



MYTILINEOS

Human Rights Policy

HR 1 Human Resources Policy – HUMAN RIGHTS POLICY

Drafting : D. BRAKATSELOU – G.GALANIS

Approval : D. BRAKATSELOU

Date : 18/01/2021



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Introduction

- MYTILINEOS is committed to respecting and protecting all kinds of Human Rights that constitute a material issue of Sustainable Development for both the Company itself and the groups of its Stakeholders.
- Respect for Human Rights is provided for in both the Company's Business Code of Conduct and the Suppliers and Business Partners Code of Conduct, considered as one of the fundamental responsible practices for employees, as well as for the Company's supply chain.
- This Policy establishes a framework for the promotion of Human Rights respect and protection, both within the Company and its sphere of influence.

Policy objective

- This Policy reflects zero tolerance shown by MYTILINEOS as regards the violation of Human Rights. It is implemented both in the form of non-participation (direct, passive or silent) of the Company in such violations, and of avoidance of any transaction and contact with third parties that may have caused or are reasonably suspected as possibly involved in creating conditions that may encourage violations of said rights.
- Moreover, the purpose of the Policy is to raise awareness and ensure the commitment of MYTILINEOS employees, suppliers and associates in respecting and protecting Human Rights, in all Business Units, including its subsidiaries.

Boundaries and specifications

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- The Policy addresses significant issues, arising from the entire range of Human Rights that fall within the scope of business activities, the effects of which (either positive or negative) have been assessed through a special self-evaluation process carried out in all Business Units of the Company, based on the international "**UN Global Compact self-assessment tool**".
- In order to draft this policy, internationally recognised standards and guidelines have been taken into account. Namely:
 - The United Nations Universal Declaration of Human Rights.
 - The Fundamental Conventions of the International Labor Organisation (ILO).
 - The Principles of the UN Global Compact.
 - The Global Sustainable Development Goals (2030 Agenda).
 - The UN Guiding Principles on Business and Human Rights.
 - The Organisation for Economic Cooperation and Development (OECD) Guidelines.
 - The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment).
- When drafting this Policy, the opinion of the key groups of MYTILINEOS Stakeholders was taken into account, through the implementation of a special consultation.

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Integration into business activities

The main objective of the Human Rights Policy is to contribute to - the overall Sustainable Development Strategy of MYTILINEOS, through its connection with processes and policies that govern the broader business activities of the Company. These include:

- policies and procedures related to work practices (recruitment, training, staff evaluation),
- procurement practices (evaluation of new and existing suppliers)
- integration in the due diligence process implemented by the Company during the acquisition and merger procedures
- integration in the recognition process implemented by the Company regarding the general situation and position of a country (mainly concerning developing countries) where the Company aims to operate by undertaking new projects and where human rights may be threatened
- integration into the process of making new investments (notification and consent prior to the approval of any project that may affect the rights of local communities),
- integration in the Acquisition & Merger process
- response, in order to meet the funding criteria set by domestic and international financial institutions, and
- integration, in the form of a separate category, in the Company's annual plan of social investments (in the light of the Global Sustainable Development Goals 5¹& 10²).

¹ Gender Equality

² Reduction of inequalities

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Implementation, validity and amendment

- The General Division of Human Resources, the General Division of Corporate Governance & Sustainable Development and the Compliance Division of MYTILINEOS cooperate for drafting and further revising the policy.
- The General Division of Human Resources, in cooperation with the General Divisions of Business Units and Central Function (CF) of MYTILINEOS, are in charge of the relevant training of the staff and the full implementation of the Human Rights Policy ensuring harmonization of all MYTILINEOS workforce and associates with the values embedded in this Policy.
- The policy is ratified by the Executive Committee, followed by the Sustainable Development Committee of the Company.
- The policy is reviewed on an annual basis, taking into account national and international developments and, if needed, it may be amended in this framework.

Communication

- Respecting the Transparency Principle, MYTILINEOS is committed to sharing information about its progress in monitoring the impact and implementation of the Human Rights Policy in all its activities.
- Using internal communication tools, the policy has been communicated to all the Company staff in Greece and abroad, whereas it is accessible to all groups of Social Partners through the official corporate website.

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Human Rights Policy

**MYTILINEOS, in the context of its business activity,
respects and protects the following labour and social
Human Rights**

Occupational Health & Safety

⇒ MYTILINEOS considers the Health and Safety of its employees to constitute a core value and maintains a safe working environment. The Company focuses on prevention, adopts high standards of health and safety, assesses and manages relevant risks in a systematic manner, while supporting and consistently spreading a corporate culture aimed at promoting health and safety at work as top priorities. Through a special policy of "Occupational Health & Safety" that it implements, the Company is committed to achieving the goal of "NO ACCIDENT AND NO OCCUPATIONAL DISEASE AT WORK" which is one of the main challenges in the industrial sector.

Working Conditions

⇒ MYTILINEOS is committed to maintaining a work environment based on trust, dialogue and mutual respect, while protecting the well-being and the work-life balance of its employees.

⇒ The Company is committed to ensuring decent wages and working hours, based on applicable laws and industry standards for work schedule, overtime and leave. Moreover, overtime pay exceeds the Greek law provisions.

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Child Labor

- ⇒ MYTILINEOS is committed to operating in accordance with all laws concerning the minimum age for hiring employees¹, in all areas where it operates. The Company prohibits the employment of minors under the age of 18.
- ⇒ The Company voluntarily commits and complies with the 10th Principle of the United Nations Global Compact, which is based on zero tolerance of child labour incidents and circumstances in its supply chain and consequently in its entire range of activities.

Forced Labour and Human Trafficking

- ⇒ MYTILINEOS is committed to taking all measures required, in order to avoid incidents and any direct or indirect involvement in any form of forced or compulsory labour and trafficking of human beings (Modern Slavery)². At the same time, the Company recognises its responsibility to remain aware of any relevant risks within the scope of its activities, as well as in its wider supply chain.
- ⇒ The exploitation of any person as well as the implementation of any form of forced or compulsory labour is prohibited for the Company, in accordance with its Business Code of Conduct.

¹ Convention number 138 of the International Labour Organisation (ILO)

² The Modern Slavery Act of 2015 was voted by the British Parliament in order to deal with slavery. Forced labour and human trafficking are crimes and violate essential human rights.

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- ⇒ The Company demonstrates zero tolerance as regards incidents and circumstances that may favour any form of Modern Slavery within the framework of its operation, as well as of the activities of its supply chain, recognising that no field of activity may be excluded.

Equal Opportunities, without Discrimination

- ⇒ MYTILINEOS is committed to offering equal opportunities while prohibiting discrimination and harassment. Corporate procedures for attracting and recruiting workforce, for access to education and training, rewards, performance appraisal and termination of cooperation are free from discriminations based on race, sex, colour, national or social origin, religion, age, disability, sexual orientation and political beliefs.
- ⇒ The Company does not tolerate any kind of offensive or inappropriate behaviour, unfair treatment or retaliation. According to its Business Code of Conduct, physical or verbal harassment of a sexual, racist or slanderous nature is prohibited in the workplace but also under any circumstances related to work outside the workplace.
- ⇒ Within the context of gender equality at work, the Company is committed to taking the appropriate measures in order to eliminate all kinds of discrimination against women in the fields of employment, equal pay for equal work, vocational education and training, as well as in decision-making processes.
- ⇒ The Company respects the privacy of its workforce data (GDPR) when collecting personal information or inspecting workplaces.

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Freedom of association

- ⇒ MYTILINEOS acknowledges and respects the fundamental rights of freedom of association and the collective bargaining, without fearing retaliation or harassment, within the framework of national legislation and existing agreements. In case employees are represented by a legally recognised union, the Company is committed to encouraging open and constructive social dialogue with their legally elected representatives, on the basis of mutual trust and aiming at mutual benefit.

Disciplinary practices

- ⇒ MYTILINEOS is committed to treating all its people with dignity and respect. The Company's disciplinary practices are implemented, if needed, as a means of management, to prevent and avert unacceptable behaviour, in accordance with labour law.
- ⇒ The Company investigates the complaints brought to its knowledge and acts accordingly, applying where deemed necessary the system of disciplinary penalties as defined in its Labour Regulation. In cases where the implementation of disciplinary measures is required, the Company is committed to respecting the essential rights of its employees, such as: a) access to the details of misconduct allegations, b) responding to and / or appealing disciplinary decisions, without suffering any adverse effects and (c) depending on the gravity of the disciplinary misconduct, advise and / or representation, if they wish, by employee representatives during the evaluation of disciplinary decisions.
- ⇒ MYTILINEOS is committed to implementing its disciplinary practices in a consistent and fair manner as regards its entire workforce, while personal characteristics, such as gender, national origin, religion, etc. do not affect the results of the investigation of a possible misdemeanor or the severity of a possible sentence.

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Local Communities Rights

- ⇒ MYTILINEOS acknowledges its influence on the communities within which it operates and is committed to working with the social partner groups of said communities, in order to ensure that it listens to their opinions and takes them into account, when conducting business.

- ⇒ The Company is committed to communicating and consulting with local communities, prior to and during its activities, so as to prevent, mitigate and eliminate potential adverse effects of its operation, by taking appropriate measures. Moreover, its is committed to respecting and supporting local community rights regarding the use of land, of natural resources and especially water, as well as the preservation of local cultural heritage, as key elements of the communities' sustainability.

- ⇒ The Company also ensures that appropriate action is taken to address the concerns of local communities regarding the potential negative impact of its activities on the citizens' access to resources or to various other livelihoods. At the same time, the Company is committed to participating, where needed, in dialogue with the social partners of its local communities on human rights issues related to its operation.

Product management

- ⇒ The Company complies with the relevant national laws, international guidelines and industry standards as regards the design, production and marketing of its products and services.

- ⇒ The Company is committed to monitoring and protecting the right to health, safety and privacy of customers - consumers³ that arise from its products being used of made available.

³ Privacy policy

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- ⇒ In case training or other measures are required for the safe use of the Company's products, the latter is committed to taking all steps needed, in order to ensure that end users are aware of said requirements.

Security Practices

- ⇒ The Company undertakes that its contracts with private security companies (where such companies exist) include requirements related to international standards for the protection of human rights, law enforcement and the use of violence. Moreover, it takes into account any illegal or abusive conduct by the security guards of the company in the past, following a relevant investigation, and allows the termination of the contract in case of such behaviour.
- ⇒ MYTILINEOS is committed to informing and training all security personnel on rules of conduct based on international standards governing the protection of human rights, as well as on law enforcement and the use of violence.

MYTILINEOS is committed to identifying, assessing, preventing and mitigating the risks of human rights violation, implementing a due diligence process, as well as remedial action in order to address such incidents, where applicable.

More specifically:

- ⇒ The Company is committed to raising awareness among its employees, through information and training, while conducting corporate activities with respect for Human Rights.
- ⇒ It is committed to promoting the respect and protection of Human Rights in its supply chain, through the "Suppliers and Partners Code of Conduct", as well as the inclusion of key Human Rights indicators in the

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criteria for selecting suppliers, in contractual terms and in the inspections conducted by the Procurement departments of its Business Units.

- ⇒ It is committed to evaluating on a regular basis the core business units of its Business Units subsidiaries, in relation to the impact on the protection of Human Rights, applying the UN Global Compact Self-Assessment Tool (Human Rights section), as well as proceeding with the publication of the relevant findings in the annual "Sustainable Development Report of MYTILINEOS".
- ⇒ The Company is informed about the general situation and the position of the country where it operates with regard to the protection of Human Rights. In countries where human rights violations are proven to be systematic, MYTILINEOS is committed to taking all measures required, in order to avoid any involvement in such violations, as well as in any form of business profit that may result from such abusive actions.
- ⇒ The Company, through the main reporting mechanism of violations of the Code of Conduct applied (reports -anonymous or by name - by phone, fax, mail, as well as by e-mail to the Compliance Directorate: compliance@mytilineos.gr), enables employees to express any concerns, as well as to report incidents of human rights violations. At the same time, the Company is committed to investigating and addressing the concerns of employees, as well as to resolving complaints by taking corrective action, while abstaining from any action against any employee who reports, in good faith, any real or alleged inappropriate behaviour.

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