



Communication on Progress – 2020

UN Global Compact Advanced Level

(updated 19 August 2016).

The present Communication on Progress (CoP) report, refers to the period from 1ST of January 2020 to 31ST of December 2020, and should be read in conjunction with the MYTILINEOS Sustainable Development Report 2020.



Chairman's statement of Continued Support

2020 was undoubtedly a year of unprecedented challenges, both globally and at a national level, a result of the Covid-19 pandemic and its consequences. This was especially true for the Greek economy, which had just begun to recover from the ten-year recession and had to cope with a new downturn in economic activity, reflected in a double-digit percentage decline in GDP year-on-year. This health emergency has put our company into the future of facing unprecedented risks and acted as an accelerator in adopting speedily sustainability goals regarding decarbonization, electrification, and digitalization. Sustainable companies showed the highest levels of flexibility and competitiveness. It became clear that sustainable progress opens the way to more growth opportunities for companies and greater resilience in the face of sudden disruptions, with a lower risk profile for shareholders.

Despite the special circumstances that prevailed throughout most of the year, we did not deviate from our broader strategic goals of tackling the climate change phenomenon. We are laying the foundations for 100% sustainable and green industrial activity by committing to reduce by 30% our air pollutant emissions across all our business activities by 2030, and to achieve a carbon-neutral footprint by 2050. To achieve these goals, we are developing a set of specialized initiatives to reduce emissions of each individual Business Unit. These ambitious goals will be inscribed in our corporate DNA and will define our strategies, our investment decisions, and our business operations.

Sustainable Development is, and should be, a priority for all.

At the same time, MYTILINEOS, having been a signatory of the UNGC since 2008, is proud of the progress made in working towards all the Compact's Principles which are universally accepted and cover the areas of human rights, labor, health and safety, the environment and anti-corruption and have become more timely than ever due to the impact on entrepreneurship and economic activity in pandemic conditions.

Moreover, we continue our Sustainable Development Goals journey focusing on areas around which we can innovate and collaborate in the search for solutions to critical local, national, and global sustainability challenges.

Our Communication on Progress report below, highlights our actions for the year 2020. We also commit to share this information with our stakeholders through our website and our annual Sustainable Development Report. I am proud to be re-confirming our support for the United Nations Global Compact.

We are committed to dedicating considerable efforts to support the UNGC Principles and to engaging in collaborative projects that advance the broader United Nations Sustainable Development Goals.

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

UN Global Compact Advanced COP 2020 Advanced Level

All information in MYTILINEOS's Communication on Progress 2020 is compiled from the company's:

- Sustainable Development Report 2020
- Annual Report 2020
- Sustainable Development strategy
- CSR policy
- Vision – Mission and set of Business Values
- Code of Business Conduct
- Suppliers & Partners Business Code of Conduct
- Human Rights policy
- The Sustainable Development section in the Company's official website and
- All Material issues DMAs*

*DMA: Disclosure Management Approach

All the publications listed above are available on our website.

The following pages are our self-assessment on how we have met the GC Advanced Level criteria and references to our implementation of best practices. According to UNGC CoP policy, we consider a criterion is met when we communicate on its implementation (at least one best practice) or planned implementation. Concerning the independent assurance letter, this can be found in our Sustainable Development Report 2020 (page 156).



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

Best Practice 1:

Opportunities and responsibilities that one or more SDGs represent to our business

The SDGs aim to create a viable model for the future in which all economic growth is achieved without compromising our environment or placing unfair burdens on societies.

MYTILINEOS argues that businesses can play a decisive role in the achievement of the SDGs, through responsible business operation, new entrepreneurship models, investments and the leveraging of new technologies and synergies, thus promoting sustainable development in a comprehensive way.

The Company, following the key steps of the SDG Compass tool, in order to decide in which SDGs can meaningfully contribute to their achievement, mainly local and national level, took under consideration the following factors: a) the key impacts of the its Business Units activity, b) the results of the Materiality analysis process, c) its core business goals and d) its CSR strategic directions.

Through this process, MYTILINEOS, can communicate clearly around how its business helps local and national economy and employment as well as the environment protection and the community well-being, in the SDGs spectrum. Also, it can consolidate a strong license to operate and to differentiate itself from its competitors.

Moreover, as a company with a wide supply chain and different customers segments, we recognize that we cannot achieve any one of the SDGs on our own. We have a potentially significant role to play in meeting many of these ambitious aims. In this direction, we are trying to develop specific collaborations with NGOs, local communities and academic community as well as to engage our suppliers and business partners and our industry peers.

On the other hand, as e responsible company, we see an opportunity in the fact that the Agenda 2030, as the only globally agreed sustainability framework, can support our potential investors in understanding the sustainability trends relevant to investment activity and their fiduciary duties.

Finally, we consider SDGs as a risk framework because the challenges put forward by the SDGs reflect specific regulatory, ethical and operational risks which can be financially material across our business and the countries we operate.

Best Practice 2:

Where the company's priorities lie with respect to one or more SDGs

SDGs with relevance to the MYTILINEOS material issues:



Please advise: <https://www.mytilneos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility>

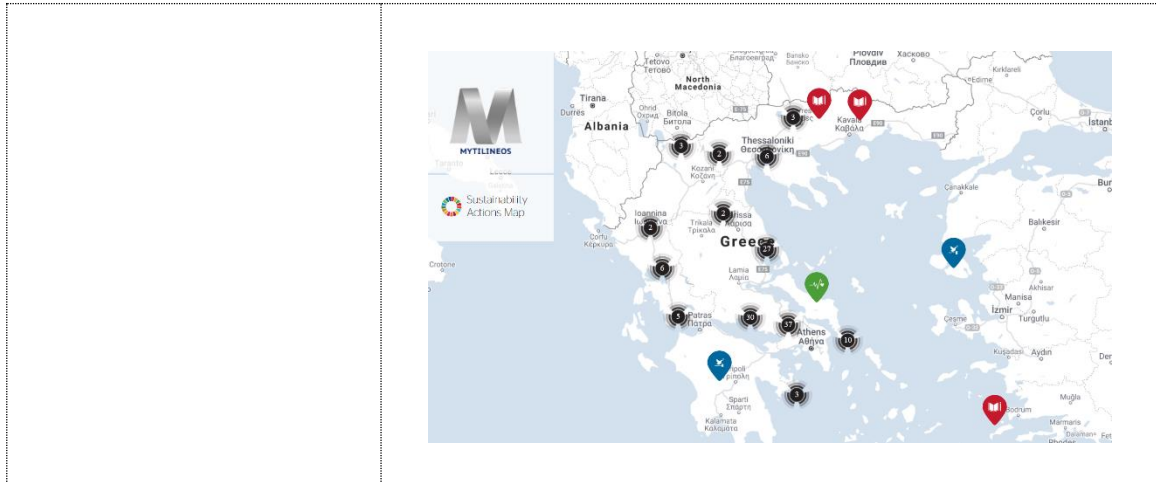
<p>Best Practice 3: <i>Goals and indicators set by our company with respect to one or more SDGs</i></p>	<p>Please advise: MYTILINEOS CSR Policy: www.mytilineos.gr/sustainability/key-sustainable-development-policies/ MYTILINEOS Sustainable Development Report 2020 (“Sustainable Development Strategy” pages 36-41): https://www.mytilineos.gr/sustainability/reports/ Please advise our tool: Generated Value Creation Scorecard 2020: https://scorecard.mytilineos.gr/index-en.html</p>
<p>Best Practice 4: <i>How one or more SDGs are integrated into the company’s business model</i></p>	<p>We consider SDGs as a risk framework because the challenges put forward by the SDGs reflect specific regulatory, ethical and operational risks which can be financially material across our business and the countries we operate. Please advise our Sustainable Development Report 2020 (“Business Model - pages 32-33 and Materiality process – pages 46-48): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 5: <i>The (expected) outcomes and impact of your company’s activities related to the SDGs</i></p>	<p>MYTILINEOS Sustainable Development Report 2020 (“Our approach to Sustainable Development” pages 38-41): https://www.mytilineos.gr/sustainability/reports/ Please advise our tool: Sustainability Actions Map: https://sdactionsmap.mytilineos.gr/en/</p>
<p>Best Practice 6: <i>If the companies’ activities related to the SDGs are undertaken in collaboration with other stakeholders</i></p>	<p>MYTILINEOS Sustainable Development Report 2020 (“Strategic priorities” page 28): https://www.mytilineos.gr/sustainability/reports/ Please advise our Sustainable Development Report 2020 (“Local Communities sustainability” Results section - pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p>

Implementing the Ten Principles into Strategies & Operations

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

<p>Best Practice 1: <i>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company’s sustainability commitments and objectives</i></p>	<p>Sustainable Development is an integral part of the “corporate DNA” of MYTILINEOS and, therefore, of its 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. You may advise our new Sustainable Development Strategy in our Sustainable Development Report 2020: https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy.</i></p>	<p>Our CSR approach, as a main practice to achieve sustainability, is a multifaceted and complex process characterized by our conscious self-commitment to continuous improvement. It is linked to all our business activity sectors and operations and defines the way in which we choose each time to move forward, taking steady steps towards achieving our continuous responsible development, guided by our mission and business values. In this context:</p>

	<ul style="list-style-type: none"> • We developed a new Human Rights policy with focus on zero tolerance to Human Rights violations. • We created and published specific DMAs according to the new GRI STANDARDS for all material issues with relevant specific targets, where available, to ensure the proper disclosure of our performance. • We have adopted the UN Sustainable Development Goals as an additional framework for measuring our impact. • <u>We have established an open dialogue with our Stakeholders at local level.</u> • <u>We are participating in Sustainability related standards and initiatives, challenging ourselves to continues improvement of our operations</u> (e.g. UN Global Compact, ISO 26000, CDP-Water Security, GRI STANDARDS, ISO 14001, ISO 14064, ISO 45001, OHSAS 18001, ESG International Indexes). <p>Also, our <u>“Code of Business Conduct”</u>, the <u>“Suppliers and Business Partners Code of Conduct”</u>, Human Rights, Environmental, Occupational Health & Safety and Quality Policies, are part of our Sustainable Development governance system and applied across all our business activity sectors.</p> <p>Moreover, the Heads of our Business Sectors are actively involved in the management of social and environmental issues, providing the respective CSR teams of their Sector with the necessary directions and ensuring that the Key Performance Indicators (KPIs) are in line with the Group’s strategic goals. The individual CSR teams operate within specific and clearly defined duties and obligations, to implement the central strategic goals and policies, as well as the CSR programs at the local level.</p>
<p>Best Practice 3: <i>Design CSR strategy to leverage synergies between and among issues areas and to deal adequately with trade-offs.</i></p>	<p>Sustainable Development is an integral part of the “corporate DNA” of MYTILINEOS and, therefore, of its 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.</p> <p>You may advise our new Sustainable Development Strategy in our Sustainable Development Report 2020: https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 4: <i>Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.</i></p>	<p>MYTILINEOS CSR Committee reviews and approves the CSR strategic lines as well as the material issues that determine the structure of its annual Sustainable Development Report. It may also act in the capacity of advisor to the Group’s Executive Management and to the relevant Board Committees on the sustainability issues, to assist in their implementation in a more complete manner.</p>
<p>Best Practice 5: <i>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.</i></p>	<p>Also, MYTILINEOS has encouraged the creation of CSR teams in each its business activity sector. Each CSR team is responsible for developing, implementing, and evaluating CSR initiatives according to the Company’ s CSR Action plan as well as general policies and targets.</p> <p>For more information, please see our Sustainable Development Report 2020 (“CSR Governance: section, page 150) https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 6: <i>Other established or emerging practices.</i></p>	<p>Spotlight: SUSTAINABILITY ACTIONS MAP</p> <p>MYTILINEOS’ strategic line to be an active member of its local communities and to make a positive difference where it operates. In this place you can see MYTILINEOS’s sustainability vision in action through the following online tool:</p>



Criterion 2: The COP describes value chain implementation

Best Practice 1.:

Communicate policies and expectations to suppliers and other business partners.

As part of our efforts to communicate more effectively our values in our sphere of influence, we have published our “[Suppliers and Business Partners Code of Conduct](#)” which sets out more clearly our policies and expectations for a responsible supply chain management and aims to focus on communicating and promoting the principles of the UN Global Compact to our principal associates and suppliers.

The Company's main objectives, by 2025, are to enhance the level of maturity and integration of Sustainable Development in its supply chain, the inclusion of ESG criteria in the selection process of new suppliers as well as the commitment of existing ones to good and responsible practices, with the aim of developing partnerships to better understand the effects and mutually harmonize objectives and expectations. In this context, please advise our Sustainable Development Report 2020 (**page 133**): <https://www.mytilineos.gr/sustainability/reports/>

Best Practice 2.:

Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence

According to our Suppliers & Business Partners Code of Conduct, MYTILINEOS may request to confirm the compliance of its key Suppliers / Business Partners with the ESG criteria in one of the following ways:

Evaluations: The Group's key Suppliers / Business Partners may be requested to complete a questionnaire on the coverage of the above ESG criteria.

Onsite verifications: MYTILINEOS representatives or an authorised business partner of the Company acting on its behalf may contact key Suppliers / Business Partners to request permission to visit their premises to verify on-site the level of coverage of the ESG criteria.

Compliance certificates: Company's key Suppliers / Business Partners may be requested to produce relevant certificates or other official documents confirming their compliance with the ESG criteria.

<p>Best Practice 3: <i>Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners.</i></p>	<p>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, the inclusion of ESG criteria in the process of selection of new suppliers as well as the commitment of the existing ones to the responsible partnerships, to better understand the impacts and harmonize goals and expectations.</p> <p>In this context, the Company in 2020 took the initiative and implemented a 1st round of specialized training webinars on the 10 Principles of the UN Global Compact, enabling more than 40 key suppliers to understand the multifaceted challenges facing the world today in relation to climate change, human rights, corruption, and bribery. These challenges are becoming more prevalent than ever, due to the impact on business and economic activity because of the pandemic. MYTILINEOS committed to the implementation of the 2nd corresponding training cycle in 2021, actively supporting its suppliers in achieving sustainable business operation.</p>
--	--

Robust Human Rights Management Policies & Procedures

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

<p>Best Practice 1: <i>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights).</i></p>	<p>MYTILINEOS respects all internationally recognized human rights as stated in its policy. The Company complies with:</p> <ul style="list-style-type: none"> • 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). <p>We promote the respecting of human rights in the following ways:</p> <ul style="list-style-type: none"> - In our business sectors by keeping our standards. - In our relationships with our significant suppliers. - By implementing social programs with NGOs.
<p>Best Practice 2: <i>Integrated or stand - alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p>	<p>MYTILINEOS's Human Rights policy which express our commitment to respect and support Human Rights has been approved by the CSR and Executive Committees and is available to our internal and external stakeholders through our website and our Sustainable Development Report.</p>

Best Practice 3:

Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products, or services

MYTILINEOS Human Rights policy reflects its zero tolerance 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.

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 5 & 10).

- [MYTILINEOS "Human Rights Policy"](#)
- [MYTILINEOS "CSR Policy"](#)
- [MYTILINEOS "Code of Business Conduct"](#)
- [MYTILINEOS "Suppliers & Business partner Code of Conduct"](#)

are publicly available on our [website](#).

Best Practice 4:

Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.

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

<p>Best Practice 1: <i>Process to ensure that internationally recognized human rights are respected.</i></p>	<p>MYTILINEOS ensures labour relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promotes the fundamental principles of the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) the respect of the freedom of association; (b) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; and (d) the elimination of all discrimination in respect of employment and occupation.</p> <p>The company also subscribes to and complies with the Principles of the UN Global Compact, which are based on the internationally recognised principles on the protection of Human Rights. In this direction an internal Human Rights Self - Assessment process, using the Global Compact related tool, is scheduled to take place every 3 years.</p> <p>Moreover, MYTILINEOS “Code of Business Conduct” applies to all employees and management teams (by signing a Consensus Form).</p> <p>Company’s “Suppliers and Business Partners Code of Conduct”, includes a description of its minimum conditions and expectations from its supply chain, in CSR topics, as a prerequisite of commercial cooperation between the two parties. The Code applies to all suppliers and business partners and its sections cover matters such as Health and Safety, Working conditions and Human Rights, Ethics and Anti-Corruption, Environmental protection and management.</p> <p>Please advise MYTILINEOS “Human Rights Policy”</p>
<p>Best Practice 2: <i>Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement / advocacy; partnerships and/or other forms of collective action.</i></p>	<p>Such programs are presented within our Sustainable Development Report 2020 (Social Investments section pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p> <p>Also, as part of the training in the Code of Business Conduct in 2020, the Company has also provided Executives with training in Human Rights subjects, focusing on the respect for the freedom of association, 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.</p>
<p>Best Practice 3: <i>Allocation of responsibilities and accountability for addressing human rights impacts</i></p>	<p>MYTILINEOS Human Resources Central Function is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to each company’s Business Activity Sector in coping with human resources & human rights related issues. Please advise MYTILINEOS “Human Rights Policy”</p>

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

<p>Best Practice 1: <i>Leadership review of monitoring and improvement results.</i></p>	<p>As has been defined according to MYTILINEOS: CSR Governance system: Sustainable Development Report 2020 (page 148) https://www.mytilineos.gr/sustainability/reports/ MYTILINEOS's Occupational Health & Safety, Employment, and Human Rights policies & DMAs within our Sustainable Development Report 2020 (pages 96, 104 & 111): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders</i></p>	<p>In 2020, no Human Rights incidents have been identified across the Company. The process to deal with incidents, is presented within our Code of Conduct where the management of Code violations is assigned to the Administration Board of each Business Unit, which is composed of the Business Unit's General Manager, the immediate supervisor of the employee who has committed the violation, the Legal and Regulatory General Manager, the Compliance Manager and the Human Resources General Manager. The Administration Board must inform the Company's Audit Committee of the progress made in connection with any matters that arise.</p>
<p>Best Practice 3: <i>Outcomes of integration of the human rights principles.</i></p>	<p>Outcomes of the internal self-assessment: Please refer to our Sustainable Development Report 2020 (pages 114 – 115 internal self-assessment outcomes): https://www.mytilineos.gr/sustainability/reports/ Disclosure of main incidents involving the company: In 2020, no Human Rights incidents have been identified across the Company. Outcomes of remediation processes of adverse human rights impacts: In 2020, there were no grievances related to human rights filed, addressed by internal or external stakeholders and resolved through formal mechanisms.</p>

Robust Labour Management Policies & Procedures

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

<p>Best Practice 1: <i>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies.</i></p>	<p>MYTILINEOS's Occupational Health & Safety policy, Employment disclosure management approach, Human Rights policy as well as its "Code of Business Conduct" are aligned with international references such as the Universal Declaration of Human Rights, the ILO relative to the principles and fundamental rights at work the ISO 45001 and OHSAS 18001 International Standards and the principles of the Global Compact, among others. Also, our suppliers, subcontractors and other business partners are required to comply with the Company's "Suppliers and Business Partners Code of Conduct", which include respect for the Fundamental Conventions of the International Labour Organization and local legislation, particularly in terms of the minimum wage, working time and health and safety.</p>
---	--

<p>Best Practice 2: <i>Reflection on the relevance of the labour principles for the company</i></p>	<p>According to our Materiality process the main social issues (concerning the Human capital) that may influence the assessments and decisions of our stakeholders are: 1) Occupational Health & Safety, 2) Employment and 3) Human Rights. Please refer to our Sustainable Development Report 2020 (“Materiality analysis” section (pages 46-48): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 3: <i>Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and engage in dialogue with representative organization of the workers (international, sectoral, national).</i></p>	<p>Please advise:</p> <p>MYTILINEOS’s Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2020 (pages 96, 104 & 111): https://www.mytilineos.gr/sustainability/reports/</p> <p>The Occupational Health & Safety section in our website: https://www.mytilineos.gr/en-us/ygeia-asfaleia/ygeia-asfaleia</p>

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

<p>Best Practice 1: <i>Risk and impact assessments in the area of labour.</i></p>	<p>We are applying specific assessment schemes such as: 1) the annual Materiality process, 2) the annual employees performance review system and 3) the annual Stakeholders Dialogue Forum. In addition, risk assessments in all company’s business sectors are applied, in the framework of the Occupational Health & Safety Management System, certified by ISO 45001 and OHSAS 18001 International Standards. This system is designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture.</p>
<p>Best Practice 2: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>MYTILINEOS Human Resources General Division is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to the Business Units in coping with human resources related issues.</p> <p>Also, according to the Company’s EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market.</p>
<p>Best Practice 3: <i>Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.</i></p>	<p>Main engagement & communication channels with employees:</p> <ul style="list-style-type: none"> • Formal Stakeholder Engagement process. • Formal Materiality process. • Established annual employee performance and skills review process. • Open & daily communication with all employees through the role of HR-Business Partner • Regular and ad hoc meetings between the Management and representatives of employees. <p>The reporting of Code of Conduct violations: www.mytilineos.gr/en-us/codes-and-policies/of-mytilineos#tab-code-of-conduct (page 20)</p>

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

<p>Best Practice 1:</p> <p><i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>Please advise:</p> <p>MYTILINEOS's Occupational Health & Safety, Employment, and Human Rights DMAs within our Sustainable Development Report 2020 (pages 96, 104 & 111) https://www.mytilineos.gr/sustainability/reports/</p> <p>The Occupational Health & Safety section in our website: https://www.mytilineos.gr/en-us/ygeia-asfaleia/ygeia-asfaleia</p> <p>MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility</p> <p>Regular reviews ensure that we adhere to all applicable labour laws and regulations and internal standards. Also, we are committed to implementing and integrating international standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • ISO 45001-2015 • OHSAS 18001 International Standard • International Labour Organisation convention • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard
<p>Best Practice 2:</p> <p><i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p>	<p>Regular meetings with union representatives are conducted with the management (Metallurgy BU) throughout the year. Main topics cover among else wages and additional benefits, proposals to improve health and safety conditions at work and other topics raised by employees.</p> <p>Please advise our Sustainable Development Report 2020 ("Management & Employees relations" section (pages 105-106): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 3:</p> <p><i>Outcomes of integration of the Labour principles.</i></p>	<p>Please advise our ESG statement in our Sustainable Development Report 2020 (pages 6-7) https://www.mytilineos.gr/sustainability/reports/</p> <p>Please advise our Social Performance section in our Sustainable Development Report 2020 (pages 96-115) https://www.mytilineos.gr/sustainability/reports/</p> <p>Also, MYTILINEOS received no fines for non-compliance with labour laws and regulations in 2020.</p>

Robust Environmental Management Policies & Procedures

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

<p>Best Practice 1: <i>Reference to relevant international conventions and other international instruments.</i></p>	<p>The adoption and implementation of international standards related to the environmental protection is a dynamic approach in the consideration of potential risks. We are committed to implementing and integrating these standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • The EU Emissions Trading System (EU ETS) • International Aluminum Stewardship Initiative (ASI) • ISO 14001-2015 International Standard • ISO 14064 International Standard • The EU's environmental regulations and Best Available Techniques (BATs) • Carbon Disclosure Project (WATER Security) • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard
<p>Best Practice 2: <i>Reflection on the relevance of environmental stewardship for the company.</i></p>	<p>According to our Materiality process the main environmental issues that may influence the assessments and decisions of our stakeholders are: 1) Pollution prevention, 2) Natural Rehabilitation & Biodiversity, 3) Energy & Air emissions, 4) Water management, 5) Circular economy, 6) Climate Change adaptation. Please advise our Sustainable Development Report 2020 ("Materiality analysis" section (pages 46-48): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 3: <i>Written company policy on environment stewardship.</i></p>	<p>You can advise our Environmental Policy: https://www.mytilineos.gr/en-us/perivallon/perivallon#tab-environmental-policy</p> <p>Our environmental policy:</p> <ul style="list-style-type: none"> • is included in our new Code of Conduct. • is included in our Suppliers Code of Conduct. • is presented by our website through the new dedicated section on Corporate Social Responsibility. • is considered as a main discussion topic in annual Dialogue Forums with our Stakeholders groups. • is applied to all our subsidiaries and to all employees, irrespective of their position within the Group's hierarchy and promoting best practices, aiming at shaping the corporate image in the market.
<p>Best Practice 4: <i>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct (pages 7-8).</p>
<p>Best Practice 5: <i>Specific commitments and goals for specified years.</i></p>	<p>In terms of commitments & goals please advise MYTILINEOS:</p> <ul style="list-style-type: none"> • Please advise our ESG statement in our Sustainable Development Report 2020 (pages 6-7) https://www.mytilineos.gr/sustainability/reports/

- MYTILINEOS is one of the first Greek industrial companies to set in 2020 ambitious targets for the reduction of its carbon footprint, following a special study that used the latest available scientific data on climate change forecasts, as well as the relevant European and national strategy, and to further incorporate sustainability into its corporate DNA.

The Company's strategic priorities in this area are in line with the European Green Deal, contributing substantially to the transformation of the country's energy model, with a view to capitalizing on the opportunities offered by the European framework.

Particularly, MYTILINEOS is committed, through the implementation of the specific initiatives :

(a) **By 2030, to reduce by 30+% its total CO₂e (scope 1 & 2) emissions, compared to 2019 level, and to achieve Net-Zero emissions in its development and construction activities.**

(b) **By 2050, to achieve Net-Zero emissions across its entire business activity.**

These ambitious targets represent the aggregation of the individual commitments taken at the level of the Company's Business Units.

These are as follows:

METALLURGY BU:

"To become the benchmark for Green Metallurgy worldwide."

- ✓ **Reduction of total CO₂e emissions (scope 1 & 2) by**

65% 

by 2030
(compared to 2019 level)

- ✓ **Reduction of specific emissions (CO₂e/t Al) by**

75% 

by 2030
(compared to 2019 level)

- ✓ **Achieve Net-Zero emissions of the Business Unit**



by 2050
(compared to 2019 levels)

ELECTRIC POWER & GAS BU:

"Becoming a catalyst for a low-emission Greek electricity sector via our Power & Gas business"

- ✓ **Reduction of specific emissions (CO₂e/MWh) by approximately**

50% 

by 2030
(compared to 2019 level)

- ✓ **Achieve Net-Zero emissions of the Business Unit**



by 2050
(compared to 2019 level)

**SUSTAINABLE ENGINEERING SOLUTIONS BU &
RENEWABLES & STORAGE DEVELOPMENT BU:**

“To play, through our new activities, an important role in the decarbonization of the global energy system”

- ✓ **Achieve Net-Zero emissions of the Business Units**



by 2030
(compared to 2019 levels)

In 2021, MYTILINEOS plans to submit a Letter of Commitment to the **“Science Based Targets Initiative”**¹, to submit the above-mentioned CO₂ reduction targets to external independent verification, to assure they have been calculated on a scientific basis. In this way, the Company reaffirms its commitment to the objectives of the Paris Agreement and contributes in a pioneering way to the efforts to tackle the threat of climate change at national and global level – and this despite the prevailing conditions of widespread uncertainty and economic recession, as coping with the public health crisis created by the pandemic becomes the top priority.

- Also please advise **MYTILINEOS ESG Targets** in our Sustainable Development Report 2020 (pages 8-9)
<https://www.mytilineos.gr/sustainability/reports/>

¹The Science Based Targets initiative (SBTi) promotes ambitious climate action in the private sector by mobilising companies to set science-based greenhouse gas emission reduction targets.

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

<p>Best Practice 1: <i>Environmental risk and impact assessments.</i></p>	<p>Core elements of the MYTILINEOS Environmental policy: https://www.mytilineos.gr/en-us/perivallon/perivallon</p> <p>We assess and prioritize environmental risks as part of our overall risk management process. Our Environmental Management System, aligned with the ISO 14001-2015 environmental standard, outlines our obligation to “manage the environmental risks of our activities” and stipulates that “environmental risk is part of the overall risk assessment which business units are required to complete on an annual basis.” We conduct environmental risk assessments in our production operations units. These include conservation and rehabilitation of nature and biodiversity, water and air pollution prevention, noise prevention, greenhouse gas stabilization & reduction, natural resource and water use and waste management. In addition, our CSR teams maintain ISO 14001-2015 certifications. Such compliance includes annual audits performed by external auditors, as well as preparatory internal audits.</p>
<p>Best Practice 2: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>According to the Company’s EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market.</p>
<p>Best Practice 3: <i>Assessments of lifecycle impact of products, ensuring environmentally sound management policies</i></p>	<p>In 2020, a Life Cycle Assessment (LCA) study was carried out, in order to assess the possible environmental impacts related to the extraction of bauxite and the production of alumina and aluminium by MYTILINEOS’ Metallurgy Business Unit. The LCA study is a process of assessing the impacts on the environment of a product throughout its lifecycle (cradle-to-grave), thus increasing the efficiency in the use of resources. The LCA study identifies the stages in the product’s lifecycle that cause the greatest impacts on the environment and the prevailing type of impact. The study was carried out in accordance with the principles of the ISO 14040 and 14044 international standards, with the aim of obtaining all the data required for securing certification with the Performance Standard of the Aluminium Stewardship Initiative (ASI).</p>

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

<p>Best Practice 1: <i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>The 100% of Company’s activity sectors have in place an Environmental Management System certified in accordance with the ISO 14001-2015 international standard. To manage and control our environmental impacts, we establish goals, targets and timetables for environmental performance improvement, which are supported by performance measure indicators and reporting processes. These are monitored and managed by the relevant departments in each activity sector, while in the Company level we have placed KPIs aligned with GRI Standards.</p> <p>Regular reviews conducted to confirm compliance to all applicable environmental laws, regulations & internal standards</p> <p>Environmental management systems and data are audited by independent parties.</p>
<p>Best Practice 2: <i>Leadership review of monitoring and improvement results.</i></p>	<p>MYTILINEOS’s Environmental performance per business activity sector is among the top (after the topic Occupational Health & Safety) on the Executive Committee’s agenda (on a monthly basis), which is led by the CEO of the company.</p>
<p>Best Practice 3: <i>Process to deal with incidents.</i></p>	<p>According to our Environmental Management System, all concerns are thoroughly investigated, and appropriate action is taken in case of non-compliance with MYTILINEOS environmental measures and principles. We have contingency plans (with trial application or application of emergency response procedures) and strategies in case of all types of pollution risks including accidental ones, or of other large-scale accidents such as significant spill or an uncontrolled and/or a controlled spill. As part of these plans, which are updated periodically, we identify the main weak points in the operated fields that require immediate attention if an event occurs.</p>
<p>Best Practice 4: <i>Outcomes of integration of the environmental principles.</i></p>	<p>The integration of the environmental principle has resulted the absence of any incidents involving a deterioration in the quality of the environment. Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the company’s operational units, is a process conducted internally, on a regular basis and by specialized personnel in each Business Sector, as well as annually, by a recognised independent organisation that undertakes to audit and certify the environmental management system in place. According to the results of the recent relevant audit for 2020, no deviations from the current environmental licenses were observed, which would necessitate the planning of investments for their rectification, while no cases of non-compliance with environmental rules and regulations were recorded.</p> <p>More specifically, we are reporting our performance according to GRI and more particularly in the following STANDARDS: Energy, Materials, Water, Emissions, Waste, Biodiversity, Pollution prevention and Climate Change adaptation.</p> <p>Please advise our Sustainable Development Report 2020 (pages 62-93): www.mytilineos.gr/en-us/csr-reports/publications</p>

Robust Anti-Corruption Management Policies & Procedures

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

<p>Best Practice 1: <i>Publicly stated formal policy of zero-tolerance of corruption.</i></p>	<p>Please advise our Anti-corruption DMA within our Sustainable Development Report 2020 (pages 141-143) https://www.mytilineos.gr/sustainability/reports/</p> <p>Our zero-tolerance against corruption:</p> <ul style="list-style-type: none"> - is included in our Code of Business Conduct - has been published in our annual Sustainable Development Report. - is presented by our website through the dedicated section on Corporate Social Responsibility. - is applied to all our employees, irrespective of their position within the Company's hierarchy.
<p>Best Practice 2: <i>Policy on anti-corruption regarding business partners.</i></p>	<p>Through our “Suppliers and Business Partners Code of Conduct” we expect from our new and significant partners to comply with the applicable national laws, regulations and the international anti - corruption conventions, as in force and to the extent to which the relevant provisions apply to the work that they provide on behalf of MYTILINEOS. Our detailed policies for our suppliers and business partners are specified within our related Code.</p>
<p>Best Practice 3: <i>Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</i></p>	<p>Please advise our Fight Against Corruption and Bribery DMA within our Sustainable Development Report 2020 (pages 141-143) https://www.mytilineos.gr/sustainability/reports/</p>

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

<p>Best Practice 1: <i>Internal checks and balances to ensure consistency with the anti-corruption commitment</i></p>	<p>Please advise our Sustainable Development Report 2020 (page 141-143): https://www.mytilineos.gr/sustainability/reports/</p> <p>The Legal and Regulatory General Central Support Function, of which the Compliance Department forms part, has been entrusted with the creation and implementation of a system of safeguards to protect the company from corruption and bribery.</p>
<p>Best Practice 2: <i>Actions taken to encourage business partners to implement anti-corruption commitments</i></p>	<p>In 2020 MYTILINEOS completed successfully the first cycle of the educational initiative with focus on 50 key suppliers’ training on the 10 Principles of the UN Global Compact (UN Global Compact). The initiative was implemented in collaboration with the network CSR HELLAS, where the company participates as a main member for more than 10 years.</p> <p>MYTILINEOS also expects the strengthening of the level of maturity and integration of the Corporate Social Responsibility of its main suppliers, through the adoption Please advise our Suppliers & Business Partners Code of Conduct: www.mytilineos.gr/en-us/responsible-management/of-local-suppliers.</p>

<p>Best Practice 3: <i>Management responsibility and accountability for implementation of the anti-corruption commitment or policy.</i></p>	<p>The Legal and Regulatory Affairs General Division, in which the Company's Compliance Division belongs, has been entrusted with the creation and implementation of mechanisms to safeguard the Company's protection from corruption and bribery at both preventive and control levels. Specifically, the Manager of the Regulatory Compliance Division reports to the General Manager for Legal & Regulatory Affairs. Finally, the establishment of a Legal Affairs Committee in early 2021 is planned, which discuss regulatory compliance issues, in the presence of the Chairman & CEO and all General Managers of the Company.</p>
<p>Best Practice 4: <i>Carrying out risk assessment of potential areas of corruption</i></p>	<p>Please advise our Sustainable Development Report 2020 (page 142-143): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 5: <i>Carrying out risk assessment of potential areas of corruption</i></p>	

Criterion 14: The CoP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

<p>Best Practice 1: <i>Process to deal with incidents.</i></p>	<p>Although, the transparency due diligence process is under formation, all possibly concerns are thoroughly investigated, and appropriate action is taken (administrative and illegal measures are available in accordance with the Company's internal working regulations), in case of non-compliance with Company's anti-corruption policy. Also, MYTILINEOS financial statements are independently audited every year. The Company will continue to have financial statements audited annually.</p>
<p>Best Practice 2: <i>Public legal cases regarding corruption.</i></p>	<p>During the reporting period, there were no public legal cases regarding corruption or bribery.</p>
<p>Best Practice 3: <i>Outcomes of integration of the anti-corruption principle</i></p>	<p>Please advise our Sustainable Development Report 2020 (page 141-143): https://www.mytilineos.gr/sustainability/reports/</p>

Taking Action in Support of Broader UN Goals and Issues

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

<p>Best Practice 1: <i>Align core business strategy with one or more relevant UN goals/issues.</i></p>	<p>From the early beginning of 2017, in the framework of the corporate transformation, the Company has entered a new era of evolution which presents improved prospects for growth, to the benefit of all its Stakeholders. In moving forward to the next decade, the elements that define the framework for the achievement of the Company's objectives in the domain of Corporate Social Responsibility comprise continuous learning and self-improvement, response to Stakeholder concerns, and transparency and accountability in connection with Company policies, decisions and performance, together with the recently enacted legislation. With its renewed, strong system of corporate governance and a new operational structure in place, the Company will work systematically and with enhanced effectiveness in order to promote sustainable practices across its value creation chain and develop partnerships that will promote the United Nations' 17 Sustainable Development Goals.</p> <ul style="list-style-type: none"> • Please advise MYTILINEOS Business Model within our Sustainable Development Report 2020 (pages 32-33): https://www.mytilineos.gr/sustainability/reports/ • Please advise MYTILINEOS new Sustainable Development Strategy within our Sustainable Development Report 2020 (pages 36-41): https://www.mytilineos.gr/sustainability/reports/ • Please advise MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • MYTILINEOS CSR issues and their connection with the Sustainable Development Goals (SDGs) https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • We participate actively in the UNGC Greece Local Network working groups and events such as the Human Rights Working Group, the Local Network meetings and expert group activities. • Since the December 2017, officially, our sponsoring & donations plan is aligned with SDGs and it is materialized through strategic alliances with local communities, NGOs and other associations aiming at sustainable communities. Please see: https://www.mytilineos.gr/sustainability/in-practice-social-requests-management-system/
<p>Best Practice 2: <i>Develop relevant products and services or design business models that contribute to UN goals/issues</i></p>	<p>Under our Power & Gas Business Unit we have RES operating (gross capacity of 211 MW (including projects in which we hold a non-controlling stake), including 193 MW of wind, 12 MW of solar and 5 MW of hydro capacity, with ongoing RES capacity expansions in progress, including, for example, the ongoing construction of a 43 MW wind farm. In accordance with our long-term strategy to become a modern “green utility”, we have agreed to invest, subject to due diligence and other customary conditions, in a pipeline of Solar PV projects that is under development in Greece with total capacity of approximately 1,500 MW, together with a portfolio of storage projects under development. The acquisition of these Solar PV projects will facilitate the increase of our market share in the retail electricity segment, while the storage projects will enable us to optimize the operation of our RES asset portfolio from an energy management perspective.</p>

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

Energy Efficiency (“UtilitEE” project)

The “UtilitEE” project, which is expected to be implemented within the next three years, will provide a Behavioural Change Framework, oriented to the end user, via an open Information and Communications Technology (ICT) ecosystem. The “UtilitEE” project focuses on discovering, quantifying, and revealing energy-consuming activities, while sending meaningful feedback to the end user, to engage them into a continuous process of learning and improving their energy behavior. Furthermore, it will incorporate human-centric intelligent control features that use occupants’ everyday habits, to minimize energy waste and keeping occupants comfortable while preserving a healthy indoor environment.

Demand Response (Holisder project)

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

Net Metering services

The Power & Gas Business Unit undertakes the installation and all the necessary procedures for the connection to a net metering system using solar panels, while making a tangible contribution to protecting the environment and combating pollution.

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

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

Electromobility

For more information, please visit the following address www.protergia.gr/en/content/%CE%B5lectromobility

In our Metallurgy Business Unit the production of primary cast Aluminium products, made of one of the most environment-friendly metals, thus ensuring a safe work environment and the application of responsible and sustainable practices in the extraction process. In addition, we have entered the recycled aluminium market increasing our annual aluminium production capacity by 40,000 tonnes and enhancing our environmental credentials, as the production of aluminium using recycled materials consumes materially less energy than primary aluminium production. We expect to reach an annual production capacity of 250,000 tonnes of aluminium by 2022 by expanding our recycled aluminium footprint while, as a result, decreasing our electricity consumption by approximately 25.0% per tonne of aluminium produced.

Our Renewables and Storage Development business unit was established as a new, autonomous business unit in February 2020, to capitalise on rapidly increasing demand for renewable energy. Our Renewables and Storage Development business unit focuses on renewable energy and storage development projects worldwide,

	<p>including projects we are implementing as an EPC contractor for third party customers and our own “Build Operate Transfer” (“BOT”) platform. With an established global presence and a leading role in the utility scale solar photovoltaic energy generation and energy storage EPC industry, our Renewables and Storage Development business unit benefits from strong partnerships with leading equipment providers and functions as a preferred contractor for leading global solar developers. We have successfully completed more than 2,500 MW of utility scale solar power projects, as well as more than 500 MW / 700 MWh of energy storage facilities, in more than two dozen countries on five continents, and with a recurring customer base, including, among others, Lightsource/BP, Sonnedix, Total and Gresham House. We believe this experience positions our Renewables and Storage Development business unit to capitalise on the increasing adoption of cutting edge solar technologies around the world, in particular as countries and market participants target faster integration of green energy in order to reduce their carbon footprint in accordance with environmental and climate change targets and commitments. We are currently implementing projects (at various stages of implementation) with capacity of approximately 800 MW as an EPC contractor and also have an approved BOT pipeline of approximately 1,670 MW at various stages of development in Australia, Spain, Portugal, Italy, Chile and South Korea.</p> <p>Our Sustainable Engineering Solutions business unit which was created in connection with the strategic transformation of our former EPC business unit in 2020, provides solutions to address national and global energy transition goals, including the development of sustainability projects and the implementation of new energy technologies. This business unit operates four distinct business segments: (i) the Conventional Business segment, which focuses on the construction of natural gas-fired thermal power plants and the implementation of electrical sub-station projects; (ii) the New Energy Solutions segment, which focuses on hybrid and off-grid energy projects; (iii) the Environmental Solutions segment, which focuses on solid waste treatment projects; and (iv) the Infrastructure segment, which focuses on high value-added construction works for civil infrastructure and industrial projects. The Sustainable Engineering Solutions business unit operates a value-centric (over volume), asset light, flexible and scalable business model with a lean cost structure that allows us to adapt to changing market conditions and focus on pursuing high value-added and higher margin activities.</p>
<p>Best Practice 3: <i>Adopt and modify operating procedures to maximize contribution to UN goals / issues</i></p>	<p>We have in place an annual social investment plan which is based on the local communities needs such as: Quality in Education, Bolstering Employment, Good Health, Culture, and local infrastructure projects.</p> <p>We have established strong relationships with NGO to contribute to Children’s Rights and Health programs.</p> <p>We have in our projects pipeline the formation of the due diligence process regarding to Anti-corruption and Human Rights protection.</p> <p>Our “Code of Business Conduct”, new Human Rights policy and our “Suppliers and Business Partners Code of Conduct” are based on UNGC 10 principles, the Universal Declaration of Human Rights, the United Nations Convention Against Corruption, ISO 26000 and the ILO International Labor Standards.</p> <p>In our Sustainable Development Report 2020 a detailed presentation of MYTILINEOS’ contribution to the achievement of the Global Sustainable Development Goals and the respective National Priorities (period 2016-2020) is presented. (pages 38-41): https://www.mytilineos.gr/sustainability/reports/</p>

Criterion 16: The CoP describes strategic social investments & philanthropy

<p>Best Practice 1:</p> <p><i>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS CSR Policy <p>www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility</p> <p>MYTILINEOS strategic focus areas concerning its social contribution are defined by the following SDGs: SDG-1: No poverty, SDG-2 Zero hunger, SDG-3 Good Health, SDG-4 Quality Education, SDG-10 Reduced Inequalities and SDG-11 Sustainable cities & communities. In 2020, the Company, continuing to implement its social policy, invested €3.2 million, implementing actions in basic social sectors that contribute to the prementioned Sustainable Development Goals. All social investments are presented in the Company's Sustainable Development Report 2020 (pages 117-121). https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2:</p> <p><i>Coordinate efforts with other organizations and initiatives to amplify - and not negate or unnecessarily duplicate - the efforts of other contributors.</i></p>	<ul style="list-style-type: none"> • «In Practice»: Social Requests Management System <p>www.mytilineos.gr/sustainability/in-practice-social-requests-management-system/</p> <p>MYTILINEOS, in line with its commitment to operate responsibly, is continuing steadfastly to take initiatives that contribute to society. During the last 11 years (2010-2020), the company has invested more than €16m covering a wide range of social issues, responding to its role as integral member of the Greek society, actively contributing to mitigating the impacts of the economic crisis.</p>

Criterion 17: The CoP describes advocacy & public policy engagement

<p>Best Practice 1:</p> <p><i>Publicly advocate the importance of action in relation to one or more UN goals/issues.</i></p>	<p>We work with industry associations to inform public policy on sustainability challenges, sharing our experience and advancing practical solutions. Also, MYTILINEOS is engaging in activities that could either directly or indirectly influence public policy on climate-related issues. We have direct engagement with policy makers in terms of cap & trade, clean energy generation and climate finance. We engage with trade associations such as: Eurometaux, European Aluminium, Business Europe and COGEN Europe. We engage also with funding research organizations.</p> <p>In 2008, MYTILINEOS become one of the first members of the SEV Business Council for Sustainable Development (BCSD) which promotes business models in line with global sustainability goals. Through the Council initiatives, the company's CSR manager and other directors participated in key actions related mainly to SDG's promotion to further advocate our commitment to the goals.</p> <p>Since 2008, our CEO has been communicating publicly our commitment to the implementation of the principles of the Global Compact.</p> <p>MYTILINEOS is an ambassador of the Greek Sustainability Code since 2015. The company was actively involved in Code's development, either by submitting its views and initiatives, through the open consultation or by participating in the relevant working groups.</p> <p>Since 2016, the company is a voluntary participant in the global sustainable development initiative CDP - WATER, by disclosing extensive quantitative and qualitative information on the management of water resources in the context of its business activity.</p> <p>Our "Code of Business Conduct" and our "Suppliers and Business Partners Code of Conduct" are publicly available to all our Stakeholders groups and is aligned with international references such as the Universal</p>
---	---

	Declaration of Human Rights, the Universal Declaration of the ILO relative to the principles and fundamental rights at work and the principles of the Global Compact.
<p>Best Practice 2: <i>Other established or emerging best practices</i></p>	<ul style="list-style-type: none"> • MYTILINEOS Human Rights Policy • MYTILINEOS CSR Policy • MYTILINEOS Code of Conduct • MYTILINEOS Suppliers & Business Partners Code of Conduct • MYTILINEOS Stakeholders Engagement Process <p>www.mytilineos.gr/sustainability/key-sustainable-development-policies/</p>

Criterion 18: The CoP describes partnerships & collective action

<p>Best Practice 1: <i>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.</i></p>	<ul style="list-style-type: none"> • Program: “Making Children Smile” in collaboration with the “Mission ANTHROPOS” organisation. Impact: MYTILINEOS offered free dental checks to 450 children from vulnerable social groups, as well as dental treatment to 388 of them, performing 1,201 dental medical acts in total, ruling out all forms of discrimination. The children who participated in the program were between the ages of 6 and 18 and come from the Social Services of Municipalities, Public Benefit Foundations and non-profit organizations, all of which are based in the Prefecture of Attica. The total investment in the program created a social value of €479,019.90 (according to the “Social Return On Investment” methodology) with an SROI rate of 7.58:1. This means that for every 1 euro invested in the program, 7.58 euros of social value were created. • #HoMellon program in collaboration with the “Know!” Social Entrepreneurship Network. Impact: MYTILINEOS, wishing to support the reintegration of homeless people and those living under precarious housing conditions or in places unsuitable for residence, has given 25 unemployed citizens the opportunity to successfully complete the first 6-month #HoMellon professional skills development pilot cycle. The program also offered to the beneficiaries clothing-personal care, technological equipment and ways of interconnecting with the labor market. At the program’s completion, 17 of the 25 beneficiaries had joined the labor market, 3 had their own residence, while the remaining 5, empowered and motivated by the program, continue to improve their lives. • In the context of the environmental R&D of the Metallurgy Business Unit, the Company continued its efforts in the development of technologies for the exploitation of bauxite residues as well as for the implementation of innovative methods to produce alumina from alternative sources. In 2020, the Metallurgy Business Unit participated in a total of 22 research projects (such as, indicatively: “SCALE”, “REMOVAL”, “ENSUREAL”, “AlSiCal”, “BIORECOVER” and “ReActiv”), representing €6.9 million of investments in total. These projects focus on the exploitation of bauxite residues for producing scandium, iron, alumina, cement additives and construction products, on the production of alumina from alternative (secondary) sources, on heat recovery and the use of RES in aluminium production, on new tools and training courses for engineers and workmen employed in the raw materials / metallurgy sector, as well as on new aluminium recycling technologies.
--	--

	<p>The above partnerships projects are indicative. More projects can be found within our Sustainable Development Report 2020 (pages 120-121): https://www.mytilineos.gr/sustainability/reports/</p>
<p>Best Practice 2: <i>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain</i></p>	<p>Multi-stakeholder partnerships are critical to solving many sustainability challenges. To this end, MYTILINEOS is developing initiatives and is participating as an active member in voluntary national and international organizations, seeking to promote CSR and SDGs, to exchange views on sustainability-related issues, to improve its social and environmental contribution and to develop responsible practices in the broader business community.</p> <p>Participation in Socially Responsible Investment Indexes: MYTILINEOS by disclosing its performance on an annual basis, respond to specific analysts or companies' assessments, in sustainable investing area.</p> <p>Please advise our Sustainable Development Report 2020 (ESG Statement page 6): https://www.mytilineos.gr/sustainability/reports/</p> <p>CSR & Sustainable Development commitments: MYTILINEOS voluntarily participates, cooperates, and supports the following Corporate Social Responsibility / Sustainable Development initiatives.</p> <p>Please advise our Sustainable Development Report 2020 (page 28): https://www.mytilineos.gr/sustainability/reports/</p>

Corporate Sustainability Governance and Leadership

Criterion 19: The CoP describes CEO commitment & leadership

<p>Best Practice 1: <i>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN GC.</i></p>	<ul style="list-style-type: none"> • Chairman's statement of Continued Support (CoP 2020) • Chairman's message (Sustainable Development Report 2020): https://www.mytilineos.gr/sustainability/reports/
<p>Best Practice 2: <i>CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.</i></p>	<p>The CEO leads the Executive committee which takes place on a monthly basis. The issues that come first on the Council's agenda are the Environmental as well as the Health & Safety performance in all MYTILINEOS Business Sectors.</p>

Criterion 20: The CoP describes Board adoption & oversight

<p>Best Practice 1: <i>Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS's Board of Directors supports the UN Global Compact. • The Executive Committee quarterly reviews and guides sustainability performance (mainly on Health & Safety, Environmental and Human Resources issues). The chairman is Mr. Evangelos Mytilineos, Chairman & CEO of the company. • Also, MYTILINEOS's CSR Committee, is primarily responsible for supervising and ensuring the correct implementation of the company's CSR Governance in terms of policies, actions, and results about environmental, social and ethical issues. The Committee reviews and approves the annual Sustainable Development Report ensuring that all
--	--

	<p>material issues are addressed. Also, it may act as advisor to the Executive Management on the above issues, to assist their implementation in a more complete manner.</p>
<p>Best Practice 2: <i>Board (or committee), where permissible, approves formal reporting on corporate sustainability (CoP).</i></p>	<ul style="list-style-type: none"> • The CSR Committee approves the material issues and their main disclosures for the formal CSR reporting purposes (e.g. Sustainable Development Report, UNGC CoP, and ISO 26000 CSR international standard).
<p>Best Practice 3: <i>Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.</i></p>	<p>Apart of the CSR Committee, the General Manager of Corporate Governance and Sustainable Development Division (member of the BoD and member of the Executive committee) is responsible for regularly communicating to members of the Board and the Executive Committee about key sustainability issues and their potential (or realized) business impact. More information about CSR Governance can be found within our Sustainable Development Report 2020 (page 148) : https://www.mytilineos.gr/sustainability/reports/</p>

Criterion 21: The CoP describes Stakeholders engagement

<p>Best Practice 1: <i>Publicly recognize responsibility for the company's impacts on internal and external stakeholders.</i></p>	<p>Proactively engaging with our key stakeholders is an important part of defining the issues that are material to our business, current and potential. The engagement with internal and external Stakeholders practically puts in place MYTILINEOS long standing commitment for responsible entrepreneurship and open, systematic and sincere social dialogue, as a key element of the social capital that the company uses, to ensure its sustainability and the added value creation for society.</p> <p>For more information please advise our:</p> <ul style="list-style-type: none"> • Stakeholder Consultation process: https://www.mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-stakeholder-engagement • Sustainable Development Report 2020 (“Materiality” section pages 46-48): https://www.mytilineos.gr/sustainability/reports/ • Sustainable Development Report 2020 (“Stakeholder engagement” section pages 49-54): https://www.mytilineos.gr/sustainability/reports/
<p>Best Practice 2: <i>Define sustainability strategies, and policies in consultation with key stakeholders.</i></p>	<p>Proactively we are engaging with our key stakeholders as an important part of defining the sustainability issues that are material to our business, current and potential.</p> <p>Policies in consultation with key stakeholders (Metallurgy Sector):</p> <ul style="list-style-type: none"> • Human Rights policy (Stakeholder Consultation 2020) • Training and skill development practices (Stakeholder Consultation 2019) • Suppliers’ policy & Business Partners code of Conduct (Stakeholder Consultation 2018) • Social Contribution policy (Stakeholder Consultation 2017) • Environmental policy (Stakeholder Consultation 2016) • Health & Safety Policy (Stakeholder Consultation 2015)

<p>Best Practice 3: <i>Consult stakeholders in dealing with challenges and invite them to take active part in reviewing performance.</i></p>	<p>Stakeholder engagement is an important element of our approach to sustainability. It builds trust, improves understanding of the impacts from our operations and addresses stakeholder concerns, while providing input to our materiality analysis process.</p> <ul style="list-style-type: none">• Sustainable Development Report 2020 (“Materiality” section pages 38-41): https://www.mytilineos.gr/sustainability/reports/• Sustainable Development Report 2020 (“Stakeholder Engagement” section pages 49-54): https://www.mytilineos.gr/sustainability/reports/
<p>Best Practice 4: <i>Establish channels to engage with stakeholders to hear their ideas and address their concerns and protect ‘whistle-blowers’.</i></p>	<p>The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders’ specific needs and expectations.</p> <p>More information can be found within our Sustainable Development Report 2020 (“Stakeholder Engagement” section pages 49-54): https://www.mytilineos.gr/sustainability/reports/</p>