



Communication on Progress - 2017

UN Global Compact Advanced Level

(updated 19 August 2016).



The present Communication on Progress (CoP) report, refers to the period from 1st of January 2017 to 31st of December 2017, and should be read in conjunction with the MYTILINEOS Sustainability Report 2017.



Chairman's statement of Continued Support

MYTILINEOS supports the United Nations Global Compact Ten Principles since 2008. We remain committed to aligning our operations with the Compact's Ten Principles, which are universally accepted and cover the areas of human rights, labor, health and safety, the environment and anti-corruption.

The UN Sustainable Development Goals (SDGs) challenges today's all time low trust in governments and businesses by redirecting our initiatives towards a more sustainable path. We believe that businesses have a critical contribution to make towards achievement of SDGs - both domestically & internationally - through responsible business operations, new business models, investments, innovation, technology and collaboration.

We, in MYTILINEOS, are already contributing in SDGs agenda in many ways and will intensify our efforts in this direction in years to come. For us, the SDGs focus in areas around which we can innovate and collaborate in the search for solutions to critical local, national and global sustainability challenges, while positioning competitively for the future.

Through our participation to Global Compact and the incorporation of the SDGs into our CSR strategy, we have set a critical framework for establishing the culture of integrity and to meet our responsibilities to people, natural environment and wider society, creating long-term value.

That is why we are proud to be a signatory to the UNGC.

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

UN Global Compact Advanced COP 2017 Advanced Level

All information in MYTILINEOS's Communication on Progress 2017 is compiled from the following:

- Company's Sustainability Report 2017
- Company's Annual Report 2017
- Company's GRI Content Index 2017
- Company's Vision – Mission and set of Business Values
- Company's Code of Business Conduct
- Company's Suppliers & Partners Business Conduct
- Company's Occupational Health & Safety DMA*
- Company's Environmental Management & Climate Change DMA
- Company's Anti-Corruption DMA
- Company's Working practices & Human Rights DMA
- Company's Local Communities DMA
- Company's Market practices DMA

*DMA: Disclosure Management Approach

All the publications listed above are available on our website.

The following pages are our self-assessment on how we have met the GC Advanced Level criteria and references to our implementation of best practices. According to UNGC CoP policy, we consider a criterion is met when we communicate on its implementation (at least one best practice) or planned implementation. Concerning the independent assurance process the company has decided to take place in the next CoP of 2018.



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

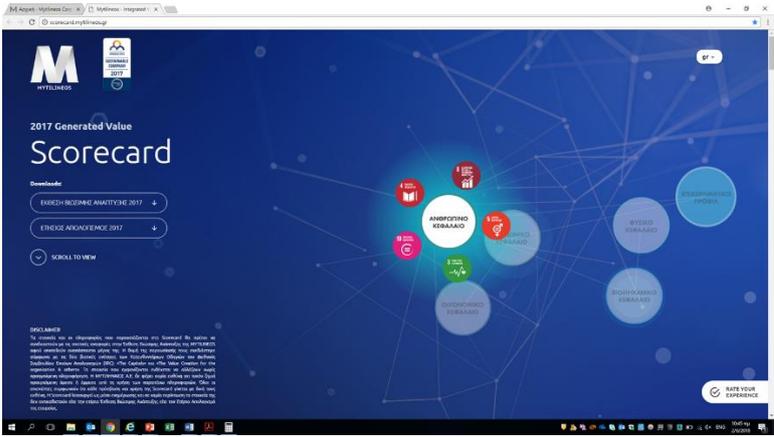
<p>Best Practice 1: <i>Opportunities and responsibilities that one or more SDGs represent to our business</i></p>	<p>The Sustainable Development Goals (SDGs) represent an historic opportunity for business. MYTILINEOS argues that businesses can play a decisive role in the achievement of the SDGs, through responsible business operation, new entrepreneurship models, investments and the leveraging of new technologies and synergies, thus promoting sustainable development in a comprehensive way. To this end, the company in 2017 decided to utilize the SDGs to define its future priorities and areas for further improvement. Following the key steps of the SDG Compass tool, starting with understanding and identifying the relevant SDGs for our business, we consider the following in order to decide in which SDGs we can meaningfully contribute to their achievement: a) the key impacts of the activity of the MYTILINEOS Business Units, b) the results of the Materiality Analysis process, c) the company's core business goals and d) its strategic directions in the domain of Corporate Social Responsibility.</p> <p>MYTILINEOS through this process it is able to communicate clearly around how its business helps government to achieve its goals, also it is able to consolidate a strong license to operate and to differentiate itself from competitors.</p>
<p>Best Practice 2: <i>Where the company's priorities lie with respect to one or more SDGs</i></p>	
<p>Best Practice 3: <i>Goals and indicators set by our company with respect to one or more SDGs</i></p>	<p>Please advise our Sustainability Report 2017 in (pages 11-13): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 4: <i>How one or more SDGs are integrated into the company's business model</i></p>	<p>Please advise our Sustainability Report 2017 in (page 10): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 5: <i>The (expected) outcomes and impact of your company's activities related to the SDGs</i></p>	<p>Please advise our tool: Generated Value Scorecard 2017: http://scorecard.mytilineos.gr/index-en.html</p>
<p>Best Practice 6: <i>If the companies' activities related to the SDGs are undertaken in collaboration with other stakeholders</i></p>	<p>Please advise our Sustainability Report 2017 in (pages 60-62): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

Implementing the Ten Principles into Strategies & Operations

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

<p>Best Practice 1:</p> <p><i>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives</i></p>	<p>Our commitment to sustainable development is embedded into our business agenda through our mission & our Code of Business Conduct, it is expressed by certain policies Disclosure Management Approaches (DMA) and it is supported by a certain CSR governance system.</p> <p>Generally, we work on two scopes: a) creating as many positive impacts as possible from our activity, and b) reducing risks related to environmental, social, employee, human rights and anticorruption matters.</p> <p>The implementation of our sustainability strategy is primary based on our CSR Governance System, with a certain structure. The integration of the CSR Governance System in the company's organizational structure relies on a uniform set of procedures and on specific reporting hierarchy, to overcome any obstacles which might result from the characteristic of our different business activity sectors. Moreover, sustainability responsibilities are assigned to main departments of the company.</p> <p>The main objectives of our CSR Governance system are:</p> <p>(a) To highlight the scope and breadth of the relevant concepts, with the goal to prevent social, environmental and governance risks,</p> <p>(b) to identify and implement policies and initiatives that will substantially contribute to the achievement of Sustainable Development,</p> <p>(c) to ensure the harmonization of company's sustainability commitments with the CSR objectives of its activity sectors,</p> <p>(d) to balance the economic, social and environmental implications of the company's business activities, while generating value for its shareholders and for all its other Stakeholder groups</p> <p>and</p> <p>(e) to guarantee that different business functions manage closely to maximize CSR performance.</p>
<p>Best Practice 2:</p> <p><i>Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy.</i></p>	<p>Our CSR approach, as a main practice to achieve sustainability, is a multifaceted and complex process characterized by our conscious self-commitment to continuous improvement. It is linked to all our business operations and defines the way in which we choose each time to move forward, taking steady steps towards achieving our continuous responsible development, guided by our mission and business values.</p> <p>In this direction:</p> <ul style="list-style-type: none"> • We created and published specific DMA's according to the new GRI STANDARDS for all material issues, with realistic targets to ensure the proper disclosure of our performance. • We have adopted the UN Sustainable Development Goals as an additional framework for measuring our impact. • We have established an open dialogue with our Stakeholders at local level. • We have adopted international standards, challenging ourselves to continues improvement of our operations (e.g. CDP-Water, UN Global Compact, ISO 26000, ISO 14001, ISO 14064, OHSAS 18001, ESG Criteria, GRI STANDARDS).

	<p>Moreover, our “Code of Business Conduct”, the “Suppliers Code of Conduct”, Environmental & Occupational Health and Safety Policies, are part of our CSR governance system and applied across all our business units.</p>
<p>Best Practice 3: <i>Design CSR strategy to leverage synergies between and among issues areas and to deal adequately with trade-offs.</i></p>	<ul style="list-style-type: none"> • For MYTILINEOS, CSR is a key strategic choice which over the last 10 years has been gaining increasing significance for developing and sustaining its competitiveness. The Company's primary objective is to introduce and implement related initiatives, which guarantee the existence of ethical operation criteria, respect for people and the protection of the natural environment in all its business initiatives and activity sectors. www.mytilineos.gr/en-us/csr-approach/about-corporate-social-responsibility • MYTILINEOS's CSR strategy is characterised by its conscious self-commitment to the achievement of "Continuous Responsible Development", guided by its vision and values (www.mytilineos.gr/en-us/our-strategy/about-corporate-social-responsibility). • The Company understands CSR as a fundamental factor which contributes to the prevention of economic, social and environmental risks, to build a context of trust in which can operate creating value for its Stakeholders. MYTILINEOS remains steadfast in its pledge to uphold the ethical rules and the principles that guarantee its unbroken alliance with Society, with its Employees and with the Environment, especially so in the adverse economic juncture the country is facing, which makes the contribution of businesses as social partners more imperative.
<p>Best Practice 4: <i>Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.</i></p>	<p>MYTILINEOS CSR Committee reviews and approves the CSR strategic lines as well as the material issues that determine the structure of the annual Sustainability Report. It may also act in the capacity of advisor to the Group's Executive Management and to the relevant Board Committees on the sustainability issues, to assist in their implementation in a more complete manner.</p>
<p>Best Practice 5: <i>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.</i></p>	<p>Also, MYTILINEOS has encouraged the creation of CSR teams in each its business activity sector. Each CSR team is responsible for developing, implementing and evaluating CSR initiatives according to the Company' s CSR Action plan as well as general policies and targets.</p> <p>For more information please see www.mytilineos.gr/en-us/csr-governance/info</p>
<p>Best Practice 6: <i>Other established or emerging practices.</i></p>	<p>Spotlight: INTEGRATED VALUE CREATION SCORECARD.</p> <p>Through our strategy, we seek to create value for our key stakeholder groups: customers, employees, shareholders and society.</p> <p>Value created by MYTILINEOS over time has two interrelated aspects – value created for the Group itself, which enables financial returns to the providers of financial capital and value created for others (i.e., stakeholders and society at large). The INTEGRATED VALUE CREATION SCORECARD tool, illustrates our efforts to provide our Stakeholders with concise, complete and transparent information about the value we create over time. http://scorecard.mytilineos.gr/index-en.html</p> <p>SCORECARD structure</p>

	<p>1. Description of the MYTILINEOS basic figures (activity sectors, industrial and renewable energy sources plants, number of employees, number of suppliers, countries of operation, turnover and social product).</p> <p>2. Basic description of the nature of capitals (financial capital, Industrial capital, natural capital, human capital and social capital) that Group's manages in the context of its activity.</p> <p>3. Capitals trade-off.</p> <p>3. Presentation of 2017 key outputs per capital.</p> <p>4. Presentation of generated value (outcomes) with reference to concrete KPIs and comparative graphs in relation with UN SDGs.</p> 
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Criterion 2: The COP describes value chain implementation

<p>Best Practice 1.: <i>Communicate policies and expectations to suppliers and other business partners.</i></p>	<p>As part of our efforts to communicate more effectively our values in our sphere of influence, we have published our “Suppliers and Business Partners Code of Conduct” which sets out more clearly our policies and expectations for a responsible supply chain management and aims to focus on communicating and promoting the principles of the UN Global Compact to our principal associates and suppliers.</p>
<p>Best Practice 2.: <i>Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence</i></p>	<p>According to our Suppliers & Business Partners Code of Conduct, MYTILINEOS may request to confirm the compliance of its key Suppliers / Business Partners with the ESG criteria in one of the following ways:</p> <p>Evaluations: The Group's key Suppliers / Business Partners may be requested to complete a questionnaire on the coverage of the above ESG criteria.</p> <p>Onsite verifications: MYTILINEOS representatives or an authorised business partner of the Company acting on its behalf may contact key Suppliers / Business Partners to request permission to visit their premises to verify on-site the level of coverage of the ESG criteria.</p> <p>Compliance certificates: Company's key Suppliers / Business Partners may be requested to produce relevant certificates or other official documents confirming their compliance with the ESG criteria.</p> <p>The 1st significant suppliers risk evaluation process has been scheduled for the 2nd half of the year 2018.</p>

<p>Best Practice 3: <i>Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners.</i></p>	<p>The application of Corporate Responsibility relies on our collaboration with social and other business partners and institutions, to promote our policies and to jointly work out and support solutions to important issues of concern at national level. To this end, MYTILINEOS is developing initiatives and is participating as an active member in voluntary Greek and international organizations, seeking to promote CSR and the principles of Sustainable Development, to exchange views on CSR-related issues, to improve its social and environmental contribution and to develop responsible practices in the broader business community.</p> <p>The 1st official suppliers open dialogue concerning sustainability risks and opportunities (in will take place in the 1st half of the year 2018.</p>
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Robust Human Rights Management Policies & Procedures

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

<p>Best Practice 1.: <i>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights).</i></p>	<p>MYTILINEOS respects all internationally recognized human rights as stated in our Code of Business Conduct. The Company complies with the Principles of the UN Global Compact, which are based on the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights. It also follows the internationally accepted practices in all geographical regions and countries where it operates, ensuring that its decisions on matters such as recruitment, compensations and benefits, promotions, professional training, termination of employment contracts, retirement etc. are taken having in mind the need to avoid any unfair discrimination.</p> <p>We promote the respecting of human rights in the following ways:</p> <ul style="list-style-type: none"> - In our business sectors by keeping our standards. - In our relationships with our supply chain. - By working through domestic and international external initiatives, such as the UN Global Compact or OECD Guidelines for Multinational Enterprises. - By implementing social programs with NGOs.
<p>Best Practice 2.: <i>Integrated or stand - alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p>	<p>Our “Disclosure Management Approach of Labor Practices & Human Rights” which express our commitment to respect and support Human Rights has been approved by the General Manager of Human Resources and is available to our internal and external stakeholders through our website and our Sustainability Report.</p>
<p>Best Practice 3: <i>Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services</i></p>	<ul style="list-style-type: none"> - MYTILINEOS “Code of Business Conduct”, - MYTILINEOS “Disclosure Management Approach of Employee Practices & Human Rights” - MYTILINEOS “Suppliers & Business partner Code of Conduct”
<p>Best Practice 4: <i>Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.</i></p>	<p>are publicly available on our website www.mytilineos.gr/en-us/corporate-social-responsibility/of-mytilineos-group</p>

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

<p>Best Practice 1.: <i>Process to ensure that internationally recognized human rights are respected.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS ensures labour relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promotes the fundamental principles of the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) the respect of the freedom of association; (b) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; and (d) the elimination of all discrimination in respect of employment and occupation. • The company also subscribes to and complies with the Principles of the UN Global Compact, which are based on the internationally recognised principles on the protection of Human Rights. In this direction an internal Human Rights Self - Assessment process, using the Global Compact related tool, is scheduled to take place every 3 years. • Moreover, MYTILINEOS "Code of Business Conduct" applies to all employees and management teams. • Company's "Suppliers and Business Partners Code of Conduct", includes a description of its minimum conditions and expectations from its supply chain, in CSR topics, as a prerequisite of commercial cooperation between the two parties. The Code applies to all suppliers and business partners and its sections cover matters such as Health and Safety, Working conditions and Human Rights, Ethics and Anti-Corruption, Environmental protection and management. <p>You can advise our Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 2.: <i>Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement / advocacy; partnerships and/or other forms of collective action.</i></p>	<p>In 2017, MYTILINEOS continued to implement, in collaboration with NGOs, high value initiatives such as the social program "I'M IN!", to combat school drop-out. The program carried out for the 3rd consecutive year, in collaboration with the Association "Together for Children". The program ensures that pupils continue their learning progress to complete their basic education, by developing a strong social solidarity network against educational and social exclusion and, in addition, makes a positive contribution to tackling poverty and unemployment in the long term.</p> <p>More information you can find in our Sustainability Report 2017 in (page 61): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 3.: <i>Allocation of responsibilities and accountability for addressing human rights impacts</i></p>	<p>You can advise our Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications</p>

Criterion 5: The COP describes effective monitoring & evaluation mechanisms of HR integration

<p>Best Practice 1.: <i>Leadership review of monitoring and improvement results.</i></p>	<p>As has been defined according to MYTILINEOS:</p> <ul style="list-style-type: none"> - CSR Governance system: www.mytilineos.gr/en-us/csr-governance/info - Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2.: <i>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders</i></p>	<p>In 2017, no Human Rights incidents has been identified across the Company.</p>
<p>Best Practice 3: <i>Outcomes of integration of the human rights principles.</i></p>	<p>Outcomes of due diligence process: Please advise our Sustainability Report (pages 55-56) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Disclosure of main incidents involving the company: In 2017, no Human Rights incidents has been identified across the Company.</p> <p>Outcomes of remediation processes of adverse human rights impacts: In 2017, there were no grievances related to human rights filed, addressed by internal or external stakeholders and resolved through formal mechanisms.</p>

Robust Labour Management Policies & Procedures

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

<p>Best Practice 1: <i>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies.</i></p>	<p>Company's DMA on "Labour Practices & Human Rights" and its "Code of Business Conduct" are aligned with international references such as the Universal Declaration of Human Rights, the ILO relative to the principles and fundamental rights at work the OHSAS 18001 International Standard and the principles of the Global Compact, among others. Also, our significant suppliers, subcontractors and other business partners are required to comply with the Company's "Suppliers and Business Partners Code of Conduct", which include respect for the Fundamental Conventions of the International Labour Organization and local legislation, particularly in terms of the minimum wage, working time and health and safety.</p>
<p>Best Practice 2: <i>Reflection on the relevance of the labour principles for the company</i></p>	<p>According to our Materiality process issues such as: Health & Safety & Employment practices were classified as a top subject.</p> <p>Please advise our Sustainability Report 2017 (pages 14-17): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 3: <i>Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and</i></p>	<p>You can advise our Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications</p>

engage in dialogue with representative organization of the workers (international, sectoral, national).

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

<p>Best Practice 1: <i>Risk and impact assessments in the area of labour.</i></p>	<p>We are applying specific impact assessment schemes such as: 1) the annual Materiality process, 2) the annual employees performance review system and 3) the annual Stakeholders Dialogue Forum. In addition, in all company's business sectors an Occupational Health & Safety Management System is applied, in accordance with the OHSAS 18001 International Standard. This system is designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture.</p>
<p>Best Practice 2: <i>Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards</i></p>	<p>MYTILINEOS has established an active dialogue between management and employees or their representatives. You can advise our Sustainability Report 2017 (pages 52-53) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 3: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>You can advise our Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 4: <i>Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.</i></p>	<p>You can advise our Code of Business Conduct: www.mytilineos.gr/en-us/codes-and-policies/of-mytilineos#tab-code-of-conduct</p>

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

<p>Best Practice 1: <i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>You can advise our Labor Practices & Human Rights DMA within our Sustainability Report 2017 (pages 49-50) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Also, regular internal reviews ensure that we adhere to all applicable labour laws and regulations and internal standards.</p>
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<p>Best Practice 2: <i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p>	<p>See Criterion 7 - Best Practice 2.</p>
<p>Best Practice 3: <i>Outcomes of integration of the Labour principles, approach) through schemes to improve workplace practices</i></p>	<p>We are reporting our performance according to GRI Standards. Advice our Sustainability Report 2017 (pages 49-57): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

Robust Environmental Management Policies & Procedures

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

<p>Best Practice 1: <i>Reference to relevant international conventions and other international instruments.</i></p>	<p>The adoption and implementation of international standards, related to the environmental protection is a dynamic approach in the consideration of potential risks. We are committed to implementing and integrating these standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> •ISO 14001 International Standard •ISO 14064 International Standard •The EU's environmental regulations and Best Available Techniques (BATs) •Carbon Disclosure Project (WATER) •The Global Reporting Initiative (GRI Environmental Standards). •The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. •The Kyoto Protocol •The ISO 26000 CSR International standard
<p>Best Practice 2: <i>Reflection on the relevance of environmental stewardship for the company.</i></p>	<p>According to our Materiality process the main environmental issues that may influence the assessments and decisions of our stakeholders are: 1) Waste management, 2) Environmental compliance, 3) Management of raw and other materials, 4) Control of greenhouse gas emissions and 5) Energy consumption.</p> <p>Please advise our Sustainability Report 2017 (pages 14-17): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 3: <i>Written company policy on environment stewardship.</i></p>	<p>You can advise our Environmental Management & Climate Change DMA within our Sustainability Report 2017 (pages 26-28) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Our DMA:</p> <ul style="list-style-type: none"> • is included in our new Code of Conduct. • is included in our Suppliers Code of Conduct. • is presented by our website through the new dedicated section on Corporate Social Responsibility. • is considered as a main discussion topic in annual Dialogue Forums with our Stakeholders groups.

	<ul style="list-style-type: none"> • is applied to all our subsidiaries and to all employees, irrespective of their position within the Group's hierarchy and promoting best practices, aiming at shaping the corporate image in the market.
<p>Best Practice 4: <i>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct: www.mytilineos.gr/en-us/responsible-management/of-local-suppliers</p>
<p>Best Practice 5: <i>Specific commitments and goals for specified years.</i></p>	<p>You can advise our Environmental Management & Climate Change DMA within our Sustainability Report 2017 (pages 26-28) www.mytilineos.gr/en-us/csr-reports/publications</p>

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

<p>Best Practice 1: <i>Environmental risk and impact assessments.</i></p>	<p>We assess and prioritize environmental risks as part of our overall risk management process. Our Environmental Management System, aligned with the ISO 14001 environmental standard, outlines our obligation to “manage the environmental risks of our activities” and stipulates that “environmental risk is part of the overall risk assessment which business units are required to complete on an annual basis.” We conduct environmental risk assessments in our production operations units. These include conservation and rehabilitation of nature and biodiversity, water and air pollution prevention, noise prevention, greenhouse gas stabilization & reduction, natural resource and water use and waste management. In addition, our CSR teams maintain ISO 14001 certifications. Such compliance includes annual audits performed by external auditors, as well as preparatory internal audits.</p>
<p>Best Practice 2: <i>Assessments of lifecycle impact of products, ensuring environmentally sound management policies.</i></p>	<p>MYTILINEOS complies fully with the national laws and the international guidelines and industry standards applicable to its activity sectors in connection with the design and manufacture of its products. The Company places emphasis on the quality of its materials, products and construction projects and applies innovative production processes that improve the quality, safety and environmental impacts of each product.</p> <p>Please advise our Sustainability Report 2017 (pages 65-66): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 3: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>According to the Company's EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that and because of the recent corporate restructuring, a new person (the head of HSE of the EPC Works) has taken over a coordinating role on the EHS aspects 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.</p>

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

<p>Best Practice 1: <i>System to track and measure performance based on standardized performance metrics.</i></p>	<ul style="list-style-type: none"> • The 100% of Company's activity sectors have in place an Environmental Management System certified in accordance with the ISO 14001 international standard. Also, in EPC Project sector is applied the ISO 14064 which is related with greenhouse gas emissions. In order to manage and control our environmental impacts, we establish goals, targets and timetables for environmental performance improvement, which are supported by performance measure indicators and reporting processes. These are monitored and managed by the relevant departments in each activity sector, while in the Company level we have placed KPIs aligned with GRI Standards. • Regular reviews conducted to confirm compliance to all applicable environmental laws, regulations & internal standards • Environmental management systems and data are audited by independent parties.
<p>Best Practice 2: <i>Leadership review of monitoring and improvement results.</i></p>	<p>The CEO as a member of the Company's Corporate Social Responsibility Committee, promotes initiatives to enhance sustainability of the Group's activity sectors. Also, CEO leads the Directors Council (one for each Business Sector) which take place in a monthly basis. The issue that come first (after the Occupational Health & Safety) on the Council's agenda is the MYTILINEOS' Environmental performance.</p>
<p>Best Practice 3: <i>Process to deal with incidents.</i></p>	<p>According to our Environmental Management System, all concerns are thoroughly investigated, and appropriate action is taken in case of non-compliance with MYTILINEOS environmental measures and principles. We have contingency plans (with trial application or application of emergency response procedures) and strategies in case of all types of pollution risks including accidental ones, or of other large-scale accidents such as significant spill or an uncontrolled and/or a controlled spill. As part of these plans, which are updated periodically, we identify the main weak points in the operated fields that require immediate attention if an event occurs.</p>
<p>Best Practice 4: <i>Outcomes of integration of the environmental principles.</i></p>	<p>We are reporting our performance according to GRI Standards and more particularly in the following Aspects: Energy, Materials, Water, Emissions, Effluents and Waste, Product and Services, Compliance, Overall and Biodiversity.</p> <p>Advice our Sustainability Report 2017 (pages 24-39): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 5: <i>Other established or emerging best practices</i></p>	<p>Spotlight:</p>  <p>In 2017 MYTILINEOS was included in the Leadership (A-) level of the CDP-WATER global initiative for sustainable development. Membership in the Leadership level is granted to companies that acknowledge the risks associated with water usage and apply best practices for the rational management of water, both within and outside the boundaries of their activities.</p>

For more information advice the following section within our website: www.mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility#tab-cdp-water

Robust Anti-Corruption Management Policies & Procedures

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

<p>Best Practice 1: <i>Publicly stated formal policy of zero-tolerance of corruption.</i></p>	<p>You can advise our Anti-corruption DMA within our Sustainability Report 2017 (pages 47-48) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Our DMA against corruption:</p> <ul style="list-style-type: none"> • is included in our new Code of Business Conduct • has been published in our annual Sustainability Report. • is presented by our website through the new dedicated section on Corporate Social Responsibility. • is included in our annual ESG presentation addressed to our Shareholders and potential investors. • is applied to all our employees, irrespective of their position within the Company's hierarchy.
<p>Best Practice 2: <i>Policy on anti-corruption regarding business partners.</i></p>	<p>Through our "Suppliers and Business Partners Code of Conduct" we expect from our new and significant partners to comply with the applicable national laws, regulations and the international anti - corruption conventions, as in force and to the extent to which the relevant provisions apply to the work that they provide on behalf of MYTILINEOS. Our detailed policies for our suppliers and business partners are specified within our related Code.</p>
<p>Best Practice 3: <i>Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes</i></p>	<p>You can advise our Anti-corruption DMA within our Sustainability Report 2017 (pages 47-48) www.mytilineos.gr/en-us/csr-reports/publications</p>

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

<p>Best Practice 1: <i>Internal checks and balances to ensure consistency with the anti-corruption commitment</i></p>	<p>Please advise our Sustainability Report 2017 (pages 47-48): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p> <p>The Legal and Regulatory General Central Support Function, of which the Compliance Department forms part, has been entrusted with the creation and implementation of a system of safeguards to protect the company from corruption and bribery.</p>
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<p>Best Practice 2: <i>Actions taken to encourage business partners to implement anti-corruption commitments</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct: www.mytilineos.gr/en-us/responsible-management/of-local-suppliers</p>
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Criterion 14: The CoP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

<p>Best Practice 1: <i>Process to deal with incidents.</i></p>	<p>Although, the transparency due diligence process is under formation, all possibly concerns are thoroughly investigated, and appropriate action is taken (administrative and illegal measures are available in accordance with the Company's internal working regulations), in case of non-compliance with Company's anti-corruption policy. Also, MYTILINEOS financial statements are independently audited every year. The Company will continue to have financial statements audited annually.</p>
<p>Best Practice 2: <i>Public legal cases regarding corruption.</i></p>	<p>During the reporting period, there were no public legal cases regarding anti-corruption.</p>
<p>Best Practice 3: <i>Outcomes of integration of the anti-corruption principle</i></p>	<p>Please advise our Sustainability Report 2017 (pages 47-48): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

Taking Action in Support of Broader UN Goals and Issues

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

<p>Best Practice 1: <i>Align core business strategy with one or more relevant UN goals/issues.</i></p>	<p>From the early beginning of 2017, in the framework of the corporate transformation the Company has entered a new era of evolution which presents improved prospects for growth, to the benefit of all its Stakeholders. In moving forward to the next decade, the elements that define the framework for the achievement of the Company's objectives in the domain of Corporate Social Responsibility comprise continuous learning and self-improvement, response to Stakeholder concerns, and transparency and accountability in connection with Company policies, decisions and performance, together with the recently enacted legislation. With its renewed, strong system of corporate governance and a new operational structure in place, the Company will work systematically and with enhanced effectiveness in order to promote sustainable practices across its value creation chain and develop partnerships that will promote the United Nations' 17 Sustainable Development Goals.</p> <p>Furthermore:</p> <ul style="list-style-type: none"> -Our core business strategy includes a set of CSR commitments and relevant Disclosure Management Approaches, which are aligned with the GRI STANDARDS, ISO 26000 CSR International Standard, OCDC Guidelines and the objectives and issues of the UN such as: Human Rights, Climate Change Mitigation, Anti-Corruption, Employment and Decent Working Conditions, Gender Equality and Biodiversity. -We participate actively in the UNGC Greece Local Network working groups and events such as the Human Rights Working Group, the Local Network meetings and expert group activities. -Since the December 2017, officially, our sponsoring & donations plan is aligned with SDGs and it is materialized through strategic alliances with local communities, NGOs and other associations aiming at sustainable communities. www.mytilineos.gr/en-us/empraktos/
<p>Best Practice 2: <i>Develop relevant products and services or design business models that contribute to UN goals/issues</i></p>	<p>Section "How we create value" within our Sustainability Report 2017 (page10): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

<p>Best Practice 3: <i>Adopt and modify operating procedures to maximize contribution to UN goals / issues</i></p>	<ul style="list-style-type: none"> • We have in place an annual social investment plan which is based on the local communities needs such as: Quality in Education, Bolstering Employment, Good Health, Culture and local infrastructure projects. • We have established strong relationships with NGO to contribute to Children's Rights and Health programs. • We have in our projects pipe line the formation of the due diligence process regarding to Anti-corruption and Human Rights protection. • Our "Code of Business Conduct" and "Suppliers and Business Partners Code of Conduct" based on UNGC 10 principles, the Universal Declaration of Human Rights, the United Nations Convention Against Corruption, ISO 26000 and the ILO International Labor Standards. • With the utmost respect for the personality of every individual, MYTILINEOS follows the internationally accepted practices in all geographical regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, professional training, retirement also the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination. As most of the company's activities are in the heavy industry sector, the participation of women in employment and the advancement of young employees (proportionately and always in accordance with the requirements in each activity sector), are key issues in the promotion of equal opportunities in its work environment. <p>Also please advise the section "Our approach to Sustainable Development" within our Sustainability Report 2017 (pages 11-13): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
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Criterion 16: The CoP describes strategic social investments & philanthropy

<p>Best Practice 1: <i>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</i></p>	<p>In 2017, MYTILINEOS continued to implement its Social policy through its three-year Social Contribution Program "IN PRACTICE" (2016-2019), contributing financial, human, material and technical resources to the development of services and the implementation of projects to support the growth of its local communities as well as of the society at large. The process that the Company followed for aligning its strategy with the UN Sustainable Development Goals resulted in a corresponding adjustment to its social agenda, which presented it with the opportunity to strengthen its collaborative activities and enhance the value it creates at the local and national level. In 2017, MYTILINEOS increased its social expenditure by 38.6% compared to 2016, supporting the social policy areas, as have been referred within our Sustainability Report 2017 (section 6): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group and in our website section of Social Contribution program: www.mytilineos.gr/en-us/empraktos/</p>
<p>Best Practice 2: <i>Coordinate efforts with other organizations and initiatives to amplify - and not negate or unnecessarily duplicate - the efforts of other contributors.</i></p>	<p>Cooperation's & Memberships in CSR initiatives: www.mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility</p>

<p>Best Practice 2: <i>Other established or emerging best practices.</i></p>	<p>Spotlight: Wishing to contribute to the sustainability of the local communities where it operates and in order to improve the everyday life of local residents, the Company invested €387,876 to cover the cost of infrastructures with a direct social benefit, such as: construction of playgrounds, upgrades to school buildings, provision of the equipment of a Municipal library, offer of materials for municipal works etc. In parallel, the added value created by the Company's business operation, with the development of projects utilising Renewable Energy Sources (RES) by its Electric Power Business Unit, refers not only to its contribution to the achievement of the national environmental goals but also to the significant benefits offered to the local communities. Thus, in 2017 the Company's total investment in infrastructure works in Municipalities where RES plants are in operation or new ones are to be deployed stood at €522,475. Finally, the Company's expenditure in support of major Greek cultural events, that promote the dissemination of cultural values and acquaint the Greek public with them, as well as in support of local sports clubs and of national federations of sports with a dynamic growth, stood at €590,154.</p>
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Criterion 17: The CoP describes advocacy & public policy engagement

<p>Best Practice 1: <i>Publicly advocate the importance of action in relation to one or more UN goals/issues.</i></p>	<ul style="list-style-type: none"> • We work with industry associations to inform public policy on sustainability challenges, sharing our experience and advancing practical solutions. • In 2008, MYTILINEOS become one of the first members of the SEV Business Council for Sustainable Development (BCSD) which promotes business models in line with global sustainability goals. Through the Council initiatives, in 2017, The company's CSR manager and other directors participated in key conferences related mainly to SDG's promotion to further advocate our commitment to the goals. • Since 2008, our CEO has been communicating publicly our commitment to the implementation of the principles of the Global Compact. • Our "Code of Business Conduct" and our "Suppliers and Business Partners Code of Conduct" are publicly available to all our Stakeholders groups and is aligned with international references such as the Universal Declaration of Human Rights, the Universal Declaration of the ILO relative to the principles and fundamental rights at work and the principles of the Global Compact.
<p>Best Practice 2: <i>Other established or emerging best practices.</i></p>	<p>Spotlight:</p>  <p>In 2017, MYTILINEOS was one of the first companies in Greece to sign the commitment statement as an initiator of the G.E.F.Y.R.A. (Greek Enterprises for Youth Reinforcement Acceleration) of the Greek Corporate Social Responsibility Network (CSR Hellas). This program combines the European initiatives for the EU talent apprenticeship and the European Pact4Youth European Pact into a single action, with core pillars of professional experience / training, internship and skills acquisition.</p> <p>More information can be found within our Sustainability Report 2017 (page 62): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

Criterion 18: The CoP describes partnerships & collective action

<p>Best Practice 1.: <i>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.</i></p>	<p>Multi-stakeholder partnerships are critical to solving many sustainability challenges. To this end, MYTILINEOS is developing initiatives and is participating as an active member in voluntary national and international organizations, seeking to promote CSR and SDGs, to exchange views on sustainability-related issues, to improve its social and environmental contribution and to develop responsible practices in the broader business community.</p> <p>MYTILINEOS participates in, endorses or supports voluntary the following initiatives:</p> <ul style="list-style-type: none"> • The UN Global Compact, since 2008. • The Carbon Disclosure Project (Water) since 2016 • The Global Reporting Initiative (GRI) international organization, since 2008. • The SEV Business Council for Sustainable Development (BCSD) since 2008. • The International standard of Corporate Social Responsibility (ISO 26000), since 2013.
<p>Best Practice 2.: <i>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain</i></p>	<ul style="list-style-type: none"> • The Hellenic Network for Corporate Social Responsibility, since 2006. • The "Council for Sustainable Development" of the Hellenic Federation of Enterprises (SEV), in which MYTILINEOS participates and adopts its Code of Principles and the Code of Corporate Governance. • The international standards on Quality (ISO 9001), Environmental Management (ISO 14001) and Occupational Health & Safety (OHSAS18001), which have been adopted by all Business Sectors. • The new Greek Sustainability Code, which the company operates as an ambassador, since 2015. • The "Code of Principles of Sustainable Development" of the Greek Mining Enterprises Association. <p>More information can be found within our Sustainability Report 2017 (page 8, 59-62): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 3: <i>Other established or emerging best practices</i></p>	<p>Spotlight: The program "ENGINEERS IN ACTION" is a part of the commitments undertaken by MYTILINEOS as initiator of the program GEFYRA (Greek Enterprises for Youth Reinforcement Acceleration), coordinated by the Greek Network for Corporate Social Responsibility (CSR Hellas, https://www.csrhellas.net/initiative/init-gefyra/) and aimed at promoting Sustainable Development Goals No 4 and 8 of the United Nations.</p> <p>The two previous annual cycles of the program were fully successful, as all the engineers who had participated, were able to find jobs within less than three months after they had completed the program, while a number of them joined directly the Metallurgy Business Unit of MYTILINEOS.</p> <p>According to the social value analysis of the program, which was based on the internationally recognised Social Return On Investment (SROI) methodology, a world-class innovative approach for industry, the Company's total investment in the</p>

	<p>program produced a social value representing a return ratio (SROI) of 4.24:1. In other words, every €1 invested in the program "ENGINEERS IN ACTION" generated the equivalent of €4.24 of social value, reflecting fully the advantages of such initiative, which contributes to building a society that offers equal opportunities within a sustainable environment.</p>
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Corporate Sustainability Governance and Leadership

Criterion 19: The CoP describes CEO commitment & leadership

<p>Best Practice 1.: <i>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN GC.</i></p>	<p>The CEO of MYTILINEOS supports the UN Global Compact and through the Chief of Staff office oversees the overall work and how the company contributes to the UN's Sustainable Development Goals, as highlighted in his statement at the 2017 Sustainability Report.</p> <ul style="list-style-type: none"> • Chairman's statement of Continued Support (CoP 2017) • Chairman's message (Annual Report 2017): www.mytilineos.gr/en-us/annual-reports/files • Chairman's message (Sustainability Report 2017): www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2.: <i>CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.</i></p>	<p>The CEO as a member of the Group's Corporate Social Responsibility Committee, promotes initiatives to enhance sustainability of the Group's activity sectors. Also, CEO leads the Executive committee which take place in a monthly basis. The issues that come first on the Council's agenda are the Environmental as well as the Health & Safety performance in all MYTILINEOS Business Sectors.</p>

Criterion 20: The CoP describes Board adoption & oversight

<p>Best Practice 1.: <i>Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS's CSR Committee, in which the Chairman is participating as a member, is primarily responsible for supervising and ensuring the correct implementation of the company's CSR Governance in terms of policies, actions and results about environmental, social and ethical issues. The Committee reviews and approves the Sustainability Report ensuring that all material issues are addressed. Also, it may also act as advisor to the Executive Management and to the relevant Board Committees on the above issues, to assist their implementation in a more complete manner. • The CSR Committee approves the material issues and their main disclosures for the formal CSR reporting purposes (e.g. Sustainability Report, UNGC CoP, and ISO 26000 CSR international standard).
<p>Best Practice 2.: <i>Board (or committee), where permissible, approves formal reporting on corporate sustainability (CoP).</i></p>	
<p>Best Practice 3.: <i>Board establishes, where permissible, a committee or assigns an individual board</i></p>	

member with responsibility for corporate sustainability.

More information can be found within our Sustainability Report 2017 (pages 72-73): www.mytilineos.gr/en-us/csr-reports/publications

Criterion 21: The CoP describes Stakeholders engagement

Best Practice 1.:

Publicly recognize responsibility for the company's impacts on internal and external stakeholders.

To succeed in our sustainability strategic lines, we need to engage and work in partnership with a wide range of stakeholders. These include: investors; employees, customers and consumers; suppliers; governments, regulators and legislators; NGOs; civil society; and others in the business environment, including peer companies. We seek to understand the issues of concern to our stakeholders and to respond openly and transparently to any questions raised about sustainability and the way we run our business. We publish our responses to some of these questions in our Annual Sustainability report.

More information can be found within our Sustainability Report 2017 (pages 16-17, 18-23, 58-59): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group

Best Practice 2.:

Define sustainability strategies, and policies in consultation with key stakeholders.

Proactively we are engaging with our key stakeholders as an important part of defining the sustainability issues that are material to our business, current and potential.

- Environmental Disclosure Management Approach
- Health & Safety Disclosure Management Approach
- Social Contribution policy
- Sustainability issues materiality analysis procedure

More information can be found within our Sustainability Report 2017 (pages 18-23): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group

Best Practice 3:

Consult stakeholders in dealing with challenges and invite them to take active part in reviewing performance.

We engage with a wide range of stakeholders on our sustainability matters including employees, consumers, customers and suppliers, as well as non-governmental organisations (NGOs), regulatory bodies, industry associations and authorities, both local and national, and the communities which are part of.

The Stakeholder Engagement process expresses the longstanding principle of the MYTILINEOS to deal with its Stakeholders through a systematic and honest dialogue. This practice is considered essential for the Group to achieve its short-term and long-term strategic goals and, therefore, ensure its sustainability. This initiative, which today has been established as an institution within the Company, is continuing with consistency and it is subject to self-evaluation and self-improvement techniques.

Through this procedure MYTILINEOS can understand and meet the expectations of the people, the local communities, the organizations, the businesses and the other social groups with which communicates, collaborates interacts in the framework of its business activity.

More information can be found within our Sustainability Report 2017 (pages 18-23): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group

Best Practice 4:

Establish channels to engage with stakeholders to hear their ideas and address their

The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders' specific needs and expectations.

<p>concerns and protect 'whistle-blowers'.</p>	<p>More information can be found within our Sustainability Report 2017 (page 19): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 5: <i>Other established or emerging best practices</i></p>	<p>Spotlight: Following the successful tradition of the last eight years, MYTILINEOS' Metallurgy & Mining Sector held the 3rd consecutive thematic consultation with its stakeholders, titled "Translating Entrepreneurship to value for society".</p> <p>Our 2017 Stakeholder Dialogue took place in Aspra Spitia, (Viotia Region) on October 16. This year's event was attended by 60 stakeholders, invited by the General Management of the Metallurgy Sector and comprising representatives from Local Government, local authorities, the key suppliers of the Company, local associations and organisations, local Media and the local school community, as well as representatives of the Company's employees.</p> <p>Discussions centred around the emergence and the consultation of the social footprint in financial terms and the value creation over the short, medium and long term by the Metallurgy Business Unit as well as by the overall business activity of MYTILINEOS at the local and national level respectively.</p> <p>More information can be found within our Sustainability Report 2017 (page 20): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>

