its continuous commitment to attaining Sustainable Development. The company perceives CSR as a fundamental factor that contributes to social and environmental risks prevention, as well as the prevention of risks related to human resources management and the company's presence in the market, contributing to the development of a climate of trust, in which the company can carry out business and innovate, creating value for all its Stakeholder groups. CSR at MYTILINEOS is a practice with significant human, environmental and social aspects going beyond legislative compliance (Law 4403/2016). It is an ongoing self-improvement and an incessant learning process aimed at increasing the company's positive impact on the greater society, in combination with the range and nature of its economic activity, while also serving as a key mechanism for renewing its "social" operating permit, also improving its competitiveness at national and international levels.

## Sustainable Development Goals (Agenda 2030)

MYTILINEOS is a signatory of the United Nations Global Compact (UNGC). In September 2015, the United Nations adopted 17 Sustainable Development Goals that comprise a new, universal set of objectives, goals and indicators that UN Member States are expected to use in formulating their agendas and policies up until 2030. The company's current CSR policy has been aligned with these Goals, being also used as a common basis for dialogue and cooperation with its Stakeholder groups.

## The strategic lines of MYTILINEOS CSR policy

The CSR policy of MYTILINEOS mainly derives from its business mission and is closely related to the minimization of its environmental impacts, the increase in its social effect and contribution, as well as the enhancement of the prevention/precaution principle within the context of its activities. To achieve its objectives, the company operates based on specific strategic lines, as presented in the table below:

Strategic lines of MYTILINEOS CSR policy	Sustainable Development Goals
Ensuring a working environment free of accidents or occupational diseases	3 (SORTION DE BOSTO SORTION CONTINUE CO
The continuous mitigation of environmental impacts	6 SUMMERS 7 STREETS 12 SECTIONS 13 CARS 14 STREETS 15 STATE 15 STA
Maintaining regulatory compliance and constant vigilance for addressing conditions that may facilitate corruption incidents at all company levels and activities	16 NUME AND THE METERS OF THE PROPERTY OF THE
Developing, managing and retaining dedicated human resources with practices that promote equal opportunities and respect for human rights	4 COUNTED 5 TOWNS 8 TREASFORMERS 10 NEWSTEEL 10 NEWSTE
Systematic and honest dialogue with key Social Partner groups, with a view to preserving nutual trust and understanding more comprehensively the impact of the company's operation	17 Participant
Contributing to the development of local infrastructure and, overall, to the well-being of the ocal communities in close proximity to the company's industrial plants	11 militari cus Alle
mplementing actions of high social value, also through the development of the employ- ees' volunteerism (related to corporate or individual initiatives) addressed to a wide range of social groups, taking into account both the current social and economic conditions, as the case may be, and the cultural priorities and challenges	1 Marrier 2 Marrier 3 Marrier 4 Marrier 11 Marrier 21 M
Emphasis on the quality and safe use specifications of the company's products, as well as on the continuous support, service and customers' satisfaction	12 ELEPHONI CONDITION ACTIONATION MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALITY MUNICIPALI
Developing responsible value chain by expanding the commitment of the company's main suppliers and associates to CSR	
Voluntary participation in domestic business networks and international organizations and sustainable development initiatives promoting MYTILINEOS CSR goals and philosophy	17 Not the County

6. mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility

# **Appendix 3: Environmental strategic lines**

Measuring environmental impact is a long-term process, which is evolving each year. To this end, the company takes steps to reduce its carbon and environmental footprint, through an integrated Environmental Management System in place in all its business activity sectors and through investments in the improvement of its production processes taking advantage of new developments in related technologies, as well as by adopting and applying Best Available Techniques (BATs).

#### MYTILINEOS Environmental strategic lines<sup>7</sup>

- Adherence to the commitments and agreements that MYTILINEOS has undertaken over and above its statutory obligations.
- Integration of Sustainable Development principles in its decision-making and operation processes.
- Assessment of the impacts of the company's activities on the environment, identification and assessment of potential
  risks, adoption of the necessary preventive measures, conduct of regular inspections and drills in order to confirm their
  implementation and evaluate their efficiency.
- Control, continuous reduction and proper management of solid, liquid and gaseous waste, employing utilisation, reuse and recycling techniques where feasible.
- Responsible use of energy and other natural resources.
- Responsible use of water, beyond regulatory requirements, by reducing water withdrawals and discharges, and by minimizing water consumption.
- Protection of biodiversity and ecosystems.
- Prevention of all identified pollution risks.
- Satisfactory readiness and effective response to environmental emergencies and correction of all deviations, by implementing corrective plans.
- Study, maintenance and evolution of appropriate prevention and suppression means, especially in cases where installations are modified.
- Correction of all deviations identified, by introducing and implementing corrective and preventive action plans and rehabilitation plans.
- Continuous briefing, training, and awareness-raising activities for personnel in all Business Sectors, in a manner that is adapted to the duties and needs of each employee and promotes an environmentally responsible culture.
- Acknowledgment of Stakeholders' needs and expectations regarding environmental issues, demonstrating increased awareness of them and promoting a climate of cooperation.
- Encouraging associates (contractors, suppliers, clients) to take action in connection with environment-related issues and strengthening of their environmental conscience.
- Organisation of regular internal and external inspections to assess the performance of the Environmental Management System, the achievement of the targets set and the application of the regulations and principles.