“The new business model is the challenge for a sustainable future”
The purpose of this statement is to provide MYTILINEOS’ Stakeholders with an up-to-date overview of Environmental, Social and Governance (ESG) issues of interest to them, also summarizing the Company’s ESG performance in 2021.

In 2021, Sustainable, one of the world’s leading ESG rating agencies, included MYTILINEOS in its list of “Industry Top Rated Companies,” which features companies that during 2021 showed “Strong ESG performance in the industry group in which they are classified.” In addition, one more leading European agency specializing in the evaluation of corporate performance in sustainable development, Ecovadis, awarded to MYTILINEOS the gold award for its business practices and its commitment to sustainable development. Finally, MYTILINEOS received the highest ESG Quality Score in the “Environmental” category by the ESG rating organization IIS, while in 2021 it also maintained its top-tier level performance in the “Society” category.

The table below presents in detail the ESG rating schemes in which MYTILINEOS participates and their results for 2021. The Company has managed to improve or maintain its performance levels in almost all of the ratings it has participated in. Based on this performance, it ranks among the top 15% of the companies with the best performance in 9 of the 11 ESG Raters it participates in.

### ESG Performance Statement

**Climate Change**
- We disclose for the first time our indirect Scope 3 emissions from our upstream and downstream activities.
- We have disclosed for the first time data on our adaptation to climate change through the CDP international organization for Sustainable Development.
- We are consistently supporting the production of clean energy with investments in RES, which in 2021 rose to 79% of our total production, increased by 18.1% relative to 2020. The absolute direct and indirect scope 1 & 2 CO₂ emissions decreased by nearly 12.4% relative to their 2019 levels.

**Occupational Health and Safety**
- No fatalities or occupational diseases were recorded among direct employees. Despite the efforts made on an ongoing basis, there was one fatality involving a contractor employee.
- Injury rates (both interruption of work for 3 or more days per 100,000 work hours and indirect and direct employees were kept at low levels (0.37 & 0.22 respectively).
- The overall injury rate for direct and indirect employees was slightly lower than in 2020 at 0.85 and 0.29 injuries per 100,000 work hours respectively.

**Environmental Management**
- We implement an ISO 14001:2015 certified environmental management system and we also promote the systematic application of Best Available Techniques in all our Business Units.
- Our expenditures for the protection of the environment in 2021 amounted to €82.8 million.
- In 2021 there were no incidents of any form of pollution of the natural environment from our production activities.

**Circular Economy**
- We increased the production of secondary aluminum using scrap as raw material, which in 2021 represented around 20% of the Company’s total production, significantly contributing to the reduction of energy consumption and air emissions.
- The percentage of solid waste that was recycled and reused during 2021 increased to 25%.
- The percentage of solid waste directed to landfills was limited to 2.0%.
- We have reduced the total amount of hazardous waste by almost 16% from 2020.

**Research & Development**
- We continued to invest in research and innovation through the participation of the Metallurgy Business Unit in 24 European programs, in the level of its 18.4% Scope 2 CO₂ emissions decreased by nearly 12.4% relative to their 2019 levels.

**Ecological Impacts**
- During 2021 there have been no incidents of degradation of biodiversity as a result of the Company’s activities.
- We continued our mining activity in a responsible and sustainable manner, increasing to 70% the rehabilitation rate of the total exploitable land area used in mining operations, without earmarking new land areas for mining purposes.

**Water**
- We withdraw water from renewable sources, while our activity does not limit or threaten the adequacy of the water quantity available in the aquifer.
- In 2021, total freshwater withdrawal decreased at 3.6x thousand ML, slightly increased by 21.6% relative to 2020.
- The amount of water reused in other Company plants, thus preventing an equivalent volume of water withdrawals, amounted to 7.1x ML.
- Increased by 10.7% from 2020.

**Environmental Compliance**
- There have been no incidents of non-compliance with environment laws and regulations, as a result of which the Company avoided direct financial risks (e.g., fines) as well as indirect ones related to its image and reputation.

**Social Investments**
- Continuing with the implementation of our social policy, we implemented 16 social programs and social initiatives at central and local level, benefiting nearly 53,000 citizens and making a significant contribution to all social aspects of the Sustainable Development Goals.
- At the same time, the management of social issues, both centrally and at local level, has prevented the occurrence of risks that might have significant negative impacts on our financial results.

**Responsible Supply Chain**
- We have completed the training of 280 of our key suppliers who are based in Greece, in the 10 Principles of the United Nations Global Compact and Sustainable Development.
- We have launched the ESG assessment of key suppliers and, at the same time, we have introduced the sustainable development assessment process for new and existing suppliers, to all purchasing and procurement department/divisions of all our Business Units.

**Corporate Conduct**
- We continued the implementation of a custom training program in the Code of Business Conduct for Company employees.
- We applied our “Zero Tolerance” approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally.
- There were no financial sanctions arising from violations of our Code of Business Conduct.
- We are strictly comply with the legislation in force regarding our activity, as a result, there were no incidents of non-compliance involving any environmental, social and economic aspects of our activity.
- We successfully continued the dialogue with our Stakeholders at the local level, implementing a special thematic Consultation in the Metallurgy Business Unit, which was entitled "Covid19 Measures and actions for the effective management of the pandemic.
- Health protection and business continuity.

**Corporate Governance**
- We continue our voluntary adaptation to the UK Corporate Governance Code -2018 and have already aligned ourselves with approximately 75% of the relevant requirements.
- We have strengthened the supervision mechanism by which the Board of Directors oversees sustainable development issues by creating the Sustainability Committee of the Board of Directors.
- We incorporate ESG KPIs in the variable fees of the Board members’ remuneration, in order to also include the percentage of women on the Board of Directors to 27.3%.

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1. The acronym “ESG” refers to environmental, social and governance-related issues.
2. According to the results of the 2021 Materiality process (p. 40-41).
## Key ESG Targets

(Related to the ESG strategy defined by the Company)

<table>
<thead>
<tr>
<th>Targets</th>
<th>Expected achievement time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduction of total Scope 1 &amp; 2 CO₂ emissions (relative to 2019 data) (t CO₂e)</td>
<td>-30%</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Reduction of total Scope 1 &amp; 2 CO₂ emissions (relative to 2019 data) (t CO₂e)</td>
<td>-65%</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Reduction of specific CO₂ emissions per ton of aluminium produced (relative to 2019 data) (t CO₂e)</td>
<td>-75%</td>
</tr>
<tr>
<td>Power &amp; Gas Business Unit: Reduction of specific CO₂ emissions per MWh produced (relative to 2019 data) (kg CO₂e)</td>
<td>-50%</td>
</tr>
<tr>
<td>Sustainable Engineering Solutions (SES) Business Unit: Reduction of specific CO₂ emissions per ton of aluminium produced (relative to 2019 data) (t CO₂e)</td>
<td>Net Zero carbon footprint</td>
</tr>
<tr>
<td>Renewables &amp; Storage Development (RSD) Business Unit: Reduction of specific CO₂ emissions per MWh produced (relative to 2019 data) (kg CO₂e)</td>
<td>Net Zero carbon footprint</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Fluorine emissions (kg/t Al)</td>
<td>1.5</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Carbon tetrafluoride emissions (kg/tAl)</td>
<td>&lt; 0.06</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Sulphur dioxide (SO₂) emissions (kg/t Al) - electrolysis process</td>
<td>≤ 15</td>
</tr>
<tr>
<td>Production of secondary aluminium (t)</td>
<td>65,000</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Total water withdrawal (industrial use &amp; drinking water, m³/day)</td>
<td>≤ 10,550</td>
</tr>
<tr>
<td>Metallurgy Business Unit: Final disposal of hazardous solid waste in the Controlled Landfill for Hazardous Waste (kg/t Al)</td>
<td>&lt; 75</td>
</tr>
<tr>
<td>Serious environmental incidents</td>
<td>0</td>
</tr>
<tr>
<td>Rehabilitation rate of total exploitable land area used in mining operations</td>
<td>87%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Targets</th>
<th>Expected achievement time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of fatalities</td>
<td>0</td>
</tr>
<tr>
<td>Occupational diseases</td>
<td>0</td>
</tr>
<tr>
<td>Number of serious injuries</td>
<td>0</td>
</tr>
<tr>
<td>Total recordable injury rate (per 200,000 work hours)</td>
<td>Continuous improvement</td>
</tr>
<tr>
<td>Human Rights violation incidents</td>
<td>0</td>
</tr>
<tr>
<td>United Nations Women’s Empowerment Principles (UN WEPs)</td>
<td>Adoption of Principles</td>
</tr>
<tr>
<td>Percentage of employees who received formal performance evaluation reviews</td>
<td>&gt; 80%</td>
</tr>
<tr>
<td>Retention rate for full-time employees</td>
<td>&gt; 90%</td>
</tr>
<tr>
<td>Number of citizens benefiting from the development of social programs</td>
<td>-250,000</td>
</tr>
<tr>
<td>Rate of assessment of key suppliers based on ESG criteria</td>
<td>60%</td>
</tr>
<tr>
<td>Confirmed incidents of corruption and bribery</td>
<td>0</td>
</tr>
<tr>
<td>Financial sanctions imposed for violations of the Code of Business Conduct (€)</td>
<td>0</td>
</tr>
<tr>
<td>Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor &amp; social matters)</td>
<td>0</td>
</tr>
</tbody>
</table>

1. Concerns the Aluminium Production Department (Electrolysis Line - Smelter - Anodes Line).
2. Concerns the percentage of employees who meet the conditions for inclusion in the annual performance evaluation process (i.e., excluding those working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work).
Parameters of the Sustainable Development Report

The MYTILINEOS Sustainable Development Report (hereinafter the “Report”) is published annually (GRI 102-52) and refers to the review of the Company’s non-financial performance, supplementing its Annual Financial Report. It is also available online at the official MYTILINEOS website (mytilineos.gr/sustainability/reports/sustainable-development-reporting/).

Report preparation principles

The Report was prepared in accordance with the Standards of the Global Reporting Initiative (GRI STANDARDS), key indicators of the Sustainability Accounting Standards Board (SASB), the 10 Principles of the UN Global Compact, and the AADOGAP 2018 Accountability Principles Standard, taking also into account the ISO 26000 Social Responsibility international standard. In addition, the Report is in line with the relevant obligations arising from Greek legislation and European Directives.

Scope of the Report

This Report covers the period from 1/1/2021 to 31/12/2021 (GRI 102-50) and contains data about the following activities per Business Unit of the Company.

<table>
<thead>
<tr>
<th>Business Unit</th>
<th>Activities</th>
</tr>
</thead>
</table>
| Metallurgy ASI | • Bauxite mining  
• Production of anhydrous and hydrated alumina  
• Production of aluminium alloys  
• Operation of port facilities, loading and unloading of products  
• Treatment of aluminium alloys  
• Electric Power generation from gas-fired combined cycle power plants and RES plants  
• Development, management, operation and maintenance of the power plants  
• Cross border trade of electric power and natural gas  
• Supply of electricity to final consumers  
• Supply of natural gas for the Company’s own consumption, for sales to the natural gas wholesale market and to final consumers  
• Aggregate representation of RES / HCHP producers on the electricity markets - RES & HCHP Aggregator activity  
| Power & Gas | • Development, construction and operation of power generation plants as well as construction of electric power transmission networks and substations  
• Public and private infrastructure projects, including concessions and projects implemented via public-private sector partnerships (PPPs)  
• Environmental management and water and solid waste treatment projects  
• Development, construction and operation of energy efficiency projects, including projects implemented through Energy Performance Contracts (EPCs)  
• Development and construction of hybrid and off grid projects, as well as sustainable development projects using new technologies, digitalization and smart management of energy production system  
• Projects involving the design and construction of data storage and processing infrastructure (Data Centers)  
| Sustainable Engineering Solutions (SES) | • Development, construction and operation of projects related to the hydrogen economy, with a strong focus on the production of blue and green hydrogen  
| Renewables & Storage Development (RSSD) | • Development, Engineering - Procurement - Construction (EPC)  
• Operation and Maintenance (O&M) of photovoltaic projects, energy storage and large scale hybrid projects |

The data about these activities are obtained from the MYTILINEOS Central Functions and Business Units in the Greek territory, the construction sites operated by the Company through its Sustainable Engineering Solutions (SES) Business Unit in countries abroad, its RES subsidiaries currently in full operation and its other subsidiaries in which the Company’s participation is over 50%, as stated in its Annual Report. Non-financial data from Zinc / Lead Metallurgy operations are not included (GRI 102-45).

Report details

The structure of the Report is organized with a view to presenting quantitative and qualitative data about the performance of MYTILINEOS in meeting key Environmental, Social and Governance (ESG) criteria and has been prepared in accordance with the GRI Standards “Core” option (GRI 102-54).

The data and information presented in the Report are initially collected using the procedures and scientific capture methods applied in each Business Unit and subsidiary of the Company, as well as from the databases kept in the context of the implementation of the respective central corporate systems. The data are then forwarded through the integrated management system for the disclosure of non-financial performance, which consists of a software platform developed in-house (custom-configured Excel files based on the GRI Standards).

The calculation of the data composing the non-financial performance indicators included in the Report generally follows the definitions and methodology described in the respective GRI and SASB Standards. The data are checked and verified using the SAP system (where available), as well as using internationally accepted verification methods which the Company has available, such as the ISO 45001 Occupational Health and Safety Management Systems Standard, the ISO 14001 Environmental Management Systems Standard, and the ISO 9001 Quality Management Systems Standard that the Company has established. Also, data from direct measurements or estimates are included, while for comparison purposes use is primarily made of three-year historical data. Performance results at top level are calculated by consolidating (aggregating the relevant quantities) the individual data obtained from the Business Units and subsidiaries of the Company.

The content focuses on the sustainability topics which are of material significance for the achievement of the strategic goals of MYTILINEOS and which have been identified based on the Company’s formal Materiality process, in accordance with the GRI Standards: (GRI 102-40) 10 (GRI 102-47). The information presented in the Report is supplemented by the required references to the Company’s Annual Report 2021. Some figures have been rounded for reasons of consistency and better visualization.

Specifically for the Metallurgy Business Unit, throughout the scope of the Report, the data concerning the power transmission networks and substations are integrated into the electric power transmission networks and substations data, while for the Power & Gas Business Unit, the data concerning the operation and maintenance of power generation plants are integrated into the energy efficiency projects data.

Significant changes from previous reporting periods (GRI 102-45)

• The transformation of the CSR Committee into the Sustainability Committee of the Board of Directors  
• The disclosure of the following new Material topics for sustainable development: “Responsible Supply Chain”, “Business Model”, “Equal Opportunities”  
• Integration of Sustainability Accounting Standards Board (SASB) indicators and inclusion of the SASB Content Index.

Communication (GRI 102-53)

Views, comments or suggestions regarding the contents of the Report are most welcome and can be submitted using a custom-developed questionnaire, available at: mytilineos.gr/sustainability/report-sustainability-report-evaluation-questionnaire/, while for more information or clarifications, please contact:

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8 Artemidos Street  
Marousi, 15222 Athens  
E-mail: georgos.galanis@mytilineos.gr
What would be, in your view, a brief review of 2021 for MYTILINEOS?

For all of us, 2021 was a year full of contrasts. On one hand, humanity having just overcome the shock of the pandemic crisis and, on the other, having to face an even greater end unprecedented one, the economic, geopolitical and energy crises created by the war in Ukraine.

In this environment, the achievement of the goals we had set certify in the most emphatic way that we have moved in the right direction and, at the same time, have laid the foundations for the Company’s further progress. Drawing on our strategic advantages, the admirable effort of our people, our sustainable strategy and our firm commitment to our values, we have entered a very dynamic growth trajectory, maintaining the solid foundations for achieving our next goals.

What is the significance of sustainable development for MYTILINEOS?

As has been the case for years now, in 2021 Sustainable Development remained an integral part of the Company’s long-term business strategy. Sustainable Development for us, is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the Sustainable Development Goals. In this respect, we aim at creating long-term and sustainable value for our shareholder as well as for our other Stakeholder groups, by adopting a holistic approach in pursuing our activities, combining the safeguarding of jobs, and growing our business, our profitability, always in terms of social and environmental sustainability.

What are the main challenges (at the macroeconomic and/or political level) which you acknowledge MYTILINEOS is already facing or will have to face in the coming years and which may affect the Company’s sustainable growth?

One of the most important challenges in the years ahead is to establish the upgraded role of MYTILINEOS in the new production model that the country needs, with a strong focus on innovation, production, services and skills. At a time when rising energy costs, geopolitical developments, rapid climate change and compliance requirements for the implementation of good environmental practices and respect for human rights are already setting the scene, we are ready to evaluate our activities accordingly and, at the same time create a corporate culture, a new mindset and the operating model that will ensure the successful implementation of our Company’s commitments in the context of Sustainable Development. We have the capacity to deal with all the obstacles that will arise and move forward with our climate-related aspirations, protecting or even enhancing at the same time the global competitiveness of the European and the Greek industrial sector.

What activities and specific products and services of MYTILINEOS contribute to Sustainable Development?

It is no coincidence that 55% of our turnover draws from our activities eligible under the European Taxonomy for sustainable activities. MYTILINEOS plays an important role in sustainable development and in the achievement of the EU’s energy and climate goals. A key activity that directly contributes to sustainable development is the RES investment program that we have announced for 2030 and is central to our strategic priorities for a strong presence in both energy production and storage projects. In addition to making a substantial contribution to the national effort to increase green energy, this investment programme is a main pillar of our overall effort to achieve our ambitious targets regarding the reduction of carbon dioxide (CO2) emissions.

In 2021, several investments aimed at increasing output levels in our “green” Aluminium production line were completed, to ensure that the Company will be able to respond to both the growing demand and the ambitious environmental goals it has set, firmly establishing its Renewables & Storage Development (RSD) Business Unit as an innovative and experienced player in the Greek and international markets.

Moreover, we became the 1st Greek company to join the international Task Force on Climate-related Financial Disclosures (TCFD) initiative for the identification of the economic impacts of climate change, and successfully completed our 1st participation in the CDP Climate Change initiative. At the same time, in

What were MYTILINEOS key ESG achievements in 2021?

2021 was a milestone year for us in the field of Sustainable Development, as MYTILINEOS became the very first industry in Greece and one of the first worldwide, to commit itself to clear decarbonization targets for 2030 and 2050. At the same time, we were among the first companies to fully integrate ESG criteria into our company’s strategy, with our overall progress in this area establishing us as one of the world’s leading companies.

Finally, MYTILINEOS is now also positioned at the heart of innovation, through the MYTILINEOS Smart Cities initiative, a project for the development of services, applications and products addressed to cities, communities, settlements and even large organizations, seeking to create sustainable smart communities, making everyday life of the local communities easier.

As a culmination of this effort, in 2021 MYTILINEOS was recognized by Sustainalytics - one of the world’s leading ESG Ratings - as one of the “Industry Top Rated Companies” for its ESG performance, ranked 2nd out of 114 companies in the Industrial Conglomerates group.
2021 we joined the group of companies that support the international initiative “Science Based Targets initiative (SBTi)”, in order to scientifically validate our climate targets. We successfully underwent 11 ESG evaluations by international ESG Ratings, significantly improving our performance compared to 2020, thus further strengthening our position as one of the top corporate performers.

2021 also saw the development of the 1st edition of the MYTILINEOS Green Bond Framework (on the context of the Company’s 1st Green Bond issuance), accompanied by very good recommendations from ISS-ESG (as Second Opinion Provider in the relevant process), while we embarked on our adaptation to the Sustainability Accounting Standards Board (SASB) disclosure standard, with the aim of gradually linking the potential impacts of sustainable development topics on our financial results, which is a key issue for the investment community.

Engagement with our Stakeholders during the year was also successful, as the Stakeholder consultations held at central and local level yielded very positive results, with 88% of participants stating that the performance of MYTILINEOS in Sustainable Development, tasked with coordinating actions and developing new initiatives in Sustainable Development, to improve our ESG performance, and (c) the creation of special Sustainability / ESG teams in each Business Unit that cooperate with the General Division on the implementation of the corporate Sustainable Development Strategy. The new Sustainability / ESG teams, with their newly created roles of “BU Sustainability leaders” and “BU Sustainability / ESG category owners”, are responsible for the organization and implementation of sustainable development initiatives in each Business Unit of the Company.

How does MYTILINEOS address the energy transition?

Our approach focuses on the interrelationship between energy transition and the actions taken to tackle climate change, based on the following action lines: (a) reducing emissions and achieving a net zero footprint, (b) supporting the national energy transition, (c) boosting investments in RES, (d) creating low-emission products and services, (e) electrification, and (f) research and innovation.

We aim at reducing our total CO2 emissions by 30% and achieve a net zero footprint in 50% of our Business Units by 2030 and in 100% of our Business Units by 2050. At the same time, to achieve a net zero footprint, we create new low-pollutant activities and products through our Renewables & Storage Development (RSD) Business Unit, representing approximately 5 GW of RES projects that are fully operational or at an early stage of development, we increase the production of secondary aluminium from 65,000 tons to 2025, and we invest in sustainable development projects such as energy from waste (Proton) and solid & liquid waste management projects, through our subsidiary Zeologik. In connection with the above, the AII international certification which we obtained, ensures our responsible production of primary aluminium, contributing towards our aim to produce “green aluminium”.

In terms of supporting the national energy transition, we have over 2 GW of total installed capacity from thermal plants and, following the official launch of operation of the Company’s new state-of-the-art CCGT power plant, MYTILINEOS has taken the lead in the national effort for a smooth energy transition, contributing greatly to ensuring energy adequacy. In the field of clean energy, our ambitious investment program for over 2.5 GW of RES assets by 2030 is in progress, while we have 25 electricity storage projects under development and we are constantly building international partnerships for developing offshore wind farms in Greek sea areas.

In connection with the electrification of the Company’s operations, we plan to gradually replace corporate vehicles with hybrid / electric technology ones, to replace oil burners with electric heat pumps in corporate buildings, and to store energy on-site at 50% of our work sites around the world, by 2030.

Finally, regarding research and innovation, we invest in the application of cutting-edge technologies and the exploitation of digital industrial methods in the production stages, examining in detail the future application of innovative technologies in our activities. Additionally, more than 10 Applied Research & Development and Innovation projects for the benefit of consumers are also currently underway in the Power & Gas Business Unit.

Are there opportunities created that the Company could exploit and manage in the context of sustainable development?

Despite any adverse conditions, we retain the flexibility to identify and exploit new opportunities and adapt and manage in the context of sustainable development. Electricity will be the main source of energy in the new era due to the rapid electrification of the market, while it will be necessary to develop new technologies that will create added value in the energy market. Development opportunities at international level are also emerging from the accelerated transition to ‘green’ energy sources, so that countries can meet the environmental targets that have been set, while achievement of carbon neutrality by 2050 necessitates the installation of highly energy-efficient infrastructure in buildings with aluminium being a key component. At the same time, significant national and international commitments of funds and government incentives aimed at tackling climate change will further increase the availability of financial resources for the development of new technologies, while the response to the growing demand for low-carbon products and services is already noticeable.

2021 was one more year that will go down in history as a year of extraordinary - and, primarily, prolonged - challenges. The fluidity of the overall landscape, the uncertainty, the surprises and, of course, the issues related to the energy crisis that now need to be addressed with appropriate investments, compose a canvas fraught with challenges in a distant horizon, inspiring us to invest in creating a new green, innovative future.
Profile, activity sectors and Business Units

Vision
“Inspired and motivated by our Greek heritage, we lead our business to global success.”

Mission
“To operate in challenging local and international markets, showing resourcefulness, efficiency and respect for the environment and for society. To rely on the potential of our people and to create value for our customers, our shareholders, our employees and the Greek economy.”

Corporate Values
- Effectiveness with Safety as a priority.
- Ceaseless Effort for Competitiveness by our People.
- Respect and important role for every Employee.
- Two Success Factors: Teamwork and Excellence.
- Continuous improvement by all to everything we do.
Profile

Founded in Greece in 1990, MYTILINEOS has been listed on the Athens Exchange (ATHEX) since 1995 and is a leading international industrial and energy company, whose share is a constituent of the FTSE/ATHEX Large Cap Index. Its complex and wide-ranging business activity is a driving force for the Greek economy, while at the same time the Company has a dynamic presence in all 5 continents. As a responsible industrial company, MYTILINEOS seeks, through continuous reinvestment, to continuously develop and maximize business and economic synergies, to maintain leadership in each one of its Business Units and to apply the principles of Sustainable Development across the entire range of its core activities. At the end of 2021 the consolidated turnover of MYTILINEOS stood at nearly €2.6 billion. MYTILINEOS is active in the sectors of Metallurgy, Power & Gas, Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD), with 4,823 direct and indirect employees and more than 10,000 suppliers (in Greece and abroad).

Metallurgy Business Unit

MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminium in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries. The main categories of hydrated alumina customers are industrial companies active in the production of water treatment products, chemicals, aluminium fluoride, catalysts and combustion retardants. The Company’s international business activity is a driving force for the national economy as well as for the development of the Greek regional areas.

Power & Gas Business Unit

The activity of MYTILINEOS extends from the production of electric power from the operation of thermal power generation plants and Renewable Energy Sources (RES) plants to the cross-border trade of electric power and natural gas, the aggre- gated representation of RES and HCHP producers on the electric markets, and the supply of electricity and natural gas to the final consumer. It is the largest private electric power producer in Greece with an energy portfolio of 1,200 MW thermal production capacity and over 200 MW Renewable Energy Sources capacity. It covered approximately 11% of total electric power demand in Greece for 2021. In the field of cross-border trade in electric power, the Company’s total volume of transactions to complex hybrid projects. With strong technical capabilities and a global business scope, the Company designs and implements high-quality projects for customers worldwide. The Business Unit’s broader strategy also includes the use of the Build-Own-Transfer (BOT) business model for the development of photovoltaic projects, utilizing construction and development technology proprietary to MYTILINEOS. Mature and operational BOT projects represent 1,963 MW of installed capacity, while the projects of the Business Unit’s BOT portfolio in their early stages of development represent in total a power generation capacity of approximately 3.0 GW. The clients of the RSD BU are the global markets for the production and storage of solar energy, in particular Electric Power Production and Distribution Companies, Institutional investors, Industries and Private Investors.

Sustainable Engineering Solutions (SES) Business Unit

The Company proceeded to transform its EPC & Integrated Projects Business Unit (META) into a new, modern and innovative Business Unit, the Sustainable Engineering Solutions Business Unit (SES BU). With an expanded business scope, the new Business Unit, in addition to the construction of thermal power plants and selected infrastructure projects it traditionally carries out, also focuses on the dynamic development of projects that promote the Energy Transition and Sustainability. In what for example regards waste-to-energy projects (Energy Recovery Facilities). MYTILINEOS identifies great growth prospects in the field of environmental solutions and is actively engaged in discussions about undertaking large-scale projects of this type. Moreover, the SES BU undertakes the most complex and demanding projects on behalf of clients and investors in the fields of Development, construction and operation of power plants as well as construction of transmission networks and substations, public and private sector infrastructure projects, including concession and public private partnership (PPP) projects, environmental management and liquid and solid waste treatment projects, development, construction and operation of energy efficiency projects, including projects implemented through Energy Performance Contracts (EPCs), development and construction of hybrid and off-grid projects, as well as sustainable development projects using new technologies, digitalization and smart management of energy production systems, projects involving the design and construction of data storage and processing infrastructure (Data Centers), as well as development, construction and operation of projects related to the hydrogen economy, with a strong focus on the production of blue and green hydrogen.

Renewables & Storage Development (RSD) Business Unit

MYTILINEOS is strategically investing in the national and global goal of the energy transition. The Company, acknowledging that its subsidiary METKA EGN has already established itself as one of the leading manufacturers of photovoltaic and energy storage projects worldwide, proceeded to create a new Business Unit, the Renewables & Storage Development Business Unit (RSD BU). The new Business Unit has evolved into a strong growth pillar and is also unlocking inherent synergies for the Company. The RSD BU is a global manufacturer and EPC/O&M contractor for the full range of solar energy and storage projects, from autonomous solar parks and energy storage projects to complex hybrid projects. With strong technical capabilities and a global business scope, the Company designs and implements high-quality projects for customers worldwide. The Business Unit’s broader strategy also includes the use of the Build-Own-Transfer (BOT) business model for the development of photovoltaic projects, utilizing construction and development technology proprietary to MYTILINEOS. Mature and operational BOT projects represent 363 MW of installed capacity, while the projects of the Business Unit’s BOT portfolio in their early stages of development represent in total a power generation capacity of approximately 3.0 GW. The clients of the RSD BU are the global markets for the production and storage of solar energy, in particular Electric Power Production and Distribution Companies, Institutional Investors, Industries and Private Investors.

Key Figures (2021)

<table>
<thead>
<tr>
<th>Key Figure</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sales of Metallurgical Products</td>
<td>721.4 kt</td>
</tr>
<tr>
<td>Employees</td>
<td>4,823</td>
</tr>
<tr>
<td>Production Plants</td>
<td>28</td>
</tr>
<tr>
<td>Sales of Renewables &amp; Storage Development</td>
<td>28</td>
</tr>
<tr>
<td>Total Capitalization</td>
<td>€5,089.2 m.</td>
</tr>
<tr>
<td>Employees</td>
<td>5,621 GWh</td>
</tr>
<tr>
<td>Net Profits</td>
<td>€162 m.</td>
</tr>
<tr>
<td>Electricity sold</td>
<td>55%</td>
</tr>
<tr>
<td>Employees</td>
<td>Total Capitalization</td>
</tr>
<tr>
<td>Turnover</td>
<td>55%</td>
</tr>
</tbody>
</table>
Countries of activity 2021

[GR102-4]

MYTILINEOS

[GR102-3]

Head Office
8 Artemidos Street
Maroussi, 15125 Athens
Greece

Industrial production plants
Greece

Metallurgy Business Unit ASI
Countries where aluminium products are exported
Azerbaijan, United States of America, Austria, Bulgaria, France, Germany, Greece, Spain, Italy, Montenegro, Norway, Netherlands, Poland, Russia, San Marino, Slovakia, Slovenia, Sweden, Turkey, Tunisia, Finland

Sustainable Engineering Solutions (SES) Business Unit
Major energy and infrastructure projects under way
Ghana, Greece, United Kingdom, Libya, Nigeria, Slovenia, Albania, Georgia

Renewables & Storage Development (RSD) Business Unit
Greece, Cyprus, United Kingdom, Spain, Italy, Chile, Tunisia, Kazakhstan, Korea, Australia, Uzbekistan, Romania

Power & Gas Business Unit
Production and Supply of Electricity and Natural Gas
Greece
**Strategic priorities**

The Company’s main goal is to grow continuously and responsibly and to maintain the leading position of all its Business Units in their respective activity sectors through steady reinvestment, securing at the same time its sustainability and stable returns for its shareholders.

**Power & Gas Business Unit**

- Largest vertically integrated private electric power and gas company (utility) in Greece.
- Top-notch private supplier in the electric power retail market with a growing presence also in the retail gas market, focusing on further expanding its market share and holding also a significant share of the wholesale natural gas market, thus securing competitive energy production costs.
- Strong presence in the RES sector, with further implementation of a significant portfolio of RES projects that substantially contribute to the effort of the Greek electric power generation sector to double its installed RES-based capacity and gradual development of business activities in electric power storage projects.
- Oneration of a new 826 MW combined cycle gas-fired power plant (CCGT) to further consolidate the Company’s position as the leading independent electric power producer in Greece.
- Reduction of specific carbon dioxide (CO2) emissions per MWh of electric power production by nearly 50% by 2030 (relative to 2019 emission levels).
- Maintaining its leading position in gas imports with a strong presence also in cross-border gas trade.
- Expansion to the energy market of neighboring countries.

**Metallurgy Business Unit ASI**

- Continuous improvement in and commitment to Health & Safety at the workplace.
- Ongoing productivity and performance improvement to keep the Company’s place within the first quadrant of the global cost curve.
- Increase of the quantity of aluminium produced through the production of secondary aluminium.
- Reduction of total CO2 (Scope 1 & 2) emissions by 65% and of specific production emissions per ton of aluminium by 75% by 2030 (relative to 2019 emission levels).
- Improvement of the environmental footprint through continuous investments, the development of relevant know-how and innovative solutions.
- Ensuring the supply of raw materials.
- Provision of best-in-class products and solutions to customers, over and above the mere supply of goods.
- Exploiting opportunities for expansion of the Metallurgy Business Unit to new areas of activity.
- Reinforcing vertical integration or expansion to strengthen the Metallurgy Business Unit.
- Increasing competitiveness through strategic investments and risk-hedging methods.

**Sustainable Engineering Solutions (SES) Business Unit**

- Dynamic penetration in Sustainable Engineering Solutions projects in the sectors of circular economy, hybrid, off-grid and innovative energy projects (e.g., hydrogen projects) in Greece and abroad.
- Entry and dynamic presence in the market for energy recovery projects from domestic, and industrial waste, in collaboration with specialized technology providers, as well as in industrial and other wastewater treatment projects using pioneering technology proprietary to MYTILINEOS.
- Achievement of net zero footprint of the Business Unit’s activities by 2030 by undertaking concrete initiatives and actions.
- Maintaining and strengthening our position in the Greek and international market for gas-driven energy production projects and gas transmission and distribution (T&D) projects.
- Further development of our presence in high added value infrastructure projects, including PPPs and Concessions, focusing as a priority on the Greek market and on selected developing countries.
- Continuous exploration and implementation of synergies with the other MYTILINEOS Business Units and with international partners in new technologies and strategies.
- Balanced geographical expansion to new markets with significant growth prospects, and strengthening of our presence in countries where we operate today.
- Exploiting energy saving opportunities by developing solutions for a wide range of activities and customers.
- Exploring and exploiting opportunities arising from the digitization of energy services in existing and new activities.

**Renewables & Storage Development (RSD) Business Unit**

- Leadership in the implementation of EPC contracts for Photovoltaic and Energy Storage projects, with a strong international presence.
- Investments in RES projects that are an important parameter for achieving the goals of decarbonization of economies worldwide.
- Achievement of net zero footprint of activities by 2030 by undertaking concrete initiatives and actions.
- Further implementation of energy storage projects, an important factor towards the increasing development of RES-based energy production.
- Adoption of a comprehensive approach to the development and implementation of projects falling within the scope of the Renewables & Storage Development (RSD) Business Unit, and decision-making regarding the implementation of a new combined investment model.
- Continuous exploitation of new opportunities emerging as a result of the rise in competitiveness.
- Strengthening relationships and strategic partnerships with major investors in the sector.
- Entry and dynamic presence in the market for energy recovery projects from domestic, and industrial waste, in collaboration with specialized technology providers, as well as in industrial and other wastewater treatment projects using pioneering technology proprietary to MYTILINEOS.
- Achievement of net zero footprint of the Business Unit’s activities by 2030 by undertaking concrete initiatives and actions.
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- Exploiting energy saving opportunities by developing solutions for a wide range of activities and customers.
- Exploring and exploiting opportunities arising from the digitization of energy services in existing and new activities.
In parallel, the Company’s dynamic business growth is inextricably linked to the principles of Corporate Responsibility and Sustainable Development. MYTILINEOS is actively involved in domestic and international initiatives and organizations working to address the challenges of Sustainable Development.

Since 2019, MYTILINEOS is participating in the International Aluminum Stewardship Initiative (ASI) as a Production & Manufacturing member.

As a founding member of the Council on Sustainable Development established by the Greek Federation of Enterprises (SEV), MYTILINEOS is fully committed to the relevant Code of Principles and is actively participating in the Council’s initiatives for the promotion and dissemination of the Sustainable Development principles.

MYTILINEOS has been supporting since 2016 the achievement of the Global Sustainable Development Goals (2030 Agenda), contributing to the respective national priorities.

As of 2012, MYTILINEOS has taken account of the Principles of the Corporate Social Responsibility international standard in its operation and is disclosing information on its progress and performance on an annual basis.

Since 2006, MYTILINEOS has been an ambassador of the Greek Sustainability Code since 2015, having actively participated in its development, either by tabling views and initiatives, through the open consultation held in the context of dialogue or by participating in the relevant working groups.

Since 2006, MYTILINEOS has been an official member of CSR Hellas, the Hellenic Network for Corporate Social Responsibility, taking active part in and supporting the Network’s various activities for the promotion and dissemination of the Corporate Social Responsibility principles and practices.

MYTILINEOS has been a member of the ‘Hellenic Association of Independent Power Producers’, an initiative whose main objective is to promote and manage issues related to the generation and distribution of reliable, cost-effective and environmental-friendly electric power and to deregulate the market for all energy raw materials.

Since 2016, MYTILINEOS has been voluntarily participating in the CDP Water Security global sustainable development initiative and, since 2021, is also participating in the CDP’s Climate Change Index, disclosing extensive quantitative and qualitative data regarding the management of water resources and its response to the impacts of climate change in the context of its business activity.

Ecovadis is the world’s leading supplier rating agency for responsible entrepreneurship. By participating in the Ecovadis evaluation platform, MYTILINEOS responds to its customers’ request by giving them access to its relevant reports and performance which they can use as a purchasing criterion.

Through SEV, MYTILINEOS takes part in the Business Europe initiative, whose aim is to promote development and competitiveness at European level and to support European companies on the issues that affect their performance the most.

Since 2008, MYTILINEOS has been consistently declaring its commitment to upholding the ten principles of the Global Compact, by disclosing its performance on an annual basis.

Distinctions

2021 was again a great year for the Company, which garnered major awards and distinctions.

- Inclusion of MYTILINEOS in “The Most Sustainable Companies in Greece 2022”.
- At the 19th edition of the “MONEY Business Awards 2021”, MYTILINEOS won the 1st Prize in the category “Corporate Governance - 2021”.

Hellenic Responsible Business Awards 2021

- GOLD Award for the implementation of the program “Information and awareness raising of the school community on forest fire prevention and response, forest protection policies and practices”, which seeks to provide students and educators of Primary and Secondary schools with up-to-date information about the prevention of forest fires and to help them understand the value of the forest through sowing of tree seeds / tree-planting activities in areas affected by fires.
- GOLD Award for the Company’s support of “The Tipsing Point” initiative of The Tipsing Point organisation.
- GOLD Award for the implementation of the Suppliers Training Program “Business Responsibility for Sustainable Development”, carried out by MYTILINEOS in cooperation with the CSR Hellas network.

Bravo Sustainability Dialogues & Awards 2021

- Distinction in the BRAVO Society pillar for the implementation of the program ‘Creation & Upgrading of Emergency Departments’, in cooperation with the organization ‘Pediatric Trauma Care’.
- Distinction in the BRAVO in Action pillar for the implementation of the program ‘We offer help to Children’ in cooperation with the organization ‘Mission ANTHROPOS’.

Energy Mastering Awards 2021

- GOLD Award in the ‘Energy Engagement’ category for the submission ‘Protergia’s shaping of users’ energy-efficient behavior’.
- SILVER Award in the ‘Reduction / Minimization Emissions’ category for the submission ‘Protergia Change Business Complete’.
- SILVER Award in the ‘Energy Transition Leadership’ category for the submission ‘Protergia’s shaping of energy communities’.
- BRONZE Award in the ‘Smart Building Technologies’ category for the submission ‘Protergia Change Home Complete’.
- BRONZE Award in the ‘Energy Efficiency in Mobility’ category for the submission ‘Protergia Change City - Adopt the City Project’.

HR Awards 2021

- BRONZE Award in the ‘Excellence in Performance Management Strategy / Initiative’ category, for the submission ‘Performance Management: It’s About You, Not The Process’.

Distinctions

- HRM Practices 2021 – Bronze Award for “HRM Strategies”.
- HRM Practices 2021 – Bronze Award for “HRM Plans”.
- HRM Practices 2021 – Bronze Award for “HRM Processes”.

MYTILINEOS Sustainability Standards & Assurance

How we create value

MYTILINEOS creates value for its Social Partners through its business activities, making a substantial contribution to the economy, to employment and to the development of its local communities.

From approaching the markets, developing and maintaining relationships with clients, purchasing raw materials, to producing, marketing and selling its products, collecting earnings and supporting them throughout their lifecycle, MYTILINEOS creates an important value chain with a strong social and economic impact. Across all its Business Units, MYTILINEOS supports incomes, tax revenues and jobs, and the same applies for its suppliers and business partners within their own value chain. This way, the Company’s positive footprint is multiplied, reaching beyond the Company and affecting domestic employment and the relevant sectors of the economy. The information given on the production and distribution of economic value in the table below illustrates how MYTILINEOS creates wealth for its key social partner groups.

### Economic Value Table1 (GRI 201-1) 2019 2020 2021

<table>
<thead>
<tr>
<th>Economic value generated</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sales (thousands €)</td>
<td>2,256,091</td>
<td>1,898,623</td>
<td>2,664,050</td>
</tr>
<tr>
<td><strong>Economic value distributed</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cost of goods sold (thousands €)²</td>
<td>1,919,722</td>
<td>1,528,864</td>
<td>2,249,228</td>
</tr>
<tr>
<td>Retirement and other employee benefits (thousands €)</td>
<td>93,807</td>
<td>123,588</td>
<td>114,114</td>
</tr>
<tr>
<td>Income tax and other taxes (thousands €)</td>
<td>84,767</td>
<td>73,444</td>
<td>75,029</td>
</tr>
<tr>
<td>Payments to capital providers (thousands €)³</td>
<td>73,053</td>
<td>80,299</td>
<td>75,322</td>
</tr>
<tr>
<td>Social investments (thousands €)</td>
<td>3,471</td>
<td>3,211</td>
<td>9,179</td>
</tr>
<tr>
<td><strong>Total (€)</strong></td>
<td>2,194,770</td>
<td>1,828,456</td>
<td>2,523,772</td>
</tr>
<tr>
<td>% economic value distributed</td>
<td>97.3%</td>
<td>96.2%</td>
<td>94.7%</td>
</tr>
<tr>
<td>% economic value retained</td>
<td>2.7%</td>
<td>3.7%</td>
<td>5.3%</td>
</tr>
</tbody>
</table>

1. The amounts for "income tax and other taxes" have been updated after deferred taxes were excluded for the previous years [GRI 102-48]
2. Cost of goods sold plus administrative & distribution expenses, minus: (a) retirement and other employee benefits, (b) taxes and duties, and (c) community-level social investments that have been included in this amount.
3. Includes interest payments and dividends paid out to shareholders.

### Social Product

MYTILINEOS’ total Social Product for 2021 amounted to €2,348 million, increased by 72% compared to 2020. The economic value generated and distributed was the following, by key Social Partner group:

- **Employee wages and benefits**: €114.1 m.
- **Taxes paid to the State**: €75.9 m.
- **Total payments to Greek suppliers**: €16 b.
- **Investments for improving the Company’s environmental footprint**: €379.3 m.

The MYTILINEOS contribution to Greek economy and employment (broad picture):

- **Total value added of**: €21.6 b.
- **Total tax contribution at**: €245.8 m.
- **Supports in total**: 26,216 jobs

The MYTILINEOS’ socio-economic impact in Greece:

Every year, MYTILINEOS generates remarkable economic and social value in the country, as a responsible company that interacts with its social partners. In this context, the 3rd Socio-Economic Impact Study of the Company was carried out, with a reference period from January 1, 2021 to December 31, 2021, conducted by an independent specialized socio-economic footprint research company according to the Nobel Prize "input-output" model.

The results of the study confirmed once again the responsible attitude and broader contribution of MYTILINEOS to the national economy and employment. At the same time, the Company is contributing to the collective effort to achieve the UN Sustainable Development Goals 8 & 9, regarding economic growth and boosting employment in the industrial sector respectively.

The social and economic impact of MYTILINEOS in Greece is derived from the economic activity it causes across its value chain, from the production to the promotion and sale of its products. For its operation, MYTILINEOS procures raw materials, products and services from Greek suppliers, thus supporting various business sectors of the Greek economy, such as electricity and gas, construction, metallurgy etc. In doing so, the Company supports incomes, tax revenues and jobs and, correspondingly, the same applies for its suppliers and business partners within their own value chain.

The multiplier benefit of MYTILINEOS’ operation for the Greek economy:

- In 2021, each unit of value added produced by MYTILINEOS contributes 2.6 units of value added to the economy.
- In 2021, 4357 jobs are created in the Greek economy per million euros of added value of MYTILINEOS.
- For every 1 direct job of the Company, 10 additional jobs are supported in the wider Greek economy.
- The full Socio-Economic Impact study is available on the website of MYTILINEOS: mytilineos.gr/sustainability/reports

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1. The MYTILINEOS environmental expenditures, in 2021, amounted to €379.3 million and related to waste disposal, management and related costs of air emissions, environmental remediation, as well as environmental prevention & management actions. Out of the above expenses, the amount of €78.3 million related to operating expenses (Operational Expenditure - OpEx) and the amount of €45 million related to capital expenses (Capital Expenditure - CapEx).
Business Model

The Company’s business model is at the core of its operation. It is the system that converts the available resources used by the Company, through its Business Units, to products, services, by-products and waste, which it produces, sells and manages with positive or negative impacts, in order to fulfill its strategic goals and create sustainable value for its shareholders, employees, customers, the natural environment and the wider society. The relevant key performance indicators, together with descriptions of the interrelationships between the resources the Company utilizes in the context of its Business Model, are available at scorecard.mytilineos.gr.

1 Resources we utilise

Our intellectual property covers a wide range of subjects, from research and development to marketing strategy, decision-making and operations.

We make sustainability a key pillar of our strategy, decision-making and operations.

We implement a new strategy for our net zero footprint by 2050.

We aim to continuously improve our performance by creating value in all three Sustainable Development pillars.

2 How we operate

Vision - Mission - Corporate Values

<table>
<thead>
<tr>
<th>Governance</th>
<th>Central Functions &amp; Support Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Corporate Governance System</td>
<td>• Finance</td>
</tr>
<tr>
<td>• Risk Management System</td>
<td>• Treasury</td>
</tr>
<tr>
<td>• Code of Business Conduct</td>
<td>• Strategy, Mergers &amp; Acquisitions</td>
</tr>
<tr>
<td>• Corporate Policies and Procedures</td>
<td>• Human Resources Management</td>
</tr>
<tr>
<td>• Established Stakeholder Engagement Process</td>
<td>• Corporate Governance &amp; Sustainable Development</td>
</tr>
<tr>
<td></td>
<td>• Legal &amp; Regulatory Affairs</td>
</tr>
<tr>
<td></td>
<td>• Corporate Communication &amp; Marketing Strategy</td>
</tr>
</tbody>
</table>

Business Units

- Metallurgy
- Power & Gas
- Renewables & Storage Development
- Sustainable Engineering Solutions

Our diversified business model and the strong synergies between the Business Units enable MYTILINEOS to sustain its strong financial performance and enhance its business development in tandem with its commitment to the UN 2030 Agenda.

3 Value generated by our business activities

**Economic Value**

- 4,823 direct and indirect employees
- €114.1 m. employee wages and benefits
- €75.9 m. taxes paid
- €1.6 bn. total payments to Greek suppliers
- €379 m. total investments
- €1.2 m. total exports
- 10.7% share of the domestic electric power production
- 334,000 electricity and gas customers

**Environmental Value**

- 12.4% reduction in total CO2 (Scope 1 & 2) emissions compared to 2019 levels
- Zero incidents affecting the natural environment, as a result of industrial accidents
- €82.8 m. expenditure for the protection of the natural environment
- 91% of total water consumption from renewable sources (low-depth sources where freshwater is naturally renewed)
- 43.9% increase in electricity production from RES, compared to 2019 levels
- 97.4% increase in the production of secondary aluminium as a share of total aluminium production, compared to 2019 levels
- -34.3% reduction in the total amount of solid (non-hazardous) waste directed to landfills, compared to 2019 levels
- 53.7% increase in the quantity of the total waste recycled, reused or recovered by third parties, compared to 2019 levels
- -€2.5 m. invested in research and development
- 84.3% of the total land area used in mining operations was rehabilitated

**Societal Value**

- 242 new jobs in Greece and over 430 in total in Greece and abroad in 2021
- -€9.2 m. of total social investment in 2021, with over €4 million representing expenditures to deal with the COVID-19 pandemic
- 105,750 citizens as direct beneficiaries of the Company’s targeted social programs since 2019
- 0.8 total recorded accidents / 200,000 work hours (direct employees)
- 41.879 man-hours of training to develop the skills of direct employees
- 92 traineeships.
- -19% percentage of women in direct employment and over 21% of women in management positions.

Application of ZERO TOLERANCE of human rights violations and of incidents of corruption and bribery across all our activities.
**ESG performance visualization tools**

**Integrated Value Creation Scorecard**

The aim of the Integrated Value Creation Scorecard (scorecard.mytilineos.gr/index-en.html) is to present to all MYTILINEOS' Stakeholders the basic resources (financial, industrial, natural, human and social) that it uses in its activity, through its business model, the corresponding results and the value generated, in combination with the 17 UN Sustainable Development Goals.

**Sustainability Actions Map**

The Sustainability Actions Map (sdactionsmap.mytilineos.gr) is an innovative tool that presents in a concise and aggregated way the most relevant and accurate update on Sustainable Development issues to all the Company Stakeholders. The direct access to the desired information and the microsite's user-friendly interface are key features that ensure the continuous and effective provision of information to the Company's Stakeholders, focusing either on the desired Global Sustainable Development Goal or on the desired region / country for each Business Unit.
Sustainable Development Strategy

Sustainable Development is an integral part of the MYTILINEOS long-term business strategy. It is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the Sustainable Development Goals.

The Company’s Sustainable Development Strategy is aimed at creating long-term and sustainable value for shareholders and other Stakeholder groups, through a holistic approach that combines economic stability with social and environmental sustainability. It is implemented on three basic levels that are inseparable from one another, and is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) across all its activities.

The Principle of Materiality:

We participate effectively in the efforts to tackle climate change and in the national effort for a transition to a low-emissions economy, with:

- Decarbonization strategy and practices in all areas of our business activity.
- Ambitious emissions reduction targets for 2030 and 2050.
- The development of new business units in Sustainable Development projects.

The Principle of Stakeholder Inclusiveness:

We enhance the valuation of our corporate value by:

- Identifying & managing significant ESG risks and development opportunities.
- Constantly improving our already solid ESG performance and publications.
- Fully integrating the ESG criteria in our investment decision-making.

The Principle of Accountability:

We operate responsibly towards:

- Our people
- The Environment
- The Society
- The Market

More specifically:

**The first level** expresses the Company’s commitment to tackling climate change and its contribution to a low-emissions economy. MYTILINEOS is fully aware that climate change is one of the most urgent issues facing the planet. Moreover, the Company, considering the high CO2 emission intensity in its production processes, has highlighted the adaptation of its activities to the consequences of climate change and the implementation of initiatives to address it, as key elements for its sustainable operation. In this respect, it has designed a local strategy to address climate change, which serves to guide its initiatives to reduce carbon dioxide emissions as defined by the Kyoto Protocol, the Paris Agreement on Climate Change (COP21) and the corresponding National Plan of Greece, which sets out its contribution to the European Green Deal (EU Green Deal).

**Strategic priorities**

- To further adapt its activity to the consequences of climate change by analyzing the risks involved, while also taking advantage of the opportunities arising.
- To implement, control and review the initiatives and the corresponding CO2 emission reduction and net zero targets for 2030 and 2050.
- To integrate climate targets into the Company’s strategic planning and decision-making processes.
- To implement an investment plan in >2.5 GW of RES assets by 2030.
- To develop strategic partnerships for the application of new technologies to production activities, with the aim of reducing the CO2 emission intensity.
- To further develop the activities of its new Business Units in Renewables & Storage development projects.

The second level focuses on MYTILINEOS’ systematic approach to the recording, optimal management and disclosure of information about the ESG risks and opportunities that may affect its performance, as well as its efforts to implement its strategy. Through the ESG approach, MYTILINEOS strengthens its ability to create long-term value and manage significant changes in the environment in which it operates. In this way, it responds to the current sustainability requirements of investors, capital markets and financial institutions, as well as to society’s expectations of commitment and transparency regarding these issues, which keep increasing.

**Strategic priorities**

- To determine Material ESG topics and link them to the Company’s financial performance.
- To optimally manage ESG risks and opportunities to create long-term value.
- To enhance the trust and facilitate the flow of information between the Company and the investor community.
- To responsibly disclose Non-Financial Information in accordance with the international standards.
- To constantly improve / maintain ESG performance levels.
- To integrate ESG criteria into the Company’s investment decisions and into main operating procedures.

The third level expresses the Company’s commitment to the 10 Principles of the UN Global Compact. For MYTILINEOS, Responsible Entrepreneurship is an ongoing, self-improvement and incessant learning process, while it also serves as a key mechanism for renewing its “social license to operate” while at the same time it helps improve its competitiveness at national and international level.

**Strategic priorities**

- To remain committed to its target of ensuring a healthy and safe work environment without accidents, adopting a prevention-oriented approach.
- To constantly mitigate the environmental impacts of its activity.
- To develop, manage and retain a dedicated human capital, with practices that promote an inclusive working environment, with equal opportunities and respect for Human Rights.
- To continue to treat its people with responsibility and consistency, remaining their first choice of employer during their entire career path, while at the same time investing in their training and in the development of their skills.
- To implement actions of high social value, including through the development of employee volunteering.
- To engage in a systematic and honest dialogue with its key Stakeholder groups, seeking to maintain mutual trust and as well as a fuller understanding by the Company of the impacts of its operation.
- To contribute to the development of local infrastructure and, overall to the prosperity and the respect of the rights of the citizens of the local communities adjacent to the Company’s industrial units.
- To develop responsible procurement / purchases by expanding the commitment of the Company’s key suppliers and business partners to sustainable development.
- To place emphasis on the quality and safety standards of the Company’s products, as well as on the continuous support, service and satisfaction of customers.
The adoption of the 17 Sustainable Development Goals (SDGs) by all UN member states in 2015 is a milestone for the international community. Universal goals. All member states are committed to the achievement of the Sustainable Development Goals (Agenda 2030). In this respect, and in line with its activity, the Company has integrated policies and practices to enhance full and productive employment, through the transition to a new socio-economic model that focuses on protecting its employees and their families, while at the same time since the COVID-19 threat was first identified, MYTILINEOS has implemented a multifaceted action plan to ensure continued learning opportunities for school students to enroll in higher education and training programs at schools, together with programs for the development of the professional skills of the young generation (SDG 4).

4. PROMOTING THE REDUCTION OF INEQUALITIES (SDGs: 6 & 10)

MYTILINEOS, as it develops, strengthens the culture in its work environment with policies and practices that enable equal opportunities, the respect for Human Rights and the promotion of gender equality. In this way, the Company enhances the participation of women at all levels of the Company’s hierarchy, the inclusion of young workers, <40 years, in its workforce as well as its effort to integrate people with disabilities into the labor market, contributing directly to SDG 5 (Gender Equality) and 10 (Reduced Inequalities).

5. COMMITMENT TO PROTECTING THE NATURAL ENVIRONMENT (SDGs: 14 & 15)

As part of the Company’s commitment to further reduce its environmental footprint, Best Available Techniques for the proper management and reduction of environmental impacts are implemented at each Business Unit.

Investments are being made in order to upgrade the production process utilizing new technologies, while almost all Company production units have in place ISO 14001:2015 certified environmental management systems as well as individual environmental rehabilitation plans for exploitable land areas, where necessary, thus contributing directly to SDG 6 (Clean Water and Sanitation), SDG 14 (Life below Water) and SDG 15 (Life on Land).

1. TACKLING CLIMATE CHANGE (SDGs: 7 & 13)

MYTILINEOS believes that the recovery of the economy and of employment, especially in the post COVID-19 era, can only take place through the transition to a new socio-economic model that will be climate-neutral, resilient, sustainable and inclusive. In this respect, and in line with its activity, the Company has highlighted SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action) as its key strategic priorities, carrying out an ambitious RES investment plan and taking concrete initiatives to reduce CO2 emissions by 30% until 2030 and achieve a net zero footprint, by 2050.

2. SUPPORTING INNOVATION AND SUSTAINABLE INDUSTRIALIZATION (SDGs: 9 & 12)

As a leading international industrial and energy company, MYTILINEOS invests in the circular economy, in the development of innovative waste recovery methods and in the application of "clean" and innovative methods, through its participation in 24 European research projects.

At the same time, it steadily enhances employability in the domestic industrial sector and creates the conditions for a responsible supply chain, in all areas of its business activity. In this way, it acknowledges its share of the relevant responsibility and is actively contributing to SDG 9 (Industry Innovation & Infrastructure) and SDG 12 (Responsible Consumption and Production).

3. PROMOTION OF SAFE & PRODUCTIVE EMPLOYMENT (SDGs: 3, 8 & 9)

In terms of its contribution to SDG 3 (Good Health and Wellbeing) and SDG 8 (Decent work and economic growth), MYTILINEOS harmoniously coexists with its local communities as well as with society at large.

305,000 beneficiaries of our social policy for the five-year period 2020-2025, to continue to invest in the development of the local employment and economy through the creation of jobs (SDG 1), and the strengthening of local suppliers and local infrastructure (SDG 11), in the reduction of food insecurity for vulnerable social groups (SDG 2), and in the implementation of training programs in new technologies at schools, together with programs for the development of the professional skills of the young generation (SDG 4).

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Sustainable Development Goals & Targets directly or indirectly related to the activity of MYTILINEOS

**(11.1)** We contribute to strengthening local infrastructure

**(11.2)** We contribute to the effort to safeguard and protect the cultural and natural heritage

**(11.5)** We contribute to the reduction of the number of people affected by natural disasters

**(12.4)** We contribute to the sound management of waste in accordance with internationally agreed frameworks

**(12.5)** We contribute to the reduction of waste generation through prevention, reduction, recycling and reuse

**(13.1)** We contribute more effectively to the effort to ensure access to water and sanitation for all.

**(13.2)** We help enhance scientific research into new technologies, raw materials and processing methods.

**(13.3)** We contribute to the improvement of navigation, adaptation, impact reduction and early warning in the event of natural disasters.

**(14.1)** We contribute to the prevention of all forms of marine pollution, especially from industrial activities.

**(15.1)** We contribute to the protection of natural habitats and the prevention of loss of biodiversity.

**(15.2)** We contribute to the fight against all forms of corruption and bribery

**(15.5)** We contribute to the efforts to end child labor and exploitation

**(17.1)** We focus on corporate partnerships and on effective public private sector cooperation, as well as on partnerships with the civil society

**Introduction**

**Environment**

**Society**

**Governance**

**Sustainability Standards & Assurance**

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**MYTILINEOS Sustainable Development Report 2021**
In August 2021, the Intergovernmental Panel on Climate Change (IPCC), in its Sixth Climate Change Assessment Report (AR6 WGI - The Physical Science Basis), stressed that the climate system is facing changes at an unprecedented scale. According to the IPCC, climate change is already affecting many extreme weather and climate conditions around the world with rising temperatures expected to exceed 2°C unless greenhouse gas emissions are significantly reduced, achieving net zero carbon footprint and significant reductions in emissions of other greenhouse gases. According to the IPCC, between 3.3 and 3.6 billion people live in areas particularly vulnerable to climate change.

The European Commissioner, in the framework of the implementation of the European Green Deal, and the achievement of the greenhouse gas emissions reduction target of at least 55% by 2030, adopted in July 2021 a relevant package of proposals. The Commission emphasizes that it is crucial that the transition to a greener economy is done in a fair way, which was also highlighted at the United Nations Conference on Climate Change in November 2021 (COP 26). At COP 26, the Just Transition Declaration was signed by more than 30 countries worldwide, including Greece. Through this Declaration, countries are committed to securing the support of employees, businesses and communities in the transition to a greener economy.

MYTILINEOS, as a modern Company, recognized the need to move to a more sustainable business model early on. At the end of 2020, the Company made the strategic decision of the energy transition as this approach was considered correct, both economically, socially and environmentally. This decision was based on:

• the desire of the Company to contribute, to the extent possible, to tackling climate change, as one of the greatest challenges facing humanity in the 21st century, which requires the participation of all in the transition to a net zero economy based on renewable energy sources, and
• to the realization, after conducting the relevant analysis and identifying the different needs arising from its expanded activities, that in order to remain resilient and competitive in the current challenges, the Company must integrate sustainability in the core of its activity, developing ambitious goals reducing CO2 emissions and achieving a net zero carbon footprint, separately for each Business Unit.

The new vision of the Company was outlined by the Chairman and CEO of MYTILINEOS, Evangelos Mytilineos, at the beginning of the ESG Summit Net Zero Action® organized by the Company in February 2021. The Chairman and CEO of MYTILINEOS, Evangelos Mytilineos, at the beginning of the ESG Summit Net Zero Action® organized by the Company in February 2021. The new vision of the Company was outlined by the Chairman and CEO of MYTILINEOS, Evangelos Mytilineos, at the beginning of the ESG Summit Net Zero Action® organized by the Company in February 2021. The Chairman and CEO of MYTILINEOS, Evangelos Mytilineos, at the beginning of the ESG Summit Net Zero Action® organized by the Company in February 2021. “Today, the need for urgent action to tackle climate change, is driving us at MYTILINEOS to take a big step towards this direction, wishing to contribute to the drastic response to the phenomenon. The time has come to set the ground for a 100% sustainable and green industrial activity, and we are committed to achieve 30% reduction in emissions across our entire business activity by 2030 and net zero emissions by 2050. Our ambitious climate targets are embedded in our corporate DNA, and have become a strategic pillar, a decision-making instrument, a driver to every business operation. Moving forward, sustainable growth is true and should be a priority for all. Only by aiming high and setting bold targets, all industries - including us - can ensure the creation of long-term value for all and a collective sustainable future for generations to come.”

In 2021, MYTILINEOS started the implementation of specialized action plans for each key initiative that contributes to achieving the ambitious goals of reducing its carbon footprint. In total, 11 key initiatives and 50 sub-actions in all Business Units focus on the utilization of existing technology as well as on innovation and the development of pioneering solutions, taking into account the specific characteristics of each Business Unit and the current situation in the energy system.

More specifically, the implementation of strategic collaborations in the field of RES, best practices, pilot programs and actions, specific technical actions applicable mainly to production activities, the optimization of existing processes and technological developments, participation in European programs, monitoring of new technologies for future application, indicative categories of actions that began to be implemented in 2021.

The graph shows the progress against the main MYTILINEOS target to reduce total CO2 emissions (Scope 1 & 2) by -30% in 2030 compared to the base year 2019. The Company has already recorded a decrease of almost 12.4% in 2021 through increasing its use of energy from renewable sources. However, due to the official start of the operation of the new natural gas fueled power plant, in mid-2022, the Company estimates that its CO2 emissions will peak at the end of 2023, 15 year of full operation of the new plant will have already passed. From this point onwards, the gradual reduction of CO2 emissions is expected to begin as a large part of the individual actions of the key decarbonization initiatives in all Business Units will be at an advanced stage of implementation.

MYTILINEOS Climate Targets

<table>
<thead>
<tr>
<th>Overall target 2030*</th>
<th>-30% reduction on total CO2e (Scope 1 &amp; 2) emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Unit</td>
<td>Targets</td>
</tr>
<tr>
<td>Metallurgy</td>
<td>Total emissions (kt CO2e)</td>
</tr>
<tr>
<td></td>
<td>Relative emissions (kt CO2e/t Al)</td>
</tr>
<tr>
<td>Power &amp; Gas</td>
<td>Relative emissions (kg CO2e/MWh)</td>
</tr>
<tr>
<td>Renewables &amp; Storage Development</td>
<td>Net zero carbon footprint</td>
</tr>
<tr>
<td>Sustainable Engineering Solutions</td>
<td>Net zero carbon footprint</td>
</tr>
</tbody>
</table>

In total, 11 key initiatives and 50 sub-actions in all Business Units focus on the utilization of existing technology as well as on innovation and the development of pioneering solutions, taking into account the specific characteristics of each Business Unit and the current situation in the energy system.

Progress against each individual target per Business Unit

<table>
<thead>
<tr>
<th>Business Unit</th>
<th>Target categories</th>
<th>Status 2021</th>
<th>Target year 2030</th>
<th>% difference compared to the base year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metallurgy</td>
<td>Total emissions MCO2e (Scope 1 &amp; 2)</td>
<td>3,056</td>
<td>2,620 (-14.3%)</td>
<td>1,070 (-65%)</td>
</tr>
<tr>
<td></td>
<td>Relative emissions (1CO2e/t Al)</td>
<td>13,7</td>
<td>11,2 (-18.2%)</td>
<td>3,43 (-75%)</td>
</tr>
<tr>
<td></td>
<td>Relative emissions (kg CO2e/MWh)</td>
<td>329</td>
<td>322 (-2.3%)</td>
<td>165 (-50%)</td>
</tr>
<tr>
<td>Power &amp; Gas</td>
<td>Relative emissions (kg CO2e/MWh)</td>
<td>764</td>
<td>6,60 (-91.3%)</td>
<td>Net Zero</td>
</tr>
<tr>
<td>Renewable &amp; Storage Development</td>
<td>Total emissions MCO2e (Scope 1 &amp; 2)</td>
<td>6.04</td>
<td>4.064 (-30%)</td>
<td></td>
</tr>
<tr>
<td>Sustainable Engineering Solutions</td>
<td>Total emissions MCO2e (Scope 1 &amp; 2)</td>
<td>4.69</td>
<td>4.459 (-5%)</td>
<td></td>
</tr>
</tbody>
</table>

The progress against the individual targets per Business Unit is outlined below. The reduction of the total CO2 emissions is mainly due to the reduction of Scope 2 emissions due to the optimization of the energy mix, through the gradual decarbonization and use of more energy from renewable sources.

1 IPCC 2021: IPCC Sixth Assessment Report
Materiality process

Identification of Material Topics

PRINCIPLE: Stakeholder inclusiveness

For the disclosure of ESG information, MYTILINEOS has established as its main criterion the identification of the topics related to its ability to create value and are therefore material for the Company itself, its Social Partners and Sustainable Development in general.

The Materiality process is a key tool of the responsible operation of MYTILINEOS, while it contributes to the enrichment and the development of its Sustainable Development strategy. It is a dynamic process that is constantly evolving. The evaluations of the Material ESG topics carried out at each Business Unit are used as a basis for their respective identification at central level and vice versa. At the same time, the open dialogue of the Company with its Social Partner groups contributes new data to this process annually. The evaluation cycle of the material topics is implemented every 2 years with an interim review.

During the implementation of the process in 2021, the Company updated the sustainable development topics based on the internal and external sources it uses, with particular emphasis on the topics proposed by the SASB (Sustainability Accounting Standards Board) standards for each Business Unit. Subsequently, the topics were prioritized from the 4 Business Units in terms of their significance in terms of their impact on sustainable development. The findings of this internal exercise were combined with the corresponding findings of a relevant field research conducted on more than 1,500 individuals, institutions and organizations from all groups of the Company’s Social Partners. In addition, the alignment of the material topics with the Global Sustainable Development Goals, strengthens the Company’s ability to manage them in accordance with international best practices.

The following is a detailed presentation of the process stages to determine the Material Non-Financial topics for the year 2021.

Identification Stage

PRINCIPLE: Stakeholder inclusiveness

Sources used in the Sustainability Topics Identification exercise:

- The MYTILINEOS Sustainable Development Strategy
- Relevant laws, regulations, international agreements, voluntary agreements of strategic importance to the Company (UNGC, SDGs)
- Significant roles for the Company
- The SASB (Sustainability Accounting Standards Board) standards Materiality Map
- 12 different international CSR and Sustainable Development standards and initiatives (e.g. GRI, ISO 26000, Tiete)
- The feedback from the ESG ratings in which the Company participated
- The results of the Social Partners annual Consultation
- Study of material topics of peer companies
- Media review (Study on the subject matter of publications related to the Company but also general publicity in this field during the reporting year)

Prioritisation Stage

PRINCIPLE: Stakeholder inclusiveness

Synthesis of findings from the prioritization of the identified topics within & outside the Company

Within the Company

- Use of an online application for the prioritization of the identified topics, with reference to their relevance for MYTILINEOS, their impact on Sustainable Development at local and national level and their correlation with the Sustainable Development Goals
- ESG Team workshops at each of the Company’s Business Units for prioritizing the identified topics
- Confirmation and approval of the results by the General Management of the respective Business Units
- Synthesis of the individual results and determination of the final value for each identified topic.

Outside the Company

Field research conducted in 2021 for the Social Partner groups of the Company (156 individuals, companies, institutions and organizations) through inviting them to respond to an electronic questionnaire for the evaluation of the 22 identified topics.

Materiality table 2021

| Material topics (with a value of > 8.60/10 on the internal evaluation scale and a value of > 8.00/10 on the external evaluation scale) were validated
| All Material topics classified as material

Sustainability Committee

The Validation of the Material Topics and the final approval for their publication in the Annual Report and the Sustainable Development Report of the Company was provided by the Sustainability Committee.

As part of the update of the Materiality process, continuous improvement and the best possible response to the modern requirements of the investment community and its Social Partners, MYTILINEOS is already considering the implementation of the “double materiality” approach. By implementing this approach, the Company will include in the analysis of Material topics, in addition to the criterion of their impact on sustainable development, the criterion of their impact on the financial performance and position of the Company.

A supplementary table is provided below, presenting the grouping of Material Topics based on a) the ESG pillar in which each identified topic is classified, b) the topics that emerged as Material from the Metallurgy Business Unit as a result of the prioritization process, within the context of the International Alumni Stewardship Initiative (ASI) in which the BU participates and c) the Global Sustainable Development Goals that the Company contributes to through the management of the respective Material topics.

<table>
<thead>
<tr>
<th>ESG Pillar</th>
<th>Material topics 2021</th>
<th>Metallurgy Business Unit* ASI</th>
<th>Relevant SDGs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ecological Impacts</td>
<td>☐</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Energy &amp; Air emissions</td>
<td>☐</td>
<td>7.13</td>
<td></td>
</tr>
<tr>
<td>Water Management</td>
<td>☐</td>
<td>6.12</td>
<td></td>
</tr>
<tr>
<td>Adaptation to Climate Change</td>
<td>☐</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>Circular Economy</td>
<td>☐</td>
<td>6.8</td>
<td>12, 14, 15</td>
</tr>
<tr>
<td>Pollution Prevention</td>
<td>☐</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Research &amp; Development</td>
<td>☐</td>
<td>8.99</td>
<td></td>
</tr>
<tr>
<td>Occupational Health &amp; Safety</td>
<td>☐</td>
<td>3.8</td>
<td></td>
</tr>
<tr>
<td>Employment</td>
<td>☐</td>
<td>8.9</td>
<td></td>
</tr>
<tr>
<td>Human Rights</td>
<td>☐</td>
<td>5.8</td>
<td>10, 16</td>
</tr>
<tr>
<td>Equal Opportunities</td>
<td>☐</td>
<td>5.8</td>
<td>10, 16</td>
</tr>
<tr>
<td>Sustainability of Local Communities</td>
<td>☐</td>
<td>1.2, 3, 4, 10, 11</td>
<td></td>
</tr>
<tr>
<td>Business Continuity</td>
<td>☐</td>
<td>11</td>
<td></td>
</tr>
<tr>
<td>Responsible Supply Chain</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Labor Practices</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Cybersecurity</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Customer Privacy</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Product Quality &amp; Safety</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Communication &amp; Marketing</td>
<td>☐</td>
<td>8.12</td>
<td></td>
</tr>
<tr>
<td>Business model</td>
<td>☐</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Business Ethics</td>
<td>☐</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Regulatory Compliance</td>
<td>☐</td>
<td>16</td>
<td></td>
</tr>
</tbody>
</table>

Material topics - Other significant topics

* Metallurgy Business Unit Material Topics
Stakeholder Engagement

Relationships and cooperation with its Stakeholder groups are structural elements of MYTILINEOS’ Sustainable Development Strategy. They contribute to the further understanding of the impact of its activities as well as to the Company’s effort to respond consistently to the expectations of its Stakeholders, building mutual relationships of trust with them.

MYTILINEOS’ Stakeholders identification table [GRI 102-42]

<table>
<thead>
<tr>
<th>Category</th>
<th>Stakeholder groups that affect, and are significantly affected by, the operation of the Company’s Business Units.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category A</td>
<td>Stakeholder groups that affect, and are significantly affected by, the operation of the Company’s Business Units.</td>
</tr>
<tr>
<td>Category B</td>
<td>Stakeholder groups that affect, and are significantly affected by, the operation of the Company’s Business Units, but are less affected by them.</td>
</tr>
<tr>
<td>Category C</td>
<td>Stakeholder groups that affect, and are significantly affected by, the operation of the Company’s Business Units.</td>
</tr>
</tbody>
</table>

MYTILINEOS promotes regular communication with its Stakeholder groups in a variety of ways, the frequency of which stems from the type of relationship built with each group. In doing so, the Company aims to understand the needs and expectations of the persons, organizations and businesses with which it interacts and to respond promptly to matters of concern to them, while at the same time maintaining its ‘social license to operate’.

Ways of communication & cooperation between MYTILINEOS and its Stakeholder groups

Key Stakeholder groups [GRI 102-40] Long-standing ways of engagement & collaboration [GRI 102-43] Issuesraised [GRI 102-44]

Employees

- Annual Stakeholder Consultation process*
- Materiality process**
- Statutory annual employee performance appraisal and skills evaluation process
- Open communication via the HR/Business Partner role
- Continuing education and training
- Policies, procedures, wherever required
- Regular and extraordinary meetings between management and employees
- Annual Sustainable Development Report
- Announcements via the internal intranet platform
- HR Call Center for employees

Investing community

- Extraordinary and regular shareholder meetings on an annual basis
- Annual presentations of financial results
- Press releases, social media and general publications
- Corporate Governance Roadshow: Stakeholder engagement with investor stakeholders and interested authorities
- Materiality process
- Information on investment development projects
- Annual meetings with financial analysts

The Company’s performance in non-Governmental Organizations’ (NGOs) and non-Governmental Organizations’ (NGOs) assessments

- Uniform corporate culture
- Strengthening corporate innovation
- Personal evaluation system and incentives
- Employee evaluation and training
- Occupational Health & Safety
- Information about the Company’s good practices
- Adaptation to Climate Change
- Engagement in R&D projects
- Protection from the COVID-19 pandemic
- Mental health and well-being of employees
- Initiatives to promote electric mobility
- Talent retention and development

Volunteer Organizations

- Annual Stakeholder Consultation process*
- Materiality process**
- Direct dialogue through the Communication & Marketing Department: General Dialogue with MYTILINEOS: issues related to the Company’s activity area
- Information on relevant business developments (Press releases, internet)
- Organization of briefing meetings with Greek and foreign journalists whenever deemed necessary
- Organization of meetings with financial analysts

Promoters of ESG solutions / Environmental, Social & Governance (ESG) & Sustainability Standards & Assurance

- Annual Stakeholder Consultation process*
- Materiality process**
- Direct dialogue through the Communication & Marketing Department: General Dialogue with MYTILINEOS: issues related to the Company’s activity area
- Information on relevant business developments (Press releases, internet)
- Organization of briefing meetings with Greek and foreign journalists whenever deemed necessary
- Organization of meetings with financial analysts

* The participation of the particular Stakeholder group in this form of cooperation depends on the subject of the Consultation

** Participation in the relevant Stakeholder survey carried out every two years

BU Metalurgy ASI

- Employees
- Customers
- Local community / Local municipalities
- Suppliers
- Regulatory bodies
- Press representatives
- Business Organizations
- Sustainability Development Organizations
- Non Governmental Organizations

BU Power & Gas

- Employees
- Customers
- Local community / Local municipalities
- Suppliers
- Regulatory bodies
- Local community / Local municipalities
- Business Organizations
- Sustainability Development Organizations
- Regulatory bodies
- Press representatives
- Non Governmental Organizations
- Academic community

BU Sustainable Engineering Solutions / BU Renewable & Storage Development

- Employees
- Customers
- Local community / Local municipalities
- Suppliers
- Regulatory bodies
- Local community / Local municipalities
- Business Organizations
- Sustainability Development Organizations
- Regulatory bodies
- Press representatives
- Non Governmental Organizations
- Academic community

Category: Stakeholder engagement

- Media
- Financial analysts
- Shareholders

Category: Regulatory bodies

- Financial analysts
- Shareholders
- Suppliers
- Business Organizations
- Non Governmental Organizations

Category: Local Government (Local communities)

- Financial analysts
- Shareholders
- Suppliers
- Business Organizations
- Non Governmental Organizations

Category: Non Governmental Organizations

- Financial analysts
- Shareholders
- Suppliers
- Business Organizations
- Non Governmental Organizations

Category: Academic community

- Financial analysts
- Shareholders
- Suppliers
- Business Organizations
- Non Governmental Organizations

Note:

1. In defining the Stakeholder groups, 5 main criteria were used (dependence, responsibility, intensity, influence and perspective) according to the AAROOO Stakeholder Engagement – 2019 international standard, leading to the classification of Social Partners in the above three main categories.

2. The Group of Stakeholder/Northeast is not included in the above table since its management, as a key group is carried out centrally by MYTILINEOS’ Finance General Division.

3. The participation of Stakeholder groups in this form of cooperation depends on the subject of the Consultation.

4. Participation in the relevant Stakeholder survey carried out every two years.
A special survey of MYTILINEOS’ Stakeholders, conducted in 2021, found that the percentage of the respondents with a positive view of the improvement in the Company’s performance in the framework of Sustainable Development, had increased compared to the corresponding measurement in 2019 (2021: 88%, 2019: 84%).

Percentage of positive view of the MYTILINEOS Social Partner groups on improving its performance

<table>
<thead>
<tr>
<th>Year</th>
<th>2019</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Value</td>
<td>84%</td>
<td>88%</td>
</tr>
<tr>
<td>Rate</td>
<td>6%</td>
<td>100%</td>
</tr>
</tbody>
</table>

The institution of the Stakeholders Consultation process [GRI 102-41]

The Stakeholder Consultation (or Dialogue) is the application in practice of MYTILINEOS’ long-standing commitment to responsible entrepreneurship and to open social dialogue. Through this process, the Company improves the degree of understanding of the impact of its activities and meets its Stakeholder’s expectations, ensuring its sustainability and the creation of added value in the wider society.

As an institution established by MYTILINEOS, the Consultation is governed by specific principles and has specific goals (https://www.mytilineos.gr/sustainability/our-approach/our-relationship-with-stakeholders/) and is carried out annually with absolute consistency primarily at local level, addressing current sustainability issues. The effectiveness and transparency of the Consultation is ensured through the Sustainable Development Governance System that the Company has established, under which the individual Sustainability/ESG Leaders and owners of MYTILINEOS’ Business Units record and evaluate all proposals, ideas, and concerns expressed by the Stakeholders. Once this has been done, the most important issues are forwarded to the respective General Divisions for decision-making regarding the responses to them and, where feasible, their integration into the corporate strategy [GRI 102-21].

Since 2015, the institution of Consultation has been taking place primarily in the form of thematic dialogue forums held locally and of electronic consultations.

MYTILINEOS Thematic Consultations Table A51

<table>
<thead>
<tr>
<th>Year</th>
<th>Thematic Consultation</th>
<th>Subject coverage</th>
<th>Implementation</th>
<th>Distinctions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>“Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity”</td>
<td>Metalurgy Business Unit</td>
<td></td>
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<tr>
<td>2020</td>
<td>“Corporate Policy on the respect for and protection of Human Rights”</td>
<td>Sustainable Development Division (Central Function)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td>“Education - Skills Development and Creation of quality jobs”</td>
<td>Metalurgy Business Unit</td>
<td></td>
<td></td>
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<tr>
<td>2018</td>
<td>“Developing a Responsible Supply Chain”</td>
<td>Metalurgy Business Unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>“Translating Entrepreneurship into Value for Society”</td>
<td>Metalurgy Business Unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>“We Talk about the Environment”</td>
<td>Metalurgy Business Unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2015</td>
<td>“Health &amp; Safety at the Workplace”</td>
<td>Metalurgy Business Unit</td>
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<td></td>
</tr>
</tbody>
</table>

Thematic Consultation 2021

The Metalurgy Business Unit of MYTILINEOS, taking into account the new conditions that have been created in the context of dealing with the consequences of the pandemic, chose to hold the Company’s 7th annual thematic Consultation online, entitled “Covid-19: Measures and actions for the effective management of the pandemic - Health protection and business continuity”.

The Consultation had a two-fold purpose:
• Presentation of all the measures and actions implemented by the Company in the aluminium plant for the effective management of the pandemic, during 2020-2021.
• Announcement and presentation of the new procedure for handling requests and complaints, which was recently approved in the Metalurgy Business Unit in order to improve communication with the local groups of the Company’s Stakeholders, and to manage effectively all requests, comments and complaints regarding ESG and Responsible Entrepreneurship issues received by the Company.

The main objective of the Consultation was achieved, according to 76% of the participants. At the same time, more than 70% of the participants said they were quite satisfied with the way the pandemic was managed, as well as with the management of their requests/complaints by the Metalurgy Business Unit. No specific reports of issues requiring further improvement were noted.

The results of this Consultation confirmed that the mutually beneficial relationships of trust between the Company and the NGOs, including the availability from both sides for the purposes of communication and the prompt response to any arising issue, are maintained. Moreover, the NGOs were informed about current developments in Sustainable Development and about the development of new innovative collaborations to support actions along the key priority lines of the Company’s social policy, towards further enhancing its positive impact on society.

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The Stakeholder Consultation (or Dialogue) is the application in practice of MYTILINEOS’ long-standing commitment to responsible entrepreneurship and to open social dialogue.

The key priority lines of the Company’s social policy, towards further enhancing its positive impact on society, are the education of employees and the employees’ families and the community in general, as well as the employment of Social Responsibility in the core of its operations. In this context, MYTILINEOS has always been able to communicate with the stakeholders, both from the company and from the community, as well as with the organisations that the company works with, and to manage effectively all requests, comments and complaints.

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In the context of the implementation of its policy regarding consultation and cooperation with its Stakeholder groups, MYTILINEOS held, for the second consecutive year, an additional constructive dialogue with NGOs.

During this consultation, the Company, faithful to its long-standing approach, focused on the following objectives:
• To further develop successful partnerships already in place with partner organisations.
• To identify and report any problems and to develop new opportunities for joint action within the existing partnerships.
• To meet new organisations and plan new programs.

During this consultation, in which 18 NGOs took part, the following issues were raised and discussed:
1. Evaluation of existing partnerships, continuation of current programs / launching new ones, and dealing with any problems.
2. The Company informed the organizations about the goals of its social policy for 2021 and their connection with the Sustainable Development Goals. For their part, the organizations informed the Company about programs of the NGOs that could serve these goals.
3. Exchange of views about how best to capture the quantitative and qualitative results of programs and actions.

The applicability of the Social Return on Investment (SROI) methodology to highlight the social impact of social programs, where feasible.
5. Exchange of views about the feasibility of initiating Corporate Volunteering activities, in order to involve employees in the actions of the NGOs.

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Alignment to UN Global Compact Principles

- 7th
- 8th
- 9th

Material Topics
- Adaptation to Climate Change
- Energy & Air emissions
- Water Management
- Circular Economy
- Pollution Prevention
- Ecological Impacts
Adaptation to Climate Change

Impact on Sustainable Development

Significance for Stakeholders

Materiality assessment process results

Scale (1-10), where 10 = "Very significant" and 0 = "Not significant"

Boundaries of the Material Topic (GRI 104-15) (GRI 103-1b)

Where the impacts occur:

The impacts of climate change may occur in the industrial units, RE's plants, mines, and construction sites of the Business Units and subsidiaries of MYTILINEOS, as well as within the boundaries of their operations.

By whom are the impacts caused:

The Company's Business Units and subsidiaries are directly exposed to these impacts, while its supply chain may also be indirectly involved.

The Management of the topic by MYTILINEOS contributes to Sustainable Development:

- Strengthening of the resilience and adaptability of its production processes to natural disasters and the risks posed by climate change.
- The promotion of mechanisms to increase the ability to organize and manage activities related to adaptation and change adaptation in the most sensitive areas of local communities.

Topical materiality and significance:

- Employees
- Suppliers
- Customers
- Shareholders / Investors / Financial Analysts
- NGOs
- Press representatives
- Public academia
- Local communities

The Company, in the context of their cooperation with MYTILINEOS.

Management Approach

The purpose of this disclosure is to inform the Stakeholders about the steps to be taken by the Company in connection with its adaptation to climate change or, in other words, with the reduction of its vulnerability to the climate change phenomenon, focusing on the following three main areas of work: (a) examining future climate forecasts at local level, in order to identify potential risks and the possibility of integrating the issue of adaptation to climate change into its business decision-making, considering existing and expected climate events and the impacts that these are projected to have. (b) Enhancing the resilience of the MYTILINEOS production units and adapting its activities to the existing and potential impacts of climate change. (c) Considering the possibility of integrating the issue of adaptation to climate change into its business decision-making, (b) avoiding or minimizing climate-related risks and the possibility of integrating the issue of adaptation to future climate forecasts at local level, in order to identify potential risks and opportunities associated with climate change.

The recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD)

The Corporate Governance and Sustainable Development General Division, through its crucial coordinating role, cooperates closely with all Business Units and determines the strategic priorities of the Company regarding the management of climate change. It informs the Company's Executive Committee and provides information to the Board, through the Sustainability Committee, on the management of carbon reduction initiatives, risks associated with climate change and the potential risks and opportunities associated with climate change, if required. At the same time, it supports the work of the Sustainability Committee regarding the supervision of corporate initiatives for adaptation and response to climate change.

New operating model

In 2021, the Company conducted a special study for the transformation of its operational structure with the aim of further integrating sustainable development and issues related to climate change in its processes. In particular, the integration of ESG criteria in key processes of the Company, such as in the performance management system, in the evaluation of investment projects, in the annual budgeting process, in the evaluation of existing and future suppliers, is currently underway. Regarding non-financial data disclosures, their linkage with financial data is systematically promoted, by incorporating the concept of “best practice ESG KPIs” in all the main financial reports.

Regarding the new operating model of the Company, the Corporate Governance and Sustainable Development General Division works closely with the Sustainability Leaders assigned at each BU to monitor the progress of the implementation of initiatives to reduce CO2 emissions and achieve a net zero carbon footprint. The Sustainability Leaders, in collaboration with ESG category owners and ESG initiative owners at each BU, develop and implement the relevant action plans, the progress on which is subject to the Cefid meetings with the central Sustainability Development Division. The ESG category owners monitor progress and provide technical guidance to ESG initiative owners, who implement specific projects or initiatives related to the climate and Sustainable Development. Regarding climate change risks, the BI Sustainability Leaders in collaboration with the ESG category owners are responsible for identifying and initially assessing potential climate-related risks prior to integrating these risks into the Company’s Enterprise Risk Management System (ERM).

Strategy

MYTILINEOS launched in 2021 a thorough analysis and prioritization of the risks and opportunities associated with climate change that may affect its activities. Through this process, the Company will be able to properly adapt its operations, in order to address the risks and to take advantage of the opportunities presented. The analysis focuses on existing industrial facilities in Greece and projects owned by MYTILINEOS, as in these cases the assessment of climate risks and opportunities is material. In the context of this analysis, the time horizons examined by MYTILINEOS are the following:

- Short-term (1 to 3 years)
- Medium-term (3 to 10 years)
- Long-term (10 to 30 years)

Main categories of climate risks and opportunities for MYTILINEOS

- Transition risks: Responding to extensive changes in the policies, laws and technologies concerning the measures for adapting to and mitigating climate change, in the broader context of the transition to a lower carbon emissions economy at the domestic, European and global level. Additionally, climate change has been identified as a potential source of reputational risk associated with changes in the Stakeholders' perception of the Company's contribution to a lower carbon economy.

- Physical risks: These are risks associated with intense or longer-term natural changes which are considered important for the operation of the Company's industrial plants including, among others, the destruction of infrastructure due to extreme weather conditions, the reduction of available water resources due to lower rainfall; the rise in the sea level, the loss of working days due to extreme temperatures, the need to strengthen measures and actions to protect and preserve the environment, etc. These physical risks may have economic impacts, such as direct damage to assets, as well as indirect impacts due to the disruption of the supply chain.

Both transition risks and physical risks may affect MYTILINEOS and its activities. Regarding transition risks, such as new regulatory requirements, the transition to a sustainable future with low carbon emissions will include the creation of additional regulatory requirements by policy makers, in addition to existing ones. As the Metallurgy and Power & Gas BUs are among the industries that are difficult to become independent from fossil fuels, the new regulatory requirements related to climate and energy may have significant implications for the Company. The high financial investment necessary for the compliance with new regulatory requirements and actively participates in work streams for the development of new regulations, in order to ensure that all relevant risks are included in the Company's risk management system.

At the same time, acute physical risks such as extreme weather events are relevant to all MYTILINEOS activities as they could affect the factories, facilities, construction sites and the normal operations of the Company. Depending on the Business Unit, some of these risks are more significant.

The table below presents the results of the first analysis of the most significant climate-related risks and opportunities that MYTILINEOS has identified for each time horizon.
The analysis of selected social and economic parameters (e.g. coal, energy and fuel prices) as well as climate (e.g. temperature, drought, sea level rise) for each of the selected scenarios is currently in progress.

**Integration of climate-related risks and opportunities in the Company business model**

The Company has created Business Units oriented to the dynamic development of its business internationally (Renewables & Storage Development BU, and Sustainable Engineering Solutions BU). Therefore, the Company is projected to play, in the next critical decade, an important role in the energy transition and in the emission reduction targets for each of the 4 MYTILINEOS BUs in order to create an organized and improved over the last 4 years, incorporating climate-relevant data and taking into account the high intensity of CO2 emissions in both aluminium production and electricity generation processes, climate change is a key element for the sustainability of MYTILINEOS activities. In this context, the Company has developed a strategy for tackling climate change, which guides its initiatives to reduce carbon dioxide emissions as set out in the Kyoto Protocol, the Paris Agreement on Climate Change (COP21) and the corresponding National Plan of Climate Change. More information is available at the following link: mytilineos.gr/sustainability/sustainable-finance/

### Risks

<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>Increased prices of GHG emissions</td>
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<td></td>
<td></td>
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<tr>
<td>Increased electricity and fossil fuel prices</td>
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<tr>
<td>Increased raw materials cost</td>
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<tr>
<td>Raw materials’ shortage (RMS) due to global recycling trends</td>
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<tr>
<td>Transition to new technologies for aluminium production</td>
<td></td>
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<tr>
<td>Extreme precipitation</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Increased severity of extreme weather events (floods, storms, wildfires, droughts, etc.)</td>
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</tr>
</tbody>
</table>

### Opportunities

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Short-term (2022-2025)</th>
<th>Medium-term (2030)</th>
<th>Long-term (2050)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investments in renewables</td>
<td></td>
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<tr>
<td>Electrification of final demand</td>
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<tr>
<td>Investments in technical development efforts (i.e. develop battery storage capacity and prediction technology for renewables)</td>
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<tr>
<td>Raising capital through issuing “transition bonds”</td>
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<tr>
<td>Investments on energy efficiency and more efficient production processes</td>
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<tr>
<td>Increased use of recycled materials (secondary aluminium production)</td>
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<tr>
<td>Use of more efficient mode of transport</td>
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<tr>
<td>Investments on non-carbon materials</td>
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<tr>
<td>Investment on secondary aluminium production</td>
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<tr>
<td>Investments on storage systems</td>
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<tr>
<td>Increased demand for low-carbon products and infrastructures (low carbon buildings, etc.)</td>
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<tr>
<td>Participation on projects aiming to protect infrastructure and restore climaterelated damages</td>
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</tbody>
</table>

**Sustainable Development Report 2021**

The TCFD recommendations, MYTILINEOS relies on climate scenarios to understand the strategic implications of climate risks and opportunities. In the context of the MYTILINEOS analysis, 3 scenarios (Representative Concentration Pathway – RCP) were selected, which present possible pathways regarding the concentration of greenhouse gases under different socio-economic assumptions and climate policies, based on the 19th Evaluation Report of the IPCC (AR6).

**Climate scenarios**

In line with the TCFD recommendations, MYTILINEOS relies on climate scenarios to understand the strategic implications of climate risks and opportunities. In the context of the MYTILINEOS analysis, 3 scenarios (Representative Concentration Pathway - RCP) were selected, which present possible pathways regarding the concentration of greenhouse gases under different socio-economic assumptions and climate policies, based on the 19th Evaluation Report of the IPCC (AR6).

**Risk Management**

**Risk and opportunity identification**

In 2021, MYTILINEOS launched an in-depth analysis to identify climate-related risks and opportunities in its Business Units. The identification of climate-related risks and opportunities was carried out following a systematic desk-based review of MYTILINEOS’ activities, data analysis and consultations with relevant stakeholders. As a result of this analysis, a list of 57 risks and 27 opportunities related to climate change and found to affect the various activities of MYTILINEOS was compiled. All identified risks and opportunities were assessed against two main criteria and the following sub-criteria:

- **The materiality** of the consequences that may occur from the identified risks and opportunities:
  - Time horizon: short-term (2022-2025), medium-term (until 2040), and long-term (until 2050). 
- **The level of certainty** that the identified risks and opportunities will actually occur.

Following the identification of the criteria, the risks and opportunities were categorized into 4 groups for each MYTILINEOS Business Unit:

- **Risks / opportunities of high importance and high certainty**. To the extent possible these risks and opportunities are quantified in terms of probability and impact over the time horizon. A quantitative analysis is subsequently conducted to capture the potential consequences of the risks and opportunities for MYTILINEOS.
- **Risks / opportunities of high importance and low certainty**. These risks and opportunities are monitored on a systematic basis, and to the extent that they appear to constitute a significant risk or opportunity for MYTILINEOS, appropriate management plans will be developed. However, immediate action is not required.
- **Risks / opportunities of low importance and low certainty**. These risks and opportunities are considered minor and no further need to develop appropriate management plans.
- **Risks / opportunities of low importance and low certainty**. These risks and opportunities are considered minor and no further need to develop appropriate management plans.

**Sustainability Standards & Assurance**

The risk assessment methodology implemented in the Company’s business model is based on an appropriate management plan and the Audit Committee of the Board of Directors of MYTILINEOS. The methodology applied aims to integrate risk management into the Corporate Governance System of the Company, and it is also available in the “Enterprise Risk Management” section of this Report.

**Management / Control practices**

In order to adapt to climate change and reduce the impact of relevant potential risks, the Company takes the following steps. The systematic desk-based review of MYTILINEOS’ activities and data analysis are conducted by the Climate Change Department, which integrates the issue of climate change adaptation in its business decision-making in order to avoid or mitigate the climate-related risks and opportunities that are expected to have a significant impact on its activities will be carried out.

**Integration of climate-related risks in the Enterprise Risk Management System**

The Company has developed an Enterprise Risk Management System for the identification, analysis, evaluation, monitoring and reporting of risks, in order to reduce the possibilities and impacts of risks. More information on the methodology applied can be found in the following link: mytilineos.gr/sustainability/sustainable-finance/
In terms of risks and opportunities related to climate change, MYTILINEOS plans to integrate the most material in the Enterprise Risk Management System, which is managed by the Risk Management Division. Risk Owners in each Company BU are responsible for identifying and evaluating risks and opportunities, in collaboration with the Sustainable Development Division. The general principles for identifying and managing risks are described in the Annual Financial Report 2021.

**Metrics & Targets**

The disclosure of the Scope 1, 2 and 3 emissions as well as information concerning the climate targets set by the Company and concern: a) absolute and specific CO2 targets, b) the relevant time horizon, c) the base year that has been set, and d) the key performance indicators used to assess progress against them are presented in the sections of this report “Energy & Air Emissions” and “Tackling Climate Change” respectively.

**Results**

**[GRI103-3a-ii]**

In 2021, MYTILINEOS submitted for the first time a report to the international CDP Climate Change initiative (Ranking C), disclosing extensive data on the actions it implements related to climate change and comparing its performance with the largest companies in the world.

Climate-related risks may have financial implications for MYTILINEOS, affecting its sales, operating costs mainly due to rising energy costs and emission allowance prices, financing terms, investments required to achieve various objectives etc. Climate-related opportunities mainly concern the increase of the share of sales from low-carbon products or products necessary for the green transition.

**European Taxonomy of Sustainable Investments**

In order to meet the EU’s climate and energy targets by 2030 and the European Green Deal targets, it is vital to focus investment on sustainable projects and activities.

To achieve this requires the development of a common language and a clear definition of what is “sustainable”. That is why the action plan to finance sustainable growth has created a common classification system for sustainable economic activities, the European Taxonomy.

In this direction, in 2021, MYTILINEOS proceeded to review its financial activities in order to determine which of them fall within the framework of the European Taxonomy, as defined by Regulation (EU) 2020/852 (art. 8), and then to publish related financial KPIs such as revenue, capital expenditure (CAPEX) and operating expenses (OPEX) related to these activities.

The proportion of the total turnover from the sale of goods or provisions of services, as well as the total CapEx and OpEx of the Group’s economic activities that correspond to activities determined to be eligible for EU Taxonomy purposes, according to the description of these activities and taking into account the respective NACE activity codes, as these are presented in the Delegated Act 2021/2139/EU, are presented below. Since we are currently in the first period of implementation of the Taxonomy framework (1/1 – 31/12/2022), the Group’s economic activities were reviewed and ultimately included/excluded solely on eligibility basis and their alignment with the relevant technical screening criteria provided in the related Delegated Acts has not been reviewed.

- **Proportion of the total turnover.** It was calculated based solely on the total net turnover from the sale of goods and provision of services. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation and under the condition that said revenue does not include own use and intergroup transactions.

- **Proportion of the total CapEx.** It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation.

- **Proportion of the total OpEx.** It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes only the activities that are considered to be eligible according to the Taxonomy regulation.

Eligible activities based on turnover

<table>
<thead>
<tr>
<th>Eligible</th>
<th>Non-eligible</th>
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<tbody>
<tr>
<td>43%</td>
<td>57%</td>
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</table>

Eligible activities based on CapEx

<table>
<thead>
<tr>
<th>Eligible</th>
<th>Non-eligible</th>
</tr>
</thead>
<tbody>
<tr>
<td>28%</td>
<td>72%</td>
</tr>
</tbody>
</table>

Eligible activities based on OpEx

<table>
<thead>
<tr>
<th>Eligible</th>
<th>Non-eligible</th>
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<tbody>
<tr>
<td>54%</td>
<td>46%</td>
</tr>
</tbody>
</table>

More information on MYTILINEOS activities under the European Taxonomy is available at the MYTILINEOS Annual Financial Report 2021.
Energy & Air emissions

Impact on Sustainable Development

Significance for Stakeholders

• Any deviations from the applicable legislation on industrial and environmental pollution, as well as its capacity to retain its customers, investors or business partners and attract new ones.

• A further increase in the price of CO2 emission allowances (Việt) as more of these allowances will be shaped by the future EU policies on energy and climate, is likely to affect future compliance costs.

Commitment

Mytilineos has adopted specific initiatives to tackle climate change, which are outlined in the section “Adaptation to Climate Change” of this Report. The Company’s targets for CO2 emissions (Scope 1 and 2) are consistent with the ambition reductions required to keep global warming below 2°C by 2030, and are in line with the vision of the European Green Deal to achieve climate neutrality by 2050, as well as with the United Nations’ Sustainable Development Goals. Mytilineos aims, until 2026, to complete a large part of its 15GW RES investment plan in Greece, to have made significant progress in the electrification of the Metallurgy Business Unit from renewable energy sources, to have increased the production of secondary aluminium to 20% of its total aluminium production, and to have integrated solar panels in the infrastructure in the production units. At the same time, the implementation of relevant initiatives such as improving energy efficiency, reducing dependence on fossil fuels and closing energy technology gaps.

Risk Management / Control Practices

Mytilineos has adopted specific initiatives to tackle climate change, which are outlined in the section “Adaptation to Climate Change” of this Report. The Company’s targets for CO2 emissions (Scope 1 and 2) are consistent with the ambition reductions required to keep global warming below 2°C by 2030, and are in line with the vision of the European Green Deal to achieve climate neutrality by 2050, as well as with the United Nations’ Sustainable Development Goals. Mytilineos aims, until 2026, to complete a large part of its 15GW RES investment plan in Greece, to have made significant progress in the electrification of the Metallurgy Business Unit from renewable energy sources, to have increased the production of secondary aluminium to 20% of its total aluminium production, and to have integrated solar panels in the infrastructure in the production units. At the same time, the implementation of relevant initiatives such as improving energy efficiency, reducing dependence on fossil fuels and closing energy technology gaps.

Management Approach

The purpose of this disclosure is to provide information and data to stakeholders and the public so that they can understand how the Company is managing the unavoidable impact of its business activity on air quality. Mytilineos has adopted initiatives to tackle climate change, which are outlined in the section “Adaptation to Climate Change” of this Report. The Company’s targets for CO2 emissions (Scope 1 and 2) are consistent with the ambition reductions required to keep global warming below 2°C by 2030, and are in line with the vision of the European Green Deal to achieve climate neutrality by 2050, as well as with the United Nations’ Sustainable Development Goals. Mytilineos aims, until 2026, to complete a large part of its 15GW RES investment plan in Greece, to have made significant progress in the electrification of the Metallurgy Business Unit from renewable energy sources, to have increased the production of secondary aluminium to 20% of its total aluminium production, and to have integrated solar panels in the infrastructure in the production units. At the same time, the implementation of relevant initiatives such as improving energy efficiency, reducing dependence on fossil fuels and closing energy technology gaps.

Major risks

• Any deviations from the applicable legislation on industrial and environmental pollution, as well as its capacity to retain its customers, investors or business partners and attract new ones.

• A further increase in the price of CO2 emission allowances (Việt) as more of these allowances will be shaped by the future EU policies on energy and climate, is likely to affect future compliance costs.
The MYTILINEOS Metallurgy and Power & Gas Business Units produce over 99% of the Company's direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production processes (consumption of fuels and chemical processing as part of the production processes) and from the generation of electricity (through the consumption of natural gas), while indirect (Scope 2) emissions correspond primarily to the consumption of electric power for the production activity of the Metallurgy Business Unit. In 2021, direct CO2 emissions (Scope 1) recorded a reduction by 5.5%, due to the scheduled major maintenance of the Korfos Power plant, while indirect CO2 emissions (Scope 2) also recorded a reduction by 15% due to the further use of RES. The above changes resulted in an overall reduction of Scope 1 & 2 emissions by 8.9% compared to 2020.

In 2021, MYTILINEOS created an integrated system for recording the sources of Scope 3 emissions and for calculating these emissions from all Company Business Units. Through this exercise, the Company calculated for the first time all the categories of indirect Scope 3 emissions, which are presented below. The exercise also helped identify the categories that contribute the most to the Company's overall carbon footprint (C1, C2, C3, C4, C10, C11). At the same time, ways of reducing the Scope 3 carbon footprint are already being examined.

### Basic energy intensities [GRI 302-3]

<table>
<thead>
<tr>
<th>Category</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Metalurgy Business Unit</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specific consumption in bauxite production (GJ of production)*</td>
<td>0.18</td>
<td>0.13</td>
<td>0.13</td>
</tr>
<tr>
<td>Specific consumption in anhydrous alumina production (GJ of production)*</td>
<td>3.2</td>
<td>3.1</td>
<td>3.1</td>
</tr>
<tr>
<td>Specific consumption in hydrated alumina production (GJ of production)*</td>
<td>5.36</td>
<td>5.85</td>
<td>5.92</td>
</tr>
<tr>
<td>Specific consumption in primary electrolysis aluminium production (GJ of production)*</td>
<td>51.17</td>
<td>51.76</td>
<td>50.4</td>
</tr>
<tr>
<td>Specific consumption in primary smelter aluminium production (GJ of production)*</td>
<td>183</td>
<td>210</td>
<td>216</td>
</tr>
<tr>
<td>Specific consumption in anodes production (GJ of production)*</td>
<td>4.20</td>
<td>4.06</td>
<td>4.01</td>
</tr>
</tbody>
</table>

**Power & Gas Business Unit**

| Specific consumption (GJ of natural gas consumption)/(GJ of electricity production) | 165 | 185 | 180 |

1. Combined consumption of electric power, gas oil & heating oil
2. Combined consumption of natural gas, electric power, gas oil & heating oil
3. Combined consumption of steam, electric power, gas oil & heating oil
4. Combined consumption of natural gas, electric power, gas oil & heating oil

### Sustainability Standards & Assurance

**Direct greenhouse gas emissions (Scope 1 [GRI 305-1])**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuels (CO2: 100%)</td>
<td>2,398,563</td>
<td>2,496,700</td>
</tr>
<tr>
<td>Processes (CO2: 74% - PFCs: 26%)</td>
<td>477,743</td>
<td>420,974</td>
</tr>
<tr>
<td>Transport (CO2: 100%)</td>
<td>3,497</td>
<td>5,684</td>
</tr>
</tbody>
</table>

**Indirect greenhouse gas emissions (Scope 2 [GRI 305-2])**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity (CO2: 100%)</td>
<td>1,841,255</td>
<td>1,573,958</td>
</tr>
</tbody>
</table>

**Total (Scope 1 & 2)**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>4,639,322</td>
<td>4,459,423</td>
<td>4,063,959</td>
</tr>
</tbody>
</table>

**Other significant air emissions (GRI 305-7)**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOx (t)</td>
<td>38,940</td>
<td>35,901</td>
</tr>
<tr>
<td>NOx (t)</td>
<td>155.3</td>
<td>149.0</td>
</tr>
<tr>
<td>CO2 (t)</td>
<td>91.6</td>
<td>13.3</td>
</tr>
<tr>
<td>H2S (t)</td>
<td>34.7</td>
<td>16</td>
</tr>
<tr>
<td>Fluorides (t)</td>
<td>75.1</td>
<td>25.2</td>
</tr>
<tr>
<td>Particulates (t)</td>
<td>94.3</td>
<td>80.5</td>
</tr>
</tbody>
</table>

**Air emissions (t CO2eq)**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>C1: Purchased goods and services</td>
<td>1,116,996</td>
<td>1,074,602</td>
</tr>
<tr>
<td>C2: Capital goods</td>
<td>703,208</td>
<td>819,923</td>
</tr>
<tr>
<td>C3: Fuel and energy-related activities not included in Scope 1 or Scope 2</td>
<td>1,642,796</td>
<td>1,782,142</td>
</tr>
<tr>
<td>C4: Upstream transportation and distribution</td>
<td>10,999</td>
<td>10,610</td>
</tr>
<tr>
<td>C5: Waste generated in operations</td>
<td>64,004</td>
<td>47,296</td>
</tr>
<tr>
<td>C6: Business travel</td>
<td>5,659</td>
<td>8,031</td>
</tr>
<tr>
<td>C7: Employee commuting</td>
<td>11,400</td>
<td>10,518</td>
</tr>
<tr>
<td>C8: Upstream leased assets</td>
<td>1,208,145</td>
<td>1,153,014</td>
</tr>
<tr>
<td>C9: Downstream transportation and distribution</td>
<td>11,264,453</td>
<td>11,044,540</td>
</tr>
<tr>
<td>C10: Processing of sold products</td>
<td>2,271,129</td>
<td>1,905,160</td>
</tr>
<tr>
<td>C11: Use of sold products</td>
<td>52,952</td>
<td>61,980</td>
</tr>
<tr>
<td>C12: End-of-life treatment of sold products</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>C13: Downstream leased assets</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>C14: Franchises</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>C15: Investments</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total (Scope 1, 2 &amp; 3)</td>
<td>N/A</td>
<td>11,450,782</td>
</tr>
</tbody>
</table>

**Society Governance**

- Volatile organic compounds - VOC (t) | 2.0 | 3.1 | 3.9 |
- Fluorine (t) | 258.3 | 262.2 | 210.8 |
- C2F6 (t) | 1.4 | 1.6 | 1.3 |
- Particulates (t) | 94.3 | 80.5 | 41.8 |
- SOx (t) | 3,634.0 | 3,190.1 | 3,214.3 |
- NOx (t) | 155.3 | 149.0 | 135.4 |
- CO2 (t) | 91.6 | 13.3 | 108 |
- H2S (t) | 34.7 | 16 | 13 |
- Fluorides (t) | 75.1 | 25.2 | 20.8 |
- Particulates (t) | 94.3 | 80.5 | 41.8 |

**Volatile organic compounds - VOC (t CO2 eq)**

<table>
<thead>
<tr>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>5,000,000</td>
<td>4,639,324</td>
<td>4,459,423</td>
</tr>
<tr>
<td>2019</td>
<td>2020</td>
<td>2021</td>
</tr>
<tr>
<td>4,639,324</td>
<td>4,459,423</td>
<td>4,063,959</td>
</tr>
</tbody>
</table>

**Sustainable Development Report 2021 MYTILINEOS Introduction**
Regarding the other significant air emissions, the most significant changes compared to 2020 were the following:

• The reduction of the total quantity of nitrogen oxide (NOx) emissions by 7.9%.
• The significant reduction by 48.3% of the quantity of particulates. The reduction compared to the respective emissions for 2020 is mainly attributed to the operation of the FTC unit (anode furnace gas treatment), which resulted in concentrations below the maximum permissible limit of 5mg/Nm^3.
• The continuous efforts, the regular inspections and the appropriate technical interventions applied for the containment of the emissions of PFCs in the anhydrous alumina electrolysis process for the production of primary aluminium led to a reduction of about 7% of these emissions.
• Significant reductions in CF4, C2F6 and fluoride, which stood at approximately 19% respectively.

<table>
<thead>
<tr>
<th>Metallurgy Business Unit</th>
<th>Specific air emissions (t CO2 eq) [GRI 305-4]</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>t CO2 (Scope 1&amp;2) / t of hydrated alumina production</td>
<td>0.401</td>
<td>0.382</td>
<td>0.385</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1) / t of hydrated alumina production</td>
<td>0.004</td>
<td>0.002</td>
<td>0.002</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 2) / t of hydrated alumina production</td>
<td>0.397</td>
<td>0.380</td>
<td>0.383</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1&amp;2) / t of anhydrous alumina production</td>
<td>0.385</td>
<td>0.177</td>
<td>0.169</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1) / t of anhydrous alumina production</td>
<td>0.075</td>
<td>0.069</td>
<td>0.060</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 2) / t of anhydrous alumina production</td>
<td>0.010</td>
<td>0.008</td>
<td>0.009</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1&amp;2) / t of primary aluminium production¹</td>
<td>2.31</td>
<td>2.15</td>
<td>2.08</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1) / t of primary aluminium production</td>
<td>2.31</td>
<td>2.15</td>
<td>2.08</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 2) / t of primary aluminium production</td>
<td>4.39</td>
<td>4.18</td>
<td>4.06</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1&amp;2) / t of secondary aluminium production</td>
<td>0.25</td>
<td>0.26</td>
<td>0.26</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 1) / t of secondary aluminium production</td>
<td>0.25</td>
<td>0.26</td>
<td>0.26</td>
<td></td>
</tr>
<tr>
<td>t CO2 (Scope 2) / t of secondary aluminium production</td>
<td>0.008</td>
<td>0.007</td>
<td>0.006</td>
<td></td>
</tr>
</tbody>
</table>

¹ Specific emissions of primary aluminium are calculated in the context of the participation of MYTILINEOS Metallurgy Business Unit in the International Aluminium Stewardship Initiative (ASI) and in accordance with the provisions of the Aluminium Carbon Footprint Technical Support Document (WA, Feb-2018) of the International Aluminium Institute, for the LEVEL 1 approach. Includes electrolysis aluminium, smelter aluminium and anode production activities.
Water management

Major risks

- The potential reduction of aquifer reserves (ground water) which the Company uses for its production activities as well as for the use of the water supply network in the local communities’ settlements. This potential risk may result in the reduction or suspension of production, in complaints from the local communities and in increased costs resulting from the use of water supplied by public utilities as an alternative source.

- An unusual potential risk concerns possible future changes in the water withdrawal limits and water discharge parameters provided for in the Environmental Terms Approval Decision of the Company’s industrial plants, in particular in the Metallurgy and Power & Gas Business Units, which may result in increased capital costs and in operational maintenance costs associated with the development of alternative water reserves.

Commitment

- Responsible management of the withdrawal, consumption and discharge of water, in line with the main priority areas of MYTILINEOS’ Environmental policy.

Risk Management / Control Practices

- In all of the Company’s Business Units: Use of water takes place in strict compliance with the Environmental Terms Approval Decisions and the Water Use License of the individual plants.

- In order to identify and assess the future likelihood of regulatory changes affecting sustainability issues, including water, the Company communicates regularly with the competent authorities and with the regulatory bodies involved.

- The environmental officers in each Business Unit ensure that the progress made towards the targets set is monitored and that water resources are managed responsibly in the context of the activities of all industrial plants.

- Internal water consumption targets are set on an annual basis for each production Unit.

- As regards the management of the water discharges resulting from MYTILINEOS’ activity, this is fully controlled and takes place by monitoring the parameters determined by the environmental terms and regulations under which the facilities of the company’s Business Units have obtained their environmental licenses.

- Aiming to continuously improve and enrich its practices in this area, the Company participates voluntarily since 2005 in the CDP - Water Security global sustainable development initiative, by disclosing comprehensive data about its practices in the management of water resources and comparing them to the international best practices of the largest companies globally.

- Particularly regarding the Metallurgy Business Unit:

  - Water withdrawals from ground water are obtained from a controlled network of wells (boreholes) which allows water to be replenished naturally after actual consumption (renewable sources).

Results

In 2021, MYTILINEOS was evaluated for the 6th consecutive year by the CDP for its national Sustainable Development organization, in the Water Security category, for its management of water resources in the context of its activity. According to the results of the evaluation, the Company maintained its B score (on a A-D scale), which ranks it the top tier of the 2nd index category “Management Level”. The official report issued for the Company and the relevant evaluation details are available at its corporate website: mytilineos.gr/sustainable in the category “Management Level”. The official report issued for the Company and the relevant evaluation details are available at its corporate website: mytilineos.gr/sustainable in the category “Management Level”.

- The Company’s water withdrawal activities do not limit or threaten the availability of the adequate water in the aquifer nor any water source that is of high biodiversity value or important for the local communities.

- In total, 169 thousand ML of water were withdrawn for use, 1.247 ML less than in 2020, while the quantity of used water returned to the water recipients after quality treatment and in accordance with the approved environmental terms of the Business Unit, stood at 162 thousand ML. As a result, total water consumption stood at 6.95 thousand ML, increasing by almost 5.5%, while the consumption of fresh water remained almost stable (increasing by just 1%) compared to 2020.

- Concerning the discharge of liquid waste, the efforts to manage them efficiently continued in 2021, to ensure the proper protection of the environment and human health. It should be noted that the figures presented regarding the quality of discharged water are lower, and in many cases much lower than the statutory ones. The total quantity of pollutants in the treated wastewater discharged to the water recipients stood at 161 t, broken down as follows: BOD 56 t, COD 90 t, TSS 15 t, TN 0 t and TP 0 t.

- The Metallurgy Business Unit produces the largest quantity of liquid waste, the largest part of which is recycled within the production process itself.

- The specifications and maximum water discharge limits for the water resulting from each activity are determined by the applicable Environmental Terms Approvals Decision and the Water Use License.

- In total, 169 thousand ML of water were withdrawn for use, 1.247 ML less than in 2020, while the quantity of used water returned to the water recipients after quality treatment and in accordance with the approved environmental terms of the Business Unit, stood at 162 thousand ML. As a result, total water consumption stood at 6.95 thousand ML, increasing by almost 5.5%, while the consumption of fresh water remained almost stable (increasing by just 1%) compared to 2020.

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Introduction

Environment

Society

Goverance

Sustainability Standards & Assurance

Water withdrawal sources and quantities 2021 (GRI 303-3) All areas[^1]

<table>
<thead>
<tr>
<th>Source</th>
<th>All areas</th>
<th>Environmentally sensitive areas (water stress areas)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sea (ML)</td>
<td>Subtotal</td>
<td>Fresh water[^2]</td>
</tr>
<tr>
<td></td>
<td>159,824.5</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types[^3]</td>
<td>193,024.5</td>
</tr>
<tr>
<td>2. Ground water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>8,599.2</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>3,421.3</td>
</tr>
<tr>
<td>3. Surface water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>13.9</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>3.9</td>
</tr>
<tr>
<td>4. Water produced (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>296.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>0.0</td>
</tr>
<tr>
<td>5. Third parties (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>426.8</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>0.0</td>
</tr>
<tr>
<td>Total water withdrawals</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td>(Subtotals 1+2+3+4+5)</td>
<td>169,080.5</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>163,481.5</td>
</tr>
</tbody>
</table>

Water discharge by destination 2021 (GRI 303-4) All areas[^1]

<table>
<thead>
<tr>
<th>Source</th>
<th>All areas</th>
<th>Environmentally sensitive areas (water stress areas)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sea (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>161,795.6</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>107,756.6</td>
</tr>
<tr>
<td>2. Ground water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>23.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>7.1</td>
</tr>
<tr>
<td>3. Surface water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>267.8</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>267.8</td>
</tr>
<tr>
<td>4. Third parties (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>43.7</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>23.0</td>
</tr>
<tr>
<td>Total water discharges</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td>(Subtotals 1+2+3+4)</td>
<td>162,330.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>161,832.4</td>
</tr>
</tbody>
</table>

[^1]: Including environmentally sensitive areas (water stress areas).
[^2]: Water with a concentration of total dissolved solids equal to or less than 1,000 mg/L.
[^3]: Water types with a concentration of total dissolved solids higher than 1,000 mg/L.

Water withdrawal sources and quantities 2021 (GRI 303-3) All areas[^1]

<table>
<thead>
<tr>
<th>Source</th>
<th>All areas</th>
<th>Environmentally sensitive areas (water stress areas)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sea (ML)</td>
<td>Subtotal</td>
<td>Fresh water[^2]</td>
</tr>
<tr>
<td></td>
<td>159,824.5</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types[^3]</td>
<td>193,024.5</td>
</tr>
<tr>
<td>2. Ground water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>8,599.2</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>3,421.3</td>
</tr>
<tr>
<td>3. Surface water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>13.9</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>3.9</td>
</tr>
<tr>
<td>4. Water produced (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>296.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>0.0</td>
</tr>
<tr>
<td>5. Third parties (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>426.8</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>0.0</td>
</tr>
<tr>
<td>Total water withdrawals</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td>(Subtotals 1+2+3+4+5)</td>
<td>169,080.5</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>163,481.5</td>
</tr>
</tbody>
</table>

Water discharge by destination 2021 (GRI 303-4) All areas[^1]

<table>
<thead>
<tr>
<th>Source</th>
<th>All areas</th>
<th>Environmentally sensitive areas (water stress areas)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sea (ML)</td>
<td>Subtotal</td>
<td>Fresh water[^2]</td>
</tr>
<tr>
<td></td>
<td>161,795.6</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types[^3]</td>
<td>107,756.6</td>
</tr>
<tr>
<td>2. Ground water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>23.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>7.1</td>
</tr>
<tr>
<td>3. Surface water (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>267.8</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>267.8</td>
</tr>
<tr>
<td>4. Third parties (ML)</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td></td>
<td>43.7</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>23.0</td>
</tr>
<tr>
<td>Total water discharges</td>
<td>Subtotal</td>
<td>Fresh water</td>
</tr>
<tr>
<td>(Subtotals 1+2+3+4)</td>
<td>162,330.0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td>Other water types</td>
<td>161,832.4</td>
</tr>
</tbody>
</table>

[^1]: Including environmentally sensitive areas (water stress areas).
[^2]: Water with a concentration of total dissolved solids equal to or less than 1,000 mg/L.
[^3]: Water types with a concentration of total dissolved solids higher than 1,000 mg/L.
Circular Economy

Management Approach

The purpose of this disclosure is to provide information and data to MYTILINEOS Stakeholder groups, so that they can understand how the Company manages the waste resulting from its production process and the manner in which their proper management contributes to its efficient operation and to its compliance with the environmental legislation, while minimizing the environmental impacts for all recipients.

Key Challenges / Impacts

The collection, management and reduction of waste are key elements of MYTILINEOS’ environmental policy. They are intended to reduce the Company’s environmental footprint and to be in line with international best practices and legislative requirements.

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Pollution prevention

Impact on Sustainable Development

Significance for Stakeholders

Sustainability assessment process results
Scale 1-10, where "1" = "not significant" and "10" = "very significant"

Boundaries of the Material Topic [GRI 102-4S] [GRI 103-1n]
Where the impacts occur: The impacts occur in the areas of operation of MYTILINEOS’ industrial plants, Business Units, subsidiaries and main suppliers.

By whom are the impacts caused: Directly involved in these impacts are the Metallurgy and Power & Gas Business Units of MYTILINEOS and its subsidiaries DELPHI DISTOMON and KORINTHO Power, while key suppliers of the Company may be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:
• The prevention of all land and marine pollution
• The environmentally sound management of all waste in accordance with internationally agreed frameworks and to the reduction of their impact on human health and the environment.
• The reduction of waste production through recycling, reusing and reducing.

Topic of increased significance to:
• Employees
• Suppliers
• Customers
• Shareholders / Investors / Financial Analysts
• NGOs
• Press representatives
• Academic community
• Local Communities in the context of their cooperation with MYTILINEOS.

Management Approach

The purpose of this disclosure is to provide information and data to MYTILINEOS’ Stakeholder groups, so that they can understand how the Company is managing the risks of pollution and spills directly associated with its safe and socially and environmentally responsible operation.

Key Challenges / Impacts

The key challenge for the Company is to effectively prevent any form of pollution of the natural environment from its production activity (air emissions, solid and liquid waste, use of chemicals) and from any major industrial accidents.

Major risks

• The possible deterioration of the air quality, of surface and ground waters, and of the marine environment, as well as pollution of the soil from industrial accidents are permanent potential risks.
• Key production and transport activities of the Company involve the risk of spills, following unforeseen malfunctions or accidents, into the marine environment, since they are adjacent to it.
• Failure to prevent and manage the above risks could have a significant impact on the Company’s economic and industrial capital, limiting its ability to create value either by increasing the financial costs for dealing with these incidents, or through possible administrative sanctions that may be imposed or the Company’s potential inability to continue to smoothly conduct its activities.

Commitment

Prevention of all identified risks of pollution from the Company’s activities, in accordance with the main priority areas of MYTILINEOS’ Environmental Policy.

Risk Management / Control Practices

Pollution risk management is directly linked to the safe, socially and environmentally responsible operation of all the Company’s Business Units.

To address this risk, preventive and suppressive response measures are implemented in all MYTILINEOS’ Business Units. In particular,

In the Metallurgy Business Unit a dedicated Major Accident Prevention Policy is in place for preventing and responding to large-scale industrial accidents. The policy addresses risks associated with the use of hazardous substances in the Business Units’ activities, and through a set of concrete measures, ensures their prevention and the avoidance of any incident involving a deterioration of the environment.

The main pollution risk prevention measures implemented in the Business Unit consist in the following:
• Strict compliance with the approved Environmental Terms of Operation of the activity of Metallurgy.
• Continuous measurement and monitoring of air emissions and suspended particulates.
• Measurement and monitoring of water discharges from point sources.
• Compliance with the measures provided for in the Safety Study (SEVESO III) and the implementation of JMD (JMD 2020/1665), which in some cases are carried out in cooperation with external bodies (Fire Service, Civil Protection, etc.).
• Final disposal of non-hazardous waste in insulated areas with the construction of a geological barrier of low water...
permeability, as well as the corresponding disposal of hazardous waste. In specialized and geotextile-insulated cells (controlled landfill sites).

- Implementation of Best Available Techniques in the management of infrastructure and industrial waste (electronic filters, bag filters, primary industrial waste treatment, biological wastewater treatment, oil basins and safety oil traps, sewer oil traps, tank levels meters, waste quality meters, custom-designed waste disposal sites).

- Performing chemical analyses of wastewater at workshops and facilities, as well as specific analyses of wastewater discharged for various chemical parameters (e.g., Al, Cr, Fe, BODs, COD, etc.).

- Good knowledge of and training in Emergency Response Plans (EPs).

- Storage and use of chemicals by following the instructions of the Safety Data Sheets.

- Systematic visual inspections of facilities.

- Unloading of heavy fuel oil from tankers using as a precaution a floating anti pollution dam.

- Constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against standard quality values.

An example is the discharge of the seawater used in the cooling systems of the cogeneration (Combined Heat and Power - CHP) plant of the Metalurgy Business Unit, where in addition to the strict compliance with the relevant law provisions determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authorative organization (Helicentric Centre for Marine Research - HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed, which were studied by the Company in accordance with the applicable Environmental Terms and their results are communicated every year to the competent authorities (the Ministry of Environment, Energy and Climate Change, and the Water Management Directories of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of the recent studies, carried out in 2019 and 2020, show a stable ecological status, with improvement trends recorded at several observation stations. These studies will be continued for at least five more years.

- Operation of a fire protection department, which is equipped with 3 fire engines, staffed by a permanent firefighting team and coordinates and trains a team of volunteer firefighters.

Moreover, in what concerns small-scale, localized incidents involving spills of lubricants in the context of mining activities in the tunnels of underground quarries, which are of a limited extent and affect surface soil only, mainly caused by wear and tear of lubricant pipes and by damages to machinery by falling stones or rocks, the subsidiary DELPHI - DISTOMON takes steps to prevent and reduce the number of incidents by adopting the following practices: (1) Purchasing supplies with the best quality available in the market. To obtain the maximum possible durability (2) Implementing, on a regular basis, special seminars to raise awareness among personnel of the need to report and log such incidents, in line with the Company’s policy on the protection of the environment, as well as of specific techniques to contain the extent of the spills in the soil. (3) Responding immediately to such incidents, collecting the quantity of contaminated soil in the area of the spill and forwarding it to the hazardous waste disposal area for appropriate handling, and (4) Regular and preventive maintenance of the equipment and its parts.

In the Power & Gas, Sustainable Engineering Solutions (SES) and Renewables and Storage Development (RSD) Business Units, intensive efforts are made in all production units (thermal plants, RES plants, composite construction plants and work sites) to identify potential risks, so that these are addressed in a timely manner and the consequences of environmental risks, functions and accidents are minimized. In particular, the following are implemented:

- All procedures provided for in the Environmental Management Systems and Emergency Response Plans, as well as the operating and maintenance instructions for installations.

- Monitoring of air emissions.

- The best available options for the reuse, recycling and disposal of the various types of generated waste.

- Training of personnel and readiness exercises for handling spills.

- Preventive maintenance programs.

- Selection of state-of-the-art equipment.

- Safety oil basins.

- Systematic visual environmental facility inspections.

- Annual audits by independent external organizations for the certification of the implemented Environmental Management Systems.

Results

- During 2021, no incidents occurred involving the pollution of the natural environment from production activities or involving losses for the Company.

- Concerning air emissions, these remained below the statutory maximum limits for yet another year.

- For the prevention of accidental spills, as well as in the case of machine failures in the context of the mining process, a total of 90 incidents occurred in 2021, 20% less than the corresponding number in 2020 (112 incidents). With the total spill volume amounting to 103,081 m³, decreased by 20% compared to 2019 (12,689 m³).

Incidents involving small scale, localised spills

<table>
<thead>
<tr>
<th>Year</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>143</td>
<td>112</td>
<td>90</td>
</tr>
</tbody>
</table>

1. The quantity of 10,308 lt corresponds to 0.065 kblt.

Ecological Impacts

Major risks

- Ineffective prevention of any adverse impacts on the flora and fauna of the wider area of the Company’s activities would lead to environmental degradation, raising issues of non-compliance with applicable legislation. In such a case, the consequences for the Company would include the disruption of its business development and growth plans, due to the impact on its reputation and financial position.

Commitment

- Protection of biodiversity and predictors during mining operations and development and operation of RES plants in protected natural areas, in accordance with the main priority areas of MYTILINEOS: Environmental Policy.

Risk Management / Control Practices

In the Metalurgy Business Unit, the Aluminium of Greece (AOG) plant, in compliance with the applicable legislation (including the plant’s Environmental Terms Approval Decisions), has established a series of prevention and control measures to contain emissions to the natural recipients, thus safeguarding their quality and, consequently, the conditions for the growth of the local flora and fauna. The prevention measures include investments in anti-pollution equipment such as state-of-the-art filters in chimneys and at the discharge points of wastewater treatment plants, installations for the treatment of process gases etc. The Aluminium of Greece plant also undertakes the restoration of the mining areas of the Accumulation Sites for Suspended Residues and the Inert Waste Disposal Areas, while it has assigned to a specialized external partner the maintenance of the new and old unlined waste disposal sites (e.g. old and restored Controlled Landfill for Hazardous Waste, inactive slopes of the Inert Waste Disposal Area and of the limestone quarry).

The control measures include:

- Taking regular groundwater and sea water samples, whose results are confirmed by samples and analyses made by independent bodies.


- Assessment and ecological evaluation of the wider area of AOG plant, a study that was carried out in 2021 and also took account of the fact that the plant is developed only on land, which however is in direct contact with a sea area of the NATURA 2000 network (i.e., GR230007 - CORINTHIAN GULF), which is a proposed Site of Community Importance (SCI).

- The evaluation of the ecological status of the Antikyta Bay, in collaboration with the Helicentric Centre for Marine Research (HCMR).

- The management of all types of hazardous and non-hazardous waste, in compliance with the provisions of the applicable laws, while the disposal of this waste takes place either in the duly licensed sites of the Company or through duly authorized and certified systems / contractors.

Information on the level of operation of critical operating equipment (filters etc.) and measurement equipment (continuous
DELPHI-DISTOMON has been systematically active for nearly 50 years in environmental rehabilitation.

In the Power & Gas Business Unit, with respect to the activities which concern the construction of wind farms located near or inside areas designated as Special Protection Areas, a key prerequisite is the development of the respective environmental impact studies foreseen (specific ecological assessment, annual monitoring of the protected area), to confirm that there are no impacts or, in cases where there are impacts, to describe the measures which may be adopted in order for these impacts to be avoided. In cases where measures cannot be taken, the project is redesigned. In line with the above, the movement of animals in the locations of the Company’s activities is not obstructed as there is no fencing, and the disturbance to the local population of birds is negligible, while where this is necessary, technical systems for the protection of birds are installed so as to guarantee the least possible alteration of the environment in connection with projects for new wind farms, the Company implements the obligation to reforest areas of a size equal to that of the project and, where possible, to also restore illegal or inactive quarries, in accordance with the applicable laws and the instructions of the corresponding Forest Departments. In this context, 617,700 m² of land have already been afforested. An additional 37 forestry projects with an equivalent afforestation area of 289,900 m² are expected to be implemented by the end of 2022.

Regarding the project for the construction of the new thermal plant (CCGT II) and its accompanying interconnection projects, in Aegos Nialos, Viakos, 89,100 m² of land have already been afforested and an additional 80,900 m² will be afforested in 2022.

For all implemented afforestation projects, there also the obligation to provide maintenance and irrigation for 3 to 5 years depending on the project, which is constantly respected.

At the same time, in the framework of the Environmental Management Systems implemented by the Company (based on ISO 14001), in addition to internal inspections, the Company is also subject to inspections by independent third parties.

Finally, MYTILINEOS is a member of the Business Council for Sustainable Development of the Hellenic Federation of Enterprises (SEV), which is a member of the Business for Nature international coalition for the protection of biodiversity and ecosystems. The SEV Business Council for Sustainable Development, as a member of the World Business Council for Sustainable Development (WBCSD), after co-signing the Lisbon Declaration, paved the way for Greek companies to contribute to tackling the global challenge of environmental balance and sustainability and to highlight the strategies they are implementing, the commitments they have made as well as the good practices they adopt and follow.

DELPHI-DISTOMON has been systematically active for nearly 50 years in environmental rehabilitation.

### Results

- During 2021, no incidents occurred involving a deterioration of biodiversity as a result of the Company’s activities, while the work scheduled for the restoration of areas used in mining operations was carried out as planned.
- Concerning mining operations, at the end of 2021 (a) the total area of land used for mining operations stood at 86,000 m², reduced by 28.3% compared with 2020, (b) the total area of land in the process of remediation stood at 13,000 m², decreased by 18.2% from the previous year, while (c) the area of land whose soil has been rehabilitated since the beginning of the mining activity, as a percentage of the total land area of land used for mining operations, stood at 84.34%, increased by 12.4% compared to 2020.
- Regarding the construction and operation of the wind farms and the new thermal power plant, the total area of land for which the reforestation process has been completed stood at 706,900 m² (617,700 m² and 89,100 m² respectively), while three avifauna monitoring studies were carried out.
### Operational sites under lease by MYTILINEOS in protected areas [GRI 304-1]

1. Wind Farm in the locality ‘Karyfi’ of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 71.0 MW in operation, owned by the company Eolek Sirodikis, situated at a maximum distance of 15 km from the outer boundaries of the Natura 2000 area ‘GR 1600001’ and at a distance of no more than 7.5 km from the area ‘GR 6000009’.

- **Concerns of the lease of 0.082 km² of land from Public Properties Company S.A.**
  - Area of operational site: 0.012 km².

2. Wind Farm in the locality ‘Karyfi (Expansion)’ of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 50.0 MW in operation, owned by the company Eolek Sirodikis, situated at a maximum distance of 10 km from the outer boundaries of the Natura 2000 area ‘GR 1600001’ and at a distance of no more than 7.5 km from the area ‘GR 6000009’.

- **Concerns of the lease of 0.027 km² of land from the Municipality of Sintiki.**
  - Area of operational site: 0.035 km².

3. Wind Farm in the locality ‘Pyrissos’ of the Municipality of Karyotsas (Regional Unit of Evia) with a power output of 15.3 MW in trial operation since April 2019, owned by the company Eolek Evia Pyrissos, situated at a maximum distance of 200 m from the outer boundaries of the area with code number ‘GR 2420002’ which is the ‘Mt Ochi Coastal Area and Islets’ Special Protection Area (SPA) for birds (a) at a maximum distance of 1000 m from the outer boundaries of the area with code number ‘GR 2420002’, which is the ‘Mt Ochi Coastal Area and Islets’ Special Protection Area (SPA) for birds (b) at a maximum distance of 200 m from the outer boundaries of the area ‘GR 2420002’, which is the Special Management Area (SMA) ‘Mt Ochi - Karyotsas - Karystos - Cape Kafireas – Marine coastal area’ of the Natura 2000 Network. Two (2) Wind Turbines are located within this area.

- Lease of 0.0679 km² from private land owners holding the ownership rights to the ‘Dafnes-Kapetel’ private forest.
  - Area of operational site: 0.010 km².

4. Wind Farm in the locality ‘Chelion’ of the Municipality of Karyotsas (Regional Unit of Evia) with a power output of 61.8 MW in trial operation since October 2019, owned by the company Eolek Evia Chelion, situated at a maximum distance of 200 m from the outer boundaries of the area ‘GR 2420002’- ‘Mt Ochi, Coastal Area and Islets’, with code number ‘GR 2420002’ belonging to NATURA 2000 network. Seven (7) Wind Turbines are located within this area.

- Area of operational site: 0.030 km².

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### Biodiversity value of protected area [GRI 304-2]

The ‘GR 1600001’ area encompasses wetlands and mountainous ecosystems of great national and international importance. In terms of both biodiversity and ecosystem services, it is a key element for the conservation of numerous species of plants and animals listed in Annex I of the Habitats Directive, Directive 92/43/EEC, as well as for the conservation of migratory birds, as a winter site and stopover site for migratory birds, as well as a breeding ground for a significant number of birds. The increased biological productivity, the coexistence of rare plant species, of rare and diverse fauna (fish, mammals, amphibians, reptiles) increase even more the area’s biodiversity value.

As was the case in 2018, 2019 and 2020, an annual avifauna monitoring study was carried out in the area of the Wind Farms in 2021 and is pending submission (usually within the first six months of the next year), to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management of the Ministry of Environment, Energy and Climate Change.

No impacts on the protected area, as the operational areas of the Wind Farms are located in the area’s peripheral zone, away from the Priority Areas.

An automated bird collision avoidance system has been installed in the area of two of these Wind Farms.

No bird killing incident has been observed.

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### Other significant Environmental topics

### Raw & other materials

Regarding the use of primary natural resources in the production of the main products of MYTILINEOS, the quantity of bauxite used in the Metallurgy Business Unit to produce aluminium and alumina in 2021 was slightly decreased by 10.9% compared to 2020, while the total quantity of natural gas used in the Power & Gas Business Unit decreased by 10.9%. The Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units do not manage primary natural resources, but instead use semi-finished or finished products.

In detail:

- **In the Metallurgy Business Unit** approximately 26 million tons of raw materials were used in 2021, to produce alumina and primary and secondary aluminium products, a quantity increased compared to 2020. Of this total quantity, 76% was bauxite, while the remaining 24% regarded the use of other raw materials from non-renewable sources.

- **MYTILINEOS**, in its effort to limit the consumption of natural resources and to reduce the energy required in aluminium production, has adopted in its production process the practice of recasting aluminium waste (scrap) that replaces the use of raw materials. Furthermore, in this direction, the Company has also expanded its activities in the industrial production, processing and trading of metals and in particular of aluminium alloys, and their products, investing in the know-how for the optimal treatment of aluminium scrap, so as to be able in the years to come, to produce raw materials again simply from low-grade scrap, thus significantly cutting costs and mitigating the impact on the environment.

### Weight (in tons) of materials used in the production and packaging of the Company’s main products [GRI 301-2]

| Material Type | 2019 | 2020 | 2021 | Basic materials
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Raw materials</td>
<td>2,265,428</td>
<td>2,278,855</td>
<td>2,372,317</td>
<td></td>
</tr>
<tr>
<td>Alumina, Aluminium Scrap</td>
<td>2,265,428</td>
<td>2,278,855</td>
<td>2,372,317</td>
<td></td>
</tr>
<tr>
<td>Bauxite, Alumina, Aluminium Scrap</td>
<td>2,265,428</td>
<td>2,278,855</td>
<td>2,372,317</td>
<td></td>
</tr>
<tr>
<td>Materials (not incorporated in the end product)</td>
<td>2,265,428</td>
<td>2,278,855</td>
<td>2,372,317</td>
<td></td>
</tr>
<tr>
<td>Anodes, Lime, Soda, Coke, Tar</td>
<td>2,265,428</td>
<td>2,278,855</td>
<td>2,372,317</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>2,504,392</td>
<td>2,530,140</td>
<td>2,638,928</td>
<td></td>
</tr>
<tr>
<td>Recycled materials</td>
<td>39,522</td>
<td>48,012</td>
<td>50,181</td>
<td></td>
</tr>
<tr>
<td>Aluminium scrap</td>
<td>39,522</td>
<td>48,012</td>
<td>50,181</td>
<td></td>
</tr>
<tr>
<td>Percentage of recycled input materials [GRI 301-2]</td>
<td>1.9%</td>
<td>1.94%</td>
<td>1.90%</td>
<td></td>
</tr>
</tbody>
</table>

### Composite Construction and Steel Treatment Units

Materials used in the production process but not incorporated in the end product are:

- **Semi-finished products**
  - 54,056 tons
  - 52,056 tons
  - 50,956 tons

### Environmental Standards & Assurance

The Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units do not manage primary natural resources, but instead use semi-finished or finished products, according to the detailed plans and procedures for each project, which specify with great accuracy each material to be used in its manufacturing method and its exact position and operation. Additionally, a key criterion in the design stage of the projects that the Business Unit is carrying out is the use of recyclable materials. The Company’s requests for proposals and contracts with suppliers of materials and equipment contain a specific clause regarding their compliance with the requirements of the ISO 14001 standard, specifically referring to the prohibition of using environmentally hazardous materials and the obligation to make the maximum possible use of recyclable materials.

In the **Power & Gas Business Unit**, the raw material used in power plants is natural gas, which is the transition fuel towards an economy with lower greenhouse gas emissions. The annual consumption of natural gas in the Company’s thermal units is linked to the fluctuations in the generation of electricity on an annual basis, and in 2021 recorded a slight decrease by 10.9% compared to 2020, due mainly to the maintained power of operation of Korfissos Power. Regarding the materials used in the production process and not incorporated in the end product, such as lubricating oils and chemicals, in 2021 these remained close to their 2020 levels.
Research & Development

Research & Development is not just another business choice but a modern-day necessity in the context of the Sustainable Development Goals (SDGs). To this end, MYTILINEOS invests in research and development with the aim of contributing, acknowledging its share of the relevant responsibility, to strengthening scientific research, upgrading the technological capabilities of the country’s industrial sector and encouraging innovation, thus ensuring industrial diversification and the added value of its products and services.

In the Metallurgy Business Unit, the company continues to consistently invest in the installation of pilot units for the development of research in the following areas:

- Utilization of bauxite residues. The company both participates in and conducts pilot tests in the framework of European programs on the use of efficient “green” technologies in the production of useful products and materials (iron, alumina, cement additives and construction products), as well as on the development of technologies for the extraction of rare earths.
- New aluminum recycling technologies. The company participates in research programs on the design and control of the production of recycled aluminum products with a low energy and environmental footprint.

At the same time, the company continues to consistently invest in research for the development of know-how in new technologies, and is actively participating in research activities in the following fields:

- Utilization of carbon-rich by-products of the alumina electrolysis production process, exploring a recycling technology within the aluminum production cycle.
- Heat recovery and utilization from exhaust gas flows of the aluminum production process.
- Use of RES in alumina/ aluminum production. The company participates in a Study Network exploring the possibilities of direct application of RES in the industry.
- Digitization alumina and aluminium production processes.
- Education and lifelong learning. The company participates in programs aimed at developing new tools and training courses for engineers and technicians working in the raw materials and metallurgy sector.

In this direction, the Research and Sustainable Development activity is established under the Innovation Division of the Company’s Metallurgy Business Unit. The company participates in 24 research projects co-funded by the EU or the Greek State under the Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET Cofund on Raw Materials (ERA-MIN 2) programs, and under programs of the Greek General Secretariat for Research and Technology (GRT). MYTILINEOS participates in these programs with a view to increasing competitiveness and exploring the application of an industrial circular economy.

The total financing of the programs for the period 2017-2025 exceeds €20 million, of which €6.7 million are related to investments of the Metallurgy Business Unit of MYTILINEOS, while the applied research is carried out in collaboration with industrial partners, research bodies and universities in Greece and Europe.

In summary, in 2021, the Unit’s Research and Sustainable Development activity announced the following research results on a pilot scale, while the two pilot units continued to operate for testing new metallurgical processes at the aluminum plant:

- Production of 1st scandium concentrate from bauxite residues.

Under the SCALE project (scale-project.eu), 10 m³ of bauxite residue extract solution were treated using the SIR technology of the company II-VI. The treatment resulted in the production of 300 g of solid concentrate containing 1.4% by weight of scandium oxide. The overall process has succeeded in upgrading the scandium concentration from the bauxite residue to the concentrate by 3000 times (producing Sc-(Al-Sc-Oxide). The technology will be further optimized in the SCALE-up program which starts in 2022 and will be co-funded under the Horizon 2020, EIT Raw Materials programs.

- Recovery of soda from bauxite residues.

Under the RemovaL program (removalproject.com), 600 kg of bauxite residues underwent hydrometallurgical treatment in order for their soda content to be recovered. The new “dealkalized” bauxite residues contain less than 0.5% by weight soda, will be tested as a raw material for the production of the cement raw meal (“farin”). Their conversion into an “active ingredient” (the so-called supplementary cementitious material) is the main objective of the ReAc- tion project (reactionproject.eu) coordinated by the company Holcim in collaboration with MYTILINEOS.

- Recovery of alumina from bauxite residue slags.

Under the RemovaL program, 300 kg of bauxite slag, which had been produced by the Research and Sustainable Development Department activity in 2003, underwent hydrometallurgical treatment in order for their alumina content to be recovered. 70% of the alumina was extracted in the solution and then precipitated using CO2 gas, producing about 40 kg of hydrated alumina as the final product.

- Treatment of Greek bauxite using the Pedersen method.

Under the ENSUREAL programme (ensureal.com), 2 tons of Greek bauxite from MYTILINEOS subsidiary DELPHI-DISTOMON underwent pyrometallurgical treatment for obtaining a cast iron product, while the slag produced underwent hydrometallurgical treatment for producing hydrated alumina. This process is an alternative to the Bayer method for the treatment of bauxites, which leads to fewer and more easily usable byproducts.

The above technologies are intended for use in developing the know-how of the Metallurgy Business Unit for the production of new products, investigating technical solutions to sustainability problems, and exploring the possible future activity of MYTILINEOS in new markets if and when these are considered profitable.

In addition, DELPHI-DISTOMON launched a pilot project on the digital monitoring of ventilation at an underground work site. The solution used (Ventilation-on-Demand) had been designed to ensure air quality in underground mining sites and reduce the energy consumption of the ventilation system. It combines cutting-edge technologies such as Internet of Things, Cloud big data, Sensors.

In the Power & Gas Business Unit, an Applied Research & Development and Innovation Department is in operation. In 2021, more than 10 projects were underway in this Department, including the following:

- Energy Blockchain - Green PPAs: Green Power Purchase Agreements (PPA), which constitute a contract between the two parties and certify the provider of “green” energy, the amount of energy, the value of the energy, the geographical information of the place of origin of the agreed energy, etc.
- Digital Innovations: New mobile apps, marketplaces and innovative digital processes to upgrade the digital customer engagement and on-boarding of Retail customers (Proter-gis ON).
- Factory: creation of processes, know-how and organization of an internal AI structure and Data Factory for introducing an Artificial Intelligence strategy at MYTILINEOS.
- Prediction of the electric power produced by wind turbines - quantification of uncertainty.
- Approval in 2021 for participation in the new Hellenic Energy Centre, whose primary purpose is to promote innovation in domestic entrepreneurship, with emphasis on the production of energy in the post-lignite era, RES projects, decentralized production and savings, smart cities and communities, and energy transmission and distribution networks.

In 2021, total investments in research and development by the Metallurgy and Power & Gas Business Units stood at €2.5 million, while the Company’s Research & Development departments employed 17 people in total.
## ESG KPIs

### Environmental KPIs

<table>
<thead>
<tr>
<th>Environmental management</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of industrial units &amp; RES units with ISO 14001:2015 certification</td>
<td>84%</td>
<td>87.5%</td>
<td>89.3%</td>
</tr>
<tr>
<td>Environmental expenditures (mio €)1</td>
<td>61.0</td>
<td>71.6</td>
<td>82.8</td>
</tr>
<tr>
<td>Incidents of non-compliance with environmental laws and regulations and relevant fines</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Energy & Air emissions

<table>
<thead>
<tr>
<th>Energy &amp; Air emissions</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct GHG emissions (Scope 1 - CO2 thousand tons)</td>
<td>2,798.0</td>
<td>2,885.5</td>
<td>2,276.0</td>
</tr>
<tr>
<td>Indirect GHG emissions (Scope 2 - CO2 thousand tons)</td>
<td>1841.3</td>
<td>1573.9</td>
<td>1,337.9</td>
</tr>
<tr>
<td>Other emissions (Scope 3 - CO2 thousand tons)2</td>
<td>N/A</td>
<td>6,991.4</td>
<td>5,612.4</td>
</tr>
<tr>
<td>Total NOx emissions (t)</td>
<td>1533.3</td>
<td>14800</td>
<td>1,363.4</td>
</tr>
<tr>
<td>Total SOx emissions (t)</td>
<td>36340</td>
<td>39011</td>
<td>3,214.3</td>
</tr>
<tr>
<td>Particulate emissions (t)</td>
<td>943</td>
<td>805</td>
<td>41.8</td>
</tr>
<tr>
<td>Fluorine emissions (t)</td>
<td>258.3</td>
<td>262.2</td>
<td>210.8</td>
</tr>
<tr>
<td>CF4 emissions (t)</td>
<td>1.4</td>
<td>1.6</td>
<td>1.3</td>
</tr>
<tr>
<td>Specific NOx emissions (t/Tj electricity production)3</td>
<td>0.054</td>
<td>0.046</td>
<td>0.042</td>
</tr>
<tr>
<td>Specific SOx emissions (t/Tj electricity production)3</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total energy production (TJ)</td>
<td>20,816.5</td>
<td>21,856.6</td>
<td>20,235.6</td>
</tr>
<tr>
<td>Energy production from RES (% of total energy production)</td>
<td>65%</td>
<td>86%</td>
<td>9.7%</td>
</tr>
<tr>
<td>Total energy consumption (TJ)</td>
<td>53,352.0</td>
<td>54,621.9</td>
<td>52,423.7</td>
</tr>
<tr>
<td>Electricity consumption (% of total energy consumption)</td>
<td>19.4%</td>
<td>18.9%</td>
<td>20.0%</td>
</tr>
<tr>
<td>Specific energy consumption in secondary aluminium production (GJ/t of production)</td>
<td>4.82</td>
<td>5.05</td>
<td>5.02</td>
</tr>
<tr>
<td>Specific product consumption (TJ/T) of electricity produced</td>
<td>17</td>
<td>16</td>
<td>1.6</td>
</tr>
</tbody>
</table>

1 Environmental Expenditures: Costs for waste disposal, emissions management, purchase of CO2 rights, environmental remediation and costs for overall prevention and environmental management.
2 The calculation of Scope 3 emissions is based on the GHG Protocol.
3 The calculation of Scope 3 energy production is based on the Power & Gas BU.
4 The difference between the total quantity of water withdrawals and the total quantity of water discharges.

### Water Management

<table>
<thead>
<tr>
<th>Water Management</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total water consumption (ML)4</td>
<td>65336</td>
<td>66034</td>
<td>6,950.5</td>
</tr>
<tr>
<td>Total water withdrawal (ML)</td>
<td>170,788.2</td>
<td>170,327.5</td>
<td>169,080.5</td>
</tr>
<tr>
<td>Total water withdrawal from surface waters (ML)</td>
<td>162,295.5</td>
<td>161,962.0</td>
<td>159,838.4</td>
</tr>
<tr>
<td>Total water withdrawal from groundwater (ML)</td>
<td>8,223.6</td>
<td>8,564.8</td>
<td>8,599.2</td>
</tr>
<tr>
<td>Total water withdrawal from public water supply companies (ML)</td>
<td>746</td>
<td>1461</td>
<td>194.7</td>
</tr>
<tr>
<td>Water savings in the production process (% of total water withdrawals)</td>
<td>39%</td>
<td>39%</td>
<td>4.4%</td>
</tr>
<tr>
<td>Water consumption / ton of hydrated alumina production (m³) ASI</td>
<td>1.24</td>
<td>3.61</td>
<td>3.37</td>
</tr>
<tr>
<td>Water consumption / ton of primary aluminium production (m³) ASI</td>
<td>1.23</td>
<td>1.37</td>
<td>1.29</td>
</tr>
</tbody>
</table>

### Circular Economy

| Total solid waste generation (thousand tons) | 8491 | 8994 | 9341 |
| Total hazardous waste (thousand tons) | 228 | 240 | 9.5 |
| Total non-hazardous waste (thousand tons) | 826.3 | 875.4 | 914.6 |
| Solid waste reused or recycled (% of total solid waste generated) | 178% | 186% | 25.0% |
| Solid waste landfilled6 (% of total non-hazardous solid waste generated) | 3.9% | 2.4% | 2.0% |

### Ecological Impacts

| Rehabilitation percentage of total land areas used in the mining process ASI | 82.3% | 83.3% | 84.3% |

### Raw & Other Materials

| Total bauxite consumption (t) ASI | 1,871,995 | 1,871,949 | 1,963,041 |
| Total natural gas consumption (mio Nm³) | 1137 | 1177 | 1,106.8 |
Sustainable Development Report 2021

Environment

Introduction

Society Governance

Sustainability Standards & Assurance

Alignment to UN Global Compact Principles

Material Topics

• Occupational Health and Safety
• Employment
• Human Rights
• Equal Opportunities
• Sustainability of local communities
• Responsible Supply Chain
• Business Continuity

Alignment to UN Sustainable Development Goals
The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The promotion of safe working conditions for all employees without discrimination.
- The reduction of fatalities and work accidents, and reduction of road accidents at national level.
- Decent work and the creation of quality jobs.
- The promotion of safe working conditions for all employees without fatalities, zero accidents with serious consequences for the lives of employees, and zero occupational diseases, as well as maintaining the total recorded accident rates at the lowest possible level.

Major risks [GRI 103-2a]

- Direct or Indirect Accident Risks: indirect risks create the conditions that lead to accidents and include the physical layout, functionality, access/evacuation routes, lighting, and temperature of work areas. Direct risks lead to accidents or occupational diseases and include natural chemical and biological factors.
- Non-Accident Risks: concern organizational, psychological, and ergonomic factors that may cause an accident but affect the physical and mental health of employees in the short or long run.

Commitment [GRI 103-2c]

MYTILINEOS continues to work relentlessly in all its Business Units, to achieve the goal of “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES AT WORK”, which is one of the main challenges in the industrial sector, in accordance with the main priority areas of MYTILINEOS’ Occupational Health and Safety Policy.

Goal [GRI 103-2c-b]

The Company’s targets, on an annual basis, are to achieve zero fatalities, zero accidents with serious consequences for the lives of employees, and zero occupational diseases, as well as maintaining the total recorded accident rates at the lowest possible level.

Risk Management / Control Practices [GRI 103-2a-c]

In all its Business Units, the Company, in addition to complying with the minimum statutory requirements, also implements an integrated and certified Occupational Health & Safety Management System voluntarily designed to minimize risk, by allowing the continuous adoption of measures to prevent accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture. The system is based on and certified in accordance with the ISO 45001:2018 international standard and, at the end of 2021, covered almost 90% of the Company’s production and RES plants in operation.

The Health & Safety system covers all direct and indirect employees in the Company’s Business Units and in its subsidiaries that have in place an ISO 45001 certified Occupational Health & Safety Management System. In addition, 99% of employees are covered by a Health & Safety system that is subjected to external audit, while 84% of employees are covered by a Health & Safety System that is audited or certified by an independent external body.

KEY CHALLENGES / IMPACTS [GRI 103-5a]

- The elimination of accidents and occupational disease incidents at the workplace and especially at MYTILINEOS’ production facilities, promotes continuous, sustainable, productive operations that work, while it also plays a decisive role in bolstering the Company’s competitiveness.

- The positive contribution of MYTILINEOS to the well-being of the local communities in which it operates, by protecting the health and safety of its direct and indirect employees.

- The continuous efforts to foster and promote a corporate Health and Safety culture, encouraging all personnel to act responsibly for their own personal safety as well as for the safety of those around them and in a long-standing commitment in daily operations.

- Occupational Health and Safety is a line of responsibility that is incorporated in the Management and Corporate Risk Management System and extends across all stages of production of all MYTILINEOS Business Units. To address the relevant risks, the Company has established a system that is subject to external audit, while 84% of employees are covered by an integrated Occupational Health & Safety Management System.

- The promotion of an integrated and certified Occupational Health & Safety Management System voluntarily designed to prevent hazardous actions and situations that could lead to accidents or occupational diseases and are described in a series of internal procedures in every Business Unit, both for direct employees and for indirect employees and business partners. Relevant examples include Management Safety Visits, Risk Identification and Inspections of Health & Environmental Safety Plans (HESP) for indirect employees, Occupational Health Visits, Assessment of Organizational Health and Well-being, and a wide range of agreements and procedures for recording accidents and hazards. Reporting of hazards and hazardous situations takes place through the hazardous situations reporting process and the risk identification process, as well as through the reporting system of the Company’s Health and Safety System. Regarding the procedure used to investigate work-related accidents, the Company has established a procedure for collecting and analyzing accidents in the accident log, for reporting and analyzing incidents, and for characterizing and investigating events, while at a higher level, selected incidents are analyzed using the “Root Cause Analysis” method. Through this procedure, appropriate corrective actions are determined so as to identify the root causes of the accident and for the OSH Management System. At the same time, conducting internal inspections and external audits ensures the quality of procedures and the implementation of the Occupational Health & Safety system. Employees may remove themselves from working conditions which they believe might cause injury or death and are protected against punishment, according to the relevant provisions of the Code of Business Conduct. The Health & Safety Officers may recommend the removal of employees, where appropriate, for their safety, health and the protection of others. On the other side, the operation of the Company with the continuous presence of nurses and the regular presence of physicians, regular visits and inspections of the work areas by a specialist Occupational Physician, and medical services provided on a daily basis at the office clinic are an effective precaution for vulnerable employees, in addition to all employees. In 2021, due to the SARS-CoV-2 pandemic, additional occupational health practices were implemented, the most important of which were conducting free COVID-19 tests for all personnel on the basis of an established schedule or in the case of emergencies, enabling remote work as a precaution for vulnerable and other employees exposed to an increased risk of infection due to excessive social interactions, and a strict distribution of a special personal COVID protection kit to all employees, as well as special trainings and updates regarding the prevention of potential hazards and the Company’s and regional disinfections of all premises. [GRI 403-3]

- To safeguard the health of its employees, in addition to allocating funds for the creation of company’s facilities and providing them with an additional private health and medical care program. It also provides them with general medical services on a daily basis, at the clinic operating in its facilities, and implements a targeted vaccination programme for specific categories of personnel. Voluntary blood donation programs are also organized in the Company’s facilities at regular intervals.

In 2021, actions focused on strengthening the mental health of employees and their families were introduced. In the framework of the Employee Assistance Program, the Psychological Support Hotline was created. This service provides 24-hour counseling support to employees and their families, delivered by a network of experienced psychologists and specialists in personal family and employment-related matters, as well as personalised intervention or remote (online) sessions. At the same time, on the occasion of the Mental Health Awareness Month, a series of educational sessions and webinars was organized for information and discussion on a number of issues related to emotional and mental health, as well as more generally to the adoption of daily habits that promote health and well-being. [GRI 403-6]

- Health and hygiene issues are key to the quality of life of all employees, a strong indicator of the health and performance regarding Health & Safety and Sustainability of the Company.

- Occupational Health and Safety is a line of responsibility that is incorporated in the Management and Corporate Risk Management System voluntarily designed to minimize risk, by allowing the continuous adoption of measures to prevent accidents and occupational diseases and are described in a series of internal procedures in every Business Unit, both for direct employees and for indirect employees and business partners. Relevant examples include Management Safety Visits, Risk Identification and Inspections of Health & Environmental Safety Plans (HESP) for indirect employees, Occupational Health Visits, Assessment of Organizational Health and Well-being, and a wide range of agreements and procedures for recording accidents and hazards. Reporting of hazards and hazardous situations takes place through the hazardous situations reporting process and the risk identification process, as well as through the reporting system of the Company’s Health and Safety System. Regarding the procedure used to investigate work-related accidents, the Company has established a procedure for collecting and analyzing accidents in the accident log, for reporting and analyzing incidents, and for characterizing and investigating events, while at a higher level, selected incidents are analyzed using the “Root Cause Analysis” method. Through this procedure, appropriate corrective actions are determined so as to identify the root causes of the accident and for the OSH Management System. At the same time, conducting internal inspections and external audits ensures the quality of procedures and the implementation of the Occupational Health & Safety system. Employees may remove themselves from working conditions which they believe might cause injury or death and are protected against punishment, according to the relevant provisions of the Code of Business Conduct. The Health & Safety Officers may recommend the removal of employees, where appropriate, for their safety, health and the protection of others. On the other side, the operation of the Company with the continuous presence of nurses and the regular presence of physicians, regular visits and inspections of the work areas by a specialist Occupational Physician, and medical services provided on a daily basis at the office clinic are an effective precaution for vulnerable employees, in addition to all employees. In 2021, due to the SARS-CoV-2 pandemic, additional occupational health practices were implemented, the most important of which were conducting free COVID-19 tests for all personnel on the basis of an established schedule or in the case of emergencies, enabling remote work as a precaution for vulnerable and other employees exposed to an increased risk of infection due to excessive social interactions, and a strict distribution of a special personal COVID protection kit to all employees, as well as special trainings and updates regarding the prevention of potential hazards and the Company’s and regional disinfections of all premises. [GRI 403-3]

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safety and health of MYTILINEOS’s human capital. In line with this approach, special Health & Safety Committees operate in key activities of the Sustainable Engineering Solutions (SES) Business Units. These Committees cover all employees, both direct and indirect employees are represented and take active part in the procedures to determine how health and safety are managed at the workplace. [GRI 103-2c(iv)]

In the Metallurgy Business Unit, an official Plant Health & Safety Committee (PHSC) is established, representing 100% of the employees. The Committee consists of 6 members who are elected by the Business Unit’s employees. The PHSC has extended responsibilities and its members participate in all key procedures, committees or working groups. Most of all, however, it is the employees themselves, from all levels in the management hierarchy, who take active part in the continuous, systematic and methodical process that involves them in the formulation of safety rules and regulations. Moreover, the following additional Safety Committees have also been established, led by Management Executives and composed of representatives from all Plant departments. Work at Heights Committee, Lockout/Tagout & Confined Spaces Committee, Circulation Committee, Contracting and Training Committee. The issues discussed by the Committees cover those related to the Plant’s main processes, while proposals for the improvement or revision of these processes are also discussed. At the Volos Plant a three-member Health & Safety Committee is in place, set up in accordance with the provisions of the Greek law and consisting of employees, trade union representatives and members of the Management. [GRI 403-4 AS]

In the Sustainable Engineering Solutions (SES) Business Unit, the Health & Safety Committees operate at facility level (in every work site or plant) and represent 100% of the Company’s direct employees and over 90% of the employees of independent contractors. Additionally, the Safety Technician and the Occupational Physician work closely and are in constant communication with the Committee regarding issues related to hygiene, safety and the protection of employees. The Committee members, the Safety Technician, the Occupational Physician and the Company’s representatives, participate in training programs on Health and Safety and in relevant official information days.

In the Renewables & Storage Development (RSD) Business Unit, the Health and Safety Officers, Safety Technicians and Safety Coordinators hold consultations with the employees, in the framework of the Occupational Health & Safety Management System. Moreover, in every work site facility, specialized personnel are constantly present for handling Health & Safety issues. First Aid services (personnel & equipment) are in place, while an ambulance and an Occupational Physician are present to offer first aid and deal with emergencies. [GRI 403-4]

In the Power & Gas Business Unit, no official Occupational Health & Safety (OHS) Committee has been set up. A consultation process on these issues is however applied, with the active participation of personnel from the company’s Energy Centers, in the context of the Occupational Health & Safety Management System. Relevant consultations take place at least once per year, in order to promote the implementation of the applicable Company OHS policy, to communicate information on OHS actions and programs and to involve the employees, through their active participation in the consultation process, in the management of occupational risk. Moreover, in the context of the OHS audits carried out in accordance with the established OHS Management System, a mechanisation has been established to monitor the enforcement of the OHS regulations in the facilities and activities of the Company’s Energy Centers, Head Offices, retail stores and RES plants. [GRI 403-4]

Results

[GRI 103-5a]  [SASB EM-EN-320a.1]  [SASB EM-MA-320a.1]  [SASB IF-EN-320a.1]  [SASB IF-MA-320a.1]

- The Business Units and subsidiaries of MYTILINEOS, in addition to the regular internal audits that they carry out, are subject to frequent external inspections by customers, government bodies and independent auditors, conducted to evaluate and improve the established Occupational Health & Safety Management Systems. In 2020, 57 internal audits and 76 external inspections were carried out.
- A total of 85 (2020: 88) incidents involving both direct and indirect employees – which, if not investigated, could pose a potential risk for employees (near misses) – were reported and investigated in production processes, representing a reduction by 3%.

Direct employees

- The targets for zero work-related fatalities and zero serious incidents from occupational diseases were achieved. [GRI 403-5b]
- The total number of recorded accidents stood at 23 and the corresponding frequency rate per 200,000 work hours was 0.85 accidents.

Ten lost time accidents were recorded, resulting in a rate of 0.37 accidents per 200,000 work hours. More specifically, one serious accident occurred, involving the amputation of an employee’s upper limb, while the other less serious accidents involved cases of fractures, sprains, dislocations and burns. All incidents were analyzed using the “Root Cause Analysis” method, in order to establish their causes and communicate the results of their investigation, so as to ensure that they will not happen again.

The total number of visits to the medical stations stood at 15, increased by 40% compared to 2020.
- No employees were involved in activities with a risk of exposure to occupational diseases.

For yet another year, particular attention was also paid to the prevention of serious accidents through training. A total of 6,608 man-hours of training in Health and Safety were implemented in all Business Units, attended by 61% of direct employees. The training, which covers both general and specialized Health & Safety topics, focused on the following topics:

- Introduction to the Wellbeing program
- "Management of Emergencies"
- "Professional Burnout"
- "Depression"
- "Behavior analysis as a method to detect phobias and panic attacks"
- "Nutrition & Its 4 Keys (Thinking, Emotion, Physical response, Behavior)"

Health & Safety Indicators [GRI 403-9]

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<tr>
<td>LTRIR (Women)</td>
<td>0.00</td>
<td>0.22</td>
<td>0.20</td>
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</tbody>
</table>

- FR (Fatality Rate) or HCR (High Consequence Injury Rate) or TRIR (Total Recordable Injury Rate) or LTRIR (Lost Time Injury Rate)
- The Lost Time Injury Rate (LTRIR) includes lost time accidents involving the loss of ≥ 3 work days.
Indirect employees
Managing the safety of the personnel of independent contractors is a particular challenge for MYTILINEOS. The Company is consistent in its efforts in this area and focuses on the need to alter everyone’s behavior and mentality about accident prevention. For example, contractors who employ a significant number of personnel at the facilities of the Metallurgy Business Unit’s aluminium plant, are required to have in place an ISO 45001 certified Occupational Health & Safety Management System, while the Company evaluates regularly their performance using specific criteria. Similarly, the management of Health and Safety issues in the Sustainable Engineering Solutions (SES) Business Unit is carried out by a series of actions that must be implemented by associated contractors, so as to ensure that the Occupational Health & Safety Management System, which is drawn up separately for each project, is correctly implemented, and that they take the appropriate measures in the context of the specific work that they undertake.

• Despite the efforts made, we regret to report one fatality due to fall from a height, involving an employee of a contractor in the Sustainable Engineering Solutions (SES) Business Unit.
• The total number of accidents recorded stood at 14 and the accident frequency rate per 200,000 work hours was 0.29 accidents.
• Twelve lost-time accidents were recorded resulting in a frequency rate of 0.22 accidents per 200,000 hours worked.
• A total of 41 visits of employees to the medical (first aid) stations were recorded, increased compared to 2020.
• With a view to strengthening and consolidating a common safety culture among all MYTILINEOS’ business partners, 28,000 man-hours of training were implemented in topics similar to those for direct employees.

Health & Safety Indicators (GRI 403-9)

<table>
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<th>Indicator</th>
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MYTILINEOS’ response to the SARS-CoV-2 pandemic

From the first moment the pandemic broke out, MYTILINEOS responded swiftly and effectively, implementing a multifaceted action plan that ensured the protection and safety of its employees, maintaining all its production units in operation and contributing to the national effort to address the pandemic crisis. The primary objectives of MYTILINEOS in 2020, for which the Company allocated over €4 million, were the following.

1. To safeguard the health of its employees and their safety at work, as well as the health of their families.

Since 2020, MYTILINEOS took a number of steps that included the following:
• Establishment of a special Covid Management Team tasked with monitoring the pandemic and with assessing and managing related risks, in order to protect its employees.
• Development of a comprehensive preventive action plan two weeks before the first confirmed case occurred in the country, which is constantly updated according to developments.
• Constant provision to its employees and business partners of information updates on the application of the personal hygiene regulations, accompanied with clear instructions obtained from the competent international and domestic bodies.
• Enabling teleworking already from the first month of the pandemic.
• Creation of a special “SARS-CoV-2 – What I need to know” microsite, and establishment of an “HR Call Centre” for keeping employees up-to-date.
• Regular distribution of a special personal kit per employee, containing face masks and antiseptics.
• Implementation of regular disinfections in all facilities.
• Carrying out molecular (PCR) and rapid diagnostic tests with a total cost of almost €1.8 million (for 2020) for its employees in Athens, Volos and the Aluminium of Greece plant.

2. To ensure its uninterrupted operation.

One of MYTILINEOS’ primary objectives was to maintain its smooth operation. In this context, relevant activities included the following:
• Maintaining Business Continuity plans, with targeted measures that were adapted to support the Company’s production units that may remained in full operation.
• Maintaining the operation of a communication and management network consisting of special teams in all the Company’s facilities in Greece and abroad.
• Constantly reviewing the need for business trips and visits to production units.
• Implementing special precautionary measures for sales agents and customers at the Protergia retail stores.
• Continuing the implementation of the Company’s investment program.

In conclusion, the holistic approach that MYTILINEOS applied and continues to apply for mitigating the impacts of the pandemic and ensuring its business continuity, maintains the guarantees required by its investors. With ambitious business decisions, the Company is taking advantage of the opportunities emerging from the public health crisis and accelerates its progress towards an even stronger green economy.
**Employment**

**Impact on Sustainable Development**

- **Significance for Stakeholders** 7.59
- **Maturity assessment process results** Scale (0-10): 0 “Not significant” and 10 “Very significant”

**Boundaries of the Material Topic** *(GRI 102-45) (GRI 103-1b)*

- **Where the impacts occur:** In all work areas of MYTILINEOS’ Business Units, subsidiaries and branches.
- **By whom are the impacts caused:** The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/ suppliers may also be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- Curtailing unemployment and poverty at local and national level.
- Strengthening the economy of local communities.
- Enhancing employability in the industrial sector.

**Major risks** *(GRI 102-15)*

- Increasing competition in the labor market and growing employee mobility may result in reduced productivity due to employee departures, loss of valuable knowledge and expertise gained through the employment of the departed employees, as well as in loss of the financial investment made and of the time dedicated to their training. The Company may also incur increased costs due to the need to replace specialized personnel.

**Risk Management / Control Practices** *(GRI 103-2a)*

To address these risks, the Company has implemented employee retention systems and practices that involve:

- The development of programs for formulating a uniform corporate policy, based on the employees’ shared values and their behaviors.

**Key elements of the Company’s approach to Employment**

- Attraction and retention of competent executives, continuous improvement of employer-employee relations and implementation of modern systems for employee performance evaluation.

- Establishing an attractive compensation and benefits framework on the basis of market data and specialized surveys for critical areas of the Company’s activity.

- Protection of employee personal data, allowing their use only by authorized persons and only in cases where this is required by law in the context of business relations and the Company’s business activity.

**Management Approach** *(GRI 102-3)*

- The Human Rights General Division of MYTILINEOS is responsible for establishing and implementing the framework for the management and development of the relevant policies and practices, as well as for providing professional support to the Business Units for dealing with issues regarding human resources.

**Management - Employee relations**

One of the main goals of MYTILINEOS, as an important social entity, is the fullfilment of its social role. The Company seeks to ensure the wellbeing of its employees, as it considers them an important factor for its growth. Therefore, employees are considered to be “integrated” within the Company, beyond the formal employment-remuneration provision relationship among them, in the sense that their continuous improvement of their capabilities and skills and of the outcome of their work, are inextricable linked to the Company’s progress. The Company has set as its priorities the safety of its employees and the protection of their interests and rights in the framework of sound corporate management, given that one of the key success factors is the environment in which the employees can work.

**Management - Employee relations**

- The Company’s Executive Committee holds monthly meetings, which are immediately communicated to all other employees participating in these meetings, with provisions made for the time necessary to disseminate the results.

**Commitment** *(GRI 103-2c)*

- Protection of employee personal data, allowing their use only by authorized persons and only in cases where this is required by law in the context of business relations and the Company’s business activity.
- Ensuring, through the individual Labor Regulations and the Code of Business Conduct, the elimination of all arbitrary or discriminatory practices in terminating employment relationships with employees.

- The Human Resources General Division of MYTILINEOS is responsible for establishing and implementing the framework for the management and development of the relevant policies and practices, as well as for providing professional support to the Business Units for dealing with issues regarding human resources.

**Management - Employee relations**

- The redesign Program will be implemented gradually, starting with the top and senior Management levels of the Company’s hierarchy.

**Employee benefits**

In all regions where MYTILINEOS operates, the compensation and benefit plans offered to its employees are designed in full compliance with the labor legislation and with the corporate collective bargaining agreements, where applicable. Any compensations over and above the statutory ones are based on the employees’ individual performance, which is reviewed and assessed annually. Moreover, MYTILINEOS provides a number of benefits to permanent employees in all levels of its hierarchy. These benefits vary between Business Units and include medical care, life insurance, disability / incapacitation coverage, retirement provisions and educational loans in cases of emergency. These benefits are non-discriminatory and are governed by the principles of equal treatment and transparency, setting clear policies per category of personnel.

**Sustainability Standards & Assurance**

- MYTILINEOS Sustainability Report 2021
- Governance
- Environment
- Society
- Introduction

Moreover, the Company’s Human Resources Committee has been established and is holding its meetings at regular intervals. The Committee is tasked with planning and obtaining approval for initiatives designed to effectively address relations to the attraction, development, retention, empowerment and rewarding of human resources, as well as with presenting updates on related “good practices” and with decision making.

The Company is currently following the new, revised recruitment policy and procedure. The purpose of the policy is to ensure adherence to meritocracy and equal treatment in the selection of personnel, based on the candidate’s capabilities and their suitability given the requirements of the particular jobs, as well as optimal leverage of the employees’ potential with regard to their development and career path prospects in the Company. At the same time, in 2021 MYTILINEOS issued a new code of conduct regarding the protection of Human Rights. The Human Rights Policy sets out the basic principles governing the respect for human rights and sets out the framework for managing employment risks.

**Key Challenges / Impacts** *(GRI 103-5a)*

- Employment is an internationally recognized goal linked to economic and social progress. It is considered an extremely important issue for MYTILINEOS’ Business Units, because of the high localization and largest in 2021. The Company has created opportunities for the employees’ long-term employment and development benefits not only for the Company’s business activities but also on a national scale, on its local communities, contributing to their sustainability.

- Commitment: the Company’s Executive Committee holds monthly meetings. The results of these meetings are immediately communicated to all other employees participating in these meetings, with provisions made for the time necessary to disseminate the results.

- The Company’s Human Resources Committee has been established and is holding its meetings at regular intervals. The Committee is tasked with planning and obtaining approval for initiatives designed to effectively address relations to the attraction, development, retention, empowerment and rewarding of human resources, as well as with presenting updates on related “good practices” and with decision making.

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Results

**GRI 103-3a-ii**

### Workforce data

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**Analysis / Gender**

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**Analysis / Employment contracts by gender**

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**Analysis / Employment contracts by country**

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<tr>
<td>Greece</td>
<td>2,001</td>
<td>2,058</td>
<td>2,182</td>
</tr>
<tr>
<td>Libya</td>
<td>18 -</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>25</td>
<td>31</td>
<td>44</td>
</tr>
<tr>
<td>Spain</td>
<td>20</td>
<td>16</td>
<td>36</td>
</tr>
<tr>
<td>Austria</td>
<td>11</td>
<td>10</td>
<td>27</td>
</tr>
<tr>
<td>Chile</td>
<td>44</td>
<td>29</td>
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<tr>
<td>Korea</td>
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</tr>
<tr>
<td>Italy</td>
<td>3</td>
<td>4</td>
<td>4</td>
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<tr>
<td>Turkey</td>
<td>2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Greece</td>
<td>2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Slovenia</td>
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<tr>
<td>Singapore</td>
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</tr>
<tr>
<td>Kazakhstan</td>
<td>36</td>
<td>-</td>
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<tr>
<td>Russia</td>
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<td>-</td>
</tr>
<tr>
<td>Ukraine</td>
<td>3</td>
<td>4</td>
<td>4</td>
</tr>
</tbody>
</table>

Starting in 2021, Candidate Evaluation Centers were included as the final stage in the personnel selection process. This stage is carried out by a panel of evaluators using tests designed to evaluate the candidates’ capabilities and skills of before the final decision on recruitment is made.

A total of 489 new jobs were created, covering the needs in all Company Business Units.

Concerning employee turnover:

- the voluntary departures rate stood at 61% (2020: 60%)
- the non-voluntary departures rate was 17% (2020: 13%)

In 2021, 34 posts were filled by internal candidates.

The return-to-work rate of employees who took parental leave stood at 99%, while the retention rate of these employees after 12 months from their return stood at 96%.

The low rate of part-time employees (0.6%) are covered by corporate collective bargaining agreements.

The high rate of employees working under a corporate collective bargaining agreements.

The total number of direct employees stood at 2,889 persons (2020: 2,455), of which 83% are employed in Greece.

The retention rate of full-time employees stood at 90.6% (2020: 91.0%).

The voluntary departures rate stood at 61% (2020: 60%).

The non-voluntary departures rate was 17% (2020: 13%).

In 2021, 34 posts were filled by internal candidates.

The Company maintained its very high rates of sourcing locally for yet another year, at 9 out of 10 of its direct and indirect employees come from the communities in the immediate vicinity of its industrial units as well as from the wider local area.

The participation of women in direct employment rose to 18.7%, increased by 3.7% compared to the base year (2019).

The total number of new hires reached 915, of which 21% involved women, while nearly 36% of the new hires involved young employees under long-term work contracts or project contracts.

Total new hires reached 915, of which 21% involved women, while nearly 36% of the new hires involved young employees under long-term work contracts or project contracts.

The total number of indirect employees (permanent and long-term contract employees) stood at 6,000 (2020: 4,823), raising the number of direct and indirect employees of the Company to 4,823 persons.

The total number of direct employees stood at 2,889 persons (2020: 2,455), of which 83% are employed in Greece.

The retention rate of full-time employees stood at 90.6% (2020: 91.0%).

The high rate of employees working under a corporate collective bargaining agreements.

The low rate of part-time employees (0.6%) was maintained.

More than 4 out of 10 employees are covered by collective bargaining agreements.

The return-to-work rate of employees who took parental leave stood at 99%, while the retention rate of these employees after 12 months from their return stood at 96%.

The voluntary departures rate stood at 61% (2020: 60%).

The non-voluntary departures rate was 17% (2020: 13%).

In 2021, 34 posts were filled by internal candidates.
Human Rights

Impact on Sustainable Development

<table>
<thead>
<tr>
<th>Impact on Sustainable Development</th>
<th>Significance for Stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.40</td>
<td>7.84</td>
</tr>
</tbody>
</table>

Materiality assessment process results: Scale (1-10) where 10 = "Highly significant" and 0 = "Not significant"

Boundaries of the Material Topic [GRI 102-44] [GRI 103-1b]

Where the impacts occur:
In all work areas of the Business Units and subsidiaries of the Company and of its contractors and suppliers

By whom the impacts caused:
The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/suppliers may also be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:
- The protection of labor rights
- Strengthening social and economic integration for all, irrespective of age, gender, disability, race, nationality, origin, religion, economic situation or other characteristics
- The elimination of any form of child or forced labor (modern slavery)

Risk Management / Control Practices

- MYTILINEOS, due to its activity in developing countries abroad, primarily mainly through the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, identifies risks related to human rights, both within its working environment and in the business environment of its main suppliers and business partners.
- Such potential risks include activities that may affect or involve children, a culture of corruption, inequalities in the workplace, limitation of human rights at the level of local communities etc. These risks may affect the Company's financial, human and social capital, through their likely impact on its reputation and its "social license to operate", and may also lead to legal sanctions as well as to emergency measures beyond those imposed by normal business conditions.

Commitment [GRI 103-2c]

- Zero tolerance of violations of Human Rights, in accordance with the key areas of the MYTILINEOS Human Rights Policy Code of Business Conduct and Suppliers' Business Partners Code of Conduct.

Risk Management / Control Practices [GRI 103-2a] [SA5 EM-EN-MM-210a.3]

- MYTILINEOS is committed to the first six Principles of the UN Global Compact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as defined in the Universal Declaration on Human Rights (UDHR). The Company's commitment to monitoring and disclosing the impacts of its activity in this area, together with the MYTILINEOS Code of Business Conduct and the Suppliers / Business Partners Code of Conduct, which are addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's work environment.
- MYTILINEOS monitors the relevant labor legislation (national, European, ILO), including reports on child labor, respect for human rights and work conditions, and is fully aligned with the collective labor agreements and the relevant international conventions. The Company's employees may without any restriction whatsoever participate in trade unions and professional associations.
- Labour rights are an issue of major significance for all employees. The Company's direct employees are covered by business or collective bargaining agreements, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. Furthermore, Employees' Unions are established in the Metallurgy Business Unit and in the Sustainable Engineering Solutions (SES) Business Unit. In the latter, a first-degree trade union body is established and functions as business unit-level (Volos plant), whose members are informed about the respect for the freedom of association and the elimination of any form of forced or compulsory labor, the identification and elimination of child labor, and the elimination of any discrimination related to the workplace and to employment.
- Regarding its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that must be followed by all, to ensure that the Health & Safety system for employees is properly implemented and the appropriate measures taken. At the same time, the contracts signed with contractors and suppliers include an explicit provision about the Company's Code of Business Conduct, to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.
- Finally, the Company is committed to conducting regular risk assessments of its main production plants and its Business Units, to identify potential impacts on key Human Rights protection areas, in accordance with the methodology proposed by the Global Compact (Global Compact Self-Assessment Tool - Human Rights section) and to publish the relevant findings. This process is supported by both daily communication and employee management procedures and systems implemented by the Human Resources General Division.

Results [GRI 103-3a-4a]

- In 2021, as part of employee training on the Code of Business Conduct, the Company provided to its Executives a special e-learning training programme which also covered Human Rights topics, during which 750 employees were informed about the respect for the freedom of association and the elimination of all forms of forced or compulsory labor, the identification and elimination of child labor, and the elimination of any discrimination related to the workplace and to employment.
- During 2021, no incident of Human Rights violation was reported to the Human Resources General Division or to the Regulatory Compliance Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. Thus, the Company's permanent target of zero tolerance of Human Rights violations was achieved.
- In 2021, the Company implemented for the 5th consecutive year the self-assessment process regarding the protection of Human Rights, in all its Business Units and in all countries of operation referred to in section "Countries of Activity 2021" According to the results of the self-assessment process, no areas were identified in which the deficiences observed could jeopardize the protection of Human Rights in the Company's activities. The main areas investigated according to the above procedure are presented in the following table.

Key Challenges / Impacts [GRI 103-1a] [GRI 103-11]

The key challenge for the Company is to maintain its strong focus on the protection of Human Rights and especially of the labor and social rights related to its activity. The protection of labor rights helps further strengthen a working environment that promotes the development of employees and also ensures that the Company is not involved in circumstances of violation of these rights, which may be caused by another company or by State bodies, natural persons or other groups with which the Company cooperates in the countries where it operates.

Management Approach [GRI 103-21] [GRI 103-2c]
The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholders, so that they can understand how the Company is managing its Human Capital in the context of its operations.

MYTILINEOS, arms to safeguard labor relations that promote mutual trust, constructive cooperation, two-way communication and recognition, as stated in the Company's Human Rights Policy. At the same time, it aims to promote the fundamental principles of the International Labour Organisations (ILO) Declaration on the Protection of Fundamental Labour Rights including: (a) respect for the freedom of association and the right to collective bargaining, (b) elimination of all forms of forced or compulsory labor, (c) effective abolition of child labor, and (d) the elimination of all forms of discrimination at work.

Represents also elected to the second degree trade union organization (Volos Labour Centre) and to the Panhellenic Metal Workers’ Federation (POEM).
- The Company, through the main grievance mechanism provided for in its Code of Business Conduct and in the Suppliers / Business Partners Code of Conduct for reporting Code violations (anonymous or named reports by phone, fax, post, as well as by email to the Regulatory Compliance Division), enables its employees and its suppliers / business partners to raise any concerns, as well as to report incidents of Human Rights violations. Moreover, the Company warrants that no action shall be taken against any person reporting in good faith any actual or alleged inappropriate conduct. This mechanism is being enriched to reflect the provisions of Directive 1937/2019 of the European Parliament and of the Council and, following the enactment of the relevant local legislation, its revised version will enter into effect.
- Regarding its activity in developing countries, MYTILINEOS' activities observed could jeopardize the protection of Human Rights, in all its Business Units and in all countries of operation referred to in section "Countries of Activity 2021" According to the results of the self-assessment process, no areas were identified in which the deficiences observed could jeopardize the protection of Human Rights in the Company's activities. The main areas investigated according to the above procedure are presented in the following table.

Sustainability Standards & Assurance
During the self-assessment exercise, no deficiencies were observed in terms of procedures or policies regarding the Health and Safety of employees.

- The Company guarantees that its employees are provided with safe and healthy work facilities.
- It also ensures that its employees are supplied with the necessary protective equipment and training to perform their tasks safely.
- The Company promotes the active participation of its employees in the Health and Safety procedures at the workplace.
- In 2021, the Company highlighted the importance of promoting and strengthening the mental health of employees and their families by providing a 24-hour Psychological Support Hotline.
- In 2021, the Company organized experiential lectures on psychosocial risks, employee resilience, health and well-being. The program of lectures, which consisted of 11 modules, was attended by 731 employees. Further information is available in the ‘Occupational Health & Safety’ section of this Report.
- Overall, the policy, the planned actions for the achievement of the targets set and the initiatives adopted voluntarily by the Company to ensure the Health and Safety of employees, are rigorously applied as presented in the relevant section of this report.

**Occupational Health & Safety**

**Employee Work Hours, Wages and Leave**

For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates.

- The Company confirms that all employees have a formal employment status.
- It also ensures that weekly work is limited to 40 hours; however, due to the workload in various activities, groups of employees may be called upon to work beyond 40 hours.
- The Company has procedures in place for planning, recording and monitoring each employee’s work hours to check any overtime, while also providing employees with a reasonable break time during work (as laid down by the law and the industrial standards).
- The Company ensures the wages of its employees in all cases of sick or parental leave and vacation leave in accordance with the international standards.
- No incident of a violation of these rights was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company’s Code of Business Conduct.

**Impact on Local Communities**

In this respect, in 2021 no circumstances were identified to justify the likelihood of incidents of human rights violations at community level. The Company’s activity does not restrict but, on the contrary, ensures access by the citizens to resources or various other methods of living. At the same time, the consultation process and the cooperation with the local Municipalities during the development and operation of RES projects is systematic, with the Company investing significant funds in the development and improvement of local infrastructure with mutual benefits.

**Freedom of Association**

The Company, through the mechanisms for formal and informal interactions with local communities which it maintains in each one of its Business Units, except in the case of industrial units located in demarcated Industrial Areas, ensures that the concerns of local communities regarding any general impact of its activity are recorded and taken, where necessary, appropriate measures.

It also takes the necessary measures to ensure that the security system of its premises or such arrangements in place are consistent with the international law enforcement principles and the use of power.

**Child Labour**

As a result, no Company activity in Greece presents any risk (significant or non-significant) of child labor incidents or of conditions likely to drive young employees to hazardous work. [GRI 408-1]

**Forced Labour**

In compliance with the Constitution of Greece (art. 22 par. 4), which protects the freedom of work, MYTILINEOS prohibits, via its Code of Business Conduct and its Suppliers / Business partners Code of Conduct, all forms of forced or compulsory in its work areas and in the work areas of its suppliers / business partners. As a result, no Company activity in Greece presents any significant risk of conditions that may lead to incidents of forced labor.

In 2021, no complaint or incident of forced or compulsory labor was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company’s Code of Business Conduct. [GRI 409-1]

**Discrimination**

MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.

No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company’s Code of Business Conduct. [GRI 406-1]
Equal Opportunities

### Impact on Sustainable Development

<table>
<thead>
<tr>
<th>Scale</th>
<th>Impact</th>
<th>Significance for Stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.75</td>
<td>Impact on Sustainable Development</td>
<td>7.49</td>
</tr>
</tbody>
</table>

#### Key Challenges / Impacts

With the main part of the Company’s activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the requirements of each Business Unit) are the two main issues in promoting equal opportunities and diversity at the workplace.

In this respect, the key challenge for the Company is to ensure equal opportunities, by eliminating discriminatory policies and practices (on the grounds of age, gender, disability, race, nationality, origin, religion, sexual identification or other status), and by promoting actions to provide a working environment where every employee has exactly the same rights and is treated fairly and in accordance with their abilities to fulfill their respective roles.

### Commitment

Provision of equal opportunities without discrimination in accordance with the main priority areas of MYTILINEOS’ Human Rights Policy

### Management Approach

The provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to their ability to respond to their assigned roles, is a core practice of MYTILINEOS, as stipulated in the Company’s Human Rights Policy. The Human Rights Policy was formally issued in 2021 and lays down a number of commitments on Equal Opportunities, such as:

- Strengthening employability in the industrial sector and enhancing corporate culture with the elements of diversity and equality
- Ensuring meritocracy and equal treatment in the selection of personnel
- Promoting equality regardless of particular characteristics such as age, gender, etc.

#### Major risks

Risks include inequalities primarily in terms of pay, education and training, as well as in terms of the opportunities for the advancement and development of human resources. Such risks may impact the morale and productivity of employees, while inequalities in terms of pay may be an obstacle to the retention of qualified employees and may jeopardize the Company’s reputation as a responsible employer.

### Risk Management / Control Practices

In 2021, priority was given to gathering and analyzing data and information on education, salary grades etc., from the Company’s individual Business Units, in order to gain a deeper understanding of these issues and formulate an action plan. The following are some initial studies and ongoing actions:

- Apart from the Code of Business Conduct and the Human Rights Policy, in which explicit provisions are made for the prohibition of discrimination at the workplace, MYTILINEOS evaluates the human resources policies in place and will formulate new ones, in order to reinforce, among other things, equality at work.

### Results

In 2020 work had already begun on the formulation of a data collection and analysis methodology that will allow a better understanding of the gender pay gap indicator. The average deviation was calculated in 2021 and according to the preliminary analyses, the difference between men’s and women’s earnings in the category of Executives appears to be less than 10%. Because of the geographic dispersion and complexity of MYTILINEOS operations and the diverse nature of its activities, the Company’s priority, before disclosing specific indicators, is to identify the various reasons that cause these deviations in each personnel category, namely Executives, Management employees, and Workers and technical staff.

In 2021, no employees with disabilities were employed at MYTILINEOS.

In the revenue generating Divisions, the percentage of women participating in the Company’s team of Executives stood at 18.1%.

### Diversity of MYTILINEOS’ Governance bodies and executive / management personnel

#### Board of Directors

<table>
<thead>
<tr>
<th>Majority</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>2020</td>
</tr>
<tr>
<td>Male</td>
<td>80.0%</td>
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<tr>
<td>Female</td>
<td>20.0%</td>
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</tbody>
</table>

#### Executive Committee

<table>
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<tr>
<th>Majority</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>2020</td>
</tr>
<tr>
<td>Male</td>
<td>83.3%</td>
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<tr>
<td>Female</td>
<td>16.7%</td>
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</tbody>
</table>

#### Executives

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<tr>
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</thead>
<tbody>
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<td>2020</td>
</tr>
<tr>
<td>Male</td>
<td>82.2%</td>
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<tr>
<td>Female</td>
<td>17.8%</td>
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</tbody>
</table>

### Employees of nationalities other than Greek

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<thead>
<tr>
<th>Majority</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>2020</td>
</tr>
<tr>
<td>Male</td>
<td>65.8%</td>
</tr>
<tr>
<td>Female</td>
<td>34.2%</td>
</tr>
</tbody>
</table>

### Percentage of women in management positions

<table>
<thead>
<tr>
<th>Year</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>17.8%</td>
<td>19.4%</td>
<td>21.3%</td>
</tr>
</tbody>
</table>
Sustainability of local communities

Investments. This is a constantly evolving effort taking various forms, whose combination results in the Company’s commitment to respond, acknowledging its relevant role in the local context. The Company’s central focus is on the recognition of the responsibilities associated with the diverse expectations of its local communities, contributing to the protection of the Natural environment, to education, health, and safety, and to the efforts to combat poverty, to strengthening social inclusion and ensuring access to education, and to assist in the development of the professional skills of the young generation.

Major risks

The Company’s failure to promptly identify and manage the changes in social norms and changes in the perception of its local communities compromises the Company’s place as fully integrated member of these communities with shared interests. This may affect the preservation of the Company’s ‘social license to operate,’ and may possibly restrict its future growth.

Management Approach

The purpose of this disclosure is to provide MYTILINEOS’ Stakeholders with access to information regarding the development of the Company’s social and economic performance, evaluating its responsible operation towards Society. The Company’s objective is to familiarize itself with the needs and priorities of its local communities, so that its development efforts are as compatible as possible with the needs and priorities of its local communities and of the broader Greek society.

Stakeholder Engagement

The Company also supported the national and regional initiatives, contributing in selected actions in sectors directly connected to: (a) its operations, (b) its local supply chain by sourcing income-generating products, (c) rapid deployment of projects that are sustainable in the long term and contribute both to the improvement of the social aspects of life in its local communities as well as to Sustainable Development in general.

Goal

A standing goal of MYTILINEOS over time in connection with its social investments (initiatives and programs) is to give priority to projects that are sustainable in the long term and contribute both to the improvement of the social aspects of life in its local communities as well as to Sustainable Development in general.

Key elements of MYTILINEOS’ social policy

- Strengthening local employment: As the core activities of MYTILINEOS are primarily located in the Greek region, the Company acknowledges and accepts its share of the responsibility to contribute to the development and preservation of the prosperity of the local communities. In all the geographical regions where the Company’s operations are located, it is observed how resources come in their majority from the local population.
- Supporting local economic growth: All Business Units of the Company subscribe to the same principle of giving priority to the selection of local suppliers for the purchase of products and services, provided that these meet their specific needs and particular requirements. More information on this topic is available within the 3rd study on “MYTILINEOS’ Socio-economic Impact in Greece,” at the following address: https://www.mytilineos.gr/sustainability/how-we-create-value/mytelines-socio-economic-impact-in-greece/.
- Making a substantial contribution through the annual social program: By providing its own social programs and initiatives, the Company strives for the strengthening of social cohesion, strategic collaborations, and the mobilization of its management by participating in selected actions in sectors directly connected to: (a) its culture and corporate values, (b) the impacts of its business activity, (c) the basic social needs that have emerged during the financial crisis and the consequences of the COVID-19 pandemic, and (d) the Sustainable Development Goals. More information is available at the following address: selectionmap.mytilineos.gr/en/.
- Further enhancing the constructive relationship it has with its local communities: Social investment, as an integral part of the Company’s operations, is governed by an electronic system of managing and evaluating social requests, which ensures transparency, enhances the relationship with citizens and stakeholders, and maximizes the (social) impact of the initiatives taken.

Local employment and growth

Over the last two years, MYTILINEOS has created nearly 1,480 new jobs, taking into account the Company’s employment figures for 2021. Moreover, the Company acknowledges that the significant share of the responsibility to generate income in its local communities, maintains new partnerships with local communities at a very high level with more than 9 out of 10 direct and indirect employees coming from the local communities. In addition, MYTILINEOS invests in the local supply chain by sourcing income-generating products, services, and jobs (more than 1,900 indirect jobs in all Company activities during 2021), creating wages consumed in the market and in turn generating induced jobs, wages and taxes paid to the State.

Results

Sustainable Development Report 2021

MYTILINEOS Sustainable Development Report 2021

Objectives

1. Strengthening local employment: As the core activities of MYTILINEOS are primarily located in the Greek region, the Company acknowledges and accepts its share of the responsibility to contribute to the development and preservation of the prosperity of the local communities. In all the geographical regions where the Company’s operations are located, it is observed how resources come in their majority from the local population.

2. Supporting local economic growth: All Business Units of the Company subscribe to the same principle of giving priority to the selection of local suppliers for the purchase of products and services, provided that these meet their specific needs and particular requirements. More information on this topic is available within the 3rd study on “MYTILINEOS’ Socio-economic Impact in Greece,” at the following address: https://www.mytilineos.gr/sustainability/how-we-create-value/mytelines-socio-economic-impact-in-greece/.

3. Making a substantial contribution through the annual social program: By providing its own social programs and initiatives, the Company strives for the strengthening of social cohesion, strategic collaborations, and the mobilization of its management by participating in selected actions in sectors directly connected to: (a) its culture and corporate values, (b) the impacts of its business activity, (c) the basic social needs that have emerged during the financial crisis and the consequences of the COVID-19 pandemic, and (d) the Sustainable Development Goals. More information is available at the following address: selectionmap.mytilineos.gr/en/.

4. Further enhancing the constructive relationship it has with its local communities: Social investment, as an integral part of the Company’s operations, is governed by an electronic system of managing and evaluating social requests, which ensures transparency, enhances the relationship with citizens and stakeholders, and maximizes the (social) impact of the initiatives taken.

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Introduction

Environment

Society

Governance

Sustainability Standards & Assurance

Percent of employees from local communities (direct & indirect employees)

- 92.6%
- 90.3%
- 92.0%
- 89.0%
- 78.0%
- 67.0%
- 56.0%
- 45.0%
- 34.0%
- 23.0%
- 12.0%
- 10.0%
- 9.0%
- 8.0%
- 7.0%
- 6.0%
- 5.0%
- 4.0%
- 3.0%
- 2.0%
- 1.0%
- 0.0%
**Social Investments**

In 2021, MYTILINEOS continued to implement its social policy, invested over €31 million in the implementation of actions in main social sectors that contribute to the Sustainable Development Goals (SDGs). All social investments are made through benefits in kind (products and services) in cooperation with competent organizations. Most notable was its contribution to SDG 3 (Good Health and Well-Being), to which over 45% of the total amount invested was allocated, with a strong focus on addressing and mitigating the impacts of the SARS-CoV-2 pandemic. The amount invested in infrastructure and services of general interest exceeded €4 million, as MYTILINEOS contributed significantly to the efforts of the Fire Service and the Civil Protection to extinguish the fires that the country faced to the maximum extent. Specifically, the Company completed 10 pilots, engineers and translators, for extinguishing the fires in Western & Central Greece, the Peloponnesse, the north-east Aegean and of course in Attica. The helicopters completed 155 flight hours and made 986 water drops.

**Key Social Initiatives & Programs**

In 2021, MYTILINEOS implemented its “#HoMellon”, in cooperation with the “Know! Social Entrepreneurship Network”.

**“#HoMellon”**, in cooperation with the “Know! Social Entrepreneurship Network”

Using the skills accelerator methodology to support the reintegration of Homeless people in the Labor Market. The programs 25 beneficiaries attended 10 Intensive Professional Skills Training, receiving 1,337 hours of online and face-to-face training in 25 thematic areas thanks to the valuable assistance of 19 trainers, and were also provided with clothing and personal care, technological equipment and advice for connecting with the labor market. Currently, 13 beneficiaries are already employed, 4 have their own residence, while the remaining 10, empowered and motivated by the program, continue to improve their lives.

**“DIAROFTI” (“NUTRITION”), in cooperation with the PROLEPSIS Institute.**

MYTILINEOS ensured the distribution of 18,509 healthy meals in total for the 4th consecutive year to 225 students of 7 schools in the Prefectures of Attica and Viotia, reducing the individual high food insecurity indexes while at the same time helping the students improve their dietary habits.

**“Emergency Food Fund-for kids”, in cooperation with the Food Bank Institute Against Hunger and Food Waste**

MYTILINEOS launched its cooperation with the “Food Bank” aiming to cover the needs of children with special needs living in orphanages and of children from large families in 25 organizations all around Attica. Specifically, the Company supported 91,338 glasses of milk and cereals for 3,784 children of whom 149 live in 6 foundations and 1,448 are children with impairments and disabilities.

**“Provision of medical equipment”, in cooperation with the Association “PNOI – Friends of Intensive Child Therapy”**

MYTILINEOS provided the Neonatology Clinic – Neonatal Intensive Care Unit of the University General Hospital of Larissa with an SLE 6000 Neonatal Monitor, pressure and high frequency square waveform oscillation (HFV) Ventilator necessary for the hospitalisation of more than 700 newborns who require mechanical support annually.

**“The Tipping Point”, in cooperation with the Organization “The Entrepreneur Network”**

The program was implemented in 30 schools around Greece, where by using technology mentoring, 2,624 students, assisted by 53 teachers, regardless of geographical area, economic and social status, were able to join a 30 minute online mentoring session in order to speak with successful professionals and obtain answers to questions about their future.
Program: Responsible Supply Chain

Impact on Sustainable Development

**Significance for Stakeholders**

**Commitment**

Development of a responsible supply chain based on ESG criteria and in accordance with the Company’s Suppliers / Business Partners Code of Conduct.

**Major risks**

The lack of responsible practices in the Company’s supply chain can be a source of various risks, such as problems in the supply of raw and other materials and of services, increased environmental impacts, health and safety risks, risks of human rights violations, and ethical and compliance risks, with consequences for the reputation and credibility of MYTILINEOS as well as potential financial sanctions.

**Risk Management / Control Practices**

MYTILINEOS seeks to develop strong, long-standing and mutually beneficial relationships of trust with its suppliers and business partners. The Company’s priority is to support its local communities, by establishing partnerships with local suppliers and contractors, while, in the context of its sustainable development strategy, it has launched specific initiatives that are also aimed at expanding responsible practices to its supply chain.

**Mytilineos** typically develops long-term partnerships with a large number of suppliers. Depending on the scope and nature of a specific purchase, priority is given to local suppliers, who are selected on the basis of their solvency, reliability in terms of quality and punctuality in terms of delivery, cost of products or services, availability to ensure the quantities required, and capability to meet the requirements of the particular purchase in accordance with the specifications set by the Company’s Business Units.

Moreover, MYTILINEOS has developed a dedicated “Suppliers / Business Partners Code of Conduct”, which sets out the Company’s minimum requirements / expectations from its supply chain actors regarding issues related to responsible entrepreneurship and sustainable development, as a key precondition for entering into any commercial association with them. The Code is structured in accordance with the ESG criteria and is aligned with the United Nations Sustainable Development Goals.

The purpose of this disclosure is to inform MYTILINEOS’ Stakeholders about the responsible practices applied by the Company in its broader supply chain. The main objectives of the Company, until 2025, are the strengthening of the level of maturity and integration of Sustainable Development in its supply chain, its inclusion of ESG criteria in the selection process for new suppliers and the commitment of existing ones to good and responsible practices, with a view to developing responsible partnerships to better understand impacts and harmonize goals and expectations.

**Key Challenges / Impacts**

Responsible supply chain management is gradually integrated into the regulatory framework at European and national level. Through due diligence processes, partnerships with supply chain members can provide better risk management, help exploit business opportunities, ensure business continuity, and, along the way, could transform the supply chain into a value chain capable of generating economic and social value.

1 The term “local suppliers” generally refers to suppliers of materials, products or services, both industrial and non-industrial, operating in Greece.
In this context, the Company has prepared a custom supplier evaluation questionnaire, which is fully aligned with the requirements of MYTILINEOS’ Suppliers / Business Partners Code of Conduct. The evaluation process of new and existing suppliers is gradually being integrated in the Purchases / Procurement units of all Business Units of the Company.

The evaluation of the ESG performance of MYTILINEOS’ suppliers and business partners focuses on material sustainable development topics which are directly related to the Sustainable Development Goals and include, among other things, the evaluation of compliance with environmental requirements, the management of health and safety issues, the protection of human rights, as well as ethical and integrity issues.

A basic description of the MYTILINEOS supply chain is presented below:

**Main business activities requiring services or products from the supply chain**
- Production & Maintenance of the alumina-chemical industry and of primary aluminium metallurgy
- Production of secondary aluminium from recycled aluminium/ scrap
- Construction for the purchase of equipment for the implementation of EPC and RES projects
- Logistical regarding the methods and time of products’ delivery in various countries
- Operation and maintenance of Energy Centers (thermal power stations)
- Development, construction and maintenance of Renewable Energy Sources projects (wind farms, solar parks, hydroelectric projects)
- Retail activity
- Studies – Investments
- Production of secondary aluminium from recycled aluminium (scrap)
- Plant production for the purchase of raw or other materials
- Production & Maintenance of the alumina chemical industry
- Raw material producers
- Manufacturers
- Distributors/Exporters
- Suppliers of spare parts/materials
- Wholesalers
- Suppliers of consultancy services & studies

**Main supplier categories**
- Metalurgy BU
- Power & Gas BU
- SES BU
- RSD BU
- Central Functions

**Results**

- At the end of 2021, the number of MYTILINEOS’ active suppliers and business partners in Greece and abroad exceeded 10,000. Compared to 2020, no significant changes affecting the Company’s activity were recorded in the basic structure of its supply chain [GRI 102-9].
- Mytilineos’ total expenditures to its suppliers in Greece for the development of its projects amounted to nearly €1.6 billion, with the share of the total amount being allocated to domestic suppliers standing at 59.6%, thus indirectly contributing for yet another year to the preservation of jobs and the creation of income [GRI 204-1].
- In 2021, almost 14% of all new suppliers with which MYTILINEOS entered a commercial relationship were evaluated using environmental criteria, while almost 16% were evaluated using social criteria [GRI 308-1] [GRI 204-1].
- In 2021, 6 key suppliers have been evaluated.

The evaluation of the ESG performance of MYTILINEOS’ suppliers and business partners focuses on material sustainable development topics which are directly related to the Sustainable Development Goals and include, among other things, the evaluation of compliance with environmental requirements, the management of health and safety issues, the protection of human rights, as well as ethical and integrity issues.

Concerning the total number of environmental inspections of contractors / suppliers, 69 such inspections were carried out, resulting in 49 confirmed cases of non-compliance for which appropriate measures were taken. Regarding the total number of inspections related to health and safety issues, 130 such inspections of contractors / suppliers were carried out, resulting in 33 confirmed cases of non-compliance.

In addition, the Company completed the 2nd training cycle of key suppliers on corporate responsibility topics, increasing the number of suppliers that have already been trained to 85, of which 10 completed an additional in-house training on sustainable development topics.

The figure below presents the allocation of expenditures to suppliers in 2021 per Business Unit of the Company. The largest expenditure, which also showed a large increase in 2021 (by 84%), concerns the Power & Gas Business Unit. The increase observed is primarily due to the purchase of increased quantities of natural gas and to the price increases that took place during the year. A significant increase was also observed in the expenditures to suppliers in the Sustainable Engineering Solutions (SES) Business Unit, which was to purchases necessary for the construction of the new thermal power plant.

**Breakdown of expenditures to suppliers per Business Unit**
- Metalurgy BU
- Power & Gas BU
- SES BU
- RSD BU
- Central Functions

**Data on the number of suppliers, their geographical distribution and the expenditures to them per Business Unit are presented below.**

<table>
<thead>
<tr>
<th>Total number of suppliers</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greece</td>
<td>9,639</td>
<td>9,543</td>
<td>10,277</td>
</tr>
<tr>
<td>Abroad</td>
<td>9,639</td>
<td>9,543</td>
<td>10,277</td>
</tr>
<tr>
<td>Total</td>
<td>19,278</td>
<td>19,086</td>
<td>20,554</td>
</tr>
</tbody>
</table>

**Total expenditure**

<table>
<thead>
<tr>
<th>Geographical distribution</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greece</td>
<td>€1,954,923,114</td>
<td>€1,661,972,526</td>
<td>€2,632,552,530</td>
</tr>
<tr>
<td>Abroad</td>
<td>40.4%</td>
<td>47.7%</td>
<td>47.5%</td>
</tr>
<tr>
<td>Total</td>
<td>€2,632,552,530</td>
<td>€2,632,552,530</td>
<td>€2,632,552,530</td>
</tr>
</tbody>
</table>
Business Continuity

Impact on Sustainable Development

Significance for Stakeholders

Materiality assessment process results

Materiality Scale (1-10): 9.25 “Significant” and 7.55 “Very Significant”

Boundaries of the Material Topic (GRI 102-45) (GRI 103-1b)

Where the impacts occur:
The impacts can occur in the Company’s industrial plants and facilities as well as in the nearby local communities

By whom the impacts caused:
The impacts may be caused by MYTILINEOS’ Business Units, its subsidiaries and the strategic suppliers and contractors working with them

The management of the topic by MYTILINEOS contributes to Sustainable Development:
The implementation and promotion of integrated policies and plans to effectively manage emergencies at all levels, so as to protect the natural environment and the well-being of society at local and national level

Topic of increased significance to:
• Employees
• Suppliers
• Shareholders / Investors / Financial Analysts
• NGOs
• Local Communities

in the context of their cooperation with MYTILINEOS.

Management Approach

The purpose of this disclosure is to inform MYTILINEOS’ Stakeholders about how the Company responds to emergencies in its facilities and areas of activity, and about the ways in which it ensures its uninterrupted operation.

The Company’s objective is to effectively respond to emergencies while protecting the environment, ensuring the Health & Safety of all persons involved in its facilities and areas of activity; and the well-being of neighboring local communities.

Key Challenges / Impacts

The development of an organization’s capacity to ensure the uninterrupted provision of its products/services (without affecting their quality availability) under abnormal operating conditions, such as natural disasters, epidemic / pandemic crises or other adverse events (and combinations thereof) as well as the continuation of the organization’s internal operation and functioning, such as for example in cases involving loss of critical IT applications, failures of suppliers / subcontractors, shortages in human resources, etc.

Major risks

The low degree of preparedness and response to emergency incidents (fires, explosions, land subsidence, release of chemicals to the environment, transportation of products, waste, natural hazards such as climatic and seismic events, health and safety incidents and other hazards), with serious consequences for the employees, the local community and the natural environment but also for the smooth operation of the Company’s activities and thereby for its reputation and its financial results.

Commitment

Safeguarding business continuity, environmental protection and health and safety in emergencies, in accordance with the main priority areas of MYTILINEOS’ Occupational Health & Safety Policy and Environmental Policy.

Risk Management / Control Practices

Managing emergencies and ensuring business continuity is of the highest priority for MYTILINEOS. Therefore, all Business Units of the Company have established appropriate Emergency Prevention and Response Plans (for fire, explosion, leakages, natural phenomena, extreme weather conditions etc.), in order to effectively deal with all incidents that result in deviations from their normal operation with serious consequences for the environment and for the health and safety of employees and the local communities.

• In the Metallurgy Business Unit, an Emergency Response System has been developed in the facilities of Ag. Nikolaos, Vios, consisting in the following: (a) an integrated Internal Emergency Plan (IEP) which includes special evacuation plans of the facilities, (b) regular training of personnel, and (c) planning and implementation of emergency preparedness exercises in accordance with the annual plan and their adaptation to the requirements of the IEP. Regarding in particular the risks related to the use of industrial substances, both the prevention and the response plans in place follow the provisions set out in the SEVESO III Directive and described in the relevant Plant Safety Study, which is registered in the National Registry established for such facilities.

• In the Power & Gas Business Unit, a package of emergency response measures is applied in the Unit’s Energy Centers, RES plants and offices, comprising the following: (a) Emergency Team or Emergency Manager, (b) documented Emergency Incident / Accident Response Procedures, (c) implementation of Emergency Management Plans, and (d) implementation of personnel exercises and trainings in accordance with the special Evacuation Plans and the Building Emergency Instructions.

• In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, appropriate Emergency Prevention and Response Plans are in place to effectively address all emergencies identified by the system in order to protect the workforce and the environment in the event of such an incident. Emergency Plans have been prepared and are applied. Each construction site has its own emergency plan appropriate to the nature of its activities and to the risks identified and assessed. The emergency plans are documented, accessible and clearly communicated to all personnel, who are trained in means of regular emergency preparedness exercises to understand these plans and to thoroughly familiarize themselves with their roles and responsibilities in the event of an emergency.

Results

• In 2021, there were no industrial accidents or environmental incidents with an impact on the natural environment or on public health.

• A total of 62 emergency preparedness exercises were carried out in all production units, construction sites and office buildings of the Company. In particular:
  • In the Metallurgy Business Unit, a total of 26 exercises were carried out covering fire emergencies (in facilities, onshore ships, in fuel tanks) and rescue operations in enclosed areas and at heights, as well as the evacuation of offices and of the Chemical Laboratory facilities. The exercises were carried out in the context of the operation of the “Mobile Emergency Response Unit”, which consists of Fire Protection Team employees. The staff is well-trained in fire safety and facility maintenance and this team is actively supported by approximately 100 volunteer firefighters from the Plant’s other units, who receive proper training and are periodically retrained. In addition to conducting and analyzing emergency response exercises, the Fire Protection Team uses appropriate certified mobile equipment and the related means of assistance to help local authorities address incidents in the wider area, offering effective and prompt assistance as needed. The particular circumstances of the pandemic did not affect the preparedness of the Team, which responded promptly to all events inside and outside the Plant. In addition, evacuation / preparedness (alarm) exercises were carried out in the alumina thermoclinic process, as well as exercises related to the explosion of natural gas and the treatment of polluted fire water, as well as exercises covering a rescue operation at height in the IPP construction site and putting out a fire in a high-voltage transformer of the Plant’s substations.
  • In the Sustainable Engineering Solutions (SES) Business Unit, 14 emergency preparedness exercises were conducted, involving general evacuation exercises as well as exercises involving the evacuation of a building due to an explosive threat, fire and earthquake response exercises, and rescue at height / in an enclosed space exercise.
  • In the Renewables & Storage Development (RSD) Business Unit, 27 preparedness exercises were conducted, involving fire, lightning strikes, earthquake and flood response exercises.
  • In the Power & Gas Business Unit, 15 preparedness exercises were conducted, involving the evacuation of a building in case of earthquake and (forest) fire and evacuating a station due to severe weather phenomena and lightning strikes.
Other significant Social topics

Labor Practices

Employee training

The activity of MYTILINEOS in diverse sectors creates to differ-
training needs, while offering to employees a wide range of
opportunities to develop management and problem-solving
skills, as they are confronted with new challenges each day. The
Company’s vocational training and development program for its personnel continued in 2021, aimed
at improving the employees’ professional skills and capabili-
ties required to cope with the current and future business chal-
 lenges for the Company as well as with the demands of their
personal life.

In particular, within 2021, €414,741 were invested for the imple-
mentation of 41,879 training man-hours (2020: 38,476), an
amount decreased by 8.8% compared to the respective number of
hours in 2020.

The Company’s training program, which was attended by 54% of
direct employees, focused primarily on the key areas:

• Induction program
• Foreign languages
• Development of skills and personal capabilities
• Development of technical skills
• Occupational Health & Safety
• Internal procedures & Management Systems
• Corporate compliance program
• Management & Leadership development

Workforce data (direct employees)

Average training man-hours per employee 2020 2021

Analysis / gender

2021

Total
246 157 14.5
Men
246 163 14.3
Women
173 137 14.3

Analysis / age

<30 years old
na na 39.5
30 – 50 years old
na na 31.2
>50 years old
na na 6.4

Analysis / employee category

Executives
245 146 29.0
Management employees
16.7 14.2
Workers and technical staff
291 18.2 13.7

Employee performance evaluation

Moreover the employee performance evaluation procedure was continued in 2021, in accordance with the Company’s uniform evaluation system, with almost 80% of the employees from all categories of personnel who met the conditions for inclusion in the annual performance evaluation procedure, participating in it.

In 2021, the revision of the Performance Management System was also completed, which involved a series of actions and adapta-
tions in a number of key points, as well as the development
of a training plan for the Company’s employees, scheduled for implementation in 2022. The objectives of the Performance Man-
gement System are the following:

• To support the implementation of the strategy through individ-
ual measurable goals.
• To enhance employees’ understanding of the Company’s expec-
tations (quantitative results) and the required skills.
• To provide the framework for productive discussions on per-
formance with managers and employees.
• To empower Team Leaders to reward high performance, rein-
force the people’s engagement and contribute to the corpo-
rate results.

Workforce data (direct employees)1 2019 2020 2021

Analysis / gender

Total
55.9% 51.9% 50.2%
Men
59.2% 53.9% 51.8%
Women
40.8% 43.4% 43.4%

Analysis / employee category

Executives
48.2% 61% 53.2%
Management employees
48.6% 47.9% 47.8%
Workers and technical staff
61% 54% 44.3%

At the same time, since 2021, Skills Development Centers are in operation, which in Company Executives participate, in order to:

• Identify the employees’ career pathways, milestones and develop-
ment needs.
• To provide the framework for productive discussions on per-
formance with managers and employees.
• Identify the most suitable employees for promotion, and
• Identify and cultivate talent development.

Employee skills development programs

Virtual Advance Negotiation Skills (strategic & selling)
The objective of this program was to introduce employees to negotiating
skills and approaches, and to equip them with the means and tools to
apply in their daily life the knowledge that they acquired. The program focused on training employees who specialize in complex or strategic
negotiations, as well as employees who are active in sales and deal with
customers on a daily basis. Among other situations, the program covered
negotiation and strategic decision-making, dealing successfully with
refusals, dead ends, maneuvering and misleading tactics, and
preventing dead ends and situating critical situations. The percentage of employees who attended the programme reached 97%.

Communication and Collaboration

Most of the large size and expansion of the MYTILINEOS activities
and, therefore, of its people, in many countries, communication and
cooperation are catalytic for the success of the organization, represent ing key skills included in the Performance Dialogue system. In cooperation with Dynargie, targeted trainings were conducted to develop these two skills. Using the tools of Dynargie and the interactive gamification that rewards the effort, all participants had the opportunity to expand their knowledge, as well as the interactions and
the collaboration between them. The program included, among other
topics, training in understanding the value of effective communication,
different types of communication, the value of collaboration and cross-
departmental teamwork. The percentage of employees who attended the programme reached 93%.

Product Quality & Safety

MYTILINEOS focuses on safeguarding the quality of its products, so that they are safe, and over and above comply with the appli-
cable legal and regulatory safety requirements. Any deviation from
these requirements is taken as a priority by the Company, as it affects its responsible operation, which in turn impacts its customers’ satisfaction levels, its good reputation and creditabilit
and, by extension, its financial results.

Because of the diverse nature of the Company’s activities, each Business Unit is faced with different end uses of the secondary products and
result from the processing carried out by its clients. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accor-
dance with the expectations and requirements of its clients.

In the Metallurgy Business Unit, the impacts of the Compa-
ny’s primary products on health and safety specifications are
understood and the secondary products that result from the processing carried out by its clients. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accordance with the expectations and requirements of its clients.

In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, in addition to taking into account the internationally appli-
cable regulations on the design of all manufacturing and RES projects, the Company monitors their quality metrics and characteristics in detail, during the supply of materials and
the construction of the final product, in order to ensure that the clients’ stated requirements are met.

In the Power & Gas Business Unit, it is very important for
MYTILINEOS to ensure the highest possible availability and reli-
bility of its thermal plants for the generation of electricity,
thermal power, as well as the continuous improvement of the quality of the services accompanying it, while at the same time taking into account the new requirements of customers in areas such as electronics,
electricity efficiency and energy metering.

All Business Units of the Company implement an ISO 9001:2015 certified
Environmental Management System, which is supported by individual Quality policies specific to each Business Unit.

In the Metallurgy Business Unit, the Company’s laboratories, whose role in the quality program is pivotal, systematically con-
trol all production stages, from raw materials to finished prod-
ucts. In this respect, the officially issued: Safety Data Sheets (SDS) describe the risks associated with the products, as well as the corresponding precautionary measures which must be taken to avoid / address these risks. The Company is committed and takes steps to ensure the best quality in its products, in response to the expectations and requirements of its clients, delivering them with products (alumina and primary aluminium) and related services that fully meet their quality requirements.

In the unit of the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the Company’s projects and services are in full agree-
ment with the terms of the respective contracts and with the
Company’s contractual obligations to its customers, to whom all Health, Safety and Environment related information is deliv-
ered. The Company is committed to ensuring the best possible availability and reliability of the entire equipment (Operation & Maintenance Manuals) and for all the materials supplied, (b) clearly visible labelling of all materials and equipment (warnings, trademarks and related instructions) without diverging, which are included in the framework of the Safety Data Sheets (SDS) for all hazardous materials.
Communication & Marketing

Due to the broad scope of its activities, MYTILINEOS is communicating on multiple levels and for a variety of purposes, which include, among others, the disclosure of stock market information, the announcement of new activities and projects, and the provision of information to consumers and of updates to its other Social Partners, such as for example local communities. At the same time, the Company’s international activity in 30 countries in all 5 continents, increases the level of difficulty and the challenge of providing timely and accurate information, as each country of activity has different morals, culture, mentality and institutional framework, to all of which the Company must align itself. Consequently, the Company’s many and varied audiences, in combination with its multiple activities, are an important challenge in the first place.

Recognizing these aspects, the Company designs and carries out its Communication and Marketing Strategy by implementing an annual communication strategy plan and individual sub-plans, depending on the business objectives. These plans are in turn evaluated, in order to examine whether corrective or updated actions are required. Communication and marketing plans are designed and implemented by the Communication and Marketing Strategy General Division, yet their scope is of relevance to all Company General Divisions and activities. For this reason, mechanisms have been developed for cooperation between all General Divisions and Committees of the Company, as well as with the Company’s Management.

At the same time, MYTILINEOS monitors developments in the relevant legislation and voluntary codes of conduct, in order to ensure the lawfulness of its communication and promotions. In this respect, the Company’s communication associates are bound by the Greek Code of Advertising-Communication Practice, compliance with which is established on an advisory, preventive and/or suppressive basis by the Communication Control Board, in line with Greek laws. The Code’s principles require all promotions to be lawful, decent, honest and truthful, prepared with a due sense of social responsibility and in line with the principles of fair competition, as this is generally accepted in the market.

The Company also participates in institutional bodies such as the Greek Federation of Enterprises (SEV), the Hellenic Capital Market Commission (HCMC) and the Hellenic Advertisers Association, membership of which is conditional on the acceptance of obligations, commitments and rules which MYTILINEOS embraces and takes into account for its Communication and Marketing activities.

Finally, the CEO and the Executive Committee are kept informed and evaluate the progress and performance of the Communication and Marketing Strategy General Division at regular intervals.

Regarding the results for 2021:

- During the implementation of MYTILINEOS’ communication strategy, there were no incidents of non-compliance with the regulations and voluntary codes on marketing communications, including product promotion and sponsorships. [GRI 417-3]
- The Company’s products are not subject to any restrictions as regards their sale to specific markets and no significant issues of concern were raised by the Company’s Stakeholder groups in connection with products and their marketing communication.
- Regarding the provision of verifiable and clear information on its products for the purposes of labelling, MYTILINEOS complies fully with the relevant requirements. In all cases, customers have at their disposal the tools allowing them to check all significant information provided and to proceed to the corresponding tests, if they so wish. In 2021, there were no incidents of non-compliance with the regulations regarding information and labelling of the Company’s products. [GRI 417-2]

Type of information related to product labelling [GRI 417-1] A31

<table>
<thead>
<tr>
<th>Major categories of products subject to the following information requirements</th>
<th>Aluminium</th>
<th>Alumina</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information on the origin of product elements or ingredients</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Information on content, particularly regarding substances which may have an environmental or social impact</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Information on the safe use of the product or service</td>
<td>Non-applicable requirements</td>
<td></td>
</tr>
<tr>
<td>Information on the product’s disposal method and its potential environmental/social impacts</td>
<td>Non-applicable requirements</td>
<td></td>
</tr>
</tbody>
</table>

In the Metallurgy Business Unit, the above labelling requirements apply to all end products for sale (aluminium billets and slabs), as well as to calcined and hydrated alumina. For each aluminium or alumina cargo, a “Certificate of Conformity” is issued containing the necessary quality specifications for that cargo, and the Safety Data Sheet (SDS) of each product is also available.
## ESG KPIs

<table>
<thead>
<tr>
<th>Social KPIs</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employment</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Direct employees</td>
<td>2,436</td>
<td>2,455</td>
<td>2,889</td>
</tr>
<tr>
<td>Indirect employees</td>
<td>1,226</td>
<td>1,401</td>
<td>1,934</td>
</tr>
<tr>
<td>Employee turnover¹</td>
<td>5.2%</td>
<td>6.0%</td>
<td>6.1%</td>
</tr>
<tr>
<td>Percentage of full-time employees covered by business collective bargaining agreements</td>
<td>53%</td>
<td>52%</td>
<td>44%</td>
</tr>
<tr>
<td>Retention rate of full-time employees</td>
<td>93%</td>
<td>91.5%</td>
<td>90.6%</td>
</tr>
<tr>
<td>Percentage of women (direct employees)</td>
<td>18%</td>
<td>18%</td>
<td>18.7%</td>
</tr>
<tr>
<td>Percentage of women in management positions²</td>
<td>17.8%</td>
<td>19.4%</td>
<td>21.1%</td>
</tr>
<tr>
<td>Percentage of employees &lt;30 years old (direct employees)</td>
<td>12.0%</td>
<td>10.4%</td>
<td>12.6%</td>
</tr>
<tr>
<td>Percentage of employees 30-50 years old (direct employees)</td>
<td>69.6%</td>
<td>68.9%</td>
<td>65.8%</td>
</tr>
<tr>
<td>Percentage of employees &gt;50 years old (direct employees)</td>
<td>18.3%</td>
<td>20.7%</td>
<td>21.7%</td>
</tr>
<tr>
<td>New job positions³</td>
<td>281</td>
<td>34</td>
<td>489</td>
</tr>
</tbody>
</table>

### Employment Practices

- **Number of employees who received formal performance evaluation review⁴**:
  - 2019: 55.9%
  - 2020: 51.9%
  - 2021: 50.2%
- **Average training man-hours (Executives)**: 245 (2019), 146 (2020), 29.0 (2021)
- **Average training man-hours (Management)**: 167 (2019), 128 (2020), 12.8 (2021)
- **Average training man-hours (Workers and technical staff)**: 291 (2019), 182 (2020), 13.7 (2021)
- **Training cost per employee (€)**: 166.7 (2019), 101.0 (2020), 143.6 (2021)

### Human Rights

- **Human Rights violation incidents⁵**: 0 (2019), 0 (2020), 0 (2021)
- **Discrimination incidents**: 0 (2019), 0 (2020), 0 (2021)

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1. Percentage of industrial plants & RES units with ISO 45001:2018 certification
2. Percentage of the total number of Company Executives
3. The difference between the total number of new hires and the total number of departures in the specific year. (Terminations of fixed-term contracts are not considered as voluntary departures for the purposes of calculating this index).
4. Percentage of the total number of direct employees. The corresponding percentage on the total number of eligible employees is nearly 80%. The term ‘eligible’ includes employees who meet the requirements for inclusion in the annual performance evaluation process. In particular, employees working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work are not included.
5. Includes issues such as: forced and child labor, health and safety, working hours, staff salaries and leaves, fair treatment, freedom of association, restriction of the rights of local community populations etc.
6. According to the GRI 403-9 (2018) standard. Includes all accidents resulting in death, days away from work, limited work or transfer to another job, medical treatment in addition to first aid or loss of consciousness or any significant injury or ill health diagnosed by a doctor or other authorized health care professional. Includes all fatalities.
Corporate Governance

This section briefly describes the MYTILINEOS Corporate Governance framework. Detailed data are presented in the Corporate Governance Statement section of the Company’s Annual Financial Report 2021. The corresponding indicators are reported in the GRI Content Index (pages 134-146), which also includes references to the Company’s Annual Report and to this Report.

Corporate Governance Code

The Board of Directors sets the tone regarding the corporate governance standards. To this end, the Board of Directors decided to voluntarily adopt the UK Corporate Governance Code as of 01/01/2019, acknowledging that this code is widely recognized as the best model of corporate governance. The Code, together with its translation into the Greek language, is posted on the Company’s website [mytilineos.gr/who-we-are/governance/corporate-governance-code] and on the website of the UK Financial Reporting Council (FRC) at frc.org.uk/directors/corporate-governance-and-stewardship/uk-corporate-governance-code.

Board of Directors

The Company is managed by a Board of Directors consisting of eleven (11) members, of which (a) three members, namely the Chairman & CEO, the Vice Chairman A and one more member, are Company Executives, (b) the Vice Chairman B is a non-executive member, and (c) seven members are independent non-executive members. The Board of Directors continues to consider the separation of the roles or the dual role of the CEO. Further information on this matter is available in the Corporate Governance Statement (Clause 9). The two committees of the Board of Directors, namely the Audit Committee and the Remuneration and Nomination Committee, are fully independent. The Board of Directors has appointed the Company’s Corporate Governance Director as Corporate Secretary, in order to receive the necessary guidance and advice on corporate governance issues.

The shareholders approve the independence of the Board’s non-executive members when the latter submit their candidacy for being considered for election to the Board of Directors. The Company applies a Diversity Policy, in which it acknowledges that diversity in the workplace in the broadest sense can increase the potential for accessing a broader range of business strategy solutions and thus increase its competitive advantage. The Company has clearly allocated responsibilities between the Management and the Board of Directors, as described in the Articles of Association. The roles and responsibilities of the Chairman, the CEO, the Lead Independent Director and the Board committees are included in the Company’s Articles of Association approved by the shareholders at the 2019 Annual General Meeting. Further information is available in the Corporate Governance Statement (Clause 12 and Chapter 1.2).

Committees of the Board of Directors

As mentioned above, the Audit Committee and the Remuneration and Nomination Committee, are fully independent. In particular:

The Company has established a dual-role Remuneration and Nomination Committee, which examines and addresses issues regarding (a) the remuneration of Board members and of the senior and other executives, and (b) the suitability of the Board’s in-office and candidate members, within the Committee’s remit and in accordance with its Terms of Reference. The Remuneration and Nomination Committee is responsible to examine the independence of candidate non-executive Board members, before their nomination as candidates for election to the Board is submitted.

The Audit Committee of the Company has been established with the purpose of assisting the Board of Directors to fulfil its supervisory responsibilities in the audit procedures, in compliance with the legal and regulatory framework regarding (a) financial information (b) internal control (c) the internal control system and the internal management system, and (d) the supervision of the (regular) statutory audit of the Company’s individual and consolidated financial statements.

In 2021, the Board of Directors established the Sustainability Committee, whose purpose is to assist the Board in strengthening the Company’s long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, and is evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) issues. The Committee assists the Company’s Board of Directors in integrating the Sustainable Development policies and procedures into the Company’s core decision-making processes and operations.

The Company’s organizational chart was revised by resolution of the Board of Directors on 04/02/2020 and is available at mytilineos.gr/who-we-are/leadership/organizational-chart.
Major developments in 2021

- In 2021, the Board of Directors established the Sustainability Committee.
- The Board of Directors approved and ratified MYTILINEOS’ Conflict of Interest policy and procedure, which applies both to the Board of Directors itself and to all Company employees.
- Since February 2021, the Company has achieved a percentage of 27% in the representation of women in the Board of Directors, in accordance with the target it has set itself, while in Greek law (470/2020) the relevant percentage is 25%.
- Compliance with the UK corporate governance code reached 75%, according to an independent reviewer.
- In order to fill two independent non-executive member vacancies on the Board of Directors, the Remuneration and Nomination Committee, taking into account (a) the policy for the Suitability Assessment of the Board Members, (b) the Company’s strategy and (c) the results of the Board of Directors’ assessment, described the role, the competencies and the required personal characteristics that will enhance the knowledge and skills of the Board as a whole.
- The Remuneration and Nomination Committee discussed and adopted the Policy for the Suitability Assessment of the Board Members, which was approved by the General Assembly by its resolution of 15/05/2021, following its approval by the Board of Directors’ resolution of 12/05/2021, and which sets out the set of principles and criteria to apply during the selection, replacement and renewal of the tenure of Board members, in the context of the assessment of their suitability at individual and collective level. The Policy aims to ensure the quality of effective operation and fulfillment of the role of the Board of Directors, based on the Company’s overall strategy and medium to long-term business goals, with the aim of promoting the corporate interest.
- The first official succession planning project was completed at the end of 2021, with support from an external consultant. The evaluation framework for Executives adopted a holistic approach to calibrating the leadership skills that are critical to the Company’s success, through face-to-face interviews as well as by using management evaluation tools. Critical competencies examined included strategic orientation, results orientation, collaboration and influence, team leadership, change leadership and organizational capacity building.
- The effectiveness of the Board was addressed through two initiatives: the first one involved an external review of the Board’s collective capabilities and was discussed by the Board in 2020, and the second one involved a follow-up review launched in 2021 and completed in 2022, which focused on each Board member’s individual capabilities and contribution. The two Board evaluation exercises reinforced the Board’s progress towards continuous improvement, while the initiatives adopted have already led to a substantial improvement in the Board’s capacity to add value through enhanced and more permanent participation.
- The Board approved the Policy on the Independence of its Members, according to which the Company must ensure that the composition of the Board of Directors includes an appropriate number of independent members (at least 60% of the Board’s total members).
- In 2021, the second Corporate Governance Road Show was organized for the investor stewardship teams. The Board Remuneration Report describes how the views of major institutional shareholders of the Company were taken into account, as they emerged from the consultation with the investor stewardship teams.
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Sustainable Development Governance (SGR 102-01)

The purpose of the Committee is to assist the Board of Directors in strengthening the Company’s long-term commitment to creating shareholder value. Through its engagement with the three pillars of Sustainable Development (economic, social and environmental) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) issues.

The Sustainability Committee was established by resolution of the Company’s Board of Directors of 02/04/2021. The Committee’s members are in their majority Independent Non-Executive members of the Board. The Chair is appointed by the Committee members. More information is available in the Terms of Reference of the Sustainability Committee.

General Division for Corporate Governance and Sustainable Development

With its crucial coordinating role, the General Division for Corporate Governance and Sustainable Development sets the short-term strategic priorities as well as the long-term overall Sustainable Development strategy of the Company. It informs the Company’s Executive Committee and submits, via the Sustainability Committee, information to the Board of Directors, including updates on the progress made towards the achievement of climate-related targets. It cooperates directly with the Central Functions on sustainability issues, and is responsible for supporting all the newly established Sustainability / ESG teams in each Business Unit regarding Sustainable Development standards and MYTILINEOS targets. Moreover, it coordinates, monitors, aggregates and synthesizes the sustainable development actions carried out across the entire Company, ensuring that, collectively, they produce the best possible results based on the ESG criteria and the relevant ratings, and that the Company’s ESG performance remains at the highest possible level and meets the increasing requirements of the investors community in this field.

Enterprise Risk Management System

The operation of MYTILINEOS’ Enterprise Risk Management System seeks to limit the likelihood and the impacts of risks and to maximize the benefit from the opportunities that are presented and are related inter alia, to the Company’s material for Sustainable Development topics. In this context, an Enterprise Risk Assessment methodology has been adopted, which is based on best international practices and is tailored to the needs of MYTILINEOS, promoting a unified culture that integrates risk management into processes, activities and decision-making at all levels of the organization.

Business Units

The General Divisions of the Business Units define the directions to their respective Sustainability / ESG teams, in cooperation with the General Division for Corporate Governance and Sustainable Development, ensuring that the Key Performance Indicators (KPIs) are aligned with the strategic objectives of MYTILINEOS. Moreover, the new Sustainability / ESG teams, with the newly created roles of “SU Sustainability leaders” and “SU Sustainability / ESG initiative owners”, are responsible for the organization and implementation of sustainable development initiatives in each Business Unit of the Company.

Consultations with Stakeholders & Local Communities

The institution of Consultation with Stakeholders and Local Communities is a long-established principle of MYTILINEOS’ responsible operation, contributing to greater transparency, satisfying the Company’s “social license to operate” and helping further improve its responsible entrepreneurship and sustainable development initiatives.

Codes of Conduct

The following codes play an important role in the governance of Sustainable Development:

(a) The MYTILINEOS’ “Code of Business Conduct”, which refers to the rules of acceptable conduct regarding the conduct of the Company’s Management towards employees, the principles of professional ethics and the rules that govern the conduct of the employees towards themselves and towards third parties.

(b) The “Suppliers and Business Partners Code of Conduct” which describes the Company’s minimum requirements / expectations of its supply chain actors regarding environmental, social and governance (ESG) related issues as one of the main prerequisites for the establishment of a commercial cooperation with them.
**Regulatory Compliance**

**Impact on Sustainable Development**

<table>
<thead>
<tr>
<th>Scale</th>
<th>Materiality assessment process results</th>
</tr>
</thead>
<tbody>
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<td>7.93</td>
<td>Significant (0-10)</td>
</tr>
<tr>
<td>9.75</td>
<td>Very significant (0-10)</td>
</tr>
</tbody>
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**Significance for Stakeholders**

- Customers
- Employees
- Suppliers
- Administrative authorities
- Environment

**Boundaries of the Material Topic**

- The impacts are caused by MYTILINEOS’ Business Units, employees, subsidiaries, business partners and supply chain.
- The management of the topic by MYTILINEOS contributes to Sustainable Development.

- The enforcement of and compliance with non-discriminatory laws and regulations is a core element of the Company’s business activity and a major issue in the context of their cooperation with MYTILINEOS.

**Management Approach**

**Cases of non-compliance could have a significant impact on the profitability, financial position and cash flows of MYTILINEOS and, consequently, on its ability to meet its obligations.**

**Commitment**

- Operation is in full alignment with the principles of operation applicable in every geographical region or country where the Company operates, in accordance with the main priority areas of the Code of Business Conduct and the Suppliers / Business Partners Code of Conduct.

**Major risks**

- Financial risks, which may arise from possible negative outcomes of legal disputes regarding non-compliance with the legislation in general.
- Potential non-compliance of the Company with its obligations under the environmental legislation and more specifically with the terms of the environmental licenses of its industrial plants. In such cases, the competent authorities may impose fines or sanctions, and may also withdraw or refuse to renew permits and approvals in the event of a breach of the applicable regulations.
- The Company operates in countries with emerging economies, where institutional functions may be affected by political conditions and changes thereto. This could negatively affect the Company’s activities.

**Risk Management / Control Practices**

- In order to prevent the aforementioned risks, the Company: (a) complies with the legal and regulatory requirements of the geographical regions in which it operates, (b) ensures that its relations and activities comply with the established and applicable institutional framework, (c) is kept informed of its applicable legal obligations, and (d) has established procedures for monitoring developments in the legislation concerning its sectors of activity, and is reviewing and assessing its compliance with the applicable laws and regulations on a regular basis.
- Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) of the Company’s operational units, is a process conducted internally on a regular basis, in each Business Unit, by qualified personnel, as well as annually, by a recognized independent organization. A regulatory audit and certification of the Company’s environmental management system.
- As a member of the UN Global Compact, the Company strives to ensure that its business practices are fully aligned with the Compact’s internationally recognized Ten Principles. Furthermore, under its Corporate Social Responsibility Policy in place, MYTILINEOS commits to adopting a responsible, sustainable and ethical business conduct that is regularly evaluated on the basis of the achieved results, and to improve its environmental and social performance, as well as its performance regarding transparency and corporate governance.
- During tendering for a project, policies and procedures (management system or due diligence procedures) are applied to prevent bribery and corruption as well as anti-competitive behavior.

**Results**

- The Regulatory Compliance Division has developed two training programs for the Company’s personnel which cover training in personal data protection (GDPR) and in MYTILINEOS’ Code of Business Conduct. Both trainings make use of remote access (distance-learning), given the requirements for teleworking and limiting face-to-face meetings, and are implemented online in asynchronous mode, checking that the employees have fully attended them and are fully familiar with the issues covered. The trainings combine references to the theoretical background, analyses of case studies from everyday work, awareness-raising of upcoming risks, and incident response and escalation methodology, where required. All employees, including the employees of MYTILINEOS’s subsidiaries, were classified in terms of the nature of their work and duties, forming a target group whose members attended the relevant trainings according to their risk exposure. In addition, material has been developed and thematic trainings are taking place for specific employees in the following areas:
  - Initial training in Regulatory Compliance for new employees
  - Healthy competition law
  - Thorough screening of third parties using the in-house integrity screening platform
  - Complaints platform management and investigation of complaints.

- In 2021, the Company’s compliance with the applicable legislation, coupled with the application of controls to ensure observance of the rules concerning its activity, resulted in the absence of incidents of non-compliance with the legislation and with the applicable regulations at environmental, social and economic level.

- The Regulatory Compliance Division continued the implementation of trainings in personal data protection (GDPR) and in MYTILINEOS’ Code of Business Conduct. In 2020, these trainings were held for Directors, employees whose responsibilities include the supervision of personnel, employees in positions where the nature of their duties involves a risk of non-compliance, and employees who perform the processing of personal data. A total of 500 employees completed the training successfully (98% completion rate). In 2021, the trainings were held for the remaining employees in the target group, with 90 employees successfully completing them (98% completion rate). The trainings are scheduled to be completed in 2022.

- In 2021, there were no incidents of legal action against the Company or of financial sanctions imposed on the Company for anticompetitive conduct, antitrust or monopolistic practices, corruption, bribery, cartel activities or price fixing.
MYTILINEOS

Sustainable Development Report 2021

Business Ethics

Impact on Sustainable Development

Significance for Sustainability

Materiality assessment process results

Grade (1-5): 3 'Significant'

Impact: Significant

Sustainable Development

120 121

Significance for Stakeholders

Grade (1-5): 4 'Important'

Impact: Important

Significance for Communities

Grade (1-5): 5 'Very significant'

Impact: Very significant

Significance for Business

Grade (1-5): 5 'Very significant'

Impact: Very significant

Significance for Stakeholders

Grade (1-5): 5 'Very significant'

Impact: Very significant

Boundaries of the Material Topic

GRI 102-44, GRI 103-19

Where the impacts occur:

The impacts of corruption in all its forms are an obstacle to Sustainable Development and can occur across the entire range of the Company’s operations, with consequences for its local communities, the wider business environment and society as a whole.

By whom are the impacts caused:

The impacts may be caused by MYTILINEOS’ Business Units, employees, subsidiaries, business partners and supply chain.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

The elimination of all forms of corruption and bribery and the safeguarding of business ethics

Topic of increased significance to:

All Stakeholder groups in the context of their cooperation with MYTILINEOS.

Management Approach

GRI 102-11, GRI 103-21

MYTILINEOS acknowledges that ensuring transparency in all transactions arising in the context of its business activities is a key issue for sustainability and for the Company’s further growth in the context of its international activity. The purpose of this disclosure is to inform MYTILINEOS’ Stakeholders about the way in which the Company manages the need for both limiting its exposure to corruption and bribery and strengthening the culture of compliance with the anti-corruption legislation.

Addressing corruption and bribery is a key element of the MYTILINEOS “Code of Business Conduct” and “Suppliers / Business Partners Code of Conduct.” For the Company, the reference point when it comes to addressing corruption and bribery is the principle of integrity, which relates to its long-standing commitment to zero tolerance of these issues. This commitment is fulfilled with the rigorous screening of third parties before entering into any agreement with them or making any payments to them, as well as by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging circumstances giving rise to corruption, extortion or bribery.

To fulfill this commitment, MYTILINEOS takes action in a number of ways:

• The Company’s operation as a “Responsible Corporate Citizen”, is reflected by its participation in international transparency advocacy initiatives (UN Global Compact), national working groups and more generally, its commitment to ethical business practices and sound corporate governance. MYTILINEOS has been formally committed to the 10 principles of the UN Global Compact and has, in accordance with its “Businesses should work against corruption in all its forms, including extortion, bribery and facilitation payments”. This principle acts as a catalyst in establishing a culture of ethics across the Company.

• As part of the Enterprise Risk Management activity, MYTILINEOS conducts on an annual basis a study on its potential exposure to corruption and bribery risks in its various business activities.

• In countries with a high risk of corruption, the Company ensures that a Grevence Mechanism is in place, to which all employees and indirect parties have access, either in their name or anonymously, complaints of violations in connection with the policies on personal data protection, bribery and corruption, human rights or of the Company’s Code of Conduct. The Company operates a central complaints mechanism for the submission of reports of violations to the Compliance Division.

In 2021, the Regulatory Compliance Division of MYTILINEOS issued the corporate policy on the conflicts of interest of its employees. The revision of the policy took place in 2021.

• The Company ensures that its personnel is regularly trained, by category of exposure to regulatory risk, in the issues covered by the Code of Business Conduct, with in-depth analyses of corruption and bribery, healthy competition, fraud, rigorous screening of business partners and conflicts of interest.

Key Challenges / Impacts

GRI 103-4a, GRI 103-15

MYTILINEOS acknowledges that corruption, bribery, fraud, violations of human rights, adverse impacts on the environment, distortion of healthy competition and money laundering undermine the achievement of sustainable development, no matter how good the intentions, policies and strategies are. Negative effects that include violations of Human Rights, adverse impacts on the environment, the moral environment of businesses and have a wide range of requirements for the award of construction projects by private parties before entering into any agreement with them or making any payments to them, as well as by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging circumstances giving rise to corruption, extortion or bribery.

Any deviation from the Company’s principles and ethical practices jeopardizes its good reputation and credibility, the Stakeholders’ confidence in it and, by extension, its financial results and its ability to undertake new projects.

Risk Management / Control Practices

GRI 102-2a, [SASB EM-MM-510a.2], [SASB EM-FN-510a.3]

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Business ethics in MYTILINEOS’ cooperation with third parties

• MYTILINEOS places particular emphasis on the analysis of the prevailing conditions and identification of potential risks or threats which may encourage the occurrence of such incidents in the corporate environment, through a third-party screening and due diligence process. This practice covers corporate activities that involve the risk of occurrence of events of corruption and bribery, such as charitable contributions, sponsorships, gifts and hospitality, third-party audits in relation to lists of parties involved in activities subject to restrictions, subject to restrictions with the financing of terrorism and human rights violations, broking services and advisory services, with a view to establishing respective prevention procedures where these are not in place. The Regulatory Compliance Division has developed an inhouse application to support the rigorous screening of third parties and decision-making processes for the Company on whether or not to cooperate with them. The application supports the classification of third parties according to the Company’s exposure to regulatory risk, the in-depth audit of third parties according to the risk category in which they are classified, the interactions between the commercial department, the Regulatory Compliance Division and the Management with the necessary documentation, and the retention of all the supporting documents supplied and the responses given by the third parties.

• MYTILINEOS’ Suppliers / Business Partners Code of Conduct aims at tackling conditions of corruption and bribery in the supply chain. MYTILINEOS carries out Supplier Integrity Checks prior to the commencement of the cooperation, while the Code provides for audits whose purpose is to ensure the implementation of the Code and to provide recommendations for corrective measures, where required.

• The Company ensures that all transactions carried out on its behalf by its shareholders, employees and major business partners and suppliers, are characterized by a high level of integrity. Through established procedures, applied primarily in the Purchases / Procurement Departments and in project management procedures, for the identity of suppliers and subcontractors, checks are carried out annually on the conditions under which each single transaction takes place, in order to identify and eliminate those that may possibly give rise to incidents of corruption or fraud.

• The Company applies prevention and detection systems and controls to ensure that suppliers comply with the standards of MYTILINEOS, disputed payments are avoided and the payment due are made correctly and are entered in the Company’s accounting books in an accurate and transparent manner.

The Legal and Regulatory General Division, in which the Regulatory Compliance Division belongs, has been entrusted with the creation and implementation of mechanisms to safeguard the Company’s protection at both preventive and control levels. Specifically, the Regulatory Compliance Director reports to the General Manager for Legal & Regulatory Affairs and to the Audit Committee of the Board of Directors, which approves and monitors the Regulatory Compliance work plan.

According to its Code of Business Conduct, MYTILINEOS does not make any donations to political formations or related persons.

Results

GRI 103-3a-4

In 2021, MYTILINEOS applied all necessary internal procedures to safeguard its Policy. Through the screening mechanisms applied in the Purchases/Procurement Departments of the Company’s Business Units, which have investigated both the process for the selection of business partners and all types of transactions identified that could possibly lead to discretionary action against employers on the grounds of corruption, nor any corruption-related incidents resulting in the termination of cooperation, nor the non-renewal of cooperation with business partners or public judicial cases against the Company or its employees for corruption.

• The Regulatory Compliance Division has distributed the updated Code of Business Conduct (November 2019) to all employees and subsidiaries of the Company against the recipients’ signed proof of receipt and commitment to the Code.

This procedure, which applies to every new employee, is expected to be repeated for existing employees also, in the event of major revisions/ renewals of the Code.

• The Metallurgy Business Unit of MYTILINEOS does not have production activity in the 20 countries with the lowest rank in the Corruption Perceptions Index published by Transparency International.

[EM-MM-510a.2]
Other significant Governance topics

Cybersecurity

Possible breaches in the security of networks, information systems and operational systems, threaten the integrity of the Company’s data and other sensitive information, and disrupt business operations. The occurrence of such events could negatively impact the Company’s reputation and its competitive position. Moreover, the Company’s possible involvement in litigations with third parties, the award of damages, the imposition of fines or the loss of business (including remediation costs), could have a significant negative impact on its financial situation and operating results. In addition, the management of cybersecurity attacks or breaches may require considerable Management involvement and significant resources.

MYTILINEOS has developed an Information Security Framework and is committed to the implementation of a holistic Information Security Management System, through which the effective and efficient protection of the Company’s information systems and data is achieved.


MYTILINEOS periodically works with independent organizations and consultants, who evaluate the adequacy and effectiveness of the Information Security Management System and verify that an information resource or management system meets the necessary requirements specified by the respective policies for the protection of information systems and their data.

Moreover, a regular and structured information security awareness-raising program has been developed and is implemented across the entire Company on a continuous basis. The aim of the program is to ensure that all employees, contractors and relevant third parties with access to information and information systems, understand the need for information security and know who to contact in cases of information security breaches, and are made aware of the important role they play in protecting the Company’s information assets and its reputation.

Finally, to ensure business continuity and minimize the impact of a cybersecurity breach or natural disaster, a business continuity and disaster recovery plan has been designed and implemented on a regular basis. At regular intervals or in case of issues arise in the wider cybersecurity environment in which the Company operates, relevant presentations are made at the Senior Management or Audit Committee level.

Customer privacy

The protection of natural persons against the processing of personal data is a fundamental right and is of the utmost priority for MYTILINEOS. Therefore, the collection and processing of personal data is carried out only in accordance with the law and only where required in connection with business relationships and with the Company’s business activity. The Company allows access to such data by authorized persons only and takes increased data security measures.

Although MYTILINEOS does not basically process special categories of data (sensitive data), the business activity of Protergia in the retail sales of electricity and natural gas as well as the size of the number of employees and active business partners, require the processing of personal data on a large scale. MYTILINEOS remains responsible for the processing of data ("data processor") and has specific obligations and responsibilities, which also apply in cases where such processing is outsourced to third parties. In addition, transactions with business partners outside the European Union, especially in countries with less rigorous data protection legislation, create the need for transferring personal data whose protection should be ensured.

The Company may face various risks related to the protection of personal data, which may be financial in nature, such as from possible sanctions imposed by European data protection authorities or from claims of personal data subjects that have suffered damage, as well as risks related to negative publicity and reputation, as well as the risk of improper retention and processing of its customers’ personal data.

For this reason, MYTILINEOS has taken a number of steps to ensure, as far as possible, the protection of the personal data it manages. More specifically:

- has appointed a Data Protection Officer (full-time employee) since 2018 and has duly notified the competent Authority of the details of this person,
- has carried out a study on the deviations from the General Data Protection Regulation and has taken appropriate corrective action since 2018,
- has established a data protection policy for all its employees and subsidiaries, as well as for its business partners, and has communicated it to all the parties concerned,
- has completed impact studies (Data Privacy Impact Assessment) regarding the processing requirements,
- has established and operates a mechanism for recording any breaches of personal data and for notifying them to the competent Data Protection Authority as well as to the affected data subjects, if required, while
- in terms of training, it has provided by the end of 2021 face-to-face as well as online trainings to over 850 employees who either process personal data or supervise their processing.

In addition, the risks related to the protection of personal data are included in the Company’s Risk Management System and are continuously monitored. In 2021, the audits for the protection of personal data in the Metallurgy and Power & Gas Business Units were completed by the Company’s internal audit function without significant findings. During 2021, the Company carried out a total of 10 in-depth checks of processes to verify their compliance with the General Data Protection Regulation (GDPR).

Enterprise Risk Management

The activities of MYTILINEOS are affected by multiple risks, whose occurrence may impact its activities, its business performance and the achievement of its strategic goals.

In 2021, MYTILINEOS, considering the nature and extent of the risks it is faced with in an ever-changing economic and business environment, proceeded to reassess the main business risks, which it classified in the following main categories:

- Financial risk
- Market risk
- Legal & Regulatory Compliance risk
- Operational risk
- Strategic risk

MYTILINEOS implements an Enterprise Risk Management System (ERM) for the identification, analysis, assessment, monitoring and reporting of risks, in order to limit the likelihood and the impacts of risks and to maximize the benefit from the opportunities presented. In this context, an Enterprise Risk Assessment methodology has been adopted, which is based on best international practices and is tailored to the needs of MYTILINEOS, promoting a unified culture that integrates risk management and decision-making in its procedures and activities.

This methodology (top-down & bottom-up) is followed by all Business Units, Central Services and Support Services of MYTILINEOS, and consists of the following steps:

- Identification and classification of key risk factors
- Assessment of the risk’s likelihood of occurrence and impacts
- Assessment of the adequacy of risk mitigation mechanisms
- Assessment of residual risk
- Risk monitoring

The responsible Executives of the General Divisions are involved in the systematic identification and assessment of risks affecting business activities, as well as in the assessment of the adequacy of the risk mitigation mechanisms. They also supervise the formulation and timely implementation of the risk management plans. For every risk, a Risk Owner has been assigned, whose responsibilities are the implementation of the risk assessment methodology and the formulation of the risk response plan. In addition, in each General Division the role of Risk Partner has been established, whose responsibilities are the development and updating of the Risk Register, as well as the monitoring of the progress made in the implementation of each risk management plan.

The risk assessment results are communicated by the Enterprise Risk Management Division to the Executive Committee and the Audit Committee of the Board of Directors of MYTILINEOS.

Finally, internal audits are carried out at MYTILINEOS to ensure the proper and effective implementation of the risk management procedures.
## ESG KPIs

<table>
<thead>
<tr>
<th>Governance KPIs</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Corporate Governance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate Governance Code</td>
<td>UK Corporate Governance Code - 2018</td>
<td>UK Corporate Governance Code - 2018</td>
</tr>
<tr>
<td>Diversity Policy</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Board Members</td>
<td>10</td>
<td>11</td>
</tr>
<tr>
<td>Board Members' term of office (years)</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Average age of Board Members (years)</td>
<td>60.9</td>
<td>59.6</td>
</tr>
<tr>
<td>Chairman’s duality</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Appointment of Lead Independent Director</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Executive Members on the Board</td>
<td>3</td>
<td>3</td>
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<tr>
<td>Non-Executive Members on the Board</td>
<td>7</td>
<td>8</td>
</tr>
<tr>
<td>Independent, Non-Executive Members on the Board</td>
<td>5</td>
<td>7</td>
</tr>
<tr>
<td>Women on the Board</td>
<td>2</td>
<td>3</td>
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<tr>
<td>Voting standard</td>
<td>Majority</td>
<td>Majority</td>
</tr>
<tr>
<td>Number of Board Meetings</td>
<td>56</td>
<td>63</td>
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<tr>
<td>Number of Board Members present in &lt;75% of Board meetings</td>
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<td>0</td>
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<tr>
<td>Remuneration &amp; Nomination Committee</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Independent Board Members on the Remuneration &amp; Nomination Committee (%)</td>
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<td>100%</td>
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<tr>
<td>Audit Committee</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Independent Board Members on the Audit Committee (%)</td>
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<td>100%</td>
</tr>
<tr>
<td>Sustainability Committee</td>
<td>Yes</td>
<td>Yes</td>
</tr>
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</table>

## Governance KPIs

<table>
<thead>
<tr>
<th>Governance KPIs</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Corporate Conduct</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Publication of business model &amp; value creation process</td>
<td>Yes</td>
<td>Yes (pp. 28-29)</td>
</tr>
<tr>
<td>Materiality process</td>
<td>Yes</td>
<td>Yes (pp. 40-41)</td>
</tr>
<tr>
<td>Political contributions</td>
<td>Not allowed</td>
<td>Not allowed</td>
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<tr>
<td>External assurance of published information</td>
<td>Yes</td>
<td>Yes (pp. 128-131)</td>
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<tr>
<td>Financial sanctions imposed for violations of the Code of Business Conduct (€)</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor &amp; social matters)</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Confirmed incidents of corruption and bribery</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Confirmed incidents of anti-competitive behavior</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Independent Assurance Statement

To the management of MYTILINEOS S.A.

Scope
We have been engaged by MYTILINEOS S.A. (hereafter "MYTILINEOS") to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on the following (hereafter the "Subject Matter"):  

1. All the available General Disclosures of the GRI Standard 102 applicable for the "in accordance: Core option".
2. All available Disclosures on Management Approach (GRI Standard 103),
3. Fifty (50) GRI topic specific disclosures associated with the Material Topics (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report), as included in the Greek version of 2021 MYTILINEOS Sustainable Development Report (hereafter the "Report") covering the financial year 2021 (1 January 2021 – 31 December 2021).

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by MYTILINEOS
In preparing the Subject Matter, MYTILINEOS applied the following criteria:

1. GRI Standards including the GRI reporting principles for report quality, accuracy, balance, clarity, comparability, reliability, and timeliness and the criteria set in the GRI standard 101 for "in accordance: Core option".
2. UN Sustainable Development Goals (UN SDGs) and the GRI organization’s publication named “SDG Compass Linking the SDGs and GRI”, developed by the GRI, the UNGC and the World Business Council on Sustainable Development (WBCSD).
3. The requirements of the criteria for the "Advanced" level, mentioned in the "GC Advanced COP Self-assessment" document.
4. AccountAbility’s AA1000 Principles Standard ("AA1000APS").

Sustainability Standards & Assurance

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000") and the requirements of a Type 2 assurance engagement, as defined by AA1000AS. Those standards require that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our Independence and Quality Control
We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Control 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed
Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

1. Performed interviews with certain MYTILINEOS’s managers to understand the current status of sustainability activities and processes for the reporting period.
2. Checked MYTILINEOS’s processes for determining material issues to be included in the Report, as well as the coverage of material issues within the Report.
3. Interviewed specialists responsible for managing, collecting and reviewing sustainability data reported for internal and public reporting purposes, linked to the GRI General and Specific Disclosures under the scope of our assurance engagement (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report).

4. Checked the Report for the appropriate transposition and presentation of the sustainability data linked to the GRI General and Specific Disclosures under the scope of our assurance engagement (indicated in the assurance column of the GRI Content Index with a mark, pp. 134-143 of the Report), including limitations and assumptions relating to how these data are presented within the Report.

5. Read information or explanations to substantiate key data, statements and assertions regarding the sustainability disclosures under the scope of our assurance engagement.

We also performed such other procedures as we considered necessary in the circumstances.

Our procedures did not include third-party activities / performance and system testing (IT&T or other), attendance to stakeholder engagement events or site visits outside of Greece. For the Sustainable Development Report the scope excludes assurance of financial data.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to Subject Matter in order for it to be in accordance with the Criteria.

Adherence to the AccountAbility Principles of Inclusivity, Materiality, Responsiveness and Impact against the relevant criteria found in the AA1000AS

► Inclusivity: Has MYTILINEOS been engaging with stakeholders across the business to develop its approach to sustainability?

We are not aware of any matters that would lead us to conclude that any key stakeholder groups have been excluded from stakeholder engagement activities of MYTILINEOS or to conclude that MYTILINEOS has not applied the Inclusivity principle in developing its approach to sustainability.

► Materiality: Has MYTILINEOS provided a balanced representation of material issues concerning its sustainability performance?

We are not aware of any matters that would lead us to believe that MYTILINEOS’s materiality determination approach does not provide a balanced representation of material issues concerning its sustainability performance.

► Responsiveness: Has MYTILINEOS responded to stakeholder concerns?

We are not aware of any matters that would lead us to conclude that MYTILINEOS has not applied the responsiveness principle in considering the matters to be reported.

► Impact: Has MYTILINEOS been measuring, monitoring and evaluating its impact?

We are not aware of any matters that would lead us to believe that MYTILINEOS has not been measuring, monitoring and evaluating the impact it has on its broader ecosystem.

Restricted use

This report is intended solely for the information and use of MYTILINEOS in accordance with the terms of reference agreed between us and is not intended to be and should not be used by anyone other than MYTILINEOS.

Athens, 20 May 2022

For and on behalf of

ERNST & YOUNG (HELLAS)
Certified Auditors Accountants S.A.

Kostas Stathopoulos
### TCFD Content Index

#### Governance
- Disclose the organization's governance around climate-related risks and opportunities.
- Describe management's role in assessing and managing climate-related risks and opportunities.
- Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.
- Discuss the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

#### Strategy
- Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.
- Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.
- Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

#### Risk Management
- Disclose how the organization identifies, assesses, and manages climate-related risks.
- Describe the organization’s processes for identifying and assessing climate-related risks.
- Describe the organization’s processes for managing climate-related risks.
- Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.

#### Metrics & Targets
- Disclose the metrics used by the organization to assess climate-related risks and opportunities, in line with its strategy and risk management process.
- Disclose the targets used by the organization to manage climate-related risks and opportunities and performance against targets.
- Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

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- Adaptation to Climate Change (p. 48-49)
- Materiality process (p. 83-86)
- Principle O: Determining and managing risks (p. 162-163)

#### Environment
- Adaptation to Climate Change (p. 49-50)
- Tackling Climate change (p. 38-39)

#### Society
- Energy & Air emissions (p. 54-58)

#### Governance
- Adaptation to Climate Change (p. 51-52)
- Principle O: Determining and managing risks (p. 162-163)

#### Sustainability Standards & Assurance
- Energy & Air emissions (p. 54-58)
- Tackling Climate change (p. 38-39)
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GRI 102  
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102-4 Location of operations  
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102-13 Membership of associations  
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--- | --- | --- | --- | ---
**How we create value**
GRI 101 Management Approach | | | | |
**Economic performance** | 2014 Direct economic value generated and distributed (p. 26) | 8, 9 | | •
**Defined benefit plan obligations and other retirement plans** | Annual Report (p. 393) | | | |

### Environment

#### Adaptation to Climate Change

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<thead>
<tr>
<th>GRI 103 Management Approach</th>
<th>103-1 Explanation of the material topics and its boundaries</th>
<th>a. Why the topic is material (p. 48)</th>
<th>b. Boundaries (p. 48)</th>
<th>c. Specific limitation regarding the topic</th>
<th>Boundary: None</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>103-2 The management approach and its components</td>
<td>a. How the organization manages the topic (p. 50)</td>
<td>b. The purpose of the management approach (p. 48)</td>
<td>c. Management Approach (p. 48)</td>
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<tr>
<td></td>
<td>103-3 Evaluation of the management approach</td>
<td>a. Evaluation: Verification</td>
<td>Internal review &amp; external verification</td>
<td>a-i Evaluation: Development of a dedicated management approach</td>
<td></td>
</tr>
</tbody>
</table>

#### GRI 201 Management Approach

| 2014 Financial implications and other risks and opportunities for the organization’s activities due to climate change | 2015 Financial implications and other risks and opportunities for the organization’s activities due to climate change (p. 64-65) | 3, 6, 12 | 13, 14, 15 | • |

### Energy & Air emissions

#### GRI 103 Management Approach

<table>
<thead>
<tr>
<th>103-1 Explanation of the material topics and its boundaries</th>
<th>a. Why the topic is material (p. 54)</th>
<th>b. Boundaries (p. 54)</th>
<th>c. Specific limitation regarding the topic</th>
<th>Boundary: None</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>103-2 The management approach and its components</td>
<td>a. How the organization manages the topic (p. 54)</td>
<td>b. The purpose of the management approach (p. 54)</td>
<td>c. Management Approach (p. 54)</td>
</tr>
<tr>
<td></td>
<td>103-3 Evaluation of the management approach</td>
<td>a. Evaluation: Verification</td>
<td>Internal review &amp; external verification</td>
<td>a-i Evaluation: Development of a dedicated management approach</td>
</tr>
</tbody>
</table>

### GRI 302 Energy

<table>
<thead>
<tr>
<th>GRI 302 Energy</th>
<th>302-1 Energy consumption within the organization (p. 56)</th>
<th>7, 8, 12, 13</th>
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<tbody>
<tr>
<td></td>
<td>302-3 Energy intensity (p. 56)</td>
<td>7, 8, 12, 13</td>
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</table>

### GRI 305 Emissions

<table>
<thead>
<tr>
<th>GRI 305 Emissions</th>
<th>305-1 Direct (Scope 1) GHG emissions (p. 57)</th>
<th>3, 12, 13, 14, 15</th>
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<tbody>
<tr>
<td></td>
<td>305-2 Energy indirect (Scope 2) GHG emissions (p. 57)</td>
<td>3, 12, 13, 14, 15</td>
<td></td>
<td>•</td>
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<tr>
<td></td>
<td>305-3 Other indirect (Scope 3) GHG emissions (p. 57)</td>
<td>3, 12, 13, 14, 15</td>
<td></td>
<td>•</td>
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<td></td>
<td>305-4 GHG emissions intensity (p. 58)</td>
<td>11, 14, 15</td>
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<td>•</td>
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<tr>
<td></td>
<td>305-5 Emissions of ozone-depleting substances (ODS) (p. 57)</td>
<td>There are no such emissions</td>
<td>3, 12</td>
<td>•</td>
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<tr>
<td></td>
<td>305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions</td>
<td>(p. 57)</td>
<td>3, 12, 14, 15</td>
<td>•</td>
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### GRI 304 Biodiversity

<table>
<thead>
<tr>
<th>GRI 304 Biodiversity</th>
<th>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas (p. 72)</th>
<th></th>
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<tbody>
<tr>
<td></td>
<td>304-2 Significant impacts of activities, products, and services on biodiversity (p. 72)</td>
<td></td>
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</table>

### GRI 306 Circular Economy

<table>
<thead>
<tr>
<th>GRI 306 2020 Waste</th>
<th>306-1 Waste generation and significant waste disposed impacts (p. 64-65)</th>
<th>3, 6, 12</th>
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<tbody>
<tr>
<td></td>
<td>306-2 Management of significant waste disposed impacts (p. 64-65)</td>
<td>3, 6, 12</td>
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<td></td>
<td>306-3 Waste generated (p. 66)</td>
<td>3, 6, 12</td>
<td></td>
<td>•</td>
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<td></td>
<td>306-4 Waste diverted from disposal (p. 66)</td>
<td>3, 6, 12</td>
<td></td>
<td>•</td>
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<tr>
<td></td>
<td>306-5 Waste directed to disposal (p. 66)</td>
<td>3, 6, 12</td>
<td></td>
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<tr>
<td>GRI Standard</td>
<td>Disclosure</td>
<td>Disclosure</td>
<td>SDGs</td>
<td>Omission</td>
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<td>--------------</td>
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<tr>
<td><strong>Water Management</strong></td>
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<td></td>
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<tr>
<td>GRI 103</td>
<td>Management Approach</td>
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<td></td>
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<tr>
<td>103-1</td>
<td>Explanation of the material topics and its boundaries</td>
<td>a. Why the topic is material (p. 61)</td>
<td>b. Boundaries: (p. 60)</td>
<td>c. Specific limitation regarding the topic: None</td>
</tr>
<tr>
<td>103-2</td>
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  - 103-2 The management approach and its components
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**Business Ethics**
SASB Content Index

**SASB Standard** | **Metric Code/Industry** | **Disclosure** | **Pages and URL(s)** | **SDGs**
--- | --- | --- | --- | ---
**Greenhouse Emissions** | EM-CM-110a.1 | Construction Materials | Energy & Air emissions | (p. 55-58) 3, 12, 13, 14, 15
| EM-MM-110a.1 | Metals & Mining | Zero hydrofluorocarbons (HFCs), sulfur hexafluoride (SF6), and nitrogen trifluoride (N2O) |  |  
| IF-EU/110a.1 | Electric Utilities & Power Generators |  |  |  
**Discussion of long term and short term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets** | EM-CM-110a.2 | Construction Materials | Tackling Climate change | (p. 38-39) 3, 12, 13, 14, 15
**Air Quality** | EM-CM-120a.1 | Construction Materials | Energy & Air emissions | (p. 55-58) 3, 12, 14, 15
| EM-MM-120a.1 | Metals & Mining | Apart from the emissions stated within the chapter “Energy & Air emissions”, MYTILINEOS does not emit other air emissions (e.g. dioxins/furans, POPs, PAHs, HAPs, heavy metals) |  |  
| IF-EU/120a.1 | Electric Utilities & Power Generators |  |  |  
**Energy Management** | EM-CM-130a.1 | Construction Materials | Energy & Air emissions | (p. 55-58) 7, 8, 12, 13
| EM-MM-130a.1 | Metals & Mining | MYTILINEOS does not consume energy from alternative sources such as but not limited to: used tires, spent solvents and waste oils, processed municipal solid waste, household wastes, agricultural wastes, and sewage sludge |  |  
**Water & Wastewater Management** | EM-CM-140a.1 | Construction Materials | Water Management | (p. 61-63) 6
| EM-MM-140a.1 | Metals & Mining | Water Management | (p. 61-63) 6
| IF-EU/140a.1 | Electric Utilities & Power Generators | Water Management | (p. 119) 6
| EM-MM-140a.2 | Metals & Mining | Regulatory Compliance | (p. 119) 6
| IF-EU/140a.2 | Electric Utilities & Power Generators | Regulatory Compliance | (p. 119) 6
| IF-EU/140a.3 | Electric Utilities & Power Generators | Water Management | (p. 60-61) 6, 12
| EM-MM-150a.1 | Metals & Mining | Not applicable. The Company does not own or operate Coal-fired Power Units |  |  
| IF-EU/150a.1 | Electric Utilities & Power Generators | Not applicable. The Company does not own or operate Coal-fired Power Units |  |  
| IF-EU/150a.2 | Electric Utilities & Power Generators |  |  |  
**Ecological Impacts** | EM-CM-160a.1 | Construction Materials | Environmental Policy | (p. 69-70) 3
| EM-MM-160a.1 | Metals & Mining | Environmental Policy |  |  
| EM-MM-160a.2 | Metals & Mining | Ecological Impacts | (p. 70) 15

**SASB Standard** | **Metric Code/Industry** | **Disclosure** | **Pages and URL(s)** | **SDGs**
--- | --- | --- | --- | ---
**Percentage of mine sites where acid rock drainage is predicted or occurred, (2) actively mitigated, and (3) under treatment or remediation** | EM-MM-160a.2 | Metals & Mining | Not applicable because acid rock drainage does not occur in Bauxite Mining sites. The percentage of mine sites where acid rock drainage occurs is 0% |  
**Percentage of (1) proved and (2) probable reserves in or near sites with protected conservation status or endangered species’ habitat** | EM-MM-160a.3 | Metals & Mining | The company does not own and has not developed mining or bauxite mining sites near sites with protected conservation status or endangered species’ habitat |  
**Number of incidents of non-compliance with environmental permits, standards, and regulations** | IF-EN-160a.1 | Engineering & Construction Services | Regulatory Compliance | (p. 119) 3

**Human Rights & Community Relations** | Percentage of (1) proved and (2) probable reserves in or near areas of conflict | EM-MM-210a.1 | Metals & Mining | 16
| Percentage of (1) proved and (2) probable reserves in or near indigenous land | EM-MM-210a.2 | Metals & Mining | 16
| Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict | EM-MM-210a.3 | Metals & Mining | 11
| Number and duration of non-technical delays | EM-MM-210a.4 | Metals & Mining | There were no non-technical delays during the reporting period |  
**Employment Practices** | Percentage of active workforce covered under collective bargaining agreements | EM-MM-310a.1 | Metals & Mining | Employment | (p. 88) 8
| Number and duration of strikes and lockouts | EM-MM-310a.2 | Metals & Mining | Employment | (p. 88) 8
| Number and duration of non-technical delays | EM-MM-310a.3 | Metals & Mining | Employment | (p. 88) 8

**Employee Health and Safety** | EM-MM-320a.1 | Construction Materials | Occupational Health and Safety | (p. 82-84) 3, 8, 16
| EM-MM-320a.2 | Metals & Mining | The near miss frequency rate for the direct and indirect employees was 100 and 119 respectively |  
| EM-MM-320a.3 | Metals & Mining |  
**Number of reported cases of silicosis** | EM-MM-320a.4 | Construction Materials |  
**Business Ethics** | Description of the management system for prevention of corruption and bribery throughout the value chain | EM-MM-510a.1 | Metals & Mining | Business Ethics | (p. 120-121) 16
| Production in countries that have the 20 lowest rankings in Transparency International’s Corruption Perception Index | EM-MM-510a.2 | Metals & Mining | Business Ethics | (p. 121) 16
| Total amount of monetary losses as a result of legal proceedings associated with charges of bribery or corruption and 2 anti-competitive practices | IF-EN-510a.1 | Engineering & Construction Services | Regulatory Compliance | (p. 119) 16
| Description of policies and practices for prevention of bribery and corruption and anti-competitive behavior in the project bidding processes | IF-EN-510a.2 | Engineering & Construction Services | Business Ethics | (p. 120-121) 16

**Environment** | Introduction | Environment |  |  
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**URL(s)** and/or **Pages**
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## ESG Reporting Guide 2022 - Athens Stock Exchange

The Athens Stock Exchange has been participating since 2018 in the Sustainable Stock Exchanges (SSE) initiative of the United Nations, which promotes the dissemination of best practices for the disclosure and integration of non-financial information, aiming to develop sustainable investments in local capital markets. Following the call for action of the organizations that promote sustainable development, the Athens Stock Exchange issued the “ESG Reporting Guide”, seeking to promote and strengthen the ESG-related information disclosure practices applied by Greek listed companies. The table below presents MYTILINEOS' response to the indicators of the Athens Stock Exchange ESG Reporting Guide (where C: Basic metrics, A: Advanced metrics, SS: Sector-Specific metrics), which are based on practices aligned with international sustainability guidelines and reporting frameworks such as GRI, SASB, GLOBAL COMPACT, IIRC, CDP, TCFD, and the Greek Sustainability Code.

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<td>Material topic: Ecological Impacts (p. 69-72)</td>
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<td>C-E1</td>
<td>Scope 1 emissions</td>
<td>Material topic: Energy &amp; Air emissions (p. 54-59)</td>
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<td>C-E2</td>
<td>Scope 2 emissions</td>
<td>Material topic: Energy &amp; Air emissions (p. 54-59)</td>
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<tr>
<td>C-E3</td>
<td>Energy consumption and production</td>
<td>Material topic: Energy &amp; Air emissions (p. 54-59)</td>
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<td>C-E4</td>
<td>Water consumption</td>
<td>Material topic: Energy &amp; Air emissions (p. 54-59)</td>
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<tr>
<td>C-E5</td>
<td>Critical materials</td>
<td>The Company does not use the 27 critical raw materials identified by the European Commission1</td>
</tr>
</tbody>
</table>

### Governance

<table>
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<tr>
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<th>Metric Title</th>
<th>References</th>
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<td>Board of Directors</td>
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<td>Sustainability Governance (p. 117)</td>
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<td>Materiality</td>
<td>Materiality process (p. 40-41)</td>
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<td>C-G4</td>
<td>Sustainability policy</td>
<td>Corporate Social Responsibility Policy</td>
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<td>C-G5</td>
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<td>Privacy Policy</td>
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<td>S-S1</td>
<td>Whistleblower policy</td>
<td>ESG KPIs (p. 124-125)</td>
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<td>S-S2</td>
<td>Critical risk management</td>
<td>Business Continuity (p. 104-105)</td>
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</tbody>
</table>

UN Global Compact Communication Progress (Advanced level)

The United Nations Global Compact is a commitment platform and a practical framework for businesses which voluntarily declare their pledge to serve the Sustainable Development agenda and promote responsible business practices.

MYTILINEOS has declared in writing, since 2008, its commitment to uphold the ten principles of the Global Compact, disclosing on an annual basis its relevant performance in the context of its broader activity. The table below presents the company's response to the 10 Principles of the Global Compact, while its independent report about the fulfillment of the 21 criteria under the UNGC Advanced COP Self-Assessment 2020 (Updated 19 August 2020) is available at the address mytilineos.gr/sustainability/reports/.

### The Greek Sustainability Code

The Greek Sustainability Code constitutes a structured system regarding the transparency and self-commitment tool of Greek Organizations / Enterprises and has been developed in the framework of the “Sustainable Greece 2020” initiative. It addresses the need for measuring the economic, environmental and social performance of Organizations / Businesses with the goal of strengthening their competitiveness in terms of incorporating the principles of Sustainable Development and Corporate Responsibility in their operation and of their compliance requirements with the EU Non-financial Reporting Directive. The table below presents MYTILINEOS’ response to the Greek Sustainability Code criteria (LEVEL A), which are based on the following international standards: GRI, GLOBAL COMPACT, EFFAS, ISO & EMAS.
**ASi Content Index Metallurgy Business Unit**

The Aluminum Stewardship Initiative (ASi) is an international standardization and certification body that encourages and aligns companies in the aluminum industry with a view to sustainable development and responsible manufacturing. The acquisition of the ASi Performance Standard is related to the creation and maintenance of responsible environmental and social standards, as well as governance criteria, in order to ensure the responsible production and rational use of aluminum. In this context, the performance of the activities that fall within the scope of the standard for the Metallurgy Business Unit is presented.

### Environmental Metrics

<table>
<thead>
<tr>
<th>Metric</th>
<th>AeG Aluminium Plant</th>
<th>DELPHI-DISTOMON</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct GHG emissions (Scope 1 – CO2e thousand tons)</td>
<td>1,275.2</td>
<td>4.5</td>
</tr>
<tr>
<td>Fuels (CO2: 100%)</td>
<td>887.9</td>
<td>4.4</td>
</tr>
<tr>
<td>Processes (CO2: 74% - PFCs: 26%)</td>
<td>383.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Transport (CO2: 100%)</td>
<td>3.6</td>
<td>0.1</td>
</tr>
<tr>
<td>Indirect emissions (Scope 2 - CO2e thousand tons)</td>
<td>1,321.2</td>
<td>2.8</td>
</tr>
<tr>
<td>Indirect emissions (Scope 3 - CO2 / t Al ingot)</td>
<td>0.358</td>
<td>-</td>
</tr>
<tr>
<td>Total NOx emissions (t)</td>
<td>709.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Total SOx emissions (t)</td>
<td>3,214.3</td>
<td>0.0</td>
</tr>
<tr>
<td>Particulate emissions (t)</td>
<td>41.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Fluorine emissions (t)</td>
<td>210.8</td>
<td>0.0</td>
</tr>
<tr>
<td>CF4 emissions (t)</td>
<td>10.8</td>
<td>0.0</td>
</tr>
<tr>
<td>C2F6 emissions (t)</td>
<td>1.3</td>
<td>0.0</td>
</tr>
<tr>
<td>Total energy consumption (TJ)</td>
<td>26,226.2</td>
<td>81.6</td>
</tr>
</tbody>
</table>

### Environmental Metrics

<table>
<thead>
<tr>
<th>Metric</th>
<th>AeG Aluminium Plant</th>
<th>DELPHI-DISTOMON</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy consumption from non-renewable sources (TJ)</td>
<td>15,872.0</td>
<td>59.6</td>
</tr>
<tr>
<td>Natural Gas</td>
<td>15,490.8</td>
<td>0.0</td>
</tr>
<tr>
<td>Mazut</td>
<td>322.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Gas Oil</td>
<td>46.7</td>
<td>57.1</td>
</tr>
<tr>
<td>Heating Oil</td>
<td>2.4</td>
<td>1.8</td>
</tr>
<tr>
<td>Gasoline</td>
<td>0.0</td>
<td>0.7</td>
</tr>
<tr>
<td>Energy purchased (Electric Power) (TJ)</td>
<td>10,354.2</td>
<td>22.1</td>
</tr>
<tr>
<td>Non-Renewable sources</td>
<td>7,130.6</td>
<td>15.2</td>
</tr>
<tr>
<td>Renewable Energy Sources (RES)</td>
<td>3,223.6</td>
<td>6.9</td>
</tr>
<tr>
<td>Total water withdrawals (ML)</td>
<td>168,541.5</td>
<td>238.1</td>
</tr>
<tr>
<td>Total water withdrawal from surface waters (ML)</td>
<td>159,820.0</td>
<td>10.1</td>
</tr>
<tr>
<td>Total water withdrawal from groundwater (ML)</td>
<td>8,578.3</td>
<td>12.1</td>
</tr>
<tr>
<td>Total water withdrawal from mining operations (ML)</td>
<td>-</td>
<td>216.0</td>
</tr>
<tr>
<td>Total water withdrawal from public water supply companies (ML)</td>
<td>143.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Water discharges (ML)</td>
<td>161,660.6</td>
<td>238.1</td>
</tr>
<tr>
<td>Water consumption (ML)</td>
<td>6,880.9</td>
<td>0.0</td>
</tr>
<tr>
<td>Water consumption (m³ / ton of hydrated alumina production)</td>
<td>3.37</td>
<td>-</td>
</tr>
</tbody>
</table>

1. The calculation of direct greenhouse gas emissions (Scope 1) is performed using energy conversion factors from fuel consumption in TJ to carbon dioxide equivalents (CO2e). The numbers at the end of the reference period (year 2020) are used. The NWP 2020 methodology has been used for the values of the conversion factors.

2. The calculation of indirect greenhouse gas emissions (Scope 2) is performed using conversion factors of energy from consumption electricity, heating, cooling, and steam in TJ to carbon dioxide equivalents (CO2e). The numbers at the end of the reference period (year 2020) are used. The European Residual Mix 2020 methodology has been used for the values of the conversion factors.

3. The calculation of indirect emissions (Scope 3) is performed using conversion factors of energy from consumption electricity, heating, cooling, and steam in TJ to carbon dioxide equivalents (CO2e). The numbers at the end of the reference period (year 2020) are used. The EU-28 Residual Mix methodology has been used for the values of the conversion factors.

4. The difference between the total amount of water withdrawals and the total amount of water discharges.
Index of Key Terms

Direct employees: The total number of employees who are employed by the Company and are included in its payroll system in accordance with national law.

Other indirect (Scope 3) GHG emissions: GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions.

Direct greenhouse gas emissions (Scope 1): Direct greenhouse gas emissions (Scope 1) come from sources (natural units or processes) that release greenhouse gas emissions into the atmosphere. Direct greenhouse gas emissions include among other things, emissions of CO2 equivalents from fuel consumption.

Recycled input materials: Materials that replace virgin materials and are purchased or acquired from internal or external sources and that are not by-products and outputs of the Company.

Recycling and reuse of water: The treatment of used water and sewage through another cycle before rejection for final treatment and disposal in the environment.

R.E.S. (Renewable Energy Sources): Energy that is extracted from or converted into a product or service in a new state or to a state where a healthy and functional ecosystem exists.

Wind Farm: Wind Power Plant

Self-assessment of human rights: Corporate internal evaluation process that applies a number of criteria for respecting and supporting human rights. The issues included in the evaluation individually are forced & child labor, health and safety, working hours, salaries and leave, fair treatment, freedom of associ- ation, restriction of population rights of local communities, etc.

Sustainable development: Growth in a way that respects the environment and the economy in a manner that is harmonious so as not to affect the ability of future generations to meet their needs.

Parental leave: Leave granted to male and female employees due to childbirth.

Discrimination: The act and result of treating persons unequally by imposing unequal burdens or denying benefits instead of equal treat- ment of each person on the basis of individual merit. Discrimination can also include harassment, defined as a course of comments or actions that are unwel- come, or should reasonably be known to be unwelcome, to the person towards whom they are addressed.

Leakage: Unexpected release of a dangerous substance that can affect human health, soil, vegetation, surface and groundwater.

Fatality: The death of an employee that occurs during the current reporting period and is due to an injury at work or illness that was suffered or was transmitted while working at the Company.

Indirect employees: Total number of self-employed workers and permanent independent contractors who perform very important tasks for the company on a long-term basis.

Indirect greenhouse gas emissions (Scope 2): Emissions resulting from the generation of electricity, heating, cooling, energy steam purchased or acquired and consumed by the Company.

Impact: The term refers to important economic, environmental and social effects that are positive, negative, existing, potential, direct, indirect, short-term, long-term, voluntary, involuntary.

Hazardous waste: Waste that possesses any of the character-istics contained in Annex III of the Basel Convention, or that is considered to be hazardous by national legislation.

Employees from local communities: People who have either been born or have the legal right to reside for an indefinite period of time in the same geographical location as the Company’s operating facilities. The geographical definition of the term “local” may include the community surrounding operations, a region within a country or a country.

Vulnerable groups: A vulnerable group is a set or subset of persons with some specific physical, social, political, economic condition or character-istics that place the group at a higher risk of suffering a burden or at a risk of suffering a disproportionate burden of the social, economic or environmental impacts of the Company’s operations. Vulnerable groups may include children who need care, the elderly, people with disabilities, refugees, HIV/AIDS-afflicted households, indigenous peoples, and ethnic minorities.

HS Committees: Occupational Health and Safety Committees

Supply chain: Activities and parties that provide products or services to the Company.

Lost Days Rate: The incidence of occupational accidents during the total number of lost days per 200,000 person-hours of work resources during the reporting period.

Circulatory Economy: The Circular economy is an economic model that focuses on reducing the waste of resources used in the production pro- cess, the utilization of renewable resources, the recovery and reuse of products, but also the production of energy from the waste of production processes, the preservation of products in good working conditions for a long time, the use of products to provide services to multiple users and offering products as services.

Injury Rate: The frequency of injuries with work inter-ruption per 200,000 hours of work in the whole workforce in the reporting period.

Forced labor: The act and result of treating persons as mere resources to provide services to multiple persons to video products or services to the Company.

Carbon Dioxide Equivalent (CO2 eq): Equivalent to CO2 (Carbon dioxide) is the global unit of measurement used to compare greenhouse gas emissions, based on their global warming potential (GWP). The equivalent CO2 of a gas is determined by multiplying the tons of the gas by the associated global warming potential.

Injury: The state or to a state where a healthy and functional ecosystem exists.

Waste treatment: The method through which waste is treated or disposed of including the following: reuse, recycling, recovery, landfill, storage at the Company’s facilities, etc.

Non-renewable materials: Materials that are not renewed in the short term, such as minerals, oil, gas, or coal.

Non-renewable energy sources: Energy sources that cannot be replen-ished, reproduced, grown or generated in a short period of time through ecological means. Non-renewable energy sources include: Fuel distilled from petroleum or crude oil; Natural gas; Coal; Nuclear power; Liquid natural gas (LNG) – Combustion gas and oil refining – Coal – Nuclear power.

NGOs: Non-Governmental Organizations

Material Topics: Topics that reflect the economic, environ-mental and social impacts of the Company’s activity and at the same time significantly affect the assessments and decisions of its Stakeholders.

Priority substances: Substances that significantly affect the aquatic environment. These substances are defined by Directive 2013/59 / EU of the European Parliament.

Water stress areas: Areas that are significantly affected by water stress and include: areas with low water availability, quality or accessibility.

Environmental laws and regulations: Laws that are necessary in the form of environmental issue (ie, emissions, liquid effluents and waste, as well as the use of industrial facilities, water, and biodiversity) that apply to the Company.

Areas with high biodiversity value: Areas with high biodiversity value have been recognized due to the important biodiversity characteristics by governments and non-governmental organizations.

Reporting period: Specific period covered by the infor- mation reported. For MYTILINEOS, the reporting period is the year that begins in January and ends in December.

Global Sustainable Development Goals (SDGs): On September 25, 2015, at the UN head- quarters in New York, 193 representatives of states and governments from around the world pledged to adopt 17 Global Targets to take action against three major challenges over the next 15 years (up to in 2030): extreme poverty, inequality and climate change.

Retirement rate of full-time employees: Number of full-time employees at the end of the reporting period / 100 / Number of full-time employees at the end of the period

Significant operating changes: Changes in the operation of the Company that have significant positive or nega- tive consequences for employees. Such changes may include for example, restruc- turing, assignment to third parties, closure, expansion, new opening, acquisitions, sale of all or part of the entity or mergers.

Significant impact on biodiversity: Impact on biodiversity affecting the integrity of a geographical area or region, either directly or indirectly. This happens through the substantial change of ecological structures, functions and structures of the whole area in the long run. This means that the habitat, the level of its population and specific species that make the habitat important cannot be maintained.

Total water withdrawal: The amount of water withdrawn from the Company’s boundary’s watershed from all sources (including surface and groundwater, rainwater and public water supply) for any use during the reporting period.

Water discharge: Water bodies impacted during the reporting period in groundwater, surface water, and that is based in the same geographical market as the organization that compiles the report. The geographic definition of the term “local” may include the com- munity surrounding operations, a region within a country or a country.

Local community: A vulnerable group of persons who live and / or work in areas that are affected by positive or negative economic, social or environmental impacts resulting from the organization’s operations. The local community may include individuals living close to the organization’s activities and even isolated settlements within walking distance of the activities, and which may still be impacted by these operations.

Fresh water: Water with a total dissolved solids concen-tration equal to or less than 1000 mg/l.