



Suppliers / Business Partners
Code of Conduct

Revised Version
2022

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1. Opening statement

Corporate Social Responsibility (CSR) at MYTILINEOS is a practice with significant human, environmental and social aspects going beyond legislative compliance (Law 4403/2016). It is an ongoing self-improvement and learning process aimed at increasing the Company's positive impact on the greater society, in combination with the range and nature of its economic activity, while also serving as a key mechanism for renewing its "social" license to operate, improving its competitiveness at national and international levels.

As a signatory and active promoter of the **UN Global Compact**, MYTILINEOS is engaged in a constant effort to formulate its policies and its strategies to ensure the alignment of its business practices with the Compact's globally recognised 10 Principles. These concern the protection of the right to work and of the fundamental human rights, the protection of the environment, the promotion of occupational health and safety, and anti-corruption. Moreover, MYTILINEOS has aligned its policy with the **Global Sustainable Development Goals**, which now serve as the new basis for the Company's dialogue and cooperation with its key Stakeholder groups and also define its core strategic priorities in this area for the years ahead.

Having integrated in its strategy the fundamental principles of Corporate Social Responsibility, as defined in the respective ISO 26000 International Standard, MYTILINEOS is also committed to the adoption of a socially responsible, sustainable and ethical business conduct, which is regularly assessed on the basis of the results and improvements achieved in its **environmental** and **social** performance, as well as in its performance in corporate **governance and administration** (ESG criteria).

In this context, the present **"Suppliers / Business Partners Code of Conduct"** of MYTILINEOS (the "Code") serves as a framework of guidelines outlining the fundamental standards of ethical conduct, values and principles of Corporate Social Responsibility which the Company expects all its Suppliers / Business Partners to uphold and, in their turn, promote in their transactions with their employees, suppliers, contactors and clients.

MYTILINEOS encourages its existing Suppliers / Business Partners to comply with the present Code. Furthermore, in evaluating its cooperation with them, the Company will be taking into consideration their progress regarding the fulfilment of the respective requirements. **Finally, the Company has determined that alignment with the present Code will be a prerequisite for participation in the selection process for new Suppliers / Business Partners.**

2. Our approach

Fully committed to strengthening its competitive position, MYTILINEOS aims at optimising its supply chain. The main objectives of the Company, to be achieved by 2025, are (a) to integrate sustainable development requirements into the process of selecting new suppliers as well as to commit existing ones to responsible practices, and (b) to establish partnerships for better understanding the impacts and for mutually aligning CSR-related goals and expectations with its suppliers.

To this end, the Company seeks to develop and maintain commercial relations with its Suppliers / Business Partners who will be able to share this commitment by:

- Conducting their business activities responsibly, in compliance with the provisions of the applicable laws.
- Safeguarding the rights of employees to a safe working environment.
- Complying with the environmental laws and regulations and with the goal to reduce the environmental impact of their activities.
- Managing and monitoring their governance practices, to ensure compliance with contracts and with the applicable laws.

3. The Code's relation to other contractual obligations

- The provisions of the present Code are guidelines on business conduct and should be considered to complement the contracts signed between MYTILINEOS and every individual Supplier / Business Partner.
- The obligations of Suppliers / Business Partners laid down in the present Code are enforceable by contract within the boundaries of the legal relationship created between the Suppliers / Business Partners and MYTILINEOS.
- The Company's existing and potential Suppliers / Business Partners should ensure their compliance with the provisions of the present Code. Where they cannot ensure such compliance and the work or services that they have undertaken or intend to undertake on behalf of the Company is performed or will be performed primarily by subcontractors and suppliers with which they are cooperating, they should actively promote to the latter the present Code, in order for the terms of compliance to be met.

4. The commitments undertaken by MYTILINEOS

MYTILINEOS undertakes the following commitments:

- To function with integrity in all aspects of its business relations with all its Suppliers / Business Partners.
- To select Suppliers / Business Partners fairly, through documented procedures.
- To promote synergies for managing business risks and improving business practices.
- To seek the continuous improvement of all its Suppliers / Business Partners through education, training and the exchange of best practices, where feasible.

ESG Criteria (**E**nvironmental - **S**ocial - **G**overnance)

"The term 'Suppliers / Business Partners' which is used in the present document refers to suppliers, contractors, subcontractors and business partners that provide work, products and services or act on behalf of MYTILINEOS"

5. Environmental Criteria (E)

Beyond complying with environmental laws and regulations, MYTILINEOS is committed to reducing its environmental impact and to promoting the sustainability of the natural resources which depend on its business activity. The Company expects its Suppliers / Business Partners to play a key part in its efforts to meet these commitments, not only by implementing environmentally responsible practices but also by offering alternatives and suggestions.

Fulfilment of the environmental criteria below contributes to the following Sustainable Development Goals:



5.1 Reduction in the use of natural resources

The Suppliers / Business Partners of MYTILINEOS should make systematic efforts to implement and improve the efficient use of natural resources (e.g. water, energy sources, raw materials). Any adverse impact on the environment and on the climate should be minimised or altogether eliminated at the source, through processes such as modifications to production, maintenance and/or replacement of production machinery, and adoption of practices to reduce the consumption of materials or to substitute, re-use and recycle materials.

5.2 Prevention of pollution / Hazardous substances

The Suppliers / Business Partners of MYTILINEOS should make systematic efforts to prevent and avoid any type of spillage of hazardous materials and substances associated with their business activity, as well as to ensure their readiness to address such incidents when these occur and to bear the costs regarding compensation for any damage caused. Additionally, water discharges and wastewater from business activities, industrial processes and sewerage facilities must be monitored, controlled and treated as required prior to their discharge or disposal, in compliance with the applicable laws and regulations.

5.3 Management of liquid & solid waste

The Suppliers / Business Partners of MYTILINEOS should ensure that they have in place the procedures required to reduce as well as to properly manage and utilise the liquid and solid waste associated with their business activity. As regards the management of waste, they must be able to choose the appropriate disposal method in order to strike a balance between dissimilar environmental impacts. Within the framework of the Circular Economy, waste minimisation is reinforced by promoting the reuse, recovery and recycling of waste.

5.4 Greenhouse gas emissions

The Suppliers / Business Partners of MYTILINEOS should have in place systems for recording and managing greenhouse gas emissions from their business activity, in particular of Carbon Dioxide (CO₂), Methane (CH₄) and Nitrogen Monoxide (N₂O) emissions, among others, in order to reduce their release into the atmosphere.

5.5 Environmental compliance and licensing

The Suppliers / Business Partners of MYTILINEOS should apply and align their activities with the laws and regulations on environment-related matters (air emissions, liquid and solid waste, use of materials, energy, water and biodiversity), as applicable to their business activity sector. They should also ensure the acquisition, updating and keeping of registers of all necessary national and local environmental licenses and requirements governing the business activities which they undertake on behalf of MYTILINEOS.

MYTILINEOS will assess positively the voluntary implementation by its Suppliers / Business Partners of the ISO 14001, EMAS (Eco Management and Audit System) and ISO 14064 standards.

6. Social Criteria (S)

In MYTILINEOS, occupational health and safety is an utmost priority. The Company is consistently making investments aimed at achieving the of "**ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES**" – one of the major challenges in the industrial sector.

In this context, MYTILINEOS expects its Suppliers and Business Partners to share this commitment, by developing a working environment that will offer decent work and will be free from all health and safety risks.

In addition, the respect for our people and the acknowledgement of our responsibility to protect Human Rights – not only in our work premises but also in all areas of our business activity in general – are fundamental principles that define the way in which MYTILINEOS operates. Our key expectations from our supply chain in this respect are represented by the 10 Principles of the United Nations Global Compact and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Fulfilment of the social criteria below contributes to the following Sustainable Development Goals:



6.1 Occupational Health & Safety

- The Suppliers / Business Partners of MYTILINEOS should ensure the safety and health of their employees in all aspects required by their work. They should also be able to introduce protection means and measures that involve prevention, information and training for their employees, in order to: (a) avoid risks or manage risks that cannot be avoided; (b) give appropriate instructions to employees, promoting common protective measures; and (c) adapt working conditions, equipment and methods, taking account of advances in technology. The protection means and measures must be adapted in cases where working conditions change.
- The Suppliers / Business Partners of MYTILINEOS should have in place systems and processes for properly recording, classifying, handling and investigating work accidents and occupational diseases in their work premises, which will also help them take corrective action and eliminate the relevant causes, in order to prevent conditions which could give rise to recurrence. They also undertake to provide their employees with the necessary medical treatment in the event of an accident and to facilitate their return to work. Finally, they should state that they are opposed to their employees being subject to any form of disciplinary sanctions on account of expressing their concerns about health and safety in the workplace.
- The Suppliers / Business Partners of MYTILINEOS undertake to supply their employees, if required and free of charge, with suitable Personal Protective Equipment when the latter carry out tasks which could be hazardous to their health, such as dyeing, glossing, smoothing, applying chemicals or solvents etc. All chemical substances used must be safe and must not involve any short or long-term hazard to the health of employees. Additionally, in tasks where work may give rise to the risk of injury, employees must in all cases obtain and wear suitable protective equipment (eye protection gear, safety gloves, welding masks, safety helmets, suitable footwear, insulated overalls, hearing protection equipment etc.), as well as any other

protective material foreseen according to the nature of the particular work, at no charge to employees. Finally, employees should be trained in the proper use of Personal Protective Equipment.

- The Suppliers / Business Partners of MYTILINEOS should be able to implement emergency response plans to forecast, identify and assess emergencies and extraordinary events and minimise their impact on their human resources. They should also have in place appropriate response procedures (including reporting of extraordinary events, written notifications to employees, evacuation procedures, employee training, first aid provision, appropriate fire detection systems including the necessary equipment, adequate emergency exits from the facilities, recovery plans etc.).
- The Suppliers / Business Partners of MYTILINEOS should identify, evaluate and control the exposure of their employees to arduous and physically demanding tasks, including handling materials, lifting heavy objects or structures and tasks involving repetitive movements and prolonged or permanent standing.
- The Suppliers / Business Partners of MYTILINEOS must ensure that they provide their employees with access to clean and safe toilet facilities, potable water and, if required, sanitary conditions of a high standard in food storage facilities. Where employees are in addition provided with living quarters, these must be kept clean and safe and must be adequately heated and fitted out, to cover all basic needs of the employees.

MYTILINEOS will assess positively the voluntary implementation on behalf of its Suppliers / Business Partners of recognised national and international Health and Safety Standards such as OHSAS 18001, while in certain cases the supplier's accreditation with Health & Safety Standards is a contractual obligation.

6.2 Labour Practices and Human Rights

6.2.1 Wages and benefits

The Suppliers / Business Partners of MYTILINEOS should be able to demonstrate that working hours comply with the applicable national laws or with the standards of their business activity sector and undertake to pay to all their employees a wage or salary that is equal to or exceeds the minimum legally mandated one and to also extend to them all benefits stipulated by the law (leave periods, holiday time etc.). They should also be able to demonstrate that their employees are compensated for overtime work at the rate stipulated by the applicable laws and regulations and declare that they do not employ wage deductions as a disciplinary measure. Finally, they should be able to demonstrate that they pay their employees' wages, social security contributions and severance payments, if any, in a timely manner and to supply clear evidence of the basis on which all aforementioned payments are made.

6.2.2 Fair treatment of employees

The Suppliers/Business Partners of MYTILINEOS should ensure the continuous improvement, problem-free provision and sustained availability of a work environment that will allow their employees to perform their duties free from moral pressures or harassment of any kind. Employees should be treated with respect and dignity, in accordance with the national laws and the principles of the International Labour Organisation, while all forms of harsh or inhumane treatment, including sexual harassment, corporeal punishment, mental coercion, physical coercion, verbal abuse as well as all types of unreasonable restrictions regarding any employee's entry into or exit from their company's facilities, shall not be tolerated.

6.2.3 Prohibition of discrimination

The Suppliers / Business Partners of MYTILINEOS should oppose all kinds of discrimination against

their employees on the basis of race, colour, age, gender, sexual orientation, nationality, disability, religion, political beliefs, trade union affiliation, national origin or family status, which could directly or indirectly affect corporate procedures and practices related to hiring and employment, promotion, determination and payment of wages, safety and health, access to training and education, evaluation, assignment of work, granting of benefits and termination of employment.

6.2.4 Prevention of child labour

The Suppliers / Business Partners of MYTILINEOS should follow a “zero tolerance” policy regarding the exploitation of children. They should undertake to prevent and eliminate all conditions which might encourage the occurrence of child labour within their sphere of influence, while taking care to ensure that the work contracts they enter into with their partners (suppliers, business partners etc.) contain clauses or provisions which ensure the prohibition of child labour. The Suppliers / Business Partners of MYTILINEOS should strictly comply with the minimum legal working age limits applicable in the countries where they operate, while in cases where no such age limit is set by law, this should be considered to be no less than 15 years of age. Moreover, persons aged over 15 but below 18 should not be hired for hazardous work or for work that does not conform to their individual mental and physical safety and health.

6.2.5 Prohibition of forced labour

The Suppliers / Business Partners of MYTILINEOS should oppose all kinds of forced or compulsory labour while taking steps to prevent and eliminate all conditions which might encourage the occurrence of forced labour in their work premises, in the regions where they operate. They should also ensure that employees select jobs of their own free will and that every employee hired is in possession of the proper work documents as required. They should also protect the right of all employees to resign from work if they so wish or to interrupt work without being subject to penalties.

6.2.6 Freedom of Association

The Suppliers / Business Partners of MYTILINEOS undertake to respect the employees' right to the freedom of association, including their right to join, if they so wish, trade unions or similar organisations and to openly communicate with the Management for negotiating work conditions and defending their economic and social rights or their interests, without fear of reprisals, intimidation or harassment of any kind, in accordance with the applicable laws and regulations.

6.2.7 Conflict Minerals

MYTILINEOS Suppliers/Partners should take measures to avoid using materials that are considered to be the result of illegal mining or raw materials sourced from war zones. Upon request, MYTILINEOS Suppliers/Partners should provide information related to the country of origin for the supplied materials

MYTILINEOS will assess positively the voluntary participation of its Suppliers / Business Partners to the United Nations Global Compact initiative.

6.3 Contribution to Local Communities

MYTILINEOS encourages its Suppliers / Business Partners to contribute to the sustainable development of the communities where they operate, assessing local community needs in accordance with the standards of their business activity sector and assuming their share of the responsibility, by assisting the efforts to promote local social and economic development and by supporting local suppliers in the context of their business activity, where this is feasible.

7. Governance Criteria (G)

The business activity of MYTILINEOS is characterised by its full compliance with the applicable laws and its adherence to market rules. Moreover, honesty and integrity in transactions are key elements of all its business relations. MYTILINEOS believes that shares the same ethical values and principles with its Suppliers / Business Partners and seeks to establish constructive partnerships with them as part of its ongoing efforts for continuous business improvement and sustainable development.

Fulfilment of the governance criteria below contributes to the following Sustainable Development Goals:



7.1 Business Ethics & Integrity

7.1.1 Anti-corruption and Anti-bribery

The Suppliers / Business Partners of MYTILINEOS undertake to ensure and uphold the highest possible standards of integrity in all their business transactions. They should have in place and be able to implement procedures for preventing conditions or incidents involving any form of bribery, corruption, extortion and abuse in their activities, following a “zero tolerance” policy which they should also apply to their own supply chain. At the same time, they should also adopt fair business practices in advertising, sales and competition. The Suppliers / Business Partners of MYTILINEOS must not offer or accept benefits or provisions (e.g. gifts, hospitality, entertainment) or other unfair payments intended to influence a decision or cause a breach of duty in order to secure an unfair advantage for MYTILINEOS, and must not make facilitation payments.¹ They should also ensure that they comply with the applicable national anti-corruption laws and regulations and the international anti-corruption conventions, as in force and to extent to which the relevant provisions apply to the work that they provide on behalf of MYTILINEOS. Finally, in line with the “zero tolerance” policy it follows regarding these matters, the Company retains the right to discontinue any type of cooperation with a Supplier or Business Partner found to be unable to comply with the principle of integrity and with the applicable anti-corruption laws and regulatory provisions in the countries where it operates.

7.1.2 Fair competition

Fair competition between enterprises promotes both cost-efficiency and sustainable development. The Suppliers / Business Partners of MYTILINEOS undertake, in line with the legal provisions governing competition in the country or countries where they operate, to refrain from all unfair competition acts and from their involvement in circumstances which might encourage acts likely to result in unfair associations with a view to creating barriers to entry in the sector for other companies, unfair business practices, abuse of market position, anti-competitive mergers, price-fixing, as well as in any other acts that impede fair business activity, especially so when they are involved in transactions on behalf of MYTILINEOS.

7.1.3 Protection of intellectual property

The Suppliers / Business Partners of MYTILINEOS undertake to effectively protect their clients' information and to respect intellectual property rights in connection with the latter's business activities, financial situation or any other information considered to be confidential. Additionally,

¹ The term “facilitation payment” usually refers to cases where a small amount of money is offered by one person to another (e.g. to a public servant or private employee) so as to secure or accelerate the performance of a normal or necessary act which the person making the payment is lawfully entitled to.

the transfer of technology, services and know-how should take place in a manner that safeguards the respective intellectual property and data protection rights. Such information may be disclosed only in accordance with the guidelines determined in the framework of each association, which is governed by a non-disclosure agreement or a privacy policy, as provided for by the applicable laws.

7.1.4 Protection of privacy

The Suppliers / Business Partners of MYTILINEOS should be able to protect the personal data of their employees, suppliers, clients and partners in a legitimate and equitable manner. They should also ensure that in collecting, storing, processing and disseminating such information they comply with the applicable requirements of the law.

7.1.5 Disclosure of information

The Suppliers / Business Partners of MYTILINEOS should be able to communicate accurately and in full all information required in connection with their business activity, structure and financial situation and performance, in accordance with the applicable regulations and the prevailing business practices. Any falsification of records, distortion or misrepresentation of information and practices by the Suppliers / Business Partners of MYTILINEOS shall not be tolerated.

7.2 Management

7.2.1 Legal and regulatory compliance

The Suppliers / Business Partners of MYTILINEOS should be able to comply with all international, national and local legal and regulatory provisions and regulations governing their operation.

7.2.2 Quality and safety of the products and services offered

The Suppliers / Business Partners of MYTILINEOS undertake to fulfil the quality and safety requirements generally acknowledged under international and national laws as well as any specifically agreed ones, both in implementing the projects and in providing the products and services that meet address the Company's needs.

7.2.3 Control of exports-imports and customs controls

The Suppliers / Business Partners of MYTILINEOS must comply with all applicable trade control laws and regulations. Exports-imports control and customs control relate to the export or import or transfer of products, services, systems, software and technological know-how through national borders, via email or even by conversations over the phone. Moreover, these controls are particularly critical in cases of counterparties to which sanctions apply. Sanctions to natural persons, legal persons, countries, sectors of the economy, or for specific products may be imposed for reasons of national security, for human rights violations or for participation in criminal or terrorist organizations. Violation of the sanctions may incur significant sanctions for the business partner concerned, imposed under administrative or criminal law.

7.2.4 Risk assessment and management

The Suppliers / Business Partners of MYTILINEOS undertake to implement procedures and corresponding mechanisms for the identification, assessment, monitoring and management of risks in all areas covered by the present Code as well as in connection with all applicable laws and regulations governing their operation.

7.2.5 Conflict of interests

The Suppliers / Business Partners of MYTILINEOS undertake to avoid all conditions or circumstances which may arise and be considered as conflicts of interests, thus safeguarding their credibility and their loyalty to the Company. To this end, they undertake to notify the Company of all cases where any employee or other business partner of the Company, in the framework of a professional contract, may have an interest in, a benefit from or any kind of personal or financial

ties with their activities. The Company does not accept any kind of gift or entertainment service from any existing or future Supplier / Business Partner, with the exception of the occasional token gifts of low value or of low-value meals.

7.2.6 Corrective action process

The Suppliers / Business Partners of MYTILINEOS should have in place a procedure for taking corrective action aimed at addressing in a timely manner any deficiencies which may result from the conduct of in-house or independent audits, evaluations, surveys, inspections or reviews in connection with their Environmental and Social performance and with the principles governing the administration of their business.

7.2.7 Keeping of documents and records

The Suppliers / Business Partners of MYTILINEOS must obtain, maintain and keep up to date records of the documents concerning the operating licenses for their businesses as well as the permits and licenses required to properly perform the project or service they have undertaken on behalf of the Company, as required by the applicable laws and regulations. It is also recommended that they develop the necessary documents and records based on which they will be able to demonstrate that they embrace and apply the key ethical conduct standards, values and principles of Corporate Social Responsibility which are described in the present Code. These documents may be subject to periodic checks by the Company, always in the framework of a mutually acceptable agreement concluded with the corresponding supplier or business partner.

7.2.8 Education and capacity building

The Suppliers / Business Partners of MYTILINEOS should be able to take the necessary education and training initiatives that will allow their management executives and employees to establish appropriate levels of knowledge, understanding and implementation capacities regarding the implementation of policies and of the corresponding procedures for all matters discussed in the present Code, as well as regarding the relevant statutory regulations and internationally recognised standards.

7.2.9 Promotion of the Code to the supply chain

The Suppliers/ Business Partners of MYTILINEOS should have in place procedures for communicating the requirements of the present Code to their direct and indirect suppliers with which they cooperate at the level of products or services on behalf of MYTILINEOS, and for ensuring their compliance with them.

7.2.10 Continuous improvement

The Suppliers / Business Partners of MYTILINEOS are expected to continuously improve their performance in accordance with the criteria of the present Code, by implementing suitable measures identified as a result of the self-evaluation and risk assessment and management procedures.

8. Compliance

The relation of MYTILINEOS with its Suppliers / Business Partners relies on mutual trust and respect. Ensuring that the principles of sustainable development are implemented by the Company's supply chain is key to successfully maintaining and further strengthening its successful evolution. To this end, MYTILINEOS encourages its Suppliers / Business Partners to designate appropriate personnel (single individuals or teams) who will be tasked with monitoring the fulfilment of their contractual obligations. Moreover, the Company urges its Suppliers / Business Partners to conduct regular reviews of their compliance with the present Code.

The Company's Suppliers / Business Partners may demonstrate their compliance with the ESG criteria of the present Code by presenting their own Code of Conduct or relevant policies which they implement, and which meet the respective specifications.

However, MYTILINEOS may request to confirm the compliance of its Suppliers / Business Partners with the ESG criteria described in the present Code in one of the following ways and to take corrective action, should this be deemed necessary:

8.1 Evaluations

The Suppliers / Business Partners of MYTILINEOS should be able to work harmoniously with the Company, if requested to complete a questionnaire regarding the coverage of the ESG criteria of the present Code and to also submit relevant certificates or other official documents confirming their compliance with them. Their compliance with the criteria of the Code will be taken into account in their overall evaluation, which is carried out either centrally or by the Purchasing Departments of the Company's Business Units.

8.2 On-site verifications

MYTILINEOS representatives or an authorised business partner of the Company acting on its behalf may contact the Company's Suppliers / Business Partners to request permission to visit their premises in order to verify on-site the level of coverage of the Code's ESG criteria. The compliance verification may be implemented in tandem and/or in conjunction with other audits of a Supplier / Business Partner of MYTILINEOS which the latter might need to perform (financial, technical, quality assurance etc.)

8.3 Reporting compliance-related concerns

MYTILINEOS expects its Suppliers / Business Partners to report any concerns regarding compliance with the Code as well as violations of the Code committed by MYTILINEOS employees or by other third parties. Such reports may be made anonymously, however the persons making such reports are encouraged to provide their personal details, as this practice lends credibility to the reports submitted and facilitates follow-up of the issues arising. The Company assures all parties that no action shall be taken against the reporting entity (an individual or a company), provided that the report and the allegations in it are made in good faith.

The Suppliers / Business Partners of MYTILINEOS may submit such reports to the Head or Manager of Purchasing/Procurement at MYTILINEOS or to the MYTILINEOS Project Manager. Alternatively, they may contact the MYTILINEOS Compliance Manager by email, at Sofoklis.Karapidakis@mytilineos.gr.