

W0. Introduction

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W0.1

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**(W0.1) Give a general description of and introduction to your organization.**

MYTILINEOS is one of Greece's leading industrial companies, with activities in Metallurgy, EPC, Electric Power and Gas Trading. The company was established in Greece in 1990 and has been listed in Athens Exchange since 1995. Today, the Company's stock is a constituent of the FTSE 25 Large Capitalisation index. As a responsible industrial company, MYTILINEOS seeks to apply the Corporate Social Responsibility and Sustainable Development principles across the range of its main activity, besides its key objective being the preservation of a leading position in all sectors of its business activity through continuing re-investment.

Business Activity Sectors

**Metallurgy Sector:** MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminum in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries. It is one of the healthiest growing industrial enterprises in Greece and in cooperation with its subsidiary DELPHI-DISTOMON exhibits a robust international activity, which renders the company a driving force for the Greek economy and society.

**EPC & Infrastructure Projects Sector:** MYTILINEOS operates in the construction of broad scale projects, covering the wide spectrum of Engineering-Procurement-Construction and the industrial production of high-level know-how, with presence in the Energy & Infrastructure sectors. In the energy sector, the Company focuses on the international markets, with ongoing projects in Europe, Middle East and Africa and is specialized in the construction of turn-key power plants that utilize the full range of thermal power generation technologies, as well as of hydro and solar power large-scale plants. With more than 50 years of experience and with the necessary resources for the implementation of complex energy projects, MYTILINEOS is a reliable partner of electricity companies, industrial customers and local communities around the world.

**Electric Power & Natural Gas Trading Sector:** MYTILINEOS has a wide range of activities in the sector of energy, extending from the construction of gas-fired thermal power generation plants and Renewable Energy Sources (RES) plants, to power and natural gas supply. It is the largest private electric power producer in Greece, with an energy portfolio of 1,200 MW thermal production capacity and 200 MW Renewable Energy Sources capacity, producing more than 11% of electricity production in Greece. In terms of its supply activity, it is steadily strengthening its presence in the market, as at the end of 2019 it represented over 180,000 electricity meters and over 13,000 gas meters across the country (businesses & households).

The dynamic business growth of MYTILINEOS is inextricably linked to our principles of Corporate Responsibility and Sustainable Development. Sustainable Development is a top priority for MYTILINEOS. Through Corporate Social Responsibility (CSR), MYTILINEOS expresses its continuous commitment to Sustainable Development. CSR is a multi-faceted and complex corporate practice, mainly characterized by the company's conscious self-commitment to responsible entrepreneurship and continuous improvement. Also, it is directly related to the company's business operations, as it defines the way it chooses to make progress, taking solid steps, towards Sustainable Development, based on its mission and values. CSR is an ongoing self-improvement and incessant learning process aimed at increasing MYTILINEOS's positive impact on the greater society while also serving as a key mechanism for renewing its "social" license to operate, improving its competitiveness at national and international level.

W-EU0.1a

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**(W-EU0.1a) Which activities in the electric utilities sector does your organization engage in?**

Electricity generation

W-EU0.1b

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(W-EU0.1b) For your electricity generation activities, provide details of your nameplate capacity and the generation for each technology.

	Nameplate capacity (MW)	% of total nameplate capacity	Gross electricity generation (GWh)
Coal – hard	0	0	0
Lignite	0	0	0
Oil	0	0	0
Gas	1215.08	100	5510
Biomass	0	0	0
Waste (non-biomass)	0	0	0
Nuclear	0	0	0
Fossil-fuel plants fitted with carbon capture and storage	0	0	0
Geothermal	0	0	0
Hydropower	0	0	0
Wind	0	0	0
Solar	0	0	0
Marine	0	0	0
Other renewable	0	0	0
Other non-renewable	0	0	0
Total	1215	100	5510

W-MM0.1a

(W-MM0.1a) Which activities in the metals and mining sector does your organization engage in?

Activity	Details of activity
Mining	Bauxite
Processing	Aluminium Alumina

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1 2019	December 31 2019

W0.3

(W0.3) Select the countries/areas for which you will be supplying data.

Greece

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

EUR

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups in which an equity share is held

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

Yes

W0.6a

**(W0.6a) Please report the exclusions.**

Exclusion	Please explain
RES plants (14 Wind Farms, 3 Photovoltaic Parks & 4 Small Hydropower Plants).	RES plants are excluded from this response boundary due to the extremely small fraction of the Company's total water use with no exposure to water risk.

**W1. Current state**

**W1.1**

**(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.**

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Important	Water is vital for all MYTILINEOS' activities, and this dependency is likely to increase in the future in the company's specific business sectors. MYTILINEOS' Metallurgy and Electric Power Sectors represent the 99% of the company's freshwater consumption (sea water, ground water and drinkable water) for the extraction of bauxite, and the production of alumina, aluminium and electrical energy (water intensity main operations: steam production and the cooling process). Direct use: Continuous production at our alumina & aluminium facility is dependent on our ability to maintain our water rights and the physical availability of the water supplies. Indirect use: the main downstream dependence of this type of water is that annually nearly 20% of our underground water withdrawals, after a minimum required treatment, is used to fulfill local communities' water needs.
Sufficient amounts of recycled, brackish and/or produced water available for use	Important	Not very important	Direct use: In Metallurgy sector brackish water is used for the casting's cooling system. This amount of water is obtained from 2 drills, owned by MYTILINEOS, in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. The use of brackish water for indirect use is considered insignificant in our value chain, upstream or downstream. Future quantity and quality dependency on this kind of water will likely remain the same. Furthermore, no dependence of this type of water is expected in our value chain in the future.

**W1.2**

**(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	76-99	MYTILINEOS considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals from 24 out of 28 industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 17 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks). We do not monitor water withdrawals from 4 Small Hydropower Plants because of their extra small to nil fraction to the total company's respective volume of water and also are not yet monitored at the corporate level. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Water withdrawals – volumes by source	76-99	MYTILINEOS considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals by source from 24 out of 28 industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 17 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks). We do not monitor water withdrawals by source from 4 Small Hydropower Plants because of their extra small to nil fraction to the total company's respective volume of water and also are not yet monitored at the corporate level. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant data at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Entrained water associated with your metals & mining sector activities - total volumes [only metals and mining sector]	100%	The company measures and monitors the volumes of entrained water from all of its 2 facilities in Metallurgy Sector: bauxite mining plant and alumina & aluminum production plant. These data are collected monthly from Metallurgy sector EHS department, through the environmental management system processes. Also we disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	We monitor water withdrawals quality in all of our 2 facilities in Metallurgy Sector: bauxite mining plant and alumina & aluminum production plant. This refers to the quality of groundwater we draw into our boundary. These data are collected monthly from the Sector EHS department and reported annually to the local authorities (where it is recommended).
Water discharges – total volumes	76-99	The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges from 24 out of 28 industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 17 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks). We do not monitor water discharges from 4 Small Hydropower Plants because of their extra small to nil fraction to the total company's respective volume of water and also are not yet monitored at the corporate level. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.

	% of sites/facilities/operations	Please explain
Water discharges – volumes by destination	76-99	The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges by destination from 24 out of 28 industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 17 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks). We do not monitor water discharges from 4 Small Hydropower Plants because of their extra small to nil fraction to the total company's respective volume of water and also are not yet monitored at the corporate level. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Water discharges – volumes by treatment method	26-50	The company monitors the quality of its water discharges to comply with local legislation and corporate environmental policy and procedures, from 7 out of 28 facilities across its business: 2 Industrial plants of Metallurgy sector, 2 plants of EPC Project and 3 Gas-fired thermal plant of primary electricity production. In our 21 RES sites we do not monitor the water discharges volumes by treatment method. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Water discharge quality – by standard effluent parameters	26-50	The company monitors the quality of its water discharges by standard effluent parameters according to its Environmental Approval Permits mainly in its 7 heavy industrial facilities which are covering the 100% of the company's total discharge volume: 2 Industrial plants of Metallurgy sector, 2 plants of EPC Project and 3 Gas-fired thermal plant of primary electricity production. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS.
Water discharge quality – temperature	1-25	MYTILINEOS considers this aspect as important in all its facilities where discharge temperature (see water) is increased, such as the 3 Gas-fired thermal plant of primary electricity production where water is used for cooling processes. The company monitors the temperature of its water discharges by standard effluent parameters according to its Environmental Approval Permits. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS. For the rest facilities the issue is not relevant.
Water consumption – total volume	76-99	MYTILINEOS considers this aspect as important. In this context measures and monitors the total water consumption volumes from 24 out of 28 industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 17 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks). We do not monitor water discharges from 4 Small Hydropower Plants because of their extra small to nil fraction to the total company's respective volume of water and also are not yet monitored at the corporate level. These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water consumption total volume, at corporate level, within our annual Sustainable Development Report under the new GRI STANDARDS.
Water recycled/reused	1-25	Reused water volume refers mainly to 3 company facilities (two Gas-fired thermal plant of primary electricity production and one plant of Metallurgy sector - mining process). Although there are in place small water recycled programs in Metallurgy sector the volumes are not officially measured. All data are collected monthly and are reported these data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals. Also we disclose water reuse volume percentage within our annual Sustainable Development Report under the new GRI STANDARDS.
The provision of fully-functioning, safely managed WASH services to all workers	100%	MYTILINEOS considers this aspect as important in all its facilities, so 100% of our Business sectors monitor this aspect as part of its labour relation policies and health and safety policies. All of our facilities (including RES sites) and corporate centers provide water consumptions and have access to fully-functioning WASH services.

## W1.2b

**(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?**

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	170788.22	About the same	The company's total water withdrawal quantity presented a slide decrease by 0.3%, comparing to 2018. The 95% of the total volume is related to seawater withdrawals. The decrease is mainly due to the decrease of the seawater volume used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy sector. Total withdrawals will likely remain at the same volumes for the next 2 years with slide ups and downs as the limit of the seawater withdrawn for cooling purposes is annually determined by the Water Resources Management Directorate of the Sterea Regional Administration.
Total discharges	164254.65	About the same	The company's total water discharges presented a slight decrease by 0.9%, comparing to 2018. The 97,6% of the total volume is related to seawater discharged back to its original source. Please see the above comment.
Total consumption	6533.57	Lower	The total consumption volume, compared to the respective one in 2018, increased by 14,5% mainly due to the decrease in total water discharges.

## W1.2d

**(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.**

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	No	<Not Applicable >	<Not Applicable>	Other, please specify	Water withdrawals from ground water in the Metallurgy sector are obtained from a controlled network of low-depth wells (boreholes) which allows water to be replenished naturally after withdrawal (renewable sources). A special study carried out by the Company in 2018 regarding the management of water withdrawals from the network of boreholes in relation to the total capacity of the wider area's aquifer, showed that the average quantity of water entering the aquifer on annual basis (rainfalls, snowfalls etc.) reaches 83.3 million m3. According to the water use permit issued, the Company has the right to withdraw 6.75% of this total quantity, however its actual withdrawal rate is even lower, standing at approximately 6% and ensuring the preservation of the water level in the aquifer and consequently in the boreholes, something that is also confirmed by the regular checks of the water level at all the wells.

## W1.2h

### (W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	7	About the same	Rainwater volume collected directly in a special reservoir, with a capacity of 6-7 mega liters per year, configured in the area of a disused mine by the company's Metallurgy sector (mining activity).
Brackish surface water/Seawater	Relevant	162296.52	About the same	This figure shows the seawater intake for the cooling purposes of the High Efficiency Combined Heat and Power plant. The limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Regional Administration of the Prefecture of Sterea Hellas. This water source is relevant to MYTILINEOS because it is the main water source for some of our significant activities and is determined by legislation. Withdrawal of this kind of water has decreased (by 0.4%) with respect to last year. Withdrawal volumes vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant.
Groundwater – renewable	Relevant	8223.55	About the same	This figure corresponds to volume of brackish, industrial service and drinking water, used primarily to meet the water supply needs of the company's facilities in all Metallurgy and 2 out of 3 Energy industrial plants and has increased by 1.1% compared to 2018. This quantity is obtained mainly by a network of 17 drills, owned by the company's Metallurgy sector, in the wider region around aluminum facilities, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. Also the source is characterized as renewable because the volumes of the water withdrawn can be replenished relatively quickly (according to company's monthly measurements) and is located at shallow dept.
Groundwater – non-renewable	Not relevant	<Not Applicable>	<Not Applicable>	Ground water (m3) Volume of industrial, brackish and drinking water, used primarily to meet the manufacturing / processing, energy and water supply needs of the Company's industrial facilities. This quantity is obtained from a network of 17 wells, owned by the Metallurgy sector, which the Company operates in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	
Third party sources	Relevant	261.15	Lower	The 71% of this volume concerns seawater returned by third party sources (Motor Oil company) and used in the desalination process for the production of industrial water in our thermal power station of the Electric Power sector . The rest 29%, concerns water from public suppliers consumed by a large variety of activities in the company. In total this source is relevant because a large number of facilities depend on this kind of water. Withdrawals of this kind of water decreased in 2019 by 22% compared to 2018 due to the decreased withdrawals volumes both from public water utilities, used to meet the needs of the buildings and primarily of MYTILINEOS' industrial facilities in Metallurgy sector and the seawater returned to third party sources.

## W1.2i

### (W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Relevant	8.3	Please select	This figure shows the water discharged in Asopos River, due to the operation of a new Business Unit of the Metallurgy Sector.
Brackish surface water/seawater	Relevant	164190.68	Lower	This figure shows the company's water discharge volume to the sea. 98% of this water volume is seawater discharge from the cooling process of the Combined Heat and Power (CHP) plant. The 1.5% is brackish water discharge for the Metallurgy casting's cooling system. The rest 0,5% waste water, including rainwater, measured at the point of exit from the primary treatment facilities of Metallurgy sector. Water discharged to this destination is relevant to MYTILINEOS as it is determined by legislation. The discharge of seawater have increased in comparison with the previous year as is directly connected with the respective withdrawal volumes which vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant.
Groundwater	Relevant	39.17	About the same	Discharge volume to the subsoil which includes a) waste water from the mining process, b) Waste water from mining sites and c) Water used for road wetting, Watering –Environmental restoration. The discharge of groundwater is decreased by 4.4% in comparison with the previous year.
Third-party destinations	Relevant	16.13	Much lower	Industrial service water in the power generation process. Disposal to a Motor Oil company liquid waste treatment plant. The discharge of this type of water is decreased by 45% in comparison with the previous year.

## W-EU1.3

### (W-EU1.3) Do you calculate water intensity for your electricity generation activities?

Yes

## W-EU1.3a

**(W-EU1.3a) Provide the following intensity information associated with your electricity generation activities.**

Water intensity value (m3)	Numerator: water aspect	Denominator	Comparison with previous reporting year	Please explain
1	Total water consumption	MWh	Higher	This intensity value refers to High Efficiency Combined Heat and Power Plant owned by MYTILINEOS, located in the Energy Complex of Ag. Nikolaos (Viotia). This indicator corresponds to water consumption per MWh. The value of the indicator is higher compared to the previous reporting year (0.70), due to the increased water consumption as a consequence of the increase in the electricity production, and due to the fact that one production unit returned to operation in 2019 after maintenance procedures in 2018 which required fewer sea water for cooling purposes.
0.04	Total water consumption	MWh	Lower	This intensity value refers to Gas-fired Combined Cycle Thermal Power Plant (CCGT) owned by KORINTHOS POWER SA, a subsidiary of MYTILINEOS located in Ag. Theodoroi (Korinthia). This indicator corresponds to water consumption per MWh. The value of the indicator is slightly lower (0.038) by 11.5% compared to the previous reporting year (0.043), although there has been an increase of 9.2% in electricity production.

**W-MM1.3**

**(W-MM1.3) Do you calculate water intensity information for your metals and mining activities?**

Yes

**W-MM1.3a**

**(W-MM1.3a) For your top 5 products by revenue, provide the following intensity information associated with your metals and mining activities.**

Product	Numerator: Water aspect	Denominator	Comparison with previous reporting year	Please explain
Bauxite	Total water consumption	Ton of final product	About the same	2019: 0.000068 mega liters 2018: 0.000065 mega liters 2017: 0.000067 mega liters The value of the indicator is about the same compared to the previous reporting year as there has been a smaller production.
Alumina	Total water consumption	Ton of final product	About the same	2019: 0.00398000 mega liters per ton of Alumina 2018: 0.00409000 mega liters 2017: 0.00464000 mega liters This indicator corresponds to water consumption of the company's alumina production process. Despite the increase of the alumina production volume the above result illustrates the effort made in the context of gradual implementation of the 'Black Belt' project, launched in 2017, aimed at reducing the consumption of industrial water, based on water reuse, the utilization of treated water and the use of modern equipment.
Aluminium	Total water consumption	Ton of final product	About the same	2019: 0.00243000 mega liters per ton of Aluminium 2018: 0.00249000 mega liters 2017: 0.00252000 mega liters Despite the increase of aluminium production by 3%, the above result illustrates the effort made in the context of gradual implementation of the 'Black Belt' project, launched in 2017, aimed at reducing the consumption of industrial water, based on water reuse, the utilization of treated water and the use of modern equipment.

**W1.4**

**(W1.4) Do you engage with your value chain on water-related issues?**

Yes, our suppliers

**W1.4a**

**(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?**

**Row 1**

**% of suppliers by number**

51-75

**% of total procurement spend**

76-100

**Rationale for this coverage**

The main objective of the company, by 2025, is to integrate specific sustainable development requirements into the process of selecting its key suppliers as well as to commit existing ones to responsible practices aiming to developing partnerships for better understanding of impacts and for mutual harmonization of goals and expectations. In this context in 2018, MYTILINEOS carried out the 1st official sustainability self-assessment of its suppliers, as they were identified by each Business Activity Sector. The group of suppliers selected for reporting about their environmental (including water use) and social impacts the relative management information are all key suppliers with purchase orders, that represented the 78% of total company's procurement spending. The collection of information is carried out through an on line Self-Assessment Sustainability Questionnaire by the I company's central CSR department. 53% of the company's key suppliers responded to this process.

**Impact of the engagement and measures of success**

The survey asks specifically about water use and reduction mechanisms, among other environmental aspects, and is used by MYTILINEOS to: 1) to investigate whether the company's key suppliers have in place a process in terms of identification and management of the most significant current and potential environmental impacts stemming from their activity, 2) to report if they comply with the environmental and other sustainability standards as defined in our Supplier Code of Conduct and 3) to record these impacts for further suppliers assessment purposes on behalf of the company and to undertake any corrective actions, if needed. Finally, following the results of the study and the practices reported by suppliers, the company designed specific improvement actions (b' cycle of self-assessment with non-responding suppliers, training conferences, sending incentivizing letters etc) which are still in the approval stage in view of a step-wise implementation starting in the period 2019-2020.

**Comment**

In 2019 no supplier assessment was conducted because the time period is narrow and no significant changes are observed. For more information please advice MYTILINEOS 2018 Sustainable Development Report, page 110.

**W1.4b**

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**(W1.4b) Provide details of any other water-related supplier engagement activity.**

**Type of engagement**

No other supplier engagements

**Details of engagement**

<Not Applicable>

**% of suppliers by number**

<Not Applicable>

**% of total procurement spend**

<Not Applicable>

**Rationale for the coverage of your engagement**

**Impact of the engagement and measures of success**

<Not Applicable>

**Comment**

<Not Applicable>

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**W2. Business impacts**

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**W2.1**

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**(W2.1) Has your organization experienced any detrimental water-related impacts?**

No

**W2.2**

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**(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?**

No

**W3. Procedures**

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**W-EU3.1**

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**(W-EU3.1) How does your organization identify and classify potential water pollutants associated with your business activities in the electric utilities sector that could have a detrimental impact on water ecosystems or human health?**

All the company's Business Sectors apply an ISO 14001 -2015 certified Environmental Management System, supported by specific environmental policies. In parallel, the systematic application of Best Available Techniques (BATs) in the electricity generation process is a significant factor that contribute to the company's business growth and drive its commitment to the protection of the environment and to ensuring the sustainable management of natural resources. The company has a specific standard-guide to manage the withdrawals and discharges in all process of Electric Power sector to guarantee the compliance with current legislation and avoiding any environmental impact. All the plants have technical instructions under this guide to determine the parameters/contaminants to be controlled, measurement points, frequency of measurement, limit values and who will carry out each measurement. There are no potential water-related impacts on ecosystem or human health. Moreover, all company's sectors follow the MYTILINEOS Measures & Principles for the protection of the natural environment, such as: a) Adherence to the agreements and commitments that the Company's Sector has undertaken over and above its statutory obligations, b) 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 regulations and principles, c) Prevention of all risks of pollution, including by accident, or of other large-scale accidents (development, testing and application of emergency response procedures), d) 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, e) Control and continuous reduction of liquid waste and f) Correction of all deviations identified, by introducing and implementing improvement / restoration plans and preventive action plans.

**W-EU3.1a**

**(W-EU3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants associated with your activities in the electric utilities sector on water ecosystems or human health.**

Potential water pollutant	Description of water pollutant and potential impacts	Management procedures	Please explain
No potential water pollutants identified	<Not Applicable>	<Not Applicable>	During 2019, no incidents occurred involving any kind of pollution of the natural environment by production activities or involving industrial accidents in all Business Activity Sectors of the Company. For more information please visit MYTILINEOS 2019 Sustainable Development Report, Pollution prevention section p. 74.

**W-MM3.2**

**(W-MM3.2) By river basin, what number of active and inactive tailings dams are within your control?**

**Country/Area & River basin**

Please select

**Number of tailings dams in operation**

0

**Number of inactive tailings dams**

0

**Comment**

We do not use tailings dams

**W3.3**

**(W3.3) Does your organization undertake a water-related risk assessment?**

Yes, water-related risks are assessed

**W3.3a**

**(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.**



## Direct operations

### Coverage

Partial

### Risk assessment procedure

Water risks are assessed as a standalone issue

### Frequency of assessment

Every two years

### How far into the future are risks considered?

3 to 6 years

### Type of tools and methods used

Other

### Tools and methods used

Internal company methods

External consultants

Other, please specify (ISO 14001)

### Comment

This refers to company's direct operations, in Metallurgy sector. We measure the water consumption and monitor the natural sources situation in order to meet the permit's rules and criteria. The company has a specific water resources procedure within the environmental management standard. In case of a new product or any production change, we re-estimate the water needs and amend the permits if it would be accepted by the authorities. Our EHS team (in Metallurgy Sector) maintains a standing agenda item on environmental topics (including water) as part of its monthly meetings. Water risk assessment is taking place particularly in the alumina & aluminium production facilities including the High Efficiency Combined Heat And Power Plant which is used for the steam production. These facilities represent more than the 99% of the company's direct industrial operations water needs. Our facilities are certified under ISO14001 and evaluate water aspects in order to prevent, minimize and control potential impacts generated.

## Supply chain

### Coverage

Partial

### Risk assessment procedure

Other, please specify (Water risks are assessed as part of the 1st company's suppliers environmental & social risk assessment according to its "Suppliers & Partners Code of Conduct" )

### Frequency of assessment

Every two years

### How far into the future are risks considered?

Up to 1 year

### Type of tools and methods used

Other

### Tools and methods used

Internal company methods

### Comment

In 2018, MYTILINEOS carried out the 1st official self-assessment of its key suppliers, as they were identified by each Business Activity Sector, through a structured questionnaire. The aim of this initiative was: 1) to investigate whether the company's suppliers own a recognition and management procedure of the most important, existing and potential impacts (environmental and social) stemming from their activity and 2) the recording of these impacts allowing the company to assess them planning any corrective actions, in the context of its effort to develop a responsible supply chain. A percentage of 53% (146 key suppliers) responded to this first attempt of bringing closer the company's suppliers with Sustainable Development issues. The degree of correlation between the suppliers who declared having a recognition procedure of effects/risks and the reporting of respective practices applied for preventing or coping with such risks is very high reaching 97%. As far as the declared practices is concerned, compliance with the legislation ranks very high, in labor issues mostly, while reference to more specialized initiatives is limited. In addition, both domestic and foreign suppliers have a common identification of the areas likely to incur potential negative impacts. Regarding the most important potential environmental impacts, the suppliers reported the following: Waste management, energy consumption, pollution of the natural environment, air emissions and water consumption.

## Other stages of the value chain

### Coverage

None

### Risk assessment procedure

<Not Applicable>

### Frequency of assessment

<Not Applicable>

### How far into the future are risks considered?

<Not Applicable>

### Type of tools and methods used

<Not Applicable>

### Tools and methods used

<Not Applicable>

### Comment

## W3.3b

**(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?**

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	Water which is used primarily to meet the manufacturing / processing, energy and water supply needs of the MYTILINEOS' industrial facilities in Metallurgy sector, is obtained from a network of 17 drills, which the company operates in the broader region around its plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Hellas Regional Administration. Concerning seawater is by its nature not subject to scarcity while, wastewater discharges comply with national and local regulations and permit authorization. Company's alumina and aluminium production plants have access to sufficient water supplies to support present and future operational demands. Also we are conducting scenario planning of potential events that could affect mining operations such as storms that produce excess water. Moreover, at operations where water availability is important, we consider future changes in water availability in our assessments using internal company knowledge. This may take the form of supply continuity risk which involve liaison with regulators on permitted withdrawal volumes.
Water quality at a basin/catchment level	Relevant, always included	Water which is used primarily to meet the manufacturing / processing, energy and water supply needs of the MYTILINEOS' industrial facilities in Metallurgy sector, is obtained from a network of 17 drills, which the company operates in the broader region around its plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Hellas Regional Administration. Concerning seawater is by its nature not subject to scarcity while, wastewater discharges comply with national and local regulations and permit authorization.
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	Where appropriate, we will always consider stakeholder conflicts when assessing water resources and our requirements, at a local level. There were no such conflicts as the MYTILINEOS' Metallurgy Sector is the water supplier of the local communities in the area of its operation. We consider early and effective engagement with our Stakeholders which strengthen the Company's process for the identification of conflicts in connection with sustainability issues. This Engagement mechanism consists of the following approaches: a) Official Stakeholder Engagement Procedure on environmental issues, b) open door policy with employees and local citizens, c) close cooperation with the Hellenic Federation of Enterprises (SEV) and the Greek Mining Enterprises Association (SME), in terms of significant environmental issues (including water).
Implications of water on your key commodities/raw materials	Relevant, always included	In case of a new product or any production change, we re-estimate the water needs and amend the permits if it would be accepted by the authorities. In Metallurgy sector, the production of alumina (is the industrial product derived from bauxite ore and is used to produce primary cast aluminium) with method (Bayer) requires significant quantities of fresh water which comes from groundwater renewable sources. MYTILINEOS' Metallurgy Sector has evaluated the possibility of using sea water after desalination treatment to cover a big part of its needs.
Water-related regulatory frameworks	Relevant, always included	We use water in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Regional Administration of the Prefecture of Sterea Hellas, and are under permission by the local Authorities. Possible future changes in the limits of the water withdrawals may effect negatively our operations in terms of business expansion. To identify and evaluate the future potential of regulatory changes of sustainability issues including water, we engage in constant dialogue with our stakeholders including the competent authorities.
Status of ecosystems and habitats	Relevant, always included	The areas used for water withdrawal by the MYTILINEOS activity sectors, are not particularly sensitive in terms of endangered or threatened ecosystem. Although, regarding the seawater used in the cooling systems of the Combined Heat and Power (CH) plant in addition to the strict compliance with the relevant provisions of the laws determining the framework for preventing any environmental impact, the company appoints, on an annual basis, an authoritative organisation (Hellenic Centre for Marine Research - HCMR) to conduct of a research study to monitor the status of living organisms (benthic biocoenoses, with emphasis on thermophilic species) on the Antikyra Gulf seabed.
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	We are providing access to water, sanitation and hygiene at the workplace at an appropriate level of standard for all employees.
Other contextual issues, please specify	Relevant, always included	Regulatory changes at a local level: MYTILINEOS activities are in conformity with the laws and regulations that are relevant to the environmental protection. The compliance cost with such regulations involves, among others, either investments or the significant spending for actions relating to the safe management of industrial wastes and measures for remediating environmental damages. Environmental issues within our responsibility might arise in the future in relation to our current facilities, facilities that we owned in the past or facilities where we conducted our operations even if the Management has not been or could not be aware of such issues up to date or these issues have not been present yet.

**W3.3c**

**(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?**

	Relevance & inclusion	Please explain
Customers	Relevant, sometimes included	There are no request information concerning water use or management by our customers. The trust of customers/consumers is essential for our success, that's why customers are factored into our assessments to ensure continuity of our business.
Employees	Relevant, always included	Our water risk assessment takes into consideration our employees behaviour and awareness concerning water consumption.
Investors	Relevant, always included	Investors are factored into our assessment because any disruption to planned operations or change in future risk exposure, has the potential to impact negatively on revenue and profitability alongside shareholder perception towards the company. Although there are no requests for information concerning water use and management by our shareholders we report the relevant data in our Sustainability reports as well as in our Global Compact CoP (Advanced Level) to give them the opportunity to assess their potential investment and to send any feedback. We are in close dialog with the capital market and rating agencies. We conduct roadshows to meet with socially responsible investors (SRI). At these events, we discuss various sustainability topics including water.
Local communities	Relevant, always included	The MYTILINEOS Metallurgy sector is the water supplier of the local communities in the area it operates. Local communities are a primary stakeholder group for the company whose input is evaluated through our annual engagement process at local level. At present we do not face any issues with local communities, but if such issues were to arise, they could jeopardize business continuity. Thus we strive to maintain dialogue with local communities and to always consider their circumstances when assessing water risk.
NGOs	Relevant, sometimes included	A fixed component of our sustainability management is the continuous exchange with our stakeholders including NGOs. NGO positions on our activities, especially where a facility withdraws or discharges significant volumes of water, are materially important to us and where applicable, we will engage directly with the NGOs and factor their views and insights into our risk assessments.
Other water users at a basin/catchment level	Not considered	There are no other water users at a local level.
Regulators	Relevant, always included	We operate facilities which are subject to water-related permits or licenses. The relevant regulators are always factored into our assessments as their evaluation of our operational performance is important to the continuity of our business. Regular inspections are carried out by Environmental Regulators and routine reports are submitted to them.
River basin management authorities	Not relevant, explanation provided	There are no river basin management authorities.
Statutory special interest groups at a local level	Not relevant, included	Included in local communities concern. MYTILINEOS does not face any issues or conflict with such groups.
Suppliers	Relevant, not included	The suppliers' water use, risks and management are considered as an issue not related to our production because of the raw materials (bauxite, pet coke etc) nature. On the other hand, we recognize the need to identify supplier-side water risk according to our strategic line to build a responsible key suppliers group until 2025.
Water utilities at a local level	Not relevant, explanation provided	There are no water utilities/suppliers at local level.
Other stakeholder, please specify	Relevant, sometimes included	Sustainable Development & Corporate Social Responsibility institutions in Greece in which MYTILINEOS participates, in the context of its broader Environmental Policy.

**W3.3d**

**(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.**

Please advise our Disclosure Management Approach within our Sustainable Development Report 2019 (page 78) in the following address: <https://www.mytilineos.gr/en-us/csr-reports/publications>.

Our aim is to avoid risks that pose a threat to MYTILINEOS operations continued existence and to make improved managerial decisions to create lasting value. We understand risk to be any event that can negatively impact the achievement of our short-term operational or long-term strategic goals. More specifically, in Metallurgy sector a substantive risks include: a) water availability and quality and extreme weather events, b) withdrawal and discharge authorisations and impact on supply chain, habitats and ecosystems. These could increased capital expenditure and operational maintenance costs associated with development of alternate water supplies. Many exposure variables and tools are used in the process to identify and assess these risks, such as: tools to monitor consumption and discharges and procedures for environmental management and the experience of the company's qualified personnel. Also, in order to effectively measure and manage identified opportunities and risks, we quantify these in terms of probability and economic impact in the event they occur. If a risk is identified that could have a significant impact on earnings, it must be immediately reported to the Executive Committee. Also, we measure the water consumption and monitor the natural sources situation in order to meet the permit's rules and criteria. In case of a new product or any production change, we re-estimate the water needs and amend the permits if it would be accepted by the authorities. Our stakeholder engagement process aims to promote open exchange between citizens and our site management with the goal of strengthening trust in our activities. In respect of water consumption, our facilities monitor their water use and implement risk minimization strategies if necessary. In addition, we specify stakeholders appropriately and use ISO26000 to ensure we have not missed any perspectives or matters that should be included in the due diligence process.

**W4. Risks and opportunities**

**W4.1**

**(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes, only within our direct operations

**W4.1a**

**(W4.1a) How does your organization define substantive financial or strategic impact on your business?**

There are no operational, financial or strategic substantive or inherent risks that undermine our business, in terms of water issue. Through self-assessment & threats and opportunities evaluation procedures at sector level, our aim is to avoid risks that pose a threat to MYTILINEOS operations continued existence and to make improved managerial decisions to create lasting value. We understand risk to be any event that can negatively impact the achievement of our short-term operational or long-term strategic goals. For example, in Metallurgy sector, water is used to produce the steam required in the digestion process; in the preparation of aqueous caustic soda, flocculants and lime; to wash the ore, residues and recycled caustic and for dust mitigation. There are also uses such as vehicle washing, sanitation and provision of drinking water which occur at a refinery. The amount of water used in refineries is dependent on a variety of factors – bauxite quality, the design of the process facility, the extent to which water is recycled and the demand for non-process applications as well as the location of the facility. A substantive risk in this sector may include the change of the limits of the water use permission issued by local authorities. This could include increased capital expenditure and operational maintenance costs associated with development of alternate water supplies. In order to effectively measure and manage identified opportunities and risks, we quantify these in terms of probability and economic impact in the event they occur. If a risk is identified that could have a significant impact on earnings, it must be immediately reported to the Board of Executive Directors. Recognising that water is a precious resource, we are investing in sustainable water management programmes, including increased use of recycled water, although non-recycled resources are still essential for some stages of the refining process in Metallurgy sector.

**W4.1b**

**(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?**

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	2	1-25	As mentioned above, although water related risks are less material for our business we report two facilities that use the 99,8% of the total amount of the company's water withdrawal and could have potential substantive impact in the future: 1) High Efficiency Combined Heat and Power Plant, in Ag. Nikolaos (Viotia), exposed to seawater risks in terms of the limits of the water use permission issued by local authorities. This facility also used by Metallurgy sector for the steam production as a basic stage in alumina production process. 2) Alumina and Aluminium production Plant in Ag. Nikolaos (Viotia), which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities.

**W4.1c**

**(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?**

**Country/Area & River basin**

Greece	Other, please specify (Sea Golf of Antikira)
--------	--

**Number of facilities exposed to water risk**

1

**% company-wide facilities this represents**

1-25

**Production value for the metals & mining activities associated with these facilities**

**% company's annual electricity generation that could be affected by these facilities**

Less than 1%

**% company's global oil & gas production volume that could be affected by these facilities**

<Not Applicable>

**% company's total global revenue that could be affected**

1-10

**Comment**

Sea water, is by its nature, not subject to scarcity. There are no clear financial water risks, deriving from the operation of the High Efficiency Combined Heat and Power Plant. Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for use in its cooling system. This facility is used by Metallurgy sector for the steam production as a basic stage in alumina production process. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume in the future may affect partially our operation increasing costs, forcing us to find alternative ways of water supply.

**Country/Area & River basin**

Greece	Other, please specify (Groundwater sources & Mornos River)
--------	--

**Number of facilities exposed to water risk**

1

**% company-wide facilities this represents**

1-25

**Production value for the metals & mining activities associated with these facilities**

**% company's annual electricity generation that could be affected by these facilities**

Less than 1%

**% company's global oil & gas production volume that could be affected by these facilities**

<Not Applicable>

**% company's total global revenue that could be affected**

1-10

**Comment**

Alumina and Aluminium production Plant which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities. In case of the change of current limits of groundwater withdrawal, it has been estimated that if we have to meet all our the water needs of these specific facilities through the municipal supply (the Athens Water Supply and Sewerage Company - EYDAP) then it will affect less than 1% the price of aluminium products according to the current pricing policy of EYDAP.

**W4.2**

**(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

**Country/Area & River basin**

Greece	Other, please specify (Sea Golf of Antikira)
--------	--

**Type of risk & Primary risk driver**

Regulatory	Statutory water withdrawal limits/changes to water allocation
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**Primary potential impact**

Reduction or disruption in production capacity

**Company-specific description**

Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for cooling purposes. Withdrawals/discharges are directly measured; consumption is calculated. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume may affect our operation increasing costs, forcing us to find alternative ways of water supply or forcing premature closures. Also, the volume of the sea water which returns back to the sea after the cooling process may affect the status of living organisms (benthic biocoenoses, with

emphasis on thermophile species) on the Antikira Gulf seabed in terms of its ph and temperature.

#### Timeframe

4-6 years

#### Magnitude of potential impact

Low

#### Likelihood

Exceptionally unlikely

#### Are you able to provide a potential financial impact figure?

No, we do not have this figure

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure - minimum (currency)

<Not Applicable>

#### Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact

We do not see financial impact for the next 5 years.

#### Primary response to risk

Engage with regulators/policymakers

#### Description of response

Engagement with public policy makers - Strengthen links with local community - Cooperation with governmental research organisations. Our strategy is applied on an annual basis and consists of the following elements: 1) Compliance with the environmental legislation (including water management) is a core priority of MYTILINEOS. This view, which also serves as the foundation of the company's environmental policy, aims to drive the continuous improvement of its environmental footprint and is based, first and foremost, on the principle of adherence to the provisions of the law, as well as to the agreements concluded and the voluntary commitments. 2) Metallurgy Sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, which are responsible for controlling its activity and environmental performance. 3) Company's Stakeholder Engagement process expresses, in a systematic way, the long-standing principle to engage in a consistent and honest open dialogue with its Stakeholders. In this context, thematic consultations on Environmental issues take place giving the opportunity to our social partners to raise its concerns or expectations 4) Finally, the Metallurgy Sector appoints, on an annual basis, an authoritative organization Hellenic Centre for Marine Research - HCMR) to conduct of a research study to monitor the status of living organisms, on the he Antikyra Gulf seabed.

#### Cost of response

54840

#### Explanation of cost of response

There is no separated cost to managing the water risks. The cost of response is related with the research study to monitor the status of living organisms, on the he Antikyra Gulf seabed, as mentioned above. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of €8-10 million in annual basis.

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#### Country/Area & River basin

Greece	Other, please specify (Groundwater sources & Mornos River)
--------	--

#### Type of risk & Primary risk driver

Regulatory	Statutory water withdrawal limits/changes to water allocation
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#### Primary potential impact

Increased operating costs

#### Company-specific description

Volume of industrial service, brackish and drinking water, used primarily to meet the manufacturing / processing, and water supply needs of the company's industrial facilities, in Metallurgy Sector. It is obtained from a network of 17 drills, owned by Metallurgy sector, in the broader region around its plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Regional Administration which has set specific limits on water withdrawal. Any change on these limits may force us to municipal supply source affecting our operational costs, although a limited production disruption is not excluded.

#### Timeframe

4-6 years

#### Magnitude of potential impact

Low

#### Likelihood

Very unlikely

#### Are you able to provide a potential financial impact figure?

No, we do not have this figure

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure - minimum (currency)

<Not Applicable>

#### Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact

As we use groundwater from renewable resources and the specific water risk is not material to our business, there is no need of calculation of its potential financial impact. We do not see financial impact for the next 5 years.

#### Primary response to risk

Engage with regulators/policymakers

#### Description of response

The MYTILINEOS Metallurgy sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, which are responsible for controlling its activity and environmental performance. Also the sector has an internal specific water target, not only to remain below the withdrawal limits but also to improve its performance as much as possible.

#### Cost of response

0

#### Explanation of cost of response

There is no distinct cost to managing the water risks. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of €8-10 million in annual basis.

### W4.2c

**(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?**

	Primary reason	Please explain
Row 1	Risks exist, but no substantive impact anticipated	In Metallurgy sector, mining is at the base of the value chain and therefore we directly evaluate water use, risk and management as a core component of our own business. The suppliers' water use, risks and management are considered as an issue not related to our production because of the raw materials (bauxite, pet coke etc) nature. Also the company's power plants are located near the coast line and all internal water needs can be covered by sea water. Gas-fired Combined Cycle Thermal Power Plant (CCGT), in Agioi Theodoroi, uses sea water for its desalination plant. The sea water is provided by the Refinery plant that lies next to the plant and the quantity and quality is guaranteed with contracts. Moreover sea water is by its nature not subject to scarcity. We have reviewed public disclosures of our key suppliers and from that review we have not identified any water-related risks that could materially impact our business.

### W4.3

**(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes, we have identified opportunities, and some/all are being realized

### W4.3a

**(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.**

#### Type of opportunity

Other

#### Primary water-related opportunity

Other, please specify (Cost savings & community relations)

#### Company-specific description & strategy to realize opportunity

The power plants of MYTILINEOS are located near the coast line and use sea water. The Metallurgy Sector covers its local communities water needs. Also, it operates three wastewater treatment plants for the needs of the plant and local communities. The selected locations for the operation of MYTILINEOS facilities, in Metallurgy and Energy sectors, have a strategic importance. The use of seawater and groundwater provides cost savings for all plants. Also the Metallurgy Sector through its network of 17 drills covers the water needs of its local communities, maintaining good community relations and its social license to operate.

#### Estimated timeframe for realization

More than 6 years

#### Magnitude of potential financial impact

High

#### Are you able to provide a potential financial impact figure?

No, we do not have this figure

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure – minimum (currency)

<Not Applicable>

#### Potential financial impact figure – maximum (currency)

<Not Applicable>

#### Explanation of financial impact

There is no calculation of its potential financial impact.

## W5. Facility-level water accounting

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### W5.1

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(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

**Facility reference number**

Facility 1

**Facility name (optional)**

High Efficiency Combined Heat and Power Plant

**Country/Area & River basin**

Greece	Other, please specify (Sea Golf of Antikira)
--------	--

**Latitude**

38.358016

**Longitude**

22.689508

**Located in area with water stress**

No

**Primary power generation source for your electricity generation at this facility**

Gas

**Oil & gas sector business division**

<Not Applicable>

**Total water withdrawals at this facility (megaliters/year)**

162296.5

**Comparison of total withdrawals with previous reporting year**

Lower

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

162296.5

**Withdrawals from groundwater - renewable**

0

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

0

**Total water discharges at this facility (megaliters/year)**

160358.1

**Comparison of total discharges with previous reporting year**

Lower

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

160358.1

**Discharges to groundwater**

0

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

1938.4

**Comparison of total consumption with previous reporting year**

Higher

**Please explain**

Seawater volumes for the cooling systems of the CHPP facility. The withdrawal and discharge volumes are lower with respect to last year. Concerning the future projections, the limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Sterea Regional Administration, so it will be about the same with limited positive or negative deviations. The water consumption volume was increased by 76% mainly due to the decrease in the water discharges.



**Facility reference number**

Facility 2

**Facility name (optional)**

Alumina and Aluminum production Plant

**Country/Area & River basin**

Greece	Other, please specify (Groundwater sources & Mornos River))
--------	---

**Latitude**

38.360912

**Longitude**

22.688575

**Located in area with water stress**

No

**Primary power generation source for your electricity generation at this facility**

Gas

**Oil & gas sector business division**

<Not Applicable>

**Total water withdrawals at this facility (megaliters/year)**

8227.77

**Comparison of total withdrawals with previous reporting year**

Higher

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

8191.29

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

36.48

**Total water discharges at this facility (megaliters/year)**

3852.58

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

3852.58

**Discharges to groundwater**

0

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

4338.71

**Comparison of total consumption with previous reporting year**

Higher

**Please explain**

Withdrawals/discharges are directly measured; consumption is calculated. Virtually all withdrawals/discharges are due to alumina and aluminium production. Consumption regards to water into production and for human use. The total water consumption was increased by 14% for the reporting year.

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W5.1a

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**(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been externally verified?**

**Water withdrawals – total volumes**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water withdrawals – volume by source**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water withdrawals – quality**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water discharges – total volumes**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water discharges – volume by destination**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water discharges – volume by treatment method**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water discharge quality – quality by standard effluent parameters**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water discharge quality – temperature**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water consumption – total volume**

**% verified**

76-100

**What standard and methodology was used?**

Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).

**Water recycled/reused**

**% verified**

Not verified

**What standard and methodology was used?**

<Not Applicable>

## W6. Governance

### W6.1

#### (W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

### W6.1a

#### (W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to align with public policy initiatives, such as the SDGs Commitments beyond regulatory compliance Acknowledgement of the human right to water and sanitation Other, please specify (Water issue is included in our Business Sectors environmental policies, in our Environmental Management & Climate Change Disclosure Management Approach under the management of raw materials as well as in our CSR policy under SDGs alignment.)	Following the results of the company's 2019 Materiality Process, we have included a separate statement concerning water management within our Environmental policy. ( <a href="https://www.mytilneos.gr/en-us/perivallon/perivallon#tab-environmental-policy">https://www.mytilneos.gr/en-us/perivallon/perivallon#tab-environmental-policy</a> ) More specifically: * Responsible use of water, beyond regulatory requirements, by reducing water withdrawals and discharges, and by minimizing water consumption. Acknowledgement of the human right to water and sanitation is included in our Human Rights policy.

### W6.2

#### (W6.2) Is there board level oversight of water-related issues within your organization?

Yes

### W6.2a

#### (W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual	Please explain
Other, please specify (Executive Committee)	The board receives the relevant environmental reports on progress, but not discussing these topics themselves. On the other hand the company's Executive Committee is discussing on water topic, if there are specific risks to manage. According to the company's EHS structure a designated Team leading by a competent person is responsible for the Environmental issues by activity sector. In addition the head of corporate HSE, has taken over a coordinating role on the Environmental aspects (including water) of the MYTILINEOS Business Activity Sectors, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market. Every 3 months an overall presentation of environmental issues (including water) takes place at Executive Committee level (executed by the head of Corporate HSE) with intermediate relevant progress reports. The company's executive management team is presented to the following link: <a href="https://www.mytilneos.gr/en-us/management-directors/list">https://www.mytilneos.gr/en-us/management-directors/list</a>
Other, please specify (CSR Committee)	CSR Committee is composed of board members and senior company staff ( <a href="https://www.mytilneos.gr/en-us/committees/and-external-auditors#tab-csr-committee">https://www.mytilneos.gr/en-us/committees/and-external-auditors#tab-csr-committee</a> ). The committee refers to water issue once a year in the context of the Materiality process results validation.

### W6.2b

#### (W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Other, please specify (The board receives the environmental progress reports, but not discussing these topics themselves unless an important matters arise.)	Monitoring implementation and performance Overseeing major capital expenditures Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Setting performance objectives	These governance mechanisms take place at the company's Business Sector level.

### W6.3

**(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).**

**Name of the position(s) and/or committee(s)**

Environmental health and safety manager

**Responsibility**

Both assessing and managing water-related risks and opportunities

**Frequency of reporting to the board on water-related issues**

Quarterly

**Please explain**

The persons with the direct responsibility for matters relating to water issues within the company's activity sectors are: a) In Metallurgy Sector the EHS and Continuous Improvement Director, b) In Energy Sector the Plant Manager of Agios Nikolaos and Agioi Theodoroi CCGT power plants and the Head of Section Environment, Management Systems & Compliance. Also, the Plant Managers and the Operation Managers of the power plants are responsible for reporting in a monthly basis to the competent local authority. The General Managers of each MYTILINEOS business activity sector inform the Executive Committee about objectives and performance of environmental issues, including water, if there are specific risks to manage.

**W6.4**

**(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?**

	Provide incentives for management of water-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	

**W6.5**

**(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?**

No

**W6.6**

**(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?**

Yes (you may attach the report - this is optional)

Mytilineos\_Annual\_Report\_2019\_ENG.pdf

**W7. Business strategy**

**W7.1**

**(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?**

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	5-10	MYTILINEOS long term business objective is to become regional leader in each sector through continuous reinvestment while ensuring stable shareholder returns. In Metallurgy Sector the company focus on continuous cost cutting and product quality improvement as well as to invest in innovative technologies to enhance productivity and performance standards. In Electric Power Sector the company focuses on the increase of power production and to implement a new round of Renewables Investments. MYTILINEOS takes into account for its above mentioned business objectives by sector of activity several water issues such as water withdrawals, water reuse & recycling, water discharges quality and water cost.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	5-10	Our strategic lines to achieve our long-term business objectives include: In Metallurgy Sector a) Ongoing productivity and performance improvement to keep the company's place within the first quadrant of the global cost curve, b) Acquisition of know-how and expansion into the aluminium scrap recycling activity by acquiring the company EPALME SA. c) The basic technical study for the new Alumina plant with a production capacity of 1m. tons annually, is under completion. Water issues have been integrated in a time horizon beyond 5 years. We expect changes since we are going to operate a new alumina production plant increasing our water withdrawals mainly from public utilities sources. Concerning our existing facilities we expect changes in the near future, in terms of water consumption reduction due to the gradual implementation of the water 'Black Belt' project, aimed at reducing the consumption of industrial and drinking water, based on water reuse, the utilization of treated water and the use of modern equipment. In Electric Power sector a) Reduction of carbon footprint by means of further investment in the sector of RES b) Implementation of a new investment related to the establishment of a gas-fired, electric power generation plant of combined cycle, currently in the process of licensing to replace the lignite plants. Water issues have been integrated expecting changes mainly in seawater withdrawals regarding the investment for the new combined cycle gas fired plant.
Financial planning	Yes, water-related issues are integrated	5-10	The financial aspects affected by the water related initiatives, concern mainly the Metallurgy sector. The outcomes of the implementation of the 'Black Belt' project will contribute to the operating cost reduction program boosted the company's Metallurgy sector competitiveness.

**W7.2**

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

-100

Anticipated forward trend for CAPEX (+/- % change)

20

Water-related OPEX (+/- % change)

-12.2

Anticipated forward trend for OPEX (+/- % change)

10

Please explain

In 2019 CAPEX was -100%, as no significant water investment have taken place. Regarding anticipated forward trend for water-related CAPEX, an amount of money is anticipated to be invested in 2020. On the other hand, in the reporting year ,OPEX has decreased by 12.2%, comparing to 2018 mainly due to decreased labor, maintenance and energy costs. Regarding OPEX anticipated forward trend, OPEX will decrease around 10% in the upcoming year due to further cost reduction of the above-mentioned parameters.

### W7.3

(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?

	Use of climate-related scenario analysis	Comment
Row 1	No, but we anticipate doing so within the next two years	The Climate Change adaptation has been added as a stand alone subject in the list of the identified issues in terms of the company's 2019 Materiality process. Since the issue will be characterized as material then the company may proceed to the development of resilient strategic lines in terms of climate-related scenario.

### W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, and we do not anticipate doing so within the next two years

Please explain

As the costs associated with water use do not reflect a significant economic impact to the company in monetary terms, we do not use an internal price on water.

### W8. Targets

#### W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Company wide our approach to setting water-related targets and goals derives mainly from our environmental policy and our commitment to support the Sustainable Development Goals 6 and 14 in conjunction with our relations with local communities in terms of environmental issues and initiatives. Moreover we have site/facility policy to set water targets for responsible water use and in order to decrease water cost and to comply with specific regulations. These targets and goals are monitored annually (through the analysis of the established KPIs) at all production sites.

#### W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number

Target 1

**Category of target**

Water pollution reduction

**Level**

Company-wide

**Primary motivation**

Commitment to the UN Sustainable Development Goals

**Description of target**

Zero water pollution incidents. This is an important and company-wide target as it responds to more than one of the MYTILINEOS Measures and Principles for the Environmental Protection: 1) Prevention of any identified pollution risk and 2) 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. This target, is a company-wide target and is broken down into annual objectives in all Business activity sectors, which, in addition, is again broken down at facility level.

**Quantitative metric**

Other, please specify (Number of pollution incidents)

**Baseline year**

2016

**Start year**

2016

**Target year**

2030

**% of target achieved**

100

**Please explain**

Target achieved: No water pollution incidents occurred during 2019. In general no incidents occurred involving any kind of pollution of the natural environment by production activities or involving industrial accidents in all Business Activity Sectors of the Company. For 2020, the target of no water pollution incidents though the year, remains.

---

**Target reference number**

Target 2

**Category of target**

Water withdrawals

**Level**

Business activity

**Primary motivation**

Commitment to the UN Sustainable Development Goals

**Description of target**

Total water withdrawal (industrial use & drinking) <13 megaliters /year. This is a specific target of the Metallurgy sector that contributes to the conservation of natural resources.

**Quantitative metric**

Absolute reduction in total water withdrawals

**Baseline year**

2019

**Start year**

2019

**Target year**

2020

**% of target achieved****Please explain**

This is a new target and the level of achievement will be reported in the upcoming year.

---

**Target reference number**

Target 3

**Category of target**

Water, Sanitation and Hygiene (WASH) services in the community

**Level**

Business activity

**Primary motivation**

Water stewardship

**Description of target**

One of the main strategic lines of MYTILINEOS Corporate Social Responsibility Policy is the contribution to the development of local infrastructure and to the wellbeing of the local communities in close proximity to the company's industrial plants. Based on this and in terms of water issues, MYTILINEOS aims to contribute to the basic human right of access to drinking water and sanitation, as recognized by the United Nations General Assembly in 2010. Accordingly, one of the targets of MYTILINEOS's Metallurgy Business Sector is to operate a network of drills that delivers (among other uses) water to more than 2,000 people in residential areas of Aspra Spitia, Antikyra and Saint Nikolaos in Viotia, to cover their needs. This includes water treatment installation.

**Quantitative metric**

Other, please specify ( The total population of the three residential areas supplied by water network drills created by MYTILINEOS (more than 2,000 people). )

**Baseline year**

2016

**Start year**

2016

**Target year**

2030

**% of target achieved**

100

**Please explain**

The quantitative metric for this target is: the total population of the three residential areas supplied by water network drills created by MYTILINEOS . This target is set every year by MYTILINEOS Metallurgy Sector. Also is in the pipeline (in 2 years period) to design an approach to specify the level of optimal consumption of the drinkable water from these residential areas. According to the MYTILINEOS Metallurgy Sector EHS department this target for the year 2019 is achieved.

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**Target reference number**

Target 5

**Category of target**

Water consumption

**Level**

Site/facility

**Primary motivation**

Water stewardship

**Description of target**

Drinking water consumption by local settlements (Winter season, OCT to APR) <2.8 megaliters /year. This target is a new one and is aiming to sensitize the local community about the responsible use of water.

**Quantitative metric**

Other, please specify (Absolute reduction in drinking water consumption)

**Baseline year**

2019

**Start year**

2019

**Target year**

2020

**% of target achieved**

**Please explain**

This is a new target and the level of achievement will be reported in the upcoming year.

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**Target reference number**

Target 6

**Category of target**

Water consumption

**Level**

Site/facility

**Primary motivation**

Water stewardship

**Description of target**

Drinking water consumption by local settlements ((Summer season, MAY to SEP) <3.5 megaliters /year. This target is a new one and is aiming to sensitize the local community about the responsible use of water.

**Quantitative metric**

Other, please specify (Absolute reduction in drinking water consumption)

**Baseline year**

2019

**Start year**

2019

**Target year**

2020

**% of target achieved**

**Please explain**

This is a new target and the level of achievement will be reported in the upcoming year.

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**(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.**

**Goal**

Other, please specify (Compliance with regulations)

**Level**

Company-wide

**Motivation**

Brand value protection

**Description of goal**

Where we have specific limits on water withdrawals and discharges, our goal is to ensure ongoing compliance with them. We set this goal pursuant to our policy commitment to prevent pollution, be compliant and continually improve.

**Baseline year**

2018

**Start year**

2018

**End year**

2019

**Progress**

In 2019, no incidents arose that resulted any legal action.

**Goal**

Engagement with suppliers to help them improve water stewardship

**Level**

Company-wide

**Motivation**

Brand value protection

**Description of goal**

Regarding MYTILINEOS value chain, one strategic objective is to mitigate environmental, social and governance risk in the supply chain and create new sustainable solutions where needed. This goal is of particular relevance and applies to the whole company (and is broken down in its business sectors). The company is implementing this goal through suppliers self assessments regarding sustainability (including water aspects).

**Baseline year**

2017

**Start year**

2017

**End year**

2025

**Progress**

Regarding MYTILINEOS sustainability targets up to 2025, one strategic objective is the development of a responsible supply chain (key suppliers). This includes: a) to inform key suppliers about MYTILINEOS Code of Conduct for Suppliers and Business Partners, b) the assessment of the environmental (including water) impacts of the activity of the Company's key suppliers and c) the inclusion of social and environmental criteria in the purchasing process. As a consequence the next goal is to foster training programs to suppliers regarding sustainable development issues (including water). The specific target applying to 2019 is to start supplier training in the 10 principles of UN Global Compact . The Company's Corporate Governance & Sustainable Development Division is implementing this goal through training courses in cooperation with the national networks CSR Hellas & Global Compact Hellas to encourage suppliers signatory to UNGC as a proof of their responsible behavior in environmental issues (including water aspects).

**W9. Verification**

**W9.1**

**(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?**

Yes

**W9.1a**

**(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?**

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	1) W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year. 2) (W1.2h) Provide total water withdrawal data by source. 3) (W1.2i) Provide total water discharge data by destination	Other, please specify (AA1000AS & ISAE3000 (revised))	Audited by external independent third party organization. For more information please visit MYTILINEOS 2019 Sustainable Development Report on page 160: Independent Assurance Statement and on page 166: GRI Content Index – General Disclosures (external assurance option).



## W10. Sign off

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### W-FI

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**(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

Concerning the unanswered (W-MM3.2): We do not use tailing dams in our mining operation (underground) for storing water. To satisfy needs for wetting the roads and watering the surrounding restored area and for the Fire Brigade and firefighting reducing pressure on freshwater resources, we collect rain water directly in a special reservoir configured in the area of a disused mine, used by MYTILINEOS' subsidiary DELPHI – DISTOMON,

### W10.1

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**(W10.1) Provide details for the person that has signed off (approved) your CDP water response.**

	Job title	Corresponding job category
Row 1	Sustainable Development Director	Chief Sustainability Officer (CSO)

### W10.2

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**(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].**

Yes

## Submit your response

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**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

**Please confirm below**

I have read and accept the applicable Terms