



Communication on Progress - 2018

UN Global Compact Advanced Level

(updated 19 August 2016).

The present Communication on Progress (CoP) report, refers to the period from 1ST of January 2018 to 31ST of December 2018, and should be read in conjunction with the MYTILINEOS Sustainable Development Report 2018.



Chairman's statement of Continued Support

MYTILINEOS has been a signatory of the UNGC since 2008 and is proud of the progress made in working towards 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.

Moreover, we are already contributing in the 17 Sustainable Development Goals 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.

Our Communication on Progress report below, highlights our actions to integrate the Global Compact principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders through our website and our annual Sustainable Development Report.

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

UN Global Compact Advanced COP 2018 Advanced Level

All information in MYTILINEOS's Communication on Progress 2018 is compiled from the company's:

- Sustainable Development Report 2018
- Annual Report 2018
- CSR policy
- GRI STANDARDS Content Index 2018
- Vision – Mission and set of Business Values
- Code of Business Conduct
- Suppliers & Partners Business Conduct
- Occupational Health & Safety DMA*
- Environmental Management & Climate Change DMA
- Anti-Corruption DMA
- Labour practices & Human Rights DMA
- Local Communities DMA
- Market presence 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 letter, this can be found in our Sustainable Development Report 2018 page 132.



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 17 Sustainable Development Goals (SDGs) and their related 169 targets have become an important framework for companies to rally around as they address an array of complex, interrelated global issues.</p> <p>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.</p> <p>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 MYTILINEOS Business Units activity, b) the results of the Materiality analysis process, c) the MYTILINEOS core business goals and d) the company's CSR strategic directions.</p> <p>MYTILINEOS, through this process, 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 its competitors.</p> <p>Also, as a company with a wide supply chain and different customers segments, we recognize that we cannot achieve any one of the SDGs on our own. We have a potentially significant role to play in meeting many of these ambitious aims. In this direction, we are trying to develop specific collaborations with NGOs, local communities and academic community as well as to engage our suppliers and business partners and our industry peers.</p>
<p>Best Practice 2: <i>Where the company's priorities lie with respect to one or more SDGs</i></p>	<p>SDGs with relevance to the MYTILINEOS material issues:</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:</p> <p>MYTILINEOS CSR Policy: www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf</p> <p>MYTILINEOS Sustainable Development Report 2018 ("Our approach to Sustainable Development" section page 26): www.mytilineos.gr/en-us/csr-reports/publications</p> <p>MYTILINEOS Generated Value Creation Scorecard 2018: https://scorecard.mytilineos.gr/index-en.html</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 Sustainable Development Report 2018 ("How we create value" section - page 21): www.mytilineos.gr/en-us/csr-reports/publications</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 Creation Scorecard 2018: https://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 Sustainable Development Report 2018 ("Local Communities" results section - pages 98 -104): www.mytilineos.gr/en-us/csr-reports/publications</p>

Implementing the Ten Principles into Strategies & Operations

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

<p>Best Practice 1: <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 approach to Sustainable Development is embedded into MYTILINEOS business agenda through its Mission & its Code of Business Conduct. It expressed by a clear CSR policy which is attended with specific Disclosure Management Approaches (DMAs) related to material issues 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> <ul style="list-style-type: none"> (a) To highlight the scope and breadth of the relevant concepts, with the goal to prevent social, environmental and governance risks, (b) to identify and implement policies and initiatives that will substantially contribute to the achievement of Sustainable Development, (c) to ensure the harmonization of company's sustainability commitments with the CSR objectives of its activity sectors,
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	<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: <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 activity sectors and 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 context:</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 are participating in CSR international standards and Initiatives, challenging ourselves to continues improvement of our operations (e.g. UN Global Compact, ISO 26000, CDP-Water Security, GRI STANDARDS, ISO 14001, ISO 14064, OHSAS 18001, ESG International Indexes). <p>Also, our "Code of Business Conduct", the "Suppliers and Business Partners Code of Conduct", Environmental, Occupational Health & Safety and Quality Policies, are part of our CSR governance system and applied across all our business activity sectors.</p> <p>Moreover, the Heads of our Business Sectors are actively involved in the management of social and environmental issues, providing the respective CSR teams of their Sector with the necessary directions and ensuring that the Key Performance Indicators (KPIs) are in line with the Group's strategic goals. The individual CSR teams operate within specific and clearly defined duties and obligations, to implement the central strategic goals and policies, as well as the CSR programmes at the local level.</p>
<p>Best Practice 3: <i>Design CSR strategy to leverage synergies between and among issues areas and to deal adequately with trade-offs.</i></p>	<ul style="list-style-type: none"> • Corporate Social Responsibility (CSR) is a multi-faceted and complex practice for MYTILINEOS, mainly characterized by the company's conscious self-commitment to responsible entrepreneurship and continuous improvement. Moreover, it is directly related to its business activity sectors and operations, as it defines how the company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values. MYTILINEOS CSR Policy • Also, the Company understands CSR as a fundamental factor which contributes to the prevention of its 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, Employees and the Environment, especially so in the adverse economic juncture the country is facing, which makes the contribution of businesses as social partners more imperative.

Best Practice 4:

Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.

Best Practice 5:

Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.

Best Practice 6:

Other established or emerging practices.

MYTILINEOS CSR Committee

reviews and approves the CSR strategic lines as well as the material issues that determine the structure of its annual Sustainable Development 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.

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.

For more information please see our Sustainable Development Report 2018 ("CSR Governance: section, page 128) www.mytilineos.gr/en-us/csr-reports/publications

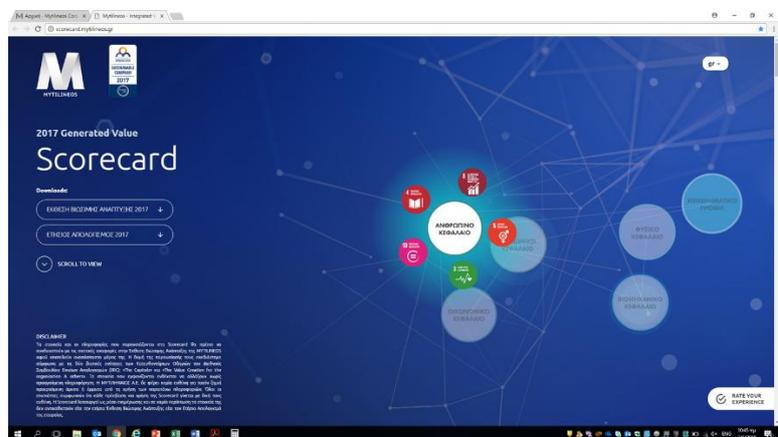
Spotlight: INTEGRATED VALUE CREATION SCORECARD.

Through our strategy, we seek to create value for our key stakeholder groups: customers, employees, shareholders and society.

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.

SCORECARD structure

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).
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.
3. Capitals trade-off.
3. Presentation of 2018 key outputs per capital.
4. Presentation of generated value (outcomes) with reference to concrete KPIs and comparative graphs in relation with **UN SDGs**.



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>In 2018, MYTILINEOS carried out the 1st official self-assessment of its main suppliers, as they were defined by each Business Activity Sector, through a structured questionnaire. The aim of this initiative was dual: 1) to investigate whether the company's suppliers own a recognition and management procedure of the most important and existing and potential negative effects (environmental and social) stemming from their activity and 2) to take stock of these effects to allow the company assess them and plan any corrective actions, in the framework of its goal to develop a responsible supply chain. A total percentage of 53% (146 basic suppliers) responded to this first attempt of bringing closer the company's suppliers with Sustainable Development issues.</p>
<p>Best Practice 3.: <i>Other established or emerging best practices</i></p>	<p>Spotlight: MYTILINEOS, having streamlined its strategic priorities with Global Sustainable Development Goals, planned a series of actions to build a more responsible supply chain across all sectors of its business activity, beyond the lawful compliance, by 2025. The Consultation 2018 (4th consecutive thematic unit and 9th in total since 2010), inaugurated the beginning of implementation of those actions by the company's Metallurgy Sector; the title of this Consultation was: “Developing a Responsible Supply Chain” with the participation of 50 key suppliers of all categories. The main targets of this open dialogue were the following: a) to inform suppliers on the latest developments regarding the company's growth and the overall purchase policy, b) to showcase the important role of the supply chain in Sustainable Development and c) to investigate ways of partnership for the attainment of mutual benefit goals. In conclusion, the Consultation highlighted the difficulties involved in sensitizing the supply chain in Sustainable Development issues, either due to the size of companies, or due to their limited exposure to external challenges and due to the lack of appropriate resources. However, an optimistic conclusion was reached since all suppliers agreed that their self-evaluation in social, environmental and labor issues constitutes more of an opportunity rather than a threat, because it will highlight the areas of their</p>

	activity in need of improvement, will help improve quality of products and services and strengthen the openness and development of their competitiveness.
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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 its Code of Business Conduct and the relevant "Disclosure Management Approach of Labor Practices & Human Rights". 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.</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 significant suppliers. - By implementing social programs with NGOs.
<p>Best Practice 2.: <i>Integrated or stand - alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p>	<p>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 Sustainable Development 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>are publicly available on our website www.mytilineos.gr/en-us/corporate-social-responsibility/of-mytilineos-group</p>
<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>	

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 Sustainable Development Report 2018 (page 82) 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>The completion of the 3rd and last round of the pilot social program for combating School Dropout, 'I AM IN', in cooperation with the Association 'Together for the Child'. Upon completion of the program, MYTILINEOS identified and analyzed its social value based on the international methodology Social Return On Investment (SROI) that applies the significant CSR programs it implements, constituting a pioneering fact and an innovation in the industry. Based on this analysis, the total investment for 'I AM IN' program produced a social value of 768,193.18 €, with an SROI indicator equal to 4,75:1. This means that for each 1€ invested in the program, the social value produced was 4.75 €. In a nutshell, the program's most significant achievements over the period 2016-2018, when 56 B' & C' grade of lower secondary school students participated, were the following:</p> <ul style="list-style-type: none"> • 90% of students participating in the program successfully completed their basic education and pursue their studies in upper secondary school (lyceum), being the program's main objective. • 16 new jobs were created, while 15 individuals from 4 different social organizations were employed in the program's management. • 6,800 healthy meals were provided to all students. • A total of 1,358 hours of remedial teaching were completed and 127 hours of experiential actions. • More than 400 hours of psychological intervention to students and counseling by school psychology experts to the program's participating teachers were carried out.

<p><u>Best Practice 3:</u> <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 Sustainable Development Report 2018 (page 82) www.mytilineos.gr/en-us/csr-reports/publications</p>
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Criterion 5: The COP describes effective monitoring & evaluation mechanisms of HR integration

<p><u>Best Practice 1:</u> <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 Sustainable Development Report 2018 (page 82) www.mytilineos.gr/en-us/csr-reports/publications
<p><u>Best Practice 2:</u> <i>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders</i></p>	<p>In 2018, no Human Rights incidents has been identified across the Company.</p>
<p><u>Best Practice 3:</u> <i>Outcomes of integration of the human rights principles.</i></p>	<p>Outcomes of due diligence process: Please advise our Sustainable Development Report (pages 92-92) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Disclosure of main incidents involving the company: In 2018, no Human Rights incidents has been identified across the Company.</p> <p>Outcomes of remediation processes of adverse human rights impacts: In 2018, 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><u>Best Practice 1:</u> <i>Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff</i></p>	<p>MYTILINEOS plans to create within 2019, apart of its DMA, the following two specific polices: 1) Employment policy & 2) Employee Training & Education policy with the relevant targets & KPIs.</p>
<p><u>Best Practice 2:</u> <i>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies.</i></p>	<p>MYTILINEOS'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</p>

	Conventions of the International Labour Organization and local legislation, particularly in terms of the minimum wage, working time and health and safety.
<p>Best Practice 3: <i>Reflection on the relevance of the labour principles for the company</i></p>	<p>According to MYTILINEOS Materiality process 2018, Health & Safety & Employment practices were classified as top issues.</p> <p>Please advise our Sustainable Development Report 2018 (pages 30-31): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p>Best Practice 4: <i>Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and engage in dialogue with representative organization of the workers (international, sectoral, national).</i></p>	<p>Please advise our Occupational Health & Safety and Labor Practices & Human Rights DMAs within our Sustainable Development Report 2018 (page 70, & page 82) www.mytilineos.gr/en-us/csr-reports/publications</p>

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 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>Allocation of responsibilities and accountability within the organization</i></p>	<p>MYTILINEOS Human Resources General Directorate is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to the Business Activity Sectors in coping with human resources related issues.</p> <p>Also, according to the Company's EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market.</p>
<p>Best Practice 3: <i>Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or</i></p>	<p>Main engagement & communication channels with employees:</p> <ul style="list-style-type: none"> • Formal Stakeholder Engagement process. • Formal Materiality process. • Established annual employee performance and skills review process. • Open & daily communication with all employees through the role of HR-Business Partner

<p><i>seek advice, designed and operated in agreement with the representative organization of workers.</i></p>	<ul style="list-style-type: none"> • Regular and ad hoc meetings between the Management and representatives of employees. <p>The reporting of Code of Conduct violations: Please advise our Code of Business Conduct: www.mytilineos.gr/en-us/codes-and-policies/of-mytilineos#tab-code-of-conduct (page 20)</p>
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Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration.

<p><u>Best Practice 1:</u> <i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>Please advise:</p> <ul style="list-style-type: none"> • MYTILINEOS's Occupational Health & Safety and Labor Practices & Human Rights DMAs within our Sustainable Development Report 2018 (pages 70 and 82) www.mytilineos.gr/en-us/csr-reports/publications • MYTILINEOS's CSR Policy www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf <p>Regular reviews ensure that we adhere to all applicable labour laws and regulations and internal standards. Also, we are committed to implementing and integrating international standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • OHSAS 18001 International Standard • International Labour Organisation convention • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard
<p><u>Best Practice 2:</u> <i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p>	<p>We have employee unions in 2 out of our 3 business activity sectors as well as regular and ad hoc communications practices with the management.</p> <p>Also, Health & Safety Committees are in operation in 66% of the company's Business Sectors, while employees are encouraged to submit their proposals with a view to improving safety conditions.</p> <p>Please advise our Sustainable Development Report 2018 ("Management & Employees relations" section page 89 & "Occupational Health & Safety results" section page 72): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p><u>Best Practice 3:</u> <i>Outcomes of integration of the Labour principles.</i></p>	<p>We are reporting our performance according to GRI STANDARDS which cover the following aspects: occupational health & safety, employment, relations between management and employees, training & development. Also, MYTILINEOS received no fines for non-compliance with labour laws and regulations in 2018.</p> <p>Please advise our Sustainable Development Report 2018 (pages 72 & 86): 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><u>Best Practice 1:</u> <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 14001-2015 International Standard •ISO 14064 International Standard •The EU's environmental regulations and Best Available Techniques (BATs) •Carbon Disclosure Project (WATER Security) •The Global Reporting Initiative (GRI Environmental Standards). •The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. •The ISO 26000 CSR International standard
<p><u>Best Practice 2:</u> <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) Environmental management (raw materials, waste, water, land use) and 2) Climate Change (control of greenhouse gas emissions and energy consumption).</p> <p>Please advise our Sustainable Development Report 2018 ("Materiality analysis" section page 28): www.mytilneos.gr/en-us/csr-reports/publications</p>
<p><u>Best Practice 3:</u> <i>Written company policy on environment stewardship.</i></p>	<p>You can advise our Environmental Management & Climate Change DMA within our Sustainability Report 2018 (pages 00-00) www.mytilneos.gr/en-us/csr-reports/publications</p> <p>Our environmental policy:</p> <ul style="list-style-type: none"> • is included in our new Code of Conduct. • is included in our Suppliers Code of Conduct. • is presented 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. • 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 (pages 7-8). Also, in 2018, MYTILINEOS carried out the 1st official self-assessment of its main suppliers, as they were defined by each Business Activity Sector, through a structured questionnaire. The aim of this initiative was dual: 1) to investigate whether the company's suppliers own a recognition and management procedure of the most important and existing and potential environmental impacts stemming from their activity and 2) to take stock of these impacts to allow the company assess them and plan any corrective actions, in the framework of its goal to develop a responsible supply chain.</p> <p>A total percentage of 53% (146 basic suppliers) responded to this first attempt of bringing closer the company's suppliers with Sustainable Development issues. Based on the survey findings:</p> <ul style="list-style-type: none"> • 7 out of 10 declared having a recognition and management procedure of environmental effects. • 7 out of 10 reported practices they put in place to mitigate environmental effects deriving from their activity. • Almost 5 out of 10 own certified environmental management system (ISO 14001).
<p>Best Practice 5: <i>Specific commitments and goals for specified years.</i></p>	<p>In terms of commitments & goals please advise MYTILINEOS:</p> <ul style="list-style-type: none"> • CSR Policy www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf • Environmental Management & Climate Change DMA within our Sustainability Report 2018 (page 48) www.mytilineos.gr/en-us/csr-reports/publications

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 14001-2015 environmental standard, outlines our obligation to "manage the environmental risks of our activities" and stipulates that "environmental risk is part of the overall risk assessment which business units are required to complete on an annual basis." We conduct environmental risk assessments in our production operations units. These include conservation and rehabilitation of nature and biodiversity, water and air pollution prevention, noise prevention, greenhouse gas stabilization & reduction, natural resource and water use and waste management. In addition, our CSR teams maintain ISO 14001-2015 certifications. Such compliance includes annual audits performed by external auditors, as well as preparatory internal audits.</p>
<p>Best Practice 2: <i>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 2018 (“Market Presence” section pages 106-111): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p> <p>Moreover, In the context of the circular economy, company's Metallurgy Sector has set itself the objective of developing technologies that will make possible the holistic utilisation of bauxite residues, through its participation in national and European research programmes.</p> <p>Please advise our Sustainability Report 2018 (“Waste Management” section pages 57-59): 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 the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, 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 14001-2015 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 issue of MYTILINEOS Environmental performance, per business activity sector, comes among the tops (after the Occupational Health & Safety) on the Executive Council's agenda (in a monthly basis) which is led by the CEO of the company.</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><u>Best Practice 4:</u> <i>Outcomes of integration of the environmental principles.</i></p>	<p>The integration of the environmental principle has resulted the absence of any incidents involving a deterioration in the quality of the environment. Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the company's operational units, is a process conducted internally, on a regular basis and by specialized personnel in each Business Sector, as well as annually, by a recognised independent organisation that undertakes to audit and certify the environmental management system in place. According to the results of the recent relevant audit for 2018, no deviations from the current environmental licenses were observed, which would necessitate the planning of investments for their rectification, while no cases of non-compliance with environmental rules and regulations were recorded.</p> <p>More specifically, we are reporting our performance according to GRI and more particularly in the following STANDARDS: Energy, Materials, Water, Emissions, Waste, and Biodiversity.</p> <p>Please advise our Sustainable Development Report 2018 (pages 52-67): www.mytilineos.gr/en-us/all-the-csr-reports/of-mytilineos-group</p>
<p><u>Best Practice 5:</u> <i>Other established or emerging best practices</i></p>	<p>Spotlight:</p>  <p>MYTILINEOS evaluation result, during the 3rd consecutive year of its participation in the global sustainable development initiative CDP-Water Security, ranked the company in the second best 'Management' level; this performance ranking is a peg lower compared to last year. This was an anticipated result, due to the upgrading of evaluation procedure qualitative criteria and of its enrichment with more and more demanding issues about water resources management. MYTILINEOS was one of the 1,268 companies worldwide that submitted adequate data for their evaluation, based on the new data, while, based on its performance, the company stands above the European and international average, compared to the companies operating in Metallurgy.</p> <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</p>

Robust Anti-Corruption Management Policies & Procedures

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

<p><u>Best Practice 1:</u> <i>Publicly stated formal policy of zero-tolerance of corruption.</i></p>	<p>Please advise our Anti-corruption DMA within our Sustainable Development Report 2018 (page 78) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Our zero-tolerance against corruption:</p> <ul style="list-style-type: none"> • is included in our Code of Business Conduct • has been published in our annual Sustainable Development Report. • is presented by our website through the dedicated section on Corporate Social Responsibility.
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	<ul style="list-style-type: none"> • 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 follow all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</i></p>	<p>Please advise our Anti-corruption DMA within our Sustainable Development Report 2018 (page 78) 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 Sustainable Development Report 2018 (page 78-81): 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>
<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>

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 corruption or bribery.</p>

Best Practice 3:

Outcomes of integration of the anti-corruption principle

Please advise our Sustainable Development Report 2018 (page 72): www.mytilineos.gr/en-us/csr-reports/publications

Taking Action in Support of Broader UN Goals and Issues

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

Best Practice 1:

Align core business strategy with one or more relevant UN goals/issues.

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**.

- Please advise MYTILINEOS CSR Policy in the following address: www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf
- 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. Please see www.mytilineos.gr/en-us/empraktos/

Best Practice 2:

Develop relevant products and services or design business models that contribute to UN goals/issues

Electric Power Sector

The generation and supply of electric power from natural gas-driven plants operating at the highest possible efficiency rates and from RES plants.

MYTILINEOS's Electric Power Sector, actively participates in two research projects, funded by the European Commission through "HORIZON 2020" Program. Both projects concern the development of an innovative suite of software applications and solutions designed to introduce the concepts of #EnergyEfficiency and #DemandResponse to end users.

Energy Efficiency ("UtilitEE" project)

The "UtilitEE" project, which is expected to be implemented within the next three years, will provide a Behavioural Change Framework, oriented to the end user, via an open Information and Communications Technology (ICT) ecosystem. The "UtilitEE" project focuses on discovering, quantifying and revealing energy-consuming activities, while sending meaningful feedback to the

end user, in order to engage them into a continuous process of learning and improving their energy behavior. Furthermore, it will incorporate human-centric intelligent control features that use occupants' every day habits, to minimize energy waste and keeping occupants comfortable while preserving a healthy indoor environment.

Demand Response (Holisher project)

The "HOLISDER" project, will introduce a Holistic Demand Response Optimization Framework that aims to significant energy costs reduction for the end user. "HOLISDER" combines a wide range of state of the art technologies, and integrates them into an accessible and interoperable framework, which constitutes of a suite of tools, to ensure the end user's empowerment into an "active market" player, through the deployment of a variety of implicit and hybrid Demand Response schemes.

Net Metering services

Electric Power Sector, in cooperation with EPC Project Sector, undertakes the installation and all the necessary procedures for the connection to a net metering system using solar panels, while making a tangible contribution to protecting the environment and combating pollution.

Net metering allows to generate your own electricity by offsetting your electricity usage as well as:

- To decrease your electricity bill
- To "save" electricity of the grid by exporting the excess electricity back to the distribution grid
- To "store" the excess production from your net metering facility to consume it at other later time
- To actively participate in protecting the environment, by producing "cleaner" electricity, regarding CO2 emissions

Electromobility

For more information please visit the following address www.protergia.gr/en/content/%CE%B5electromobility

Metallurgy Sector

The production of primary cast Aluminium products, made of one of the most environment-friendly metals, thus ensuring a safe work environment and the application of responsible and sustainable practices in the extraction process.

With respect to the circular economy, we further strengthened the already recognised innovation excellence of MYTILINEOS in the management of bauxite residues. 2017 saw the launch of the European R&D project SCALE for obtaining Rare Earths from residues of the European metallurgical industry, such as bauxite residues. This programme, with a total budget of €7 million, is coordinated by the MYTILINEOS Metallurgy Unit and implemented by a consortium of 19 partners (among which is the National Technical University of Athens - NTUA) from 9 European countries. Moreover, December 2017 saw the approval, with the top evaluation mark of 14.5/15.0, of the proposal for the European research project RemovAL, with the MYTILINEOS Metallurgy Sector as Coordinator. During the 4-year implementation period foreseen for the project, whose approved budget stands at €11.5 million, different technologies will be applied for the utilisation of bauxite residues. As a company, we will have the opportunity to exchange views and know-how and work closely with the other 27 major project partners, which include the largest alumina producers outside China (RUSAL, RIO TINTO, ALCOA), as well as the European Aluminium Association and the International Aluminium Institute.

	<p>EPC Project Sector The construction of turn-key power plants with the minimum possible environmental footprint, in countries with substantial needs in energy infrastructure, thus helping ensure access to energy for thousands of people.</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. <p>Also please advise MYTILINEOS CSR Policy in the following address: www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf</p>

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>MYTILINEOS strategic focus areas concerning its social contribution are defined by the following SDGs: SDG-1: No poverty, SDG-2 Zero hunger, SDG-3 Good Health, SDG-4 Quality Education, SDG-10 Reduced Inequalities and SDG-11 Sustainable cities & communities. Our community funding was channeled into the above strategic areas in 2018. (For more information, please see the section "Local Communities" of the 2018 Sustainable Development Report, pages 96-104). www.mytilineos.gr/en-us/csr-reports/publications</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>	<ul style="list-style-type: none"> • In 2018 MYTILINEOS pursued the implementation of its social policy through a three-year Social Contribution Plan "IN PRACTICE" (2016-2019) raising its social expenditure by 20,2% compared to 2017, implementing actions in social sectors directly associated with the Global Sustainable Development Goals and the respective national priorities. In 2018 MYTILINEOS invested more than €2.4 million into community programmes.

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.
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	<p>Through the Council initiatives, the company's CSR manager and other directors participated in key actions related mainly to SDG's promotion to further advocate our commitment to the goals.</p> <ul style="list-style-type: none"> • Since 2008, our CEO has been communicating publicly our commitment to the implementation of the principles of the Global Compact. • MYTILINEOS is an ambassador of the Greek Sustainability Code since 2015. The company was actively involved in Code's development, either by submitting its views and initiatives, through the open consultation or by participating in the relevant working groups. • Since 2016, the company is a voluntary participant in the global sustainable development initiative CDP - WATER, by disclosing extensive quantitative and qualitative information on the management of water resources in the context of its business activity. • 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>	<div style="display: flex; align-items: flex-start;"> <div style="flex: 1;">  <p>gefyra <small>Greek Enterprises For Youth Reinforcement Acceleration</small></p> </div> <div style="flex: 2; padding-left: 10px;"> <p>Spotlight: In the context of developing important partnerships for the attainment of the Sustainable Development Goals (SDG-4, SDG-8 & SDG-17) MYTILINEOS participates in G.E.F.Y.R.A. program (Greek Enterprises For Youth Reinforcement Acceleration), seeking to create qualitative jobs for 'employment preparation'. In 2018, under this initiative, the company developed 6 new forms of cooperation with higher educational institutions, while it continued the application of a successful program of 12-month salaried in-service training 'ENGINEERS IN ACTION' that constitutes an important option for young people who find themselves excluded from the labor market. In total, 81 new quality vacancies were created for occupational training, in-service training and apprenticeship, while 5 of these new posts were converted into new jobs in the METALLURGY Sector.</p> <p>More information can be found in the following address: https://www.csrhellas.net/initiative/init-gefyra/</p> </div> </div>

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>	<ul style="list-style-type: none"> • Reinforcing youth entrepreneurship and equal opportunities in education. In 2018, MYTILINEOS launched its cooperation with Athens University of Economics and with the Department of Administrative Science and Technology, to support the 9th Summer School of Youth Entrepreneurship (YES program), that has turned into an institution and attracts the interest of an increasing number of students across the country. The company offered in total 15 scholarships to upper secondary school students of all grades, enabling children of its employees and students from Attica and the rest of Greece to explore their capabilities as future executives or entrepreneurs and perceive
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	<p>more directly the outlook offered by this dynamically developing sector of economy. In addition, the company supported for 11th consecutive year the Scholarships Program of Piraeus University with 3 scholarships. This program aims to upgrade the studies and showcase excellence for a better future for young people and particularly for those coming from economically feeble families and to give them an equal opportunity of accessing the best possible education.</p> <ul style="list-style-type: none"> • Contributing to the attainment of the Global Sustainable Development Goal 16 that focuses on the elimination of all forms of violence, abuse and exploitation of children, MYTILINEOS supported actively as 'Great Panhellenic Sponsor' the organization of 12 training seminars, entitled 'Protect your Child from the Electronic Crime' in 10 cities in the country. For the company, this initiative is part of high social value actions since 3,166 students, parents and teachers had the opportunity to be informed about the safe use of Internet, phenomena of our times, addiction, high risk behaviors, ways of coping with the digital world challenges and to get answers in more than 200 different questions regarding their daily life submitted by the retired Police Lieutenant General of the Hellenic Police and President of Cyber Security International Institute Mr. Manolis Sfakianakis, who was the action's main rapporteur. • As regards health promotion and access by all to all basic care quality services, MYTILINEOS, in 2018 continued the important cooperation launched in the previous year, with the Charity "Pediatric Trauma Care". Through this collaboration, the company aims to contribute to creating and upgrading the Emergency Departments at State Hospitals and Health Centers and to inform parents and teachers on pediatric trauma. In the context of this cooperation, MYTILINEOS in 2018 undertook and finalized full upgrading of three (3) Emergency Departments: 1) the Pediatric Department of Livadia General Hospital, 2) Hydra Healthcare Center 3) the Pediatric Clinic of Ioannina General University Hospital, with the necessary medical equipment. Considering also the company's contribution to the respective Emergency Department of the General Hospital of Larissa, in the end of 2017, the specific healthcare infrastructure is set to serve currently more than 16,000 children annually. • In the context of the circular economy, MYTILINEOS continues its intensified efforts for waste management and holistic utilization, either by discarding them to production of other industrial materials or by participating in European research and pilot programs. <p>The above partnerships projects are indicative. More projects can be found within our Sustainable Development Report 2018 (pages 98-104): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 2: <i>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's</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>

<p><i>positive impact on its value chain</i></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. • 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>For more information please visit the following address: www.mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility</p>
<p>Best Practice 3: <i>Other established or emerging best practices</i></p>	<p>Spotlight: The completion of the 3rd and last round of the pilot social program for combating School Dropout, 'I AM IN', in cooperation with the Association 'Together for the Child'. Upon completion of the program, MYTILINEOS identified and analyzed its social value based on the international methodology Social Return On Investment (SROI) that applies the significant CSR programs it implements, constituting a pioneering fact and an innovation in the industry. Based on this analysis, the total investment for 'I AM IN' program produced a social value of 768,193.18 €, with an SROI indicator equal to 4,75:1. This means that for each 1€ invested in the program, the social value produced was 4.75 €. In a nutshell, the program's most significant achievements over the period 2016-2018, when 56 B' & C' grade of lower secondary school students participated, were the following:</p> <ul style="list-style-type: none"> - 90% of students participating in the program successfully completed their basic education and pursue their studies in upper secondary school (lyceum), being the program's main objective. - 16 new jobs were created, while 15 individuals from 4 different social organizations were employed in the program's management. - 6,800 healthy meals were provided to all students. - A total of 1,358 hours of remedial teaching were completed and 127 hours of experiential actions. - More than 400 hours of psychological intervention to students and counseling by school psychology experts to the program's participating teachers were carried out.

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. Please advise:</p> <ul style="list-style-type: none"> • Chairman's statement of Continued Support (CoP 2018) • Chairman's message (Sustainable Development Report 2018): 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 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 Board of Directors supports the UN Global Compact. • The Executive Committee quarterly review and guide sustainability performance (mainly on Health & Safety, Environmental and Human Resources issues). The chairman is Mr. Evangelos Mytilineos, Chairman & CEO of the company. • Also, MYTILINEOS's CSR Committee, 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 annual Sustainable Development Report ensuring that all material issues are addressed. Also, it may act as advisor to the Executive Management on the above issues, to assist their implementation in a more complete manner.
<p>Best Practice 2.: <i>Board (or committee), where permissible, approves formal reporting on corporate sustainability (CoP).</i></p>	<ul style="list-style-type: none"> • The CSR Committee approves the material issues and their main disclosures for the formal CSR reporting purposes (e.g. Sustainable Development Report, UNGC CoP, and ISO 26000 CSR international standard).
<p>Best Practice 3.: <i>Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.</i></p>	<p>More information about CSR Governance can be found within our Sustainable Development Report 2018 (page 128): www.mytilineos.gr/en-us/csr-reports/publications</p>

Criterion 21: The CoP describes Stakeholders engagement

<p>Best Practice 1.: <i>Publicly recognize responsibility for the company's impacts on internal and external stakeholders.</i></p>	<p>Proactively engaging with our key stakeholders is an important part of defining the issues that are material to our business, current and potential. The engagement with internal and external Stakeholders practically puts in place MYTILINEOS long standing commitment for responsible entrepreneurship and open, systematic and sincere social dialogue, as a key element of the social capital that the company uses, to ensure its sustainability and the added value creation for society.</p> <p>For more information please advise our:</p> <ul style="list-style-type: none"> • Stakeholder Consultation process: www.mytilineos.gr/en-us/dialogue-with-stakeholders/details • Sustainable Development Report 2018 ("Materiality analysis" section pages 28-31): www.mytilineos.gr/en-us/csr-reports/publications • Sustainable Development Report 2018 ("Stakeholder engagement" section pages 35-45): www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2.: <i>Define sustainability strategies, and policies in consultation with key stakeholders.</i></p>	<p>Proactively we are engaging with our key stakeholders as an important part of defining the sustainability issues that are material to our business, current and potential.</p> <p>Policies in consultation with key stakeholders (Metallurgy Sector):</p> <ul style="list-style-type: none"> • Suppliers & Business Partners code of Conduct (Stakeholder Consultation 2018) • Social Contribution policy (Stakeholder Consultation 2017) • Environmental Disclosure Management Approach (Stakeholder Consultation 2016) • Health & Safety Disclosure Management Approach (Stakeholder Consultation 2015) <p>More details can be found in our website: www.mytilineos.gr/en-us/dialogue-with-stakeholders/details</p>
<p>Best Practice 3.: <i>Consult stakeholders in dealing with challenges and invite them to take active part in reviewing performance.</i></p>	<p>MYTILINEOS applied the Open Social Dialogue with its Social partners groups, with absolute consistency over the last 9 years. In this respect, MYTILINEOS, having streamlined its strategic priorities with Global Sustainable Development Goals, planned a series of actions to build a more responsible supply chain across all sectors of its business activity, beyond the lawful compliance, by 2025. The Consultation 2018 (4th consecutive thematic unit and 9th in total since 2010), inaugurated the beginning of implementation of those actions by the company's Metallurgy Sector; the title of this Consultation was the following: 'Developing a Responsible Supply Chain' with the participation of 50 key suppliers of all categories. The main targets of this open dialogue were the following: a) to inform suppliers on the latest developments regarding the company's growth and the overall purchase policy, b) to showcase the important role of the supply chain in Sustainable Development and c) to investigate ways of partnership for the attainment of mutual benefit goals. In conclusion, the Consultation highlighted the difficulties involved in sensitizing the supply chain in Sustainable Development issues, either due to the size of companies, or due to their limited exposure to external challenges</p>

	<p>and due to the lack of appropriate resources. However, an optimistic conclusion was reached since all suppliers agreed that their self-evaluation in social, environmental and labor issues constitutes more of an opportunity rather than a threat, because it will highlight the areas of their activity in need of improvement, will help improve quality of products and services and strengthen the openness and development of their competitiveness.</p>
<p>Best Practice 4: <i>Establish channels to engage with stakeholders to hear their ideas and address their concerns and protect 'whistle-blowers'.</i></p>	<p>The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders' specific needs and expectations.</p> <p>More information can be found within our Sustainable Development Report 2018 ("Stakeholder Engagement" section pages 36-37): www.mytilineos.gr/en-us/csr-reports/publications</p>