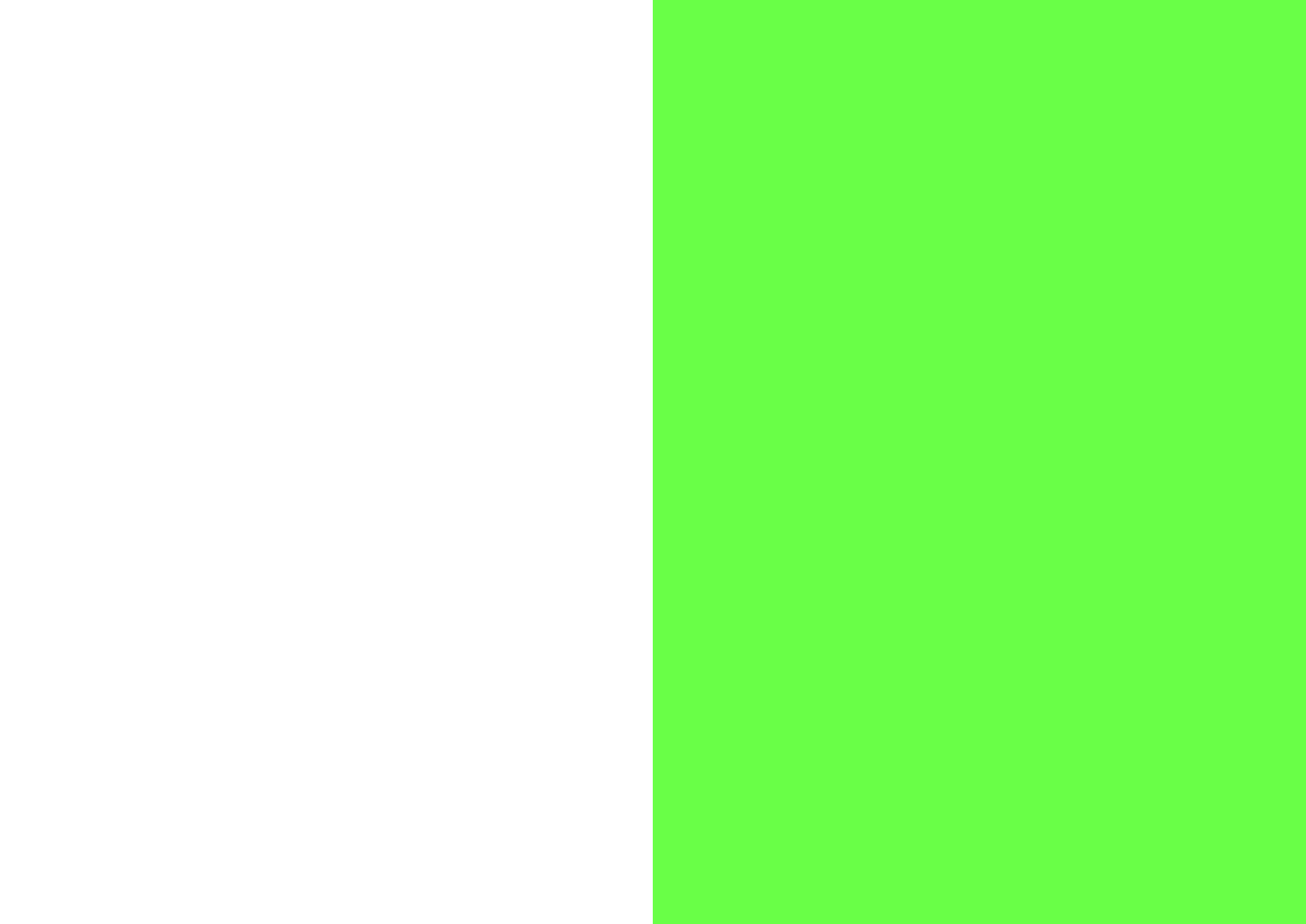


“Net Zero Action From challenge to opportunity for a sustainable future”



MYTILINEOS



Contents

6	ESG Performance Statement
8	Key ESG Targets
10	Parameters of the Sustainable Development Report
13	Message from the Chairman
17	Profile, activity sectors and Business Units
24	MYTILINEOS' response to the SARS-CoV-2 pandemic
26	Strategic priorities
30	How we create value
32	Business Model
34	ESG Performance Tools
36	Sustainable Development Strategy
44	Climate Change and Energy Transition
46	Materiality process
49	Stakeholder Engagement
56	Financial performance 2020 & outlook for 2021

Environment

62	Environmental policy
64	Adaptation to climate change
64	Management Approach
65	Results
67	Energy & Air emissions
67	Management Approach
70	Results
73	Environmental restoration & Biodiversity
73	Management Approach
75	Results
77	Circular economy (Waste management)
77	Management Approach
79	Results
84	Water management
84	Management Approach
86	Results
88	Pollution prevention
88	Management Approach
90	Results
91	Other significant Environmental topics
91	Raw and other materials
92	ESG KPIs

Society

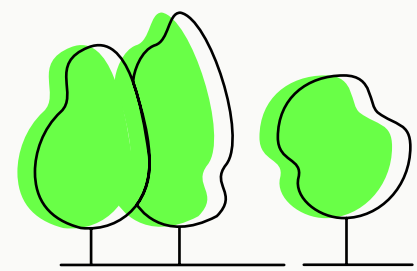
96	Occupational Health and Safety
96	Management Approach
99	Results
104	Employment
104	Management Approach
106	Results
111	Human Rights
111	Management Approach
113	Results
117	Sustainability of local communities
117	Management Approach
119	Results
124	Emergency Response Plans
124	Management Approach
125	Results
126	Customer Health & Safety
126	Management Approach
127	Results
128	Communication & Marketing
128	Management Approach
129	Results
130	Other significant Social topics
130	Employee Training & Evaluation
131	Diversity & Equal opportunities
133	Supply chain management
134	ESG KPIs

Governance

138	Corporate Governance
140	Anti-Corruption and Bribery
140	Management Approach
142	Results
143	Legal Compliance
143	Management Approach
144	Results
148	Other significant Governance topics
148	Governance of Corporate Social Responsibility
149	Organization and implementation of risk management
150	Personal Data Protection
152	ESG KPIs

Sustainability Standards & Assurance

156	Independent Assurance Statement
161	The Greek Sustainability Code
162	ESG Reporting Guide 2020 – Athens Stock Exchange
164	TCFD Content Index
166	UN Global Compact Communication on Progress (Advanced Level)
167	ESG Content Index – Metallurgy Business Unit
168	GRI Content Index
179	Accountability Principles Standard AA1000 Index
180	Index of Key Terms

















“We are pioneers,
a company that shows the way to a greener and
more environmentally friendly industry”



ESG Performance Statement¹

The purpose of this statement is to provide MYTILINEOS' Stakeholders with up-to-date information on Environmental, Social and Governance (ESG) issues which are of interest to them.² It summarizes **the Company's commitments for the years ahead and its distinctions and performance** in 2020, reflecting its ability to create value as part of its commitment to Sustainable Development.

Commitments				
    	2021			
		<ul style="list-style-type: none">To join the CDP Climate Change international sustainability initiative.To submit a Letter of Commitment to the Science-Based Targets Initiative for the independent verification of the current targets concerning the reduction of the Company's carbon footprint.To join the official supporters of the Task Force on Climate-Related Financial Disclosures (TCFD) international initiative.To incorporate in the Materiality process for non-Financial disclosures, elements of the SASB (Sustainability Accounting Standards Board) methodology for the identification of Material Topics.		
	2022			
		<ul style="list-style-type: none">To obtain the ASI Performance Standard certification of the Aluminium Stewardship Initiative (ASI) international organization for the Metallurgy Business Unit³.To implement the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) international climate initiative.		

ESG ratings				
MYTILINEOS' long-standing commitment to Sustainable Development is reflected through the significant ESG performance it has already achieved. Nevertheless, the Company seeks to constantly evolve and makes the most of the recommendations for improvement it receives from the independent ESG rating organizations in which it participates.				
	Performance	Ranking	Sector or Global Average	Rating scale (High/Low)
	29,98 Medium risk level	4/105 Industrial Conglomerates sector	-	100/0
	2 (Environmental)	-	-	1/10
	1 (Social)	-	-	1/10
	4 (Governance)	-	-	1/10
	75	26/234 Diversified Industrials sector	-	100/0
	B (Water Security)	-	B (Global avg.)	A/D
	265,5	AA Conglomerates' sector	BBB	300/0
	4,1	8% of best performers Diversified Industrials sector		5/0
	62,4 (ESG performance)	-	52 (Global avg.)	100/0
	70,9 (UNGC performance)	-	50,3 (Global avg.)	100/0
	62,8	-	-	100/0
	71 (ESG / CSR performance)	26/18.425 Global ranking	-	100/0
Performance data as at 31 December 2020				

1. The acronym "ESG" refers to issues related to the environmental, social and governance.
2. According to the results of the Materiality process 2020 (p. 47)
3. This certification relates to the development, application, and maintenance of responsible environmental, social and governance standards to ensure responsible production and rational use of aluminium.

ESG Performance

- E
- Climate Change** • In 2020, we set ambitious targets for the reduction of our direct and indirect carbon dioxide emissions and for the decarbonization of our activities by 2030 and 2050. • We are consistently supporting with investments in RES the production of clean energy, which in 2020 rose to 8.5% of our total production, increased by 38% relative to 2019. • The absolute direct and indirect (Scope 1 & Scope 2) CO₂ emissions decreased by nearly 4% relative to their 2019 levels.

Air Quality: We reduced by 10% the total quantity of our NO_x/SO_x emissions, and by 14% the quantity of particulates emissions.

Environmental management: • We implement an ISO 14001:2015 certified environmental management system, and we also promote the systematic application of Best Available Techniques in all our Business Units. • Our expenditures for the protection of the environment in 2020 amounted to €71.6 million. • In 2020 there were no incidents of any form of pollution of the natural environment from our production activity.

Circular economy: In line with the principles of the circular economy, we increased the production of secondary aluminium using aluminium scrap as raw material, which grew to >20% of our total production, significantly contributing to the reduction of energy consumption and air emissions.

- Biodiversity:** • During 2020 there were no incidents of degradation of biodiversity because of the Company's activities. • We continued our mining activity in a responsible and sustainable manner, increasing to 83.3% the rehabilitation rate of the total exploitable land area used in mining operations, without earmarking new land areas for mining purposes.
- Water:** We withdraw water (ground water) from renewable sources, while our activity does not limit or threaten the adequacy of the water quantity available in the aquifer.
- Waste:** • The environmental R&D expenditures of the Metallurgy Business Unit stood at €6.5 million, representing investments in specialized programs for the development of new technologies for the exploitation of bauxite residues. **ASI** • The percentage of solid waste recycled and reused increased further in 2020, reaching 18.6%, while the amount of waste directed to landfills decreased by 39.1% compared to 2019.
- Environmental compliance:** There have been no incidents of non-compliance with environmental laws and regulations, as a result of which the Company avoided direct financial risks (e.g., fines) as well as indirect ones related to its image and reputation.

- S
- Occupational Health and Safety:** • Regarding the health and safety of direct and indirect employees, no occupational diseases were recorded, while lost time injury rates (with interruption of work for 3 or more days) per 200,000 work hours were kept at very low levels (0.19 & 0.14 respectively) with all workers having returned to work in good health. • Despite the efforts that are made on an ongoing basis, it is with regret that we report one fatality due to electrocution, involving an employee of a contractor in the Power & Gas Business Unit. • We continued to implement supplementary pharmaceutical and hospital care programs for all our employees and their family members, and we also secured privileged prices for SARS-CoV-2 RNA detection molecular tests, giving top priority, as always, to health issues.

Labor practices: • As an industrial Company, we increased by 5% our percentage share of total employment (direct & indirect) in our sector, in order to ensure our smooth operation, while we also kept the percentage shares of part-time and fixed-term employees very low. • Despite the adverse circumstances of the COVID-19 pandemic, we continued to invest in the development of technical and personal skills, covering 65% of our human resources with targeted vocational education and training programs.

- Human rights:** • We proceeded with the elaboration of a specialized Human Rights Policy which expresses the Company's zero tolerance of any violation of Human Rights. • We fully protected labor rights as well as the other categories of Human Rights related to our activity.
- Social Investments:** • Continuing with the implementation of our social policy, we implemented new social programs and investments in local infrastructure worth €3.21 million in total, benefiting nearly 30,000 citizens and making a significant contribution to all social aspects of the Sustainable Development Goals. • At the same time, the management of social issues, both centrally and at local level, has prevented the occurrence of risks that might have significant negative impacts on our financial results.
- Responsible supply chain:** We invested in training 40 of our key suppliers in the 10 Principles of the UN Global Compact and in Sustainable Development.

- G
- Corporate conduct:** • We further integrate the concept of sustainability into our DNA, making it a key pillar of our strategy, decision-making, and operations. • We implemented a custom training program in the Company's Code of Business Conduct for 300 employees. • We applied our "Zero Tolerance" approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally. • We successfully continued the dialogue with our Stakeholders, implementing a special thematic Consultation focused on the creation of our corporate Human Rights Policy, gaining the almost universal acceptance and support of all our Stakeholder groups for this initiative of the Company. • There were no financial sanctions arising from violations of our Code of Business Conduct. • We have strictly complied

- with the legislation in force regarding our business activity; as a result, there were no incidents of non-compliance with the legislation nor any related environmental, social and economic impacts.
- Corporate Governance:** • Seeking to implement higher Corporate Governance standards, we continue our voluntary adaptation to the UK Corporate Governance Code – 2018, and have already aligned ourselves with approximately 70% of the relevant requirements. • We strengthen the supervision mechanism using which the Board of Directors oversees sustainable development issues, by creating a new Board Committee (Sustainable Development Committee). • We incorporate ESG KPIs into the variable fees of the Board members' remuneration.

Key ESG Targets

(Related to the ESG strategy defined by the Company)

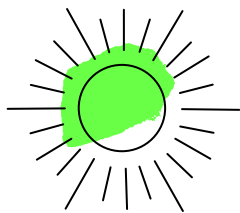
E		Targets	Achievement time		
E	Reduction of total Scope 1&2 CO ₂ emissions (relative to 2019 data)	-30%			
	Metallurgy Business Unit: Reduction of total Scope 1&2 CO ₂ emissions (relative to 2019 data) ASI	-65%			
	Metallurgy Business Unit: Reduction of specific CO ₂ emissions per ton of aluminium produced (relative to 2019 data) ASI	-75%			
	Power & Gas Business Unit: Reduction of specific CO ₂ emissions per KWh produced (relative to 2019 data)	-50%			
	Sustainable Engineering Solutions (SES) Business Unit (relative to 2019 data)	Zero carbon footprint			
	Renewables & Storage Development (RSD) Business Unit (relative to 2019 data)	Zero carbon footprint			
	Metallurgy Business Unit: Fluorine emissions (kg/t Al) ASI	1.2	Annually		
	Metallurgy Business Unit: Carbon tetrafluoride emissions (kg CF ₄ /tAl) ASI	<0.06	Annually		
	Production of secondary aluminium (t)	65,000			
	Metallurgy Business Unit: Total water withdrawal (industrial use & drinking, m ³ /day) ASI	≤13,000			
	Serious environmental incidents	0	Annually		
	Rehabilitation rate of total exploitable land area used in mining operations	87%			
S	Number of fatalities	0	Annually		
	Occupational diseases	0	Annually		
	Number of serious injuries	0	Annually		
	Total recordable injury rate (per 200,000 work hours)	Continuous improvement	Annually		
	Human Rights violation incidents	0	Annually		
	United Nations Women's Empowerment Principles (UN WEPs) initiative	Adoption of Principles			
	Percentage of employees who received formal performance evaluation reviews ¹	>80%	Annually		

G		Targets	Achievement time		
G	Retention rate for full-time employees	>90%	Annually		
	Percentage of women in positions with extended responsibility	>20%			
	Number of citizens benefiting from the development of social programs	-250,000			
	Percentage of revenues from sustainable products (out of the Company's total revenues)	>30%			
	Rate of assessment of key suppliers based on ESG criteria	60%			
	Confirmed incidents of corruption and bribery	0	Annually		
G	Financial sanctions imposed for violations of the Code of Business Conduct (€)	0	Annually		
	Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	Annually		

Short-term Targets (1-3 years)	
Medium-term Targets (4-7 years)	
Long-term targets (8-10 years)	

1. Concerns the percentage of employees who meet the conditions for inclusion in the annual performance evaluation process (i.e., excluding those working in the Company for less than 6 months, as well as special categories of employees based on their role/scope of work).

Parameters of the Sustainable Development Report



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

Report preparation principles

The Report was prepared according to the Standards of the Global Reporting Initiative (GRI STANDARDS), the 10 Principles of the UN Global Compact, the AA1000AP 2018 Accountability Principles Standard and taking into account the international standard of Corporate Social Responsibility ISO 26000. In addition, the Report is in line with the relevant obligations arising from Greek legislation and European Directives.

Scope of the Report

This Report covers the period from 1/1/2020 to 31/12/2020 **[GRI 102-50]** and contains data about the following activities per Business Unit of the Company.

Business Unit	Activities
Metallurgy ASI	<ul style="list-style-type: none">• Bauxite mining.• Production of anhydrous and hydrated alumina.• Production of aluminium alloys.• Operation of port facilities, loading and unloading of products.• Treatment of aluminium alloys.
Electric Power & Gas Trading	<ul style="list-style-type: none">• Electric Power generation.• Development, organization, supervision of construction, operation and maintenance of RES power stations.• Management and sale of electric power.• Supply of electricity to the retail market.• Supply of natural gas to the retail market.
Sustainable Engineering Solutions ¹	<ul style="list-style-type: none">• Development, management, construction, operation and maintenance of energy projects.• Development, management, construction, operation and maintenance of building construction and infrastructure projects.• Development, management, manufacture, operation and maintenance of electromechanical equipment for energy and infrastructure projects.• Dynamic development of Sustainable Engineering projects.• Construction of solid and liquid waste treatment units.• Construction of hybrid and off-grid energy projects.• Execution of innovative, first-of-kind projects.
Renewables And Storage Development ²	<ul style="list-style-type: none">• Study• Supply• Construction / Operation and Maintenance (EPC/O&M) of photovoltaic projects, energy storage and large-scale hybrid projects.

1. Transformation and renaming of the EPC & Infrastructure Projects Business Unit of MYTILINEOS into "Sustainable Engineering Solutions" Business Unit from 08/07/2020.
2. Creation of the new "Renewables & Storage Development" Business Unit from 10/02/2020.

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

Report details

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

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

The calculation of the data composing the non-financial performance indicators included in the Report generally follows the definitions and the methodology described in the respective GRI Standards. The data are checked and verified using the SAP system (where available), as well as using internationally accepted verification methods which the Company has available, such as the OHSAS 18001 and ISO 45001 Occupational Health and Safety Management Systems, the ISO 14001 Environmental Management Standard, the ISO 14064 Greenhouse Gas Inventory Management and Reporting System (where this is in place) and the ISO 9001 Quality Management Standard. Also, data from direct measurements or estimates are included, while for comparison purposes use is primarily made of three-year historical data. Performance results at top level are calculated by consolidating (aggregating the relevant quantities) the individual data obtained from the Business Units and subsidiaries of the Company.

The content focuses on the sustainability issues which are significant to the achievement of the strategic goals of MYTILINEOS and which have been identified based on the Company's formal Materiality process, in accordance with the GRI Standards **[GRI 102-40]** to **[GRI 102-47]**. The information presented in the Report is supplemented by the required references to the Company's Annual Report 2020. Some figures have been rounded for reasons of consistency and better presentation.

Significant changes from previous reporting periods **[GRI 102-49]**

- The inclusion of the new "Renewables and Storage Development" Business Unit.
- The transformation of the EPC & Infrastructure Projects Business Unit to the "Sustainable Engineering Solutions" Business Unit.

Restatements of information **[GRI 102-48]**

Compared to the previous report (2019), this Report contains the following new information and data:

- A new section titled "MYTILINEOS' response to the SARS-CoV-2 pandemic".
- A new section titled "Tackling climate change and energy transition".
- A section on the new Material topic "Communication & Marketing".
- A section titled "Personal Data Protection".
- A new table presenting the Company's alignment with the recommendations of the TCFD initiative (TCFD Content Index).
- A new table presenting the Company's alignment with the AA1000AP Accountability Principles.
- The reporting of data exclusively for the Metallurgy Business Unit in the context of the Aluminium plant's certification in accordance with the ASI Performance Standard of the Aluminium Stewardship Initiative (ASI). Throughout this Report, these items will be accompanied by the badge: **ASI**

Communication **[GRI 102-53]**

To send your remarks, comments or suggestions about the Report's content, please use the custom-designed questionnaire available at: mytilineos.gr/sustainability/sustainable-development-reporting/, while for more information or clarifications, please use the contact details given below:

Mr. George Galanis
Sustainable Development Director
MYTILINEOS S.A.
8, Artemidos Street
Maroussi, 15125 Athens
E-mail: georgios.galanis@mytilineos.gr



NetZeroAction.

From **challenge** to **opportunity** for accelerated & sustainable **value creation**.

Message from the Chairman

[GRI 102-14]

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.

In this environment, the strong financial results of MYTILINEOS attest in the clearest possible way that we have successfully absorbed the shocks of the pandemic. Drawing on our strategic advantages, on the tireless efforts of our people and on our dedication to our values, we remain on a stable growth path and, building on solid foundations, we are confident that we will achieve the goals we have set for the coming years.

This year, despite the adverse conditions, we ensured the smooth operation of all our Business Units: The Metallurgy Business Unit and the Power & Gas Business Unit remained fully operational, while the Sustainable Engineering Solutions Business Unit and the Renewables & Storage Development Business Unit showed slight delays in the completion of current projects and the contractualization of new ones.

Our priority has been the safety of our employees. We designed and carried out a concerted plan to safeguard their health, involving the implementation of protocols, rules and measures, and conducted Covid-19 diagnostic tests on a regular basis and always before the employees' arrival for work, at all Company facilities. Moreover, business travel was

restricted to the absolutely necessary, teleworking was universally implemented wherever possible, and special work arrangements were followed for employees that belong to clinically vulnerable groups.

Despite the special circumstances that prevailed throughout most of the year, we did not deviate from our broader strategic goals. The need for urgent action to tackle climate change prompted us at MYTILINEOS to take a big step forward in order to contribute to the efforts to drastically deal with this 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. For it is only by setting bold and high sustainability goals, initiated by us, industrial companies, that we can ensure the creation of long-term value for all and a collective sustainable future for the next generations. We are proud to be the first Greek company, as well as one of the first industries in Europe and globally, to set clear goals and pledge to minimize its carbon footprint. By doing so, we become pioneers, a company that shows the way to a greener and more environmentally friendly industry. The industry of tomorrow, based on the ESG performance indicators for Environment, Society and Governance.

“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.”



Over the past year, we maintained our high-level performances improving our ESG ratings, while we also secured our participation in even more indicators for Socially Responsible Enterprises. Our goal is to enhance the assessment of our corporate value and to effectively manage ESG risks and opportunities, as well as to fully integrate the ESG criteria into our strategic decision-making.

Continuing with the implementation of our social policy, we carried out actions in key social sectors that contribute to the Sustainable Development Goals. Most notable was the Company's contribution to Sustainable Development Goal 3 (Good Health and Well-Being), where we strongly focused on addressing and mitigating the consequences of the SARS-CoV-2 pandemic. At the same time, however, we also contributed to other Sustainable Development Goals, by strengthening local infrastructure and services, supporting culture, sports and quality education, and by acting in order to alleviate poverty and unemployment and reduce national insecurity.

In the context of creating a responsible supply chain for MYTILINEOS, we organized the first cycle of a new educational initiative focusing on sustainability, which was attended by suppliers and business partners from all sectors of our business activity. The purpose of this initiative was to raise participants' awareness of basic sustainability principles, human rights, working conditions, environmental protection and the fight against corruption, thus contributing to the efforts to promote the principles of Sustainable Development in the entire business community. In tandem with the above, last year we developed a new corporate policy regarding the protection and respect for Human Rights, in dialogue with our Social Partners, during which MYTILINEOS listened to the views of all its Social Partners on the key points of the policy and integrated them into its final corporate policy document.

The issue of Sustainable Development has become a key priority and a major aspect of the Company's strategy and organization. To obtain optimum results of our goals we created a new General Division for Corporate Governance and Sustainable Development, which will monitor the implementation of all relevant activities and will ensure alignment of the Company's strategy with the Sustainable Development framework. In addition, we completed the acquisition of the subsidiary METKA EGN, which is rapidly evolving into one of the largest manufacturers of photovoltaic and energy storage projects worldwide, and we are creating a new Business Unit – the Renewables and Storage Development (RSD) Business Unit.

We also transformed the EPC and Infrastructure Projects Sector (ex METKA) into the modern and innovative Sustainable Engineering Solutions (SES) Business Unit, which will function as an individual General Division. The new Business Unit, in addition to the construction of thermal power plants and selected infrastructure projects it traditionally carries out, will

focus on the dynamic development of Sustainable Development projects. Indicative examples of projects of this type are solid and liquid waste management projects, hybrid and off-grid energy projects, energy upgrade projects, and innovative first-of-kind energy projects (e.g., hydrogen projects). Finally, based on international good practices and the developments in the Greek energy sector, we consolidated the Gas Trading Business Unit with the Electric Power Business Unit, with the financial results of these two activities also being consolidated on the Company's financial statements.

2020 will go down in history as a year of extraordinary challenges. The overall environment remains particularly fluid, as there are still significant uncertainties, concerning both the speed of vaccinations and the time it will take until the measures to bolster the economy start to deliver. However, the recovery in aluminium prices, which rose back to nearly pre-pandemic levels, our success in maintaining competitive production costs, the improvement in the domestic electric power consumption and the gradual increase of its prices, coupled with the fact that major new projects in the Renewables & Storage Development (RSD) and Sustainable Engineering Solutions (SES) sectors are now mature for implementation, lay strong foundations for strengthening MYTILINEOS' economic performance in 2021, always in the context of Sustainable Development.

Evangelos G. Mytilineos

Chairman of the Board of Directors and
Chief Executive Officer



Profile, activity sectors and Business Units

Vision

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

Mission

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

Corporate Values [GRI 102-16]

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

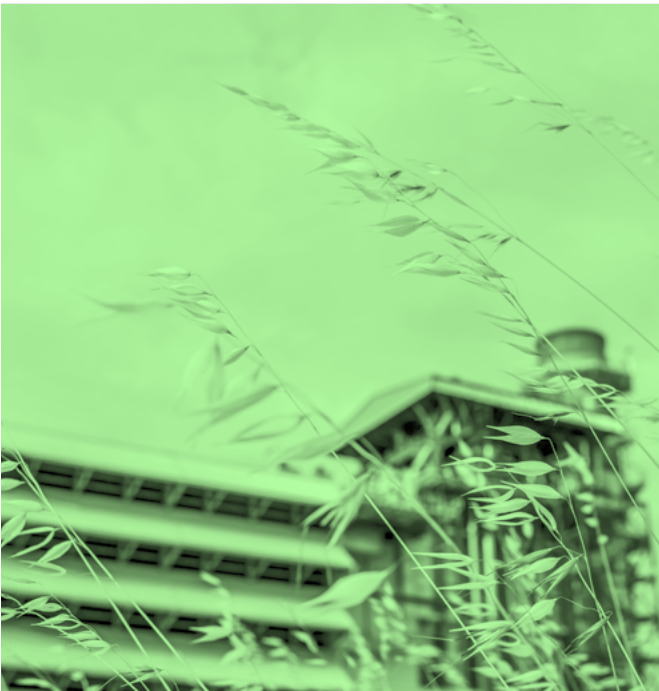
Profile

Founded in Greece in 1990, MYTILINEOS [GRI 102-1] has been listed on the Athens Stock Exchange since 1995 and is a leading international industrial and energy company. Its complex and wide-ranging business activity is a driving force for the Greek economy, while at the same time the Company has a dynamic presence in all 5 continents. As a responsible industrial company, it seeks, through continuous reinvestment, to continuously develop and maximize business and economic synergies, to maintain leadership in each business activity sector and to apply the principles of Sustainable Development across the entire range of its core activities. At the end of 2020, the consolidated turnover of MYTILINEOS stood at nearly **€1.9 billion**. MYTILINEOS is active in the sectors of Metallurgy, Power and Gas, Sustainable Engineering Solutions, and Renewables & Storage Development. [GRI 102-2] [GRI 102-6]



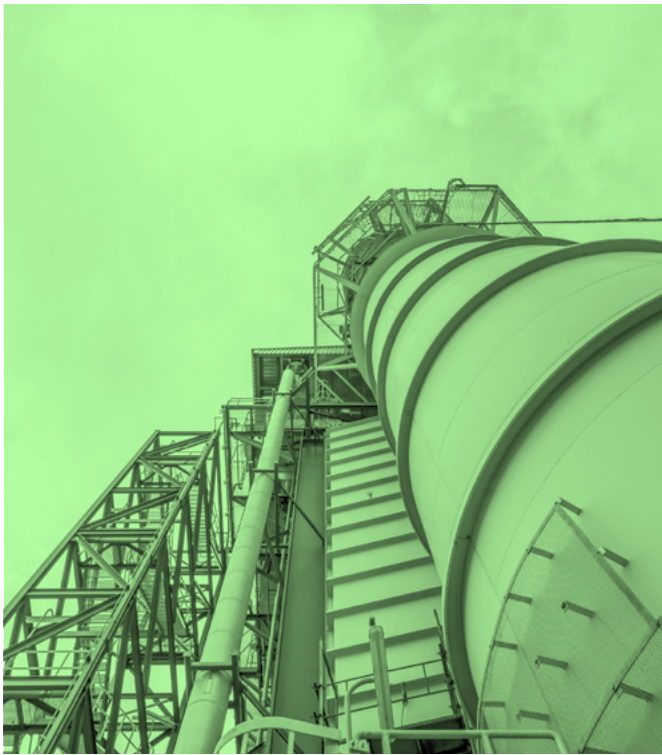
Metallurgy Business Unit

MYTILINEOS owns the only vertically integrated production and trading plant of alumina and aluminium in the European Union, offering high quality products mainly to enterprises producing products of rolling, processing/aluminium extrusion and aluminium metal production industries. [ASI]



Power & Gas Business Unit

The activity of MYTILINEOS extends from the operation of gas-fired thermal power generation plants to the development and operation of Renewable Energy Sources (RES) plants, and the production and supply of electric power and natural gas. It is the largest private electric power producer in Greece, with an energy portfolio of 1,200 MW thermal production capacity and over 200 MW Renewable Energy Sources capacity, covering approximately 12% of electricity demand in Greece. Regarding the supply of electricity and gas, Protergia continued to strengthen its position as the leading independent private supplier, increasing its market share to 7.7% at the end of 2020 (2019: 5.5%), and is currently representing more than 285,000 customers in electricity and gas.



Sustainable Engineering Solutions Business Unit

MYTILINEOS invests strategically in the national and global goal of energy transition, placing all its forces at the service of Sustainable Development. The Company proceeded to transform its EPC & Integrated Projects Business Unit to a new modern and innovative Business Unit, the Sustainable Engineering Solutions Business Unit (SES BU). In addition to the construction of thermal power stations and selected construction projects which it traditionally carries out, the SES Business Unit strengthens its activity with the dynamic development of Sustainable Engineering projects. It undertakes and implements turn-key energy projects, providing the complete range of engineering, procurement and construction services and successfully penetrating developing markets abroad, with projects under way in parallel in the markets of Europe, Turkey, the Middle East, Asia, North and West Africa, as one of Greece's major exporters. In particular, it undertakes the most complex and demanding projects on behalf of clients and investors in the fields of: Development, construction and operation of power plants as well as construction of transmission networks and substations, public and private sector infrastructure projects, including concession and public-private partnership (PPP) projects, environmental management and liquid and solid waste management projects, development, construction and operation of energy efficiency projects, including projects implemented through Energy Performance Contracts (EPCs), development and construction of hybrid and off-grid projects, as well as sustainable development projects using new technologies, digitization and smart management of energy production systems.



Renewables & Storage Development Business Unit

MYTILINEOS, acknowledging that its former subsidiary METKA EGN has already established itself as one of the leading manufacturers of photovoltaic and energy storage projects worldwide, proceeded to create a new Business Unit. The new Business Unit of MYTILINEOS is a global manufacturer, investor and EPC/O&M contractor for the full range of solar energy and storage projects, from autonomous solar parks and energy storage projects to complex hybrid projects. With strong technical capabilities and a global business scope, the Company designs and implements high quality projects for its customers worldwide. The Business Unit's broader strategy also includes the use of the Build-Own-Transfer ("BOT") business model for the development of photovoltaic projects, utilizing construction and development technology proprietary to MYTILINEOS and having successfully completed over 1.2 GW of solar power plants and 200 MW of energy storage projects on all five continents. The clients of the Business Unit are the global markets for the production and storage of solar energy, in particular Electric Power Production and Distribution Companies, Institutional Investors, Industries and Private Investors.

Key Figures 2020 [GRI 102-7]

24

Production Plants
(Industrial: 10 – RES: 14 in full operation)

3,856

Employees
(Direct & Indirect)

€1,899

m. Turnover

€432

m. Revenues
from products with environmental and/or social benefits.

€129

m. Net Profits

€3,991.8

m. Total Capitalisation
(Equity 39,4% – Liabilities 60,6%)

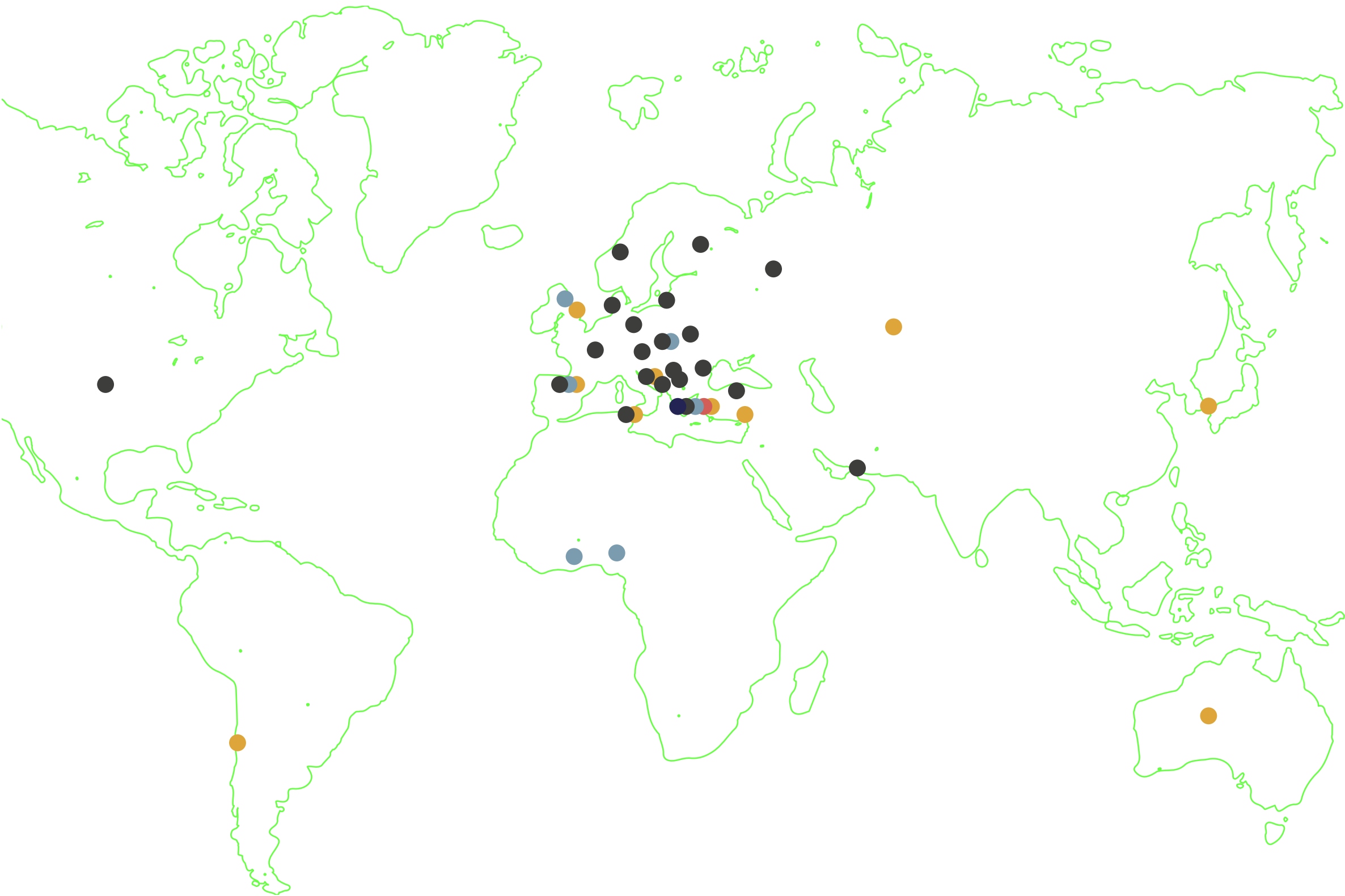
698.7

kt Sales of Metallurgical Products
(Alumina: 67,8% – Aluminium: 32,2%) [ASI]

6,071.3

GWh Electricity sold

Countries of activity 2020 [GRI 102-4]



● **MYTILINEOS** [GRI 102-3]

Head Office
8, Artemidos Street
Maroussi, 151 25 Athens

Industrial production plants
Greece

● **Metallurgy Business Unit** ASI

Countries where aluminium products are exported
Austria, Bulgaria, France, Germany, Greece, United Arab Emirates, United States of America, Spain, Italy, Montenegro, Norway, Netherlands, Poland, Russia, San Marino, Serbia, Slovakia, Slovenia, Turkey, Tunisia, Finland

● **Sustainable Engineering Solutions Business Unit**

Major large-scale energy and infrastructure projects under way
Ghana, Greece (infrastructure), United Kingdom, Libya, Nigeria, Slovenia

● **Renewables & Storage Development Business Unit**

Greece, Cyprus, United Kingdom, Spain, Italy, Chile, Tunisia, Kazakhstan, Korea, Australia

● **Power & Gas Business Unit**

Production and Supply of Electric Power - Trading of Natural Gas
Greece

MYTILINEOS' response to the SARS-CoV-2 pandemic

Since early March 2020, when the outbreak of the COVID-19 pandemic took the global community by surprise and became an issue of major concern for public health and for the economy worldwide, MYTILINEOS, acting responsibly and maintaining strict vigilance, **implemented a multifaceted action plan**, investing over **€1.8 million** to contain the spread of the virus. The Company, following the instructions of the authorities, the Hellenic Public Health Organization (EODY), the World Health Organization and the Occupational Physicians, assured **the protection of its employees** around the world, **kept in operation all its production units** without problems in the supply chain as well as in the orders of its customers, and **ensured the smooth operation of the 1.2 GW capacity thermal power plants** covering the country's electricity demand, contributing effectively to **the shielding and support of the Greek economy**. Particular emphasis was placed on ensuring its competitiveness and operational efficiency.

The primary objectives of MYTILINEOS were –and still are– the following:

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

Relevant activities included the following:

- Establishment of a special team (**Covid Management Team**) for monitoring, evaluating and dealing effectively with the impacts of the pandemic.
- Creation of a **special “SARS-CoV-2 – What I need to know” microsite**, and establishing an **“HR Call Center”** for keeping employees constantly informed about the Company's measures and instructions.
- Development of a comprehensive preventive action plan two weeks before the first case occurred in the country, which is constantly updated according to developments.
- **Regular distribution of a special personal kit** per employee, containing face masks and sanitizers, fully observing the **social distancing** measures.
- **Timely adoption of increased personal hygiene measures** and supervision of their observance, by providing to all personnel clear instructions on the personal hygiene rules to

be followed, while at the same time providing specific instructions to employees belonging to vulnerable groups.

- **Activation of teleworking for 90%** of personnel working in offices and implementation of over 800 online meetings per day using Teams/Skype/Teleconference.
- Implementation of a special **regular disinfection schedule** in all facilities to significantly reduce microbial load levels, and placement of antiseptic containers at key locations of the facilities.
- Implementation of a **daily temperature-taking procedure** for all personnel and suspension of the operation of dining/catering facilities /re-operation under specific conditions and with the obligation to apply protective measures.
- Collaboration with diagnostic centers to secure **privileged prices** for testing employees and their first-degree relatives.

2 To ensure its uninterrupted operation

Relevant activities at operational and financial level included the following:

- Development of **Business Continuity plans** with targeted measures for our production units, which remain in full effect and are adapted according to developments.
- Creation of a communication and management network consisting of special teams in all Company facilities in Greece and abroad.
- Constant review of the need for business trips and visits to production units.

- Implementation of special prophylactic measures in the retail stores of Protergia.
- Continuation of the implementation of **70% of the Company's overall investment plan** and re-assessment of the remaining 30% pending the effects of the pandemic.
- **Granting of an over €1 million bonus** to employees in the production lines of the Company's plants, in recognition of their significant contribution to its smooth operation and to its efforts to maintain liquidity.

3 To contribute to the national effort, by supporting the National Health System and society

Relevant activities included the following:

- Donation of **15 specialized ICU Respirators** and consumable medical supplies to the medical and nursing staff of the First Department of Propaedeutic and Internal Medicine/AHEPA General Hospital.
- Donation of a NeuMoDx Molecular System 96 **molecular diagnostic platform** for the detection of SARS-CoV-2, together with 53 kits containing a total of 5,088 molecular detection tests, to the Diagnostic Laboratory of the Polyclinic of the Athens Eye Clinic of “EVANGELISMOS General Hospital”.
- Donation of medical equipment and sanitary supplies to the General Hospitals of Volos and Serres.
- Donation of equipment (consumables, sampling kits for coronavirus tests, respirators) to the hospitals of the **Municipalities of Levadia and Distomo-Arachova-Antikyra, as well as to the Regional Unit of Viotia.**

- Donation of **40 tablets** for the schools of **the Municipality of Distomo-Arachova-Antikyra.**
- Participation in Bodossaki Foundation's **“Digital School for All”** program, strengthening the educational infrastructure of 21 schools **with 100 tablets** for students of financially vulnerable families in the Prefecture of Aitolokarnania.
- Strengthening the **“Emergency financial assistance to vulnerable families”** program of the Association 'Together for the Child' by enabling **20** vulnerable families to obtain vouchers for redemption at Retail Food Chains, while also providing them with free counselling.
- Participation in the program **“We protect our Grandparents”** of the organization "Mission ANTHROPOS", offering to senior citizens in non-profit Homes for the Elderly **3,400 masks, 30,000 gloves** and **60 liters of antiseptic solution.**

4 To implement activities in support of its customers

Relevant activities included the following:

- Extension of payment deadlines.
- **Abolition of additional charges** for late payments.
- Creation of new applications to facilitate customer service, and activation of **electronic signature capabilities.**
- Modification of the corporate switchboard's working hours to optimize customer service.
- Extension of the provision of services (e.g. additional free mobile data).
- Creation of new services specifically focusing on the needs of customers during the pandemic (e.g. online shopping).

In conclusion, the holistic approach that MYTILINEOS applied and continues to apply for mitigating the effects of the pandemic and ensuring its business continuity, maintains the guarantees required by its investors. With ambitious business decisions, the Company is taking advantage of the opportunities emerging from the public health crisis and accelerates its progress towards an even stronger green economy. At the same time, building on its comparative advantages, the Company has designed a **new Sustainable Development strategy** based on international trends and upcoming green policies, centered on a sustainable future for itself and for the environment in which it operates, while maintaining the foundations of its financial soundness to the satisfaction of its shareholders.

Strategic priorities

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

Metallurgy Business Unit **ASI**

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

Power & Gas Business Unit

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



Sustainable Engineering Solutions Business Unit

- Leadership in the implementation of EPC projects for Photovoltaic and Energy Storage projects, with a strong international presence.
- Investments in RES projects that are an important parameter for achieving the goals of decarbonization of economies worldwide.
- Complete decarbonization of activities by 2030, by undertaking concrete initiatives and actions.
- Further implementation of energy storage projects, an important factor towards the increasing development of RES-based energy production.
- Adoption of a comprehensive approach to the development and implementation of projects falling within the scope of the Renewables and Storage Development Business Unit, and decision-making regarding the implementation of a new combined investment model.
- Continuous exploitation of new opportunities emerging as a result of the rise in competitiveness.
- Strengthening relationships and strategic partnerships with major investors in the sector.

Renewables & Storage Development Business Unit

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

In parallel, the Company's dynamic business growth is inextricably linked to the principles of Corporate Social Responsibility and Sustainable Development. MYTILINEOS is actively involved in domestic and international initiatives and organizations working to address the challenges of Sustainable Development. **[GRI 102-12] [GRI 102-13]**

	Since 2008, MYTILINEOS has been consistently declaring its commitment to upholding the ten principles of the Global Compact, by disclosing its performance on an annual basis.
	Since 2019, MYTILINEOS is participating in the International Aluminium Stewardship Initiative (ASI) as a Production & Manufacturing member.
	As a founding member of the Council on Sustainable Development established by the Greek Federation of Enterprises (SEV), MYTILINEOS is fully committed to the relevant Code of Principles and is actively participating in the Council's initiatives for the promotion and dissemination of the Sustainable Development principles.
	MYTILINEOS has been supporting since 2016 the achievement of the Global Sustainable Development Goals (2030 Agenda), contributing to the respective national priorities.
	As of 2012, MYTILINEOS has integrated the Principles of the Corporate Social Responsibility international standard into its operation, and is disclosing information on its progress and performance on an annual basis.
	MYTILINEOS has been an ambassador of the Greek Sustainability Code since 2015, while it actively participated in its co-drafting, by either tabling views and initiatives, through the open consultation held in the context of dialogue or by participating in the relevant working groups.
	Since 2006, MYTILINEOS is an official member of CSR Hellas, the Hellenic Network for Corporate Social Responsibility, taking active part in and supporting the Network's various activities for the promotion and dissemination of the Corporate Social Responsibility principles and practices.
	Since 2010, MYTILINEOS has been a member of the "Hellenic Association of Independent Power Producers", an initiative whose key objective is to promote and manage issues related to the generation and distribution of reliable, cost-effective and environment-friendly electric power and to deregulate the market for all energy raw materials.
	Ecovadis is the world's leading supplier rating agency for responsible entrepreneurship. By participating in the ecovadis evaluation platform, MYTILINEOS responds to its customers' request by giving them access to its relevant reports and performance, which they can use as a market criterion.
	Through SEV, MYTILINEOS takes part in the Business Europe initiative, whose aim is to promote development and competitiveness at European level and to support European companies on the issues that affect their performance the most.

Distinctions

2020 was again a great year for the Company, which garnered major awards and distinctions.



- Inclusion of MYTILINEOS in **"The Most Sustainable Companies in Greece 2020"**.
- **Change the World (Fortune):** MYTILINEOS received one of the highest scores for its initiative **"#skills4engineers"**, winning a place among the top 20 initiatives in the Greek **"Change the World"** list of Fortune magazine. The criteria and the methodology established by the American publication brought the public's attention to the companies that stand out for the sustainable development model that they follow, assuming in practice their share of the responsibility towards society, their employees and the environment.

- **Hellenic Responsible Business Awards: GOLD Award** for the implementation of the program "Making children smile", involving preventive dental checks and dental treatments for children from vulnerable social groups.
- **Hellenic Responsible Business Awards: BRONZE Award** for the Company's support of the initiative "Medium-Term Accommodation Facility for Women at Risk" of the NGO "Doctors of the World / Médecins du Monde - Greece".
- **Hellenic Responsible Business Awards: BRONZE Award** for the implementation of the program **"Skills4engineers | Mellon Skills Accelerator"**.



- **Corporate Affairs excellence awards 2020:** Presented to MYTILINEOS by the Corporate Affairs Department of the Hellenic Management Association (EEDE), in the category "Best Use of Digital Communications", for the Company's **"Integrated Value Creation SCORECARD"** tool.

- **Health & Safety Awards 2020: GOLD Award** in the category "Health & Safety Culture Consolidation Activities", for **"Safety Days 2019"** - the awareness raising campaign on Health and Safety, addressed to the personnel of AoG and carried out at the plant of the Metallurgy Business Unit.
- **Health & Safety Awards 2020: GOLD Award** in the category "Health & Wellness - Community Health Activities" for the **"Blood Donation Days 2019"** of the Metallurgy Business Unit, which helped increase the number of young volunteers as well as of the blood units offered.
- **Health & Safety Awards 2020: SILVER Award** in the category "Upgrade & Modernization of Installation", for the project **"New Holding Furnaces & Aluminium Plate Casting Installation"** of the Metallurgy Business Unit, which upgraded ergonomics and improved the safety level and working conditions of the Foundry staff.



- **HR Awards 2020: SILVER Award** in the category "Covid-19 Response Actions", for the "MYTILINEOS Covid-19 Task Forces-We Stay Safe", in the context of the Company's activities for addressing the consequences of the COVID-19 pandemic.

- **Concrete Awards: GOLD Award** in the category "Commercial Buildings", for the **LEED Platinum USGBC** international certification received by MYTILINEOS for the construction of its Head Offices, completed by the Sustainable Engineering Solutions Business Unit of the Company within 24 months and to the highest standards.
- **Concrete Awards: GOLD award** in the category "Infrastructure Projects", for the project **"192 MW Combined Cycle Power Plant in Takoradi, Ghana"**, constructed by the Sustainable Engineering Solutions Business Unit of the Company.



- **Events Awards 2020: BRONZE Award** in the category "Event Experience (Road Shows-Pop-up)", presented to Protergia for its innovative action **"Protergia Energy Station"**, organized by Sales Promotion Center S.A. The Protergia van travelled around Greece and gave its unique energy to its visitors.

How we create value

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

The value created by the Company is determined, over the long term, by the increases, reductions or changes in the basic categories of the resources/funds it utilizes, which are caused by its business activities and its financial results. This value is

characterized by two interrelated aspects of the Company's capacity: **(a)** to create economic value for itself and, at the same time, for its shareholders and capital providers, and **(b)** to create value for its other Social Partners and for society at large.

Economic Value Table [GRI 201-1]	2018	2019	2020
Economic value generated			
Turnover (thousands €)	1,526,514.04	2,256,091.0	1,898,623.0
Economic value distributed			
Cost of goods sold (thousands €) ¹	1,226,959.0	1,939,671.9	1,558,864.2
Retirement and other employee benefits (thousands €)	81,033.0	93,807.0	112,538.0
Current tax liabilities (thousands €)	52,005.0	61,711.0	70,840.0
Payments to capital providers (thousands €) ²	76,702.0	77,672.0	85,870.4
Social Investments (thousands €)	2,296.0	3,471.1	3,210.9
Total (thousands €)	1,438,995.0	2,176,333.0	1,831,323.4
% economic value distributed	94.3%	96.5%	96.5%
% economic value retained	5.7%	3.5%	3.5%

1. Cost of goods sold plus administrative & distribution expenses, minus a) retirement and other employee benefits b) taxes and duties c) social investments that have been included in this amount.
2. Shareholder dividends, payment of interest to creditors; this includes interest in all forms of debt, as well as retrospective dividend dues to preference shareholders.

Social Product

MYTILINEOS' total Social Product for 2020 amounted to **€1,368 million, increased by 12.1%** compared to 2019. The economic value created and distributed was the following, per key stakeholder group:

€112.5 m. Employee wages and benefits	€70.8 m. Taxes paid to the State	€872.2 m. Total payments to Greek suppliers
€85.8 m. Payments to capital providers	€3.2 m. Social investments	€71.6 m. Expenditures for improving the Company's environmental footprint
	€150.0 m. Investments for improving the Company's competitiveness	

MYTILINEOS' Socio-economic impact in Greece

Every year, MYTILINEOS generates remarkable economic and social value in the country, as a responsible company that interacts with its social partners. In this context, in May 2020, the Climate Change and Sustainable Development services of EY Greece carried out the 2nd study of the Company's Socio-Economic Impact in Greece, for the period from 1 January 2019 to 31 December 2019.

The results of the study confirmed once again the responsible attitude and broader contribution of MYTILINEOS to the national economy and employment. At the same time, the Company is contributing to the collective effort to achieve the UN Sustainable

Development Goals 8 & 9, related to economic growth and boosting employment in the industrial sector respectively. The social and economic impact of MYTILINEOS in Greece is derived from the economic activity it causes across its entire value chain, from the production to the promotion and sale of its products. For its operation, MYTILINEOS procures raw materials, products and services from Greek suppliers, thus supporting various business sectors of the Greek economy, such as electricity and gas, construction, metallurgy etc. In doing so, the Company supports incomes, tax revenues and jobs and, respectively, the same applies for its suppliers and business partners within their own value chain.



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

- The total jobs supported by MYTILINEOS, support the income of 31,745 citizens, further increasing the social benefit created in Greece by the Company's activities.
- For every €1 of added value created by MYTILINEOS, an additional €1.34 of added value is created for the Greek economy.
- For every €1 of direct taxes paid by MYTILINEOS, its direct and indirect suppliers pay more than €3 in taxes as a result of their cooperation with the Company.
- Each 1 direct job in the Company supports 4.5 additional jobs in the wider Greek economy.

The full study of the MYTILINEOS' Socio-Economic Impact in Greece is available on the MYTILINEOS website: mytilineos.gr/sustainability/how-we-create-value/

Business Model

The Company's business model is at the center of its operation. We utilize our available resources in accordance with our vision, mission and business values, to produce and market our products and services, while also contributing to the Global Sustainable Development Goals (UN 2030 Agenda) and creating value for our Social Partners. The relevant key performance indicators, together with descriptions of the interrelationships between the resources utilized in the context of our Business Model, is available at: scorecard.mylilineos.gr/index-en.html



Financial
Our business activities require significant resources, drawn from cash flows from our business activity, investments, own capital and loans.

Industrial
Our 10 industrial plants and 14 Renewable Energy Sources (RES) plants, together with our supply chain, enable us to manufacture and offer products and services that meet the needs of customers and consumers.

Human
Our more than 3,800 direct and indirect employees add value with their knowledge, talent and skills across the entire range of our activities, from enhancing efficiency and developing innovation in production activities, to maintaining relationships of mutual trust and cooperation with our local communities and customers.

Natural
Bauxite, natural gas and water are the key raw materials we use in our activities. Additionally, the use of land and of semi-manufactured materials are key inflows, which we seek to use responsibly and effectively.

Intangible
Our intellectual property covers a wide range of subjects, from research and development for new products, bauxite residues utilisation, energy efficiency and know-how in the optimal processing of aluminium scrap, to excellent skills and advanced know-how in the management of construction projects that allow the Company to implement complex and demanding projects to the strictest technological standards.

Social
The social acceptance of our activity is based on our reputation, the strengthening of transparency in everything we do, our social investments and the trust of the local communities where we operate, as well as on our people, our customers, our supplies and our other Stakeholders.

Vision – Mission – Corporate Values

Governance

Central Services & Support Services

- Corporate Governance System
- Risk Management System
- Code Of Business Conduct
- Corporate Policies And Procedures
- Established Stakeholder Engagement Process

- Finance
- Treasury
- Strategy, Mergers & Acquisitions
- Human Resources Management
- Corporate Governance & Sustainable Development
- Legal & Regulatory Affairs
- Corporate Communication & Marketing Strategy

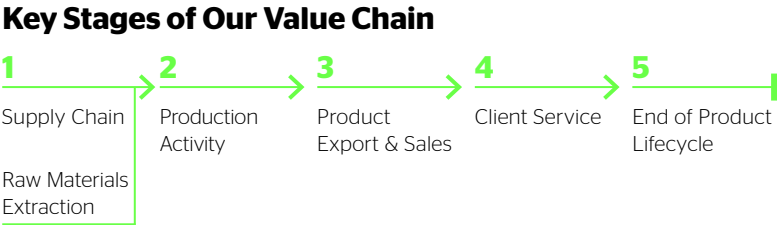


“We are pursuing our business development, alongside with our long-term commitment to the UN 2030 Agenda.”

We integrate the concept of sustainability into our DNA, making it a key pillar of our strategy, decision-making and operations.

We are implementing a new strategy for the decarbonisation of our activities, with ambitious targets for 2030 and 2050.

We aim to continuously improve our performance by attaining measurable results, creating value in all three pillars of Sustainable Development.



3

Value increased ↑ or decreased ↓ by our business activities

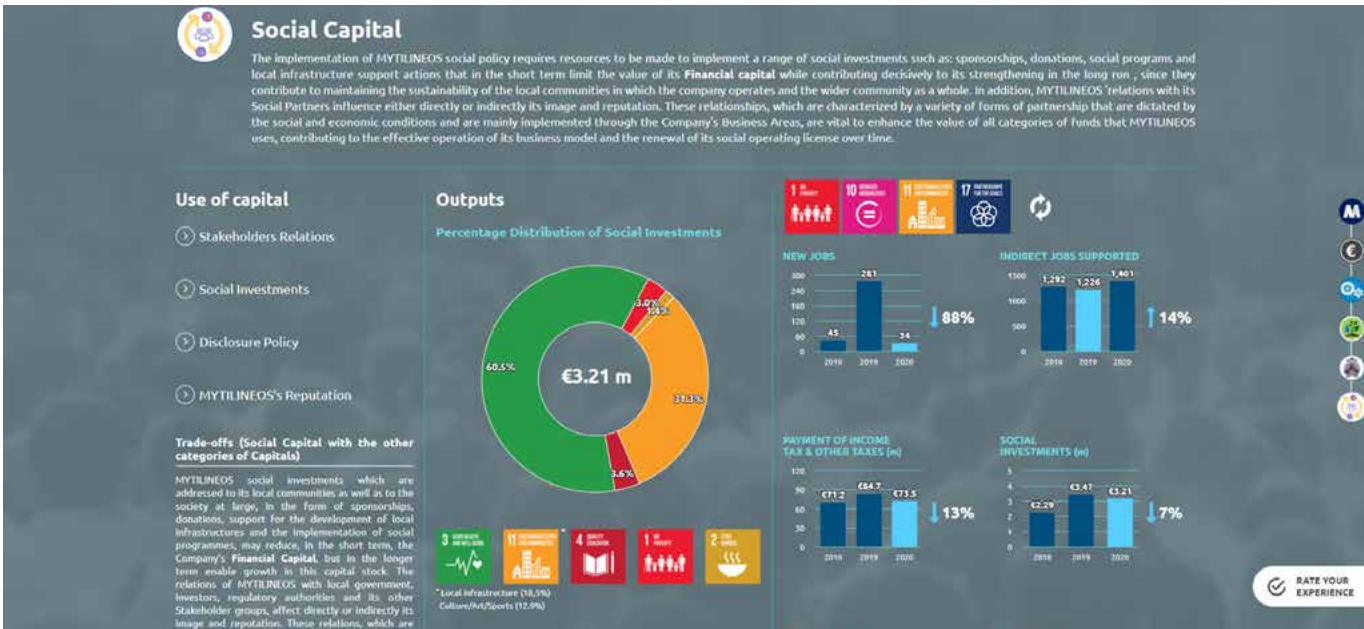
Sustainable Development Goals

Economic Value			<div><div>7</div><div>AFFORDABLE AND CLEAN ENERGY</div></div> <div><div>8</div><div>DECENT WORK AND ECONOMIC GROWTH</div></div> <div><div>9</div><div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div></div> <div><div>17</div><div>PARTNERSHIPS FOR THE GOALS</div></div>
----------------	--	--	---

ESG Performance Tools

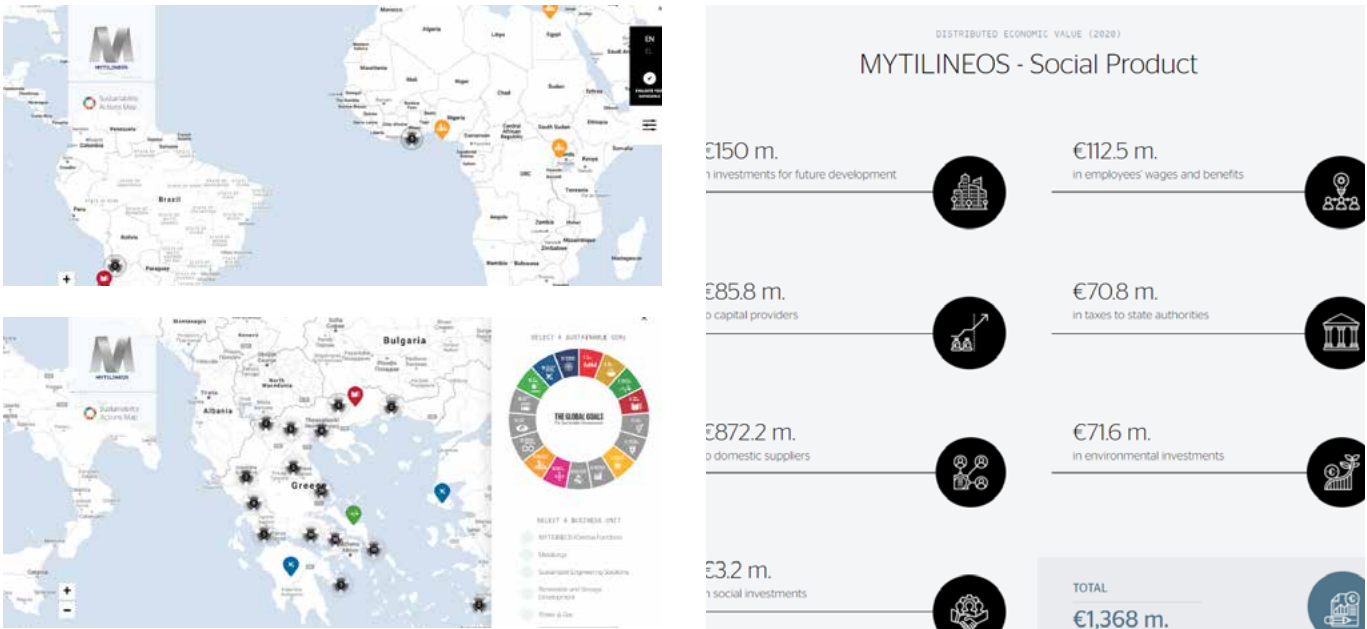
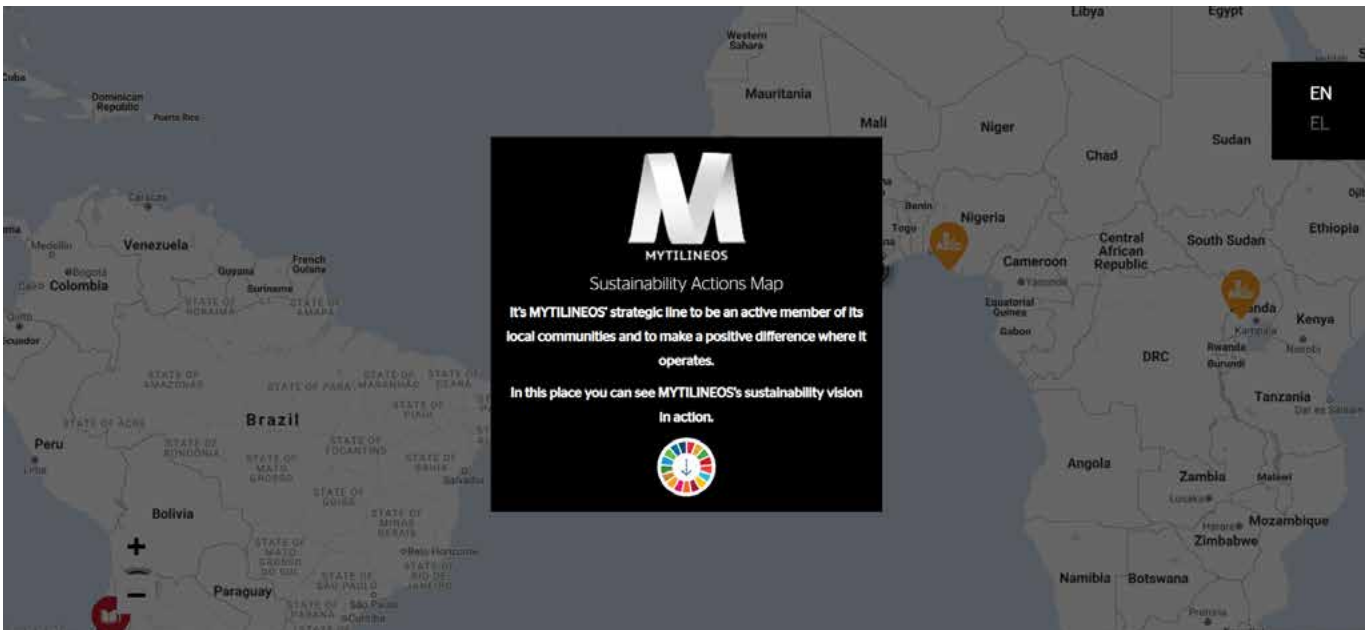
Integrated Value Creation Scorecard

The aim of the [Integrated Value Creation Scorecard](https://scorecard.mytilineos.gr/index-en.html) (scorecard.mytilineos.gr/index-en.html) is the presentation to all MYTILINEOS Social Partners of the basic resources (economic, industrial, natural, human and social) that it utilizes during its activity, through its business model, the corresponding results and the value generated in combination with the 17 UN Sustainable Development Goals.



Sustainability Actions Map

The [Sustainability Actions Map](https://sdactionsmap.mytilineos.gr/en) (sdactionsmap.mytilineos.gr/en) is an innovative tool that provides in a concise and centralized way, the information on Sustainable Development issues to all Stakeholders. Immediate access to the desired information and easy operation of the microsite are key features for the effective provision of information to the Company's stakeholders, focusing either on the desired Global Sustainable Development Goal or on the desired region / country for each of the Business Units.



Sustainable Development Strategy

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.

The Company, after carefully examining the existing significant social, environmental and economic challenges affecting its activity, developed a new Sustainable Development strategy aiming at creating long-term and sustainable value for its shareholders and other stakeholder groups, through a holistic approach that combines economic stability with social and environmental sustainability.

The Company's new strategy is implemented on three basic levels that are inseparable from one another, and is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) across all its activities.

“We create long-term and sustainable value for all our Stakeholders, contributing to the Sustainable Development Goals and the respective national priorities.”



New Sustainable Development strategic framework

Climate Change	We participate effectively in the efforts to tackle climate change and in the national effort for a transition to a low-emissions economy, with:			
	Decarbonization strategy and practices in all areas of our business activity.	Ambitious emissions reduction targets for 2030 and 2050.	The development of new business unit in Sustainable Development projects.	
ESG Approach	We enhance the valuation of our corporate value by:			
	Identifying & managing significant ESG risks and development opportunities.	Constantly improving our already solid ESG performance and publications.	Fully integrating the ESG criteria in our investment decision-making.	
Corporate Responsibility (CSR)	We operate responsibly towards:			
	Our people	The Environment	The Society	The Market

13

CLIMATE ACTION

9

INDUSTRY, INNOVATION AND INFRASTRUCTURE

8

DECENT WORK AND ECONOMIC GROWTH

15

LIFE ON LAND

4

QUALITY EDUCATION

5

GENDER EQUALITY

11

SUSTAINABLE CITIES AND COMMUNITIES

7

AFORDABLE AND CLEAN ENERGY

12

RESPONSIBLE CONSUMPTION AND PRODUCTION

3

GOOD HEALTH AND WELL-BEING

6

CLEAN WATER AND SANITATION

16

PEACE, JUSTICE AND STRONG INSTITUTIONS

10

REDUCED INEQUALITIES

17

PARTNERSHIPS FOR THE GOALS

The Principle of Materiality:
The Material topics that reflect our significant economic, environmental and social impacts or substantively influence the assessments and decisions of our Stakeholders, are the fundamentals of our Sustainable Development strategy implementation.

The Principle of Stakeholder Inclusiveness:
Through an open and systematic consultation process, we seek to build quality and trusted relationships and to improve our collaboration with our Stakeholders, to jointly contribute to Sustainable Development.

The Principle of Accountability:
We implement our commitment to transparency and to the regular provision of information to our Stakeholders, by publishing annually, for more than 12 years, the Sustainable Development Report which contains valuable information about our Non-Financial performance.

More specifically:
The first level focuses on the Company's commitment to tackling climate change and on its contribution to a low-emissions economy. MYTILINEOS is fully aware that climate change is one of the most urgent issues facing the planet for the next decade. Considering the high CO₂ emission intensity in both aluminium production and electric power generation processes, climate change is a key element for the sustainability of its activities. In this context, the Company has designed a topical strategy to address climate change, which serves to guide its initiatives to reduce carbon dioxide emissions as defined by the Kyoto Protocol, the Paris Agreement on Climate Change (COP21) and the corresponding National Plan of Greece, which sets out its contribution to the European Green Deal (EU Green Deal). MYTILINEOS becomes the first Greek industry to set specific, measurable and ambitious CO₂ emission reduction targets for 2030 and 2050, thus making the reduction of its carbon footprint a priority of its new Sustainable Development Strategy.⁴ Moreover, the new Business Units created by the Company, which are oriented towards the dynamic development of sustainable development projects internationally (Renewables & Storage Development Business Unit and Sustainable Engineering Solutions Business Unit), are expected to play, over the crucial decade ahead, an important role in the energy transition and in the reduction of greenhouse gas emissions globally, giving MYTILINEOS the opportunity to scale up its positive impact and become one of the leading companies in the global market in this area.

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

The third level expresses the responsible operation of MYTILINEOS, which has been systematically cultivated over the last 12 years through the implementation of its Corporate Social Responsibility (CSR) policy and the Company's commitment to the 10 Principles of the UN Global Compact. For MYTILINEOS, CSR is an ongoing self-improvement and incessant learning process, while also serves as a key mechanism for renewing its “social license to operate” and, at the same time, improves its competitiveness at national and international level.

MYTILINEOS, as a member of the United Nations Global Compact, has aligned its strategy with the **17 Sustainable Development Goals (Agenda 2030)**, thus expressing its commitment to contribute, to the extent of its share of the responsibility, to their implementation. These Goals are used as a common basis for dialogue and cooperation between MYTILINEOS and the main groups of its Social Partners, while they also define the Company's key commitments up to 2030.

The key commitments of MYTILINEOS:

- To consistently implement its new ambitious plan for the decarbonization of its activities, helping to keep the global average temperature increase well below 2°C relative to pre-industrial era levels (targets agreed at the 21st Conference of the Parties to the United Nations Framework Convention on Climate Change in Paris).
- To further adapt its activity to the consequences of climate change by analyzing the risks involved, while also taking advantage of the opportunities arising.
- To maintain its objective of ensuring a healthy and safe work environment without accidents, adopting a prevention-oriented approach.
- To continue to treat its people with responsibility and consistency, remaining their first choice of employer during their entire career paths, while at the same time investing in their training and in the development of their skills.
- To ensure respect for and protection of human rights, and an inclusive work environment free from all discriminations.
- To ensure the further reduction of its environmental footprint by properly managing and limiting environmental impacts in connection with the use of water and energy, the protection of local biodiversity and the management of waste.
- To promote the principles of Sustainable Development and Responsible Entrepreneurship to its key suppliers and business partners.
- To consistently implement its social policy, through actions and initiatives that enhance its harmonious coexistence with its local communities as well as with society at large.

In addition, these commitments define more broadly a framework for responsible business conduct and, in particular, how environmental, social and governance (ESG) issues are managed by each Business Unit and subsidiary of MYTILINEOS, with the aim of enhancing their capacity to generate long-term and sustainable value.

4. More and more detailed information on decarbonization initiatives and CO₂ reduction targets, per Business Unit, is available in the “Climate Change and Energy Transition” section of this report.



Detailed presentation of MYTILINEOS’ contribution to the achievement of the Sustainable Development Goals and the respective national priorities (for the period 2016-2020)

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

The contribution of MYTILINEOS (Cumulative data 2016-2020)



(1.2) We contribute to the reduction of the percentage of men, women and children living in poverty in all its forms.

(1.5) We contribute to the reduction of the exposure and vulnerability of the poor and of those in vulnerable situations, to economic and social problems.

- Through the direct and indirect jobs that we maintain, **we support the income of more than 31.500 people⁵ on an annual basis.**
- As we consider the reduction of unemployment to be a key factor for alleviating poverty, **we have created 534 new jobs in the framework of our activity.**
- We support and cover the daily needs, on an annual basis, of 501 families** facing serious economic and health problems, in our local communities.
- We have **provided access to the labor market to 51 young unemployed** engineers, through the implementation of custom-developed vocational training and skills development programs.
- Moreover, through the five (5) core social programs and initiatives we implemented, we have alleviated the consequences of poverty for more than **432 people (adults and children)** in financial difficulty and social exclusion, ruling out all forms of discrimination.



(2.1) We contribute to ensuring access to sufficient and nutritious food throughout the year, for children in vulnerable situations.

(2.2) We contribute to the reduction of all forms of malnutrition, and we address the nutritional needs of children and adolescents.

- We have offered **131,977 hot and nutritious school meals to 1,262 students of 56 schools** with an increased rate of food insecurity, in the Prefectures of Attica, Viotia, Kavala, Trikala and Fokida.
- We have helped alleviate the consequences of the COVID-19 pandemic, securing feeding arrangements for **80 vulnerable people** (adults and children) in the Prefecture of Attica.
- We have secured feeding arrangements for **249 children** living in extreme poverty, **by building a new dining hall and upgrading the restaurant equipment** of St. Nicolas Preparatory School in Ghana, as well as by distributing food to the children's homes during the COVID-19 pandemic.



(3.2) We contribute to the reduction of the number of deaths of newborns and children under 5 years of age.

(3.6) We contribute to the reduction of the number of deaths from injuries caused by road traffic accidents.

(3.7) We help avoid deaths and illnesses caused by hazardous chemicals and air, water and soil pollution and contamination.

- We have completed the upgrade/creation of **10 Emergency Departments** (for child injuries) in the country's Public Hospitals and Health Centers, directly benefiting more than **67,000 children** annually.
- We implement specialized **Safe Driving** training programs with over **700 direct beneficiaries** (employees, professional drivers and school students in our local communities).
- We support in practice information campaigns at schools and Local Health Units across Greece, having so far informed more than **11,000 children, parents and teachers, by publishing 50,000 specialized brochures annually** ("Trauma prevention at School", "Trauma prevention at Home", "Sports & Safety", "Beware of Burns!").
- We covered the hospital costs of **3 surgeries for children** from financially vulnerable families who were **in urgent need of cardiac surgery.**
- We contributed to alleviating the consequences of the COVID-19 pandemic, by offering **3,400 masks, 30,000 gloves and 60 liters of antiseptic solution to 156 senior citizens in 3 Homes for the Elderly.**
- We performed **1,201 dental checks to 450 children** from vulnerable social groups, of which 388 also required dental treatment.
- We recorded **zero incidents of degradation of the natural environment and zero incidents of occupational diseases** from our productive activity. **We have set ambitious targets for the reduction of the carbon footprint and the decarbonization of 50% of our Business Units by 2030.**



(4.1) We contribute to ensuring that all boys and girls complete equitable and quality primary education.

(4.3) We contribute to ensuring equal access for all to quality technical and vocational training as well as access to tertiary education.

(4.4) We contribute to the increase of the number of young people who have the appropriate vocational and technical skills, providing them with access to employment and decent jobs.

(4.b) We contribute to the increase of the number scholarships, thus encouraging school students to enroll in higher education and to participate in vocational training programs in various fields.

- We supported for **three years 56 students** from vulnerable social groups, helping them improve their prospects of completing their basic education through their participation in program "IM IN", designed to tackle school dropout.
- We created **172 new, quality vocational training and internship positions.**
- We created **15 school libraries** in an equal number of primary and secondary schools in the Prefectures of Viotia, Magnesia and Preveza, benefiting **2,198 school students and 251 teachers.**
- We offered modern technological equipment to **50 schools** in various Greek regions.
- We offered **100 tablets to 21 Secondary education schools in the Prefecture of Aitolokoarmania,** helping alleviate the consequences of the COVID-19 pandemic.
- We offered to **2,513 school students from 45 schools** around Greece the opportunity, with the use of technology and the assistance of **94 teachers,** to participate in **165 online group mentoring sessions.** during which they discussed with successful professionals and obtained answers to questions about their future.
- We offered **57 scholarships** to the Youth Entrepreneurship Summer School of the Athens University of Economics and Business (AUEB) and to the Scholarships Program of the University of Piraeus.
- We supported S.T.E.M. Education programs, offering of **49 Educational Robotics kits** and "Renewable Energy Sources" educational material to an equal number of schools that cannot afford to buy them.
- In addition, we provided **2 robots and 18 robot kits** to the Centre for Educational Robotics and Sciences of Crete, to be used for holding more than 100 educational workshops covering the entire range of S.T.E.A.M., in the framework of the 3rd Educational Robotics and S.T.E.A.M. Festival of Crete, **benefiting over 1,000 children and adults.**
- With the implementation of two (2) core social programs, #skills4engineers & #HoMellon, we strengthened the professional skills of **328 people.**
- We completed **the construction** of a secondary school in **Nigeria** and the supply of **modern classroom equipment** to a primary school in **Uganda,** offering access to education to **more than 200 children.**

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

The contribution of MYTILINEOS (Cumulative data 2016-2020)



(5.1) We support the efforts to end of all forms of discrimination against women everywhere.

We are opposed to all forms of discrimination against women.

- Percentage of women in the Company's Board of Directors:** 2016: 14% - **2020: 20%.**
- Percentage of women in direct employment:** 2016:13% - **2020: 19%.⁶**
- Percentage of women in positions with extended responsibility:** 2016:18% - **2020: 19.4%.**
- Lost-time injury rate for women (with 3 days lost) per 200,000 hours worked.** 2016:0 - **2020: 0.21**
- Percentage of women still at work 12 months after returning from maternal leave: 94%**



(6.1) We contribute to the efforts to achieve universal and equitable access to safe drinking water for all.

(6.2) We contribute to the efforts to achieve adequate and equitable access to sanitary facilities for all.

(6.3) We contribute to the protection of water resources as well as to a substantial increase in water recycling and reuse.

(6.4) We contribute to the efficient use of water and to ensuring sustainable water abstraction.

- We protect against any risk** of pollution the water resources that we use in our activity.
- Through our responsible practices, the main sources which we use to withdraw water from (the sea, groundwater, public water supply companies) **are not affected** by factors such as water depletion in the aquifer, shortage of water, limitation of the capacity of water-related ecosystems to perform their functions, and reduction of drinking water availability.
- We are managing responsibly **a controlled network of low-depth wells (boreholes)** which allows water to be **replenished naturally after withdrawal (renewable sources).**
- We ensure the availability and the sustainable management of water, as well as sanitary facilities, for **nearly 2,000 citizens** of the local settlements of Aspra Spitia, Antikyra and Ag. Nikolaos, in the Prefecture of Viotia, supplying them with nearly **1 million m³** of drinking water annually.
- A specific programme to reduce the consumption of industrial use and drinking water is implemented in the Metallurgy Business Unit, with the first results being particularly positive.
- By recycling water discharges for reuse in our power plants in the Energy Center of Ag. Nikolaos (Viotia), **we avoid, on an annual basis, the need to withdraw an additional 6 to 7 million m³ of seawater,** which would otherwise be required.



(7.1) We contribute to ensuring universal access to affordable, reliable and modern energy services.

(7.2) We contribute to increasing the share of renewable energy in the energy mix.

(7.3) We aim to improve energy efficiency.

(7.a) We enhance access to "clean" energy research and technology, by promoting renewable forms of energy and investments in energy infrastructure and cleaner energy technology.

- Market share of the retail market for electric power:** 2016: 2.69% - **2020: 7.7% (increased by 186%).**
- MYTILINEOS' Power & Gas Business Unit, steadily focused on creating added value for its customers, follows closely the developments in the global energy market, strategically choosing to participate in international initiatives that work on new energy services. It participates in **4 European research and innovation projects** and in **3 European research projects** on energy efficiency and the reduction of the electric power purchase cost for the final consumer.
- Portfolio of RES projects in operation:** 2016: 130 MW - **2020: 222 MW (increased by 71%).**
- Electric power generated from RES projects: 2016: 175,530 MWh - **2020: 522,930 MWh (increased by 198%), thus avoiding the release to the atmosphere of nearly 287,100 tons of CO₂ emissions.**



(8.1) We contribute to the economic development of the country.

(8.4) We decouple our economic growth from environmental degradation and we promote sustainable production and consumption.

(8.5) We contribute to full and productive employment and decent jobs for all women and men and for young people.

(8.7) We contribute to the elimination of forced and child labor.

(8.8) We protect labor rights and we promote safe working conditions for all employees without discrimination.

- With our overall business activity, **we create an added value of €1,058 million equal to 0.6% of the country's GDP** (GDP 2017: €177,335.3 m. - Source: Eurostat).
- Zero incidents of degradation of the natural environment from our production activity - We have set ambitious targets for the reduction of the carbon footprint and the decarbonization of 50% of our Business Units by 2030** - Implementation of responsible and sustainable practices in the mining activity.
- Our labor practices comply as a minimum with all the provisions of the legislation force and respect the fundamental principles laid down in the International Labor Organisation's (ILO's) Declaration on Fundamental Principles and Rights at Work.
- We created **325 new jobs for young people <30 years of age.**
- We further reduced the exceptionally low percentage of part-time employees.** 2016: 1.16% - **2020: 0.53 (-54%).**
- Our full compliance with the national laws in each country where we operate and the fulfilment of the commitments that we have taken in the context of our participation in international Sustainable Development Initiatives (UN Global Compact), **result in the avoidance of incidents of child and forced labor incidents.**
- Injury rate (direct employees)** 2016: 0.21 - **2020: 0.19.**
- Injury rate (indirect employees)** 2016: 0.49 - **2020: 0.14.**
- Zero fatalities & Occupational diseases for direct employees.**

5. 2019 Socio-Economic Impact Study of MYTILINEOS.

6. The percentage refers to the number of members of the Board of Directors on 31/12/2020 which was 10 members. On 02/02/2021 the members of the Board were 11, with the percentage of women participants reaching 27%.

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



(9.2) We contribute to sustainable industrialization and to increasing employability rates in the industrial sector.

(9.4) We contribute to the upgrading of the industry by adopting more "clean" and environmentally sound technologies and industrial processes.

(9.5) We help enhance scientific research for upgrading the technological capabilities of the industrial sectors.

The contribution of MYTILINEOS
(Cumulative data 2016-2020)

- **Total number of direct employees:** 2016: 1,888 - **2020: 2,455 (increased by 30%).**
- Implementation of the salaried employment (internship) program **"ENGINEERS IN ACTION". A model "School for Engineers" of a high standard**, which has been consistently providing Greek industry and entrepreneurship with talented and competent executives.
- In the Metallurgy Business Unit, the **€15 million** investment in the new modern alumina calcination plant for the replacement of outdated technology and high thermal consumption units, was successfully completed.
- Innovative 10-year collaboration of the MYTILINEOS Metallurgy Business Unit General Electric (GE) for implementation of **the world's first Digital Smelter, an innovative digital solution in the electrolysis process**, designed to optimize productivity and reduce energy costs.



(11.1) We contribute to strengthening local infrastructure.

(11.4) We contribute to the effort to protect and safeguard the cultural and natural heritage.

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

- **Investments worth over €5.4 million** for meeting needs related to local infrastructures & services of direct public benefit. (Supply of vehicles to municipalities, renovation of access infrastructure to playgrounds/churches/municipal libraries, paving and maintenance of central and rural roads, repairs to school buildings, financing of studies for the modernization of a biological treatment plant/the supply of water to a settlement/the construction of a local community public transport hub etc.)
- We have supported studies for Cultural Routes & Archaeological Park projects, which are gradually extending to almost all the regions of the country.
- We upgraded the energy efficiency of the Gymnasium-Lyceum school complex and nearby indoor gym of the Municipality of Rafina-Pikermi, **where the educational and sports activities of 1,700 children from the fire-stricken areas of the Municipality and the adjacent Municipalities take place.**
- **We donated six (6) autonomous fire trucks** to the Hellenic Fire Service Headquarters, reinforcing the operational readiness of the service.



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

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

- We participate, through the Metallurgy Business Unit, in **four (4) European research projects** on the development of technologies that will allow the holistic exploitation of bauxite residues, **with investments of a total value of €6.5 million.**
- We drastically increased the amount of waste from our activity that was recycled, reused and/or utilized in other industrial uses: 2016: 36,000 tons - **2020: 156,300 tons (increased by 334%)**



(13.1) We strengthen the adaptive capacity of our activity to natural disasters and climate-related hazards.

(13.3) We contribute to the improvement of education and awareness-raising on climate change mitigation, adaptation, impact reduction and early warning in the event of natural disasters.

- **We have set ambitious targets for the reduction of the carbon footprint and the decarbonization of 50% of our Business Units by 2030.**
- We participate in the **International Aluminium Stewardship Initiative (ASI)** as a Production & Manufacturing member. Our objective is to obtain the relevant certification by integrating our Sustainable Development commitments into the value chain of the Metallurgy Business Unit.
- We implemented the special program **"Information and awareness-raising of the school community on forest fire prevention and response, forest protection policies and practices"** in **42 primary and secondary schools** from all over Greece, directly benefiting **1,250 students and 76 teachers.**

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



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

The contribution of MYTILINEOS
(Cumulative data 2016-2020)

- Regarding the use and discharge of seawater in our activities and in particular in the cooling process of the cogeneration (Combined Heat & Power) plant of the Metallurgy Business Unit, the relevant legislative provisions defining the framework for avoiding any environmental impact are strictly adhered to. In addition, in collaboration with the authoritative organization Hellenic Marine Research Centre (HMRC), we have already carried out **4 research studies** to monitor the status of living organisms on the seabed of Antikyra Bay. The studies are carried out in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change and the Water Management Directorate of the Decentralized Regional Administration). **The findings of the recent studies, carried out in 2019 and 2020, have shown in both cases the ecological status to be stable, with improvement trends recorded at several observation stations. These studies will be continued for at least five more years.**



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

- **There have been no incidents of biodiversity degradation from the Company's activities**, while the planned environmental rehabilitation activities for land areas used in mining operations are implemented annually.
- So far, we have rehabilitated **83.31%** of the total land area used for our mining activity, increased by **4.1% since 2016.**
- We have reforested a total area of **618,000 m²**, as part of the construction and operation of RES units. At the same time, we carry out annual bird fauna monitoring studies, while the movement of animals is not hindered as there is no fencing and the disturbance to birds is also negligible, while technical systems for their protection are installed where this is necessary.



(16.2) We contribute to the fight against all forms of corruption and bribery.

(16.5) We contribute to the efforts to end child abuse and exploitation.

- We follow a policy of **ZERO TOLERANCE** of all forms of corruption and bribery across all our activities.
- We developed two training programs for the Company's personnel, which covered **training in personal data protection (GDPR)** and in MYTILINEOS' **Code of Business Conduct**.
- We organized **12** information seminars in 10 Greek cities on the subject of children and cybercrime, titled **"Protect Your Child from Cybercrime", which directly benefited 3,166 parents & children.**
- We supported in Greece the Council of Europe's **"ONE in FIVE"** campaign to stop sexual violence against children. We have undertaken to produce **20,000 DVDs** with the campaign's information material. The campaign visited over **85** municipalities and **50** cities in Greece and was hosted on **164** television shows.



(17.17) We focus on corporate partnerships and effective public-private and civil society partnerships.

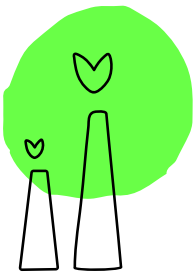
- **We have held 6 thematic consultations** with our Social Partners, at local level, in the context with our activities related to the Sustainable Development Goals.
- We work with **10** domestic Sustainable Development organizations and we establish selective partnerships with academic institutions in the context of our research and development activities.
- We have long-standing partnerships with more than 20 **voluntary and non-governmental organizations for the implementation of our social policy.**
- We participate in **10 international ESG/CSR indicators**, aiming to participate in assessments and draw on best practices for our continuous improvement.
- **We implemented a 3-year community service program** in partnership with the Municipality of Levadia (2016-2018), under which we provided specific materials and financial resources for the renovation of public infrastructures, while at the same time **promoting the employment of nearly 90 unemployed citizens.**

“We, at MYTILINEOS, are bold in designing new, innovative tools that will support the green transition of the European economy”



Climate Change and Energy Transition

“Climate change” means the change in the global climate due to human activities and caused primarily by the increase in the concentration of greenhouse gases in the atmosphere. At global level, a rise in temperature by approximately 1°C compared to pre-industrial levels is already observed, while according to the findings of recent studies, such as for example those published by the Climate Change Impacts Study Committee (CCISC) in Greece, this rise in temperature could reach up to 6°C in 2100 if no concerted action is taken to halt climate change by reducing greenhouse gas emissions, while the cost of the impacts in such a case will be particularly high. The EU therefore aims to reduce greenhouse gas emissions by at least 55% by 2030. This objective is the result of the Paris Agreement on climate change and the European Green Deal. Greece is one of the most climate-ambitious countries and supports all European initiatives to drastically reduce greenhouse gas emissions.



In 2021, MYTILINEOS plans to submit a Letter of Commitment to the **“Science Based Targets Initiative”**⁷ for the purpose of submitting the above-mentioned targets regarding the reduction of its carbon dioxide emissions 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.

7. The Science Based Targets initiative (SBTi) promotes ambitious climate action in the private sector, enabling companies to set science-based emission reduction targets.

In this regard, **in recent years MYTILINEOS has focused on maximizing financial returns to its shareholders, while also remaining true to a firm commitment to sustainability.** We have cultivated a corporate culture that considers ESG and Sustainability in general, as one of the most important pillars for our long-term development strategy. At the same time, MYTILINEOS is the first Greek industrial company that in 2020 proceeded, after a special study which utilized the latest available scientific data on climate change forecasts, as well as the relevant European and national strategy, **in determining ambitious goals to reduce its carbon footprint while further integrating viability 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 and industry, with a view to utilizing the funds offered by the European framework.

In particular, MYTILINEOS’ commitment is based on the implementation of the following concrete initiatives⁸:

- By 2030,
To reduce by at least 30% its total CO₂ (scope 1 & 2) emissions relative to the 2019 levels **and to achieve a neutral carbon footprint in 2 of its 4 Business Units.**
- By 2050,
To achieve a neutral carbon footprint in all its operational units.

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

These are as follows:



8. More information about CO₂ emission reduction initiatives is available in the “Energy & Air emissions” section of this report.

Materiality process

Identification of Material Topics

[GRI 102-46]

Seeking to provide the fullest possible information to its shareholders, to investors and to all its other Social Partner groups, MYTILINEOS' approach to Materiality consists of the following two strands of work: (a) the identification of the significant Financial issues which allow the Company's financial growth, performance and position to be evaluated, and (b) the identification of the Material Non-Financial issues which specify the positive or negative impacts of its activities on its Social Partner groups, on the natural environment and on the wider society.

The Materiality process, i.e. the process of identifying, understanding and prioritizing the sustainability issues, is one of the key elements in the Company's responsible operation. Through the assessment of the Material Non-Financial issues, MYTILINEOS enriches and shapes its strategy on Sustainable Development, with the aim of operating responsibly in all its activities, at local, national and international level.

This is a process that has been constantly evolving over the years and in which the individual assessments of the Material topics carried out by each Business Unit are brought together and used as the basis for the prioritization of the respective issues which takes place centrally, and vice versa. At the same time, the Company's open dialogue with its Stakeholders, in addition to enhancing its ability to understand the impact of its activities, enriches this process with new inputs.

In 2020, the Company proceeded with the detailed mapping of the process for the identification of the Material sustainability topics, which clearly defines the roles involved and the objectives and expected results. After its approval by the CSR Committee, the process has now also been established as a formal corporate practice. In addition, in order to better understand and consolidate the particular characteristics of the

Materiality process, 4 special videoconferences were held, one for each Business Unit of the Company, involving more than 50 Administrative employees and Executives, members of the individual CSR teams.

In the context of the implementation of the Materiality process for 2020, the Company, after updating the sustainability issues on the basis of the internal and external sources it uses, proceeded to their internal review. The topics were prioritized by all 4 Business Units in terms of the extent to which they affect the Company's ability to meet its business goals, as well as in terms of their impact on Sustainable Development, taking into account the respective national priorities, as also provided for by the guidelines of the Global Reporting Initiative (GRI) international organization. The findings of this internal exercise were combined with the respective findings of a relevant field survey, conducted in 2019, of the Company's Stakeholder groups (1,222 individuals, entities and organizations).

A detailed presentation of the stages in the process of identifying the Material Non-Financial topics for the year 2020 is given below:

Identification Stage	Sources used in the sustainability topics identification exercise
PRINCIPLE: Stakeholder inclusiveness	<ul style="list-style-type: none">• MYTILINEOS' CSR policy & strategic priorities.• Business mission & values.• Codes of Business Conduct.• Overview of the items discussed in the meetings of the Company's Executive Committee.• International Standards and responsible entrepreneurship and CSR/Sustainable Development initiatives (UNGC, SDGs, TFCD, OECD, CDP, GRI, ISO26000, TI, PRI, SASB etc.).• Key ESG Rating Agencies (Sustainalytics, FTSE4Good, Bloomberg, Refinitiv, ISS, MSCI).• Content of publications in the press by and about the Company, as well as general publicity in this area.• Basic overview of the competitive environment.• Requirements under the European and Greek legislation.• Ways of communication with the Stakeholders.
PRINCIPLE: Sustainability context	

22 topics identified in total

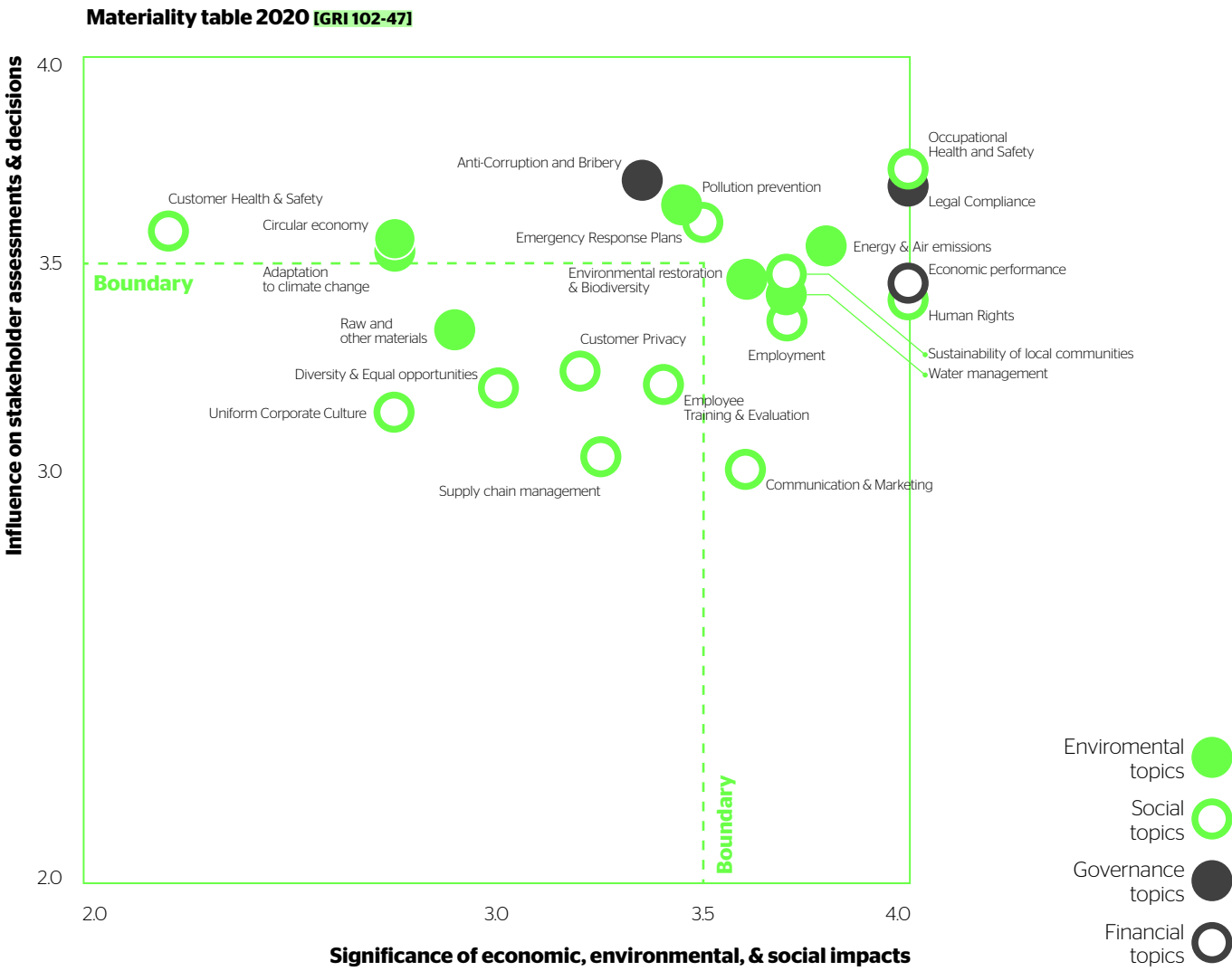
Prioritisation Stage	Synthesis of findings from the prioritization of the topics identified within & outside the company
PRINCIPLE: Stakeholder inclusiveness	Within the Company <ul style="list-style-type: none">• Use of a new a new online application for the prioritization of the identified issues, with reference to their relevance for MYTILINEOS, their impact on Sustainable Development at local and national level, and their correlation with the Sustainable Development Goals.• Working meetings of the CSR Teams of the Company's Business Activity Sectors for prioritizing the identified issues – Confirmation and approval of the results by the General Management of the respective Business Activity Sectors. – Synthesis of the individual results and determination of the final value for each identified topic.
PRINCIPLE: Materiality	

16 topics prioritised as material

The 16 material topics (with a value >3.5/4 on the evaluation scale) include
(a) the 5 most significant topics for the Stakeholders,
(b) the 7 most significant topics in terms of their impact on Sustainable Development, and
(c) the 4 topics that emerged as significant both for Stakeholders and for their impact on Sustainable Development.

Outside the Company

The final value for each identified issue, as this resulted from the relevant survey of the Company's Stakeholder groups (1,222 individuals, entities and organizations) conducted in 2019, remained the same in 2020. The next Stakeholder survey will be conducted in 2021.



Validation Stage	Corporate Social Responsibility (CSR) committee
PRINCIPLE: Stakeholder inclusiveness PRINCIPLE: Completeness	The responsibility for validating the Material topics and granting final approval for their publication in the Company's Annual Report and Sustainable Development Report, rests with the Corporate Social Responsibility Committee, to which the steps of the relevant methodology, its individual results and the relevant Materiality table for 2020 were presented in a special meeting of the Committee held for this purpose.
All Material topics were validated	

In conclusion, the Material topics for 2020 remain the same as those for the previous year, the only exception being “Communication & Marketing”, which in 2020 emerged as material. A supplementary table is given below, presenting the grouping of the Material topics on the basis of: (a) the resources utilized by the Company in the context of its activity, as these are mentioned

in its Business Model, (b) the Sustainable Development Goals to which MYTILINEOS contributes through the management of the respective Material Topics, and (c) the Environmental, Social and Governance (ESG) performance indicators managed by the Company in order to reflect its ability to create value and formulate effective long-term strategies.

TABLE OF MATERIAL AND OTHER SIGNIFICANT SUSTAINABILITY TOPICS					
Resources	Material Topics 2020	Metallurgy Business Unit* ASI Required	Relevant SDGs	Criteria ESG	
Financial	Financial performance	●	8	E	
Industrial	Pollution prevention	●	12, 14, 15		
Natural	Biodiversity & Environmental Restoration	●	15		
	Energy & Air emissions	●	7, 13		
	Water management	●	6, 12		
	Adaptation to climate change		13		
	Circular economy	●	6, 8, 12		
	Raw and other materials				
Human	Occupational Health & Safety	●	3, 8	S	
	Employment	●	8, 9		
	Human rights	●	5, 8, 10, 16		
	Employee Training & evaluation				
	Diversity & Equal opportunities				
	Uniform corporate culture				
Social	Sustainability of local communities	●	1, 2, 3, 4, 11		G
	Emergency response plans	●	11		
	Customer Health & Safety		3, 12, 16		
	Customer privacy				
	Supply chain management				
	Communication & Marketing		16		
	Anti-corruption	●			
	Legal compliance	●			

Material Topics – Other significant Issues
* Material Topics Metallurgy Business Unit

Stakeholder Engagement

Relationships and cooperation with Stakeholders are structural elements of MYTILINEOS’ Business Model, as a function of its mission and strategy. These different Stakeholder groups are identified, ranked and characterized as “key groups” for the Company, on the basis of specific criteria and in correlation with: (a) the position they hold within its sphere of influence, (b) the degree of significance and relevance that they attribute to or have for its activities, and (c) the way in which they affect its ability to fulfil its vision and mission.

MYTILINEOS’ Stakeholders identification table [GRI 102-42]

	Metallurgy BU ASI	Power & Gas BU	Sustainable Engineering Solutions (SES) BU / Renewables & Storage Development (RSD) BU
Category A: Stakeholder groups that affect, and are significantly affected by, the operation of the Company's Business Units.	<ul style="list-style-type: none">EmployeesCustomersLocal community / Local municipalitiesSuppliers	<ul style="list-style-type: none">EmployeesCustomersLocal community / Local municipalitiesSuppliersRegulatory bodies	<ul style="list-style-type: none">EmployeesCustomersSuppliersLocal community / Local municipalities
Category B: Stakeholder groups that affect the operation of the Company's Business Units, but are less affected by them.	<ul style="list-style-type: none">Regulatory bodiesPress representativesAcademic community	<ul style="list-style-type: none">Press representativesBusiness OrganizationsSustainable Development Organizations	<ul style="list-style-type: none">Business OrganizationsRegulatory bodies & Sustainable Development Organizations
Category C: Stakeholder groups that affect, and are affected by, the Company's Business Units in a limited way only.	<ul style="list-style-type: none">Business OrganizationsSustainable Development OrganizationsNon-Governmental Organizations	<ul style="list-style-type: none">Non-Governmental OrganizationsAcademic community	<ul style="list-style-type: none">Press representativesNon-Governmental OrganizationsAcademic community

Note:
1. In defining the Stakeholder groups, use was made of the 5 basic criteria (dependence, responsibility, intensity, influence and outlook) according to the **AA1000 Stakeholder Engagement – 2015** international standard, leading to the classification of Social Partners in the above three main categories.
2. The group of shareholders/investors is not included in the above table since its management, as a key group, is carried out centrally by MYTILINEOS’ General Division for Investor Relations and Corporate Governance.

MYTILINEOS promotes regular communication with its Stakeholder groups in a variety of ways, the frequency of which stems from the type of relationship built with each group. In doing so, the Company aims to understand the needs and expectations of

the persons, organizations and businesses with which it interacts and to respond promptly to matters of concern to them, while at the same time maintaining and strengthening its “social license to operate”.

Ways of communication & cooperation between MYTILINEOS and its Stakeholder groups

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
Employees	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Established annual employee performance and skills evaluation process.Open daily communication via the HR-Business Partner role.Continuing education and training.Policies disclosure, whenever required.Regular and extraordinary meetings between management and employees (annual institution of hierarchy Conferences, annual meetings between the Management and employees in groups of 25 people).Annual Sustainable Development Report.Announcements via the online Intranet platform.HR Call Center for employees.	<ul style="list-style-type: none">Uniform corporate culture.Strengthening corporate innovation.Personnel evaluation system and incentives.Education and training.Work quality and employee development issues.Occupational Health & Safety.Information about the Company's good practices.Adaptation to Climate Change.Investments in RES projects.Protection from the COVID-19 pandemic.Mental health and well-being of employees.
Investing community (Shareholders - Investors - Financial analysts)	<ul style="list-style-type: none">Extraordinary and regular shareholders' meetings on an annual basis.Annual presentations of financial results (Press releases, videoconferences, internet).Corporate Governance Roadshow Shareholder engagement with the investor teams of investors and the authorized directors.Materiality process**.Information on topical business developments (Press releases, internet).Annual meetings with financial analysts.Direct communication through MYTILINEOS' Investor Relations Division.Annual Financial Report and Sustainable Development Report.	<ul style="list-style-type: none">The Company's performance in international ESG ratings.Implementation of the UK Code of Corporate Governance.Climate Change: Prospect of adaptation to the TCFD recommendations.Adoption of the SASB methodology.Diversity of the Board of Directors.Evaluation of the Board of Directors' effectiveness.Upgrading of the role of Lead Independent Director.Independent Members on the Board.
Suppliers & Business Partners	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Regular communication (even daily) through the Purchasing Departments of the Company's Business Units.Social and environmental impact assessment every 3 years.Training program for key suppliers (Business Responsibility for Sustainable Development).	<ul style="list-style-type: none">Meritocracy.Stabilization and further reduction of air emissions from the Company's activities.Added value of long-term partnerships.Bolstering local employment.Expansion of support for Greek suppliers.Integration of the UN Global Compact's 10 principles into the business activity.
Customers	<ul style="list-style-type: none">Promotion and information about products and services (continuous communication of the responsible departments).Annual Stakeholder Consultation process*.Materiality process**.Daily communication via the Company's Commercial Divisions.Cooperation in the context of the annual customer satisfaction surveys.	<ul style="list-style-type: none">Product quality.Processing of orders placed.Prevention and support measures for dealing with the consequences of the COVID-19 pandemic.
Local Government (local communities)	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Regular and extraordinary communication ("open door" policy, meetings, participation in local events or consultations, whenever deemed necessary).Annual communication as part of the implementation of MYTILINEOS' social policy.Annual Sustainable Development Report.	<ul style="list-style-type: none">Support of local infrastructure and local cultural and sports activities.Support of local community.The Company's environmental footprint.

* The participation of the particular Stakeholder group in this form of cooperation depends on the subject of the Consultation.
** Participation in the relevant Social Partners survey carried out every two years.

Key Stakeholder groups [GRI 102-40]	Long-standing ways of engagement & collaboration [GRI 102-43]	Issues raised [GRI 102-44]
Business Organizations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Regular and ad hoc communication (provision of data and information, meetings, participation in consultations).Participation in events, whenever deemed necessary.	<ul style="list-style-type: none">Social footprint of MYTILINEOS in its local communities.Fair treatment of employees.
Regulatory bodies & Sustainable Development Organizations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Regular and ad hoc communication (supply of data and information, meetings, participation in consultations).Participation in events held by Sustainable Development Organizations whenever deemed necessary.	<ul style="list-style-type: none">Inclusion of ESG criteria in the financing of Company investments.Training of executives in dealing with Corruption and Bribery.Renewable sources of energy by 2025.Incorporation of TCFD recommendations.Greater development of Diversity & Inclusion issues.Increase in the number of women on the Company's Board of Directors.
Academic community	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Forms of cooperation on an annual basis in the framework of the implementation of research programs and of the Company's social policy.	<ul style="list-style-type: none">As mentioned in the "Thematic Consultation 2019" section.Development of partnerships (e.g. scholarships, traineeships).Support of schools with materials and equipment in the framework of addressing the consequences of the COVID-19 pandemic.
Press representatives	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Direct communication through MYTILINEOS' Communication General Division.Information on topical business developments (Press releases, internet).Organization of briefing meetings with Greek and foreign journalists on an annual basis.	<ul style="list-style-type: none">The Company's progress in the light of the pandemic: (a) security of energy generation, (b) financial stability, (c) contribution to the national effort. Maintaining Company results at pre-pandemic levels.Upgrading of the EPC & Infrastructure Projects Sector to Sustainable Engineering Solutions (SES) Business Unit - highlighting the need to shift focus on sustainable development projects.Establishment of the Renewables & Storage Development (RSD) Business Unit as one of the top 10 solar EPC contractors globally.Highlighting of the contributory benefits of the Company's metallurgical activity for the local communities.Company's contribution to the proper functioning of the energy market.Agreement with Gazprom/security of supply, diversified sources, better prices.Opening to traffic of the Kiato-Rododafni railway sectionEstablishment of the Company as key player in the market for large-scale projects.Green aluminium.Minibond repayment - flexibility of the Company.Company's social profile - Covid-19/Donations.Promotion of the Company to media and audiences abroad.
Volunteer Organizations	<ul style="list-style-type: none">Annual Stakeholder Consultation process*.Materiality process**.Electronic platform for submitting social requests, available throughout the year.Meetings with NGO representatives, whenever deemed necessary, based on the result of their requests' evaluation.Annual Sustainable Development Report.	<ul style="list-style-type: none">Development of innovative synergies to support actions around the strategic action lines of MYTILINEOS' social policies.Highlighting the positive impact on society.MYTILINEOS' commitment to respect & protect human rights.Promotion of the Company in the Social Media via each organization's mechanism.Strengthening MYTILINEOS' Corporate Volunteering.Right to education and lifelong training.Company's contribution to the escalating changes in the climate.

The institution of the Stakeholders Consultation process [GRI 102-43]



The Stakeholder Consultation (or Dialogue) is the application in practice of MYTILINEOS' long-standing commitment to responsible entrepreneurship and to open, social dialogue as a key element of the social resources it harnesses, to ensure its sustainability and to create added value for society at large.

As an institution established by MYTILINEOS, the Consultation is governed by specific principles and has specific goals (mytilineos.gr/media/mmwd2ntn/social_partners_consultation_process_2018_en.pdf), and is carried out annually with absolute consistency. The effectiveness and transparency of the Consultation is ensured through the CSR Governance system,

under which the individual CSR teams of the MYTILINEOS Business Units record and evaluate all proposals, ideas and concerns expressed by the Social Partners. Once this has been done, the most important issues are forwarded to the respective General Divisions for decision-making regarding the responses to them and, where feasible, their integration into the corporate strategy. [GRI 102-21]

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

MYTILINEOS Thematic Consultations Table [ASI]

Thematic Consultation	Subject coverage	Implementation	Distinctions
2020	"Corporate Policy on the respect for and protection of Human Rights"	Sustainable Development Division (Central Services)	
2019	"Education - Skills Development & Creation of Quality Jobs"	Metallurgy Business Unit	
2018	"Developing a Responsible Supply Chain"	Metallurgy Business Unit	
2017	"Translating Entrepreneurship into Value for Society"	Metallurgy Business Unit	
2016	"We Talk about the Environment"	Metallurgy Business Unit	
2015	"Health & Safety at the Workplace"	Metallurgy Business Unit	

Thematic Consultation 2020

MYTILINEOS, considering the new conditions that have been created in the context of dealing with the consequences of the pandemic, and wishing to protect and safeguard the health of its Stakeholders, decided to organize centrally and to hold online its annual Consultation, which was titled "Corporate policy on the respect for and protection of Human Rights" by sending a custom-developed questionnaire to all its Stakeholder groups.

The Consultation had a two-fold purpose: a) for MYTILINEOS to communicate to its Stakeholders the formal corporate policy on the protection of and respect for Human Rights, which are directly related to its business activity, and b) to record the Stakeholders' key views and attitudes, which are key to the design of corporate policy, in accordance with best international practices.

Moreover, the Consultation had the following individual objectives:

- To explore the Stakeholders' level of AGREEMENT with the way in which MYTILINEOS will approach the issue of Human Rights in its formal policy.
- To explore the level of SIGNIFICANCE for the Stakeholders, of MYTILINEOS' decision to formally commit itself to the proper management of Human Rights.
- To explore the level of ACCEPTANCE by the Stakeholders of the issues that MYTILINEOS wishes to include in its Human Rights policy.

Results

- Overall, the Stakeholders' response rate (42%) to MYTILINEOS' invitation was among the highest recorded so far.
- The greatest interest, with very high individual response rates, was shown by the groups of suppliers, employees, Sustainable Development Organizations, Business Organizations, and the Academic community.
- The main objective of the consultation was achieved, since overall, there was wide acceptance of the Company's specific initiative.
- Regarding the Stakeholder's recorded interventions, the most important ones concerned the following: (a) the creation of a dedicated call center (telephone line) for receiving complaints about Human Rights violations, (b) the creation of a due diligence procedure, (c) the need for suppliers and contractors to commit themselves to respect human rights, and (d) the translation of the policy into the languages of the countries where the Company is primarily active.

In detail:

Consultation Results				
Response ¹	Agreement ²	Significance	Acceptance ³	Participation ⁴
42%	94%	83%	99%	5%
A total of 673 responses were received from Employees, Suppliers, Customers, Shareholders - Financial Analysts, NGOs, Journalists, Local Communities, the Academic Community, Sustainable Development Institutions and members of the Business Community.	Over 9 out of 10 participants in the consultation expressed their agreement with the basic approach of MYTILINEOS' policy to the respect for and protection of Human Rights.	Over 8 out of 10 participants in the consultation stated that it is very important for them that MYTILINEOS undertakes a formal commitment to respect and protect Human Rights.	All Stakeholder groups expressed their universal acceptance of all the issues included by MYTILINEOS in its Human Rights policy.	A total of 31 comments were recorded, mainly by the Employees and Suppliers Stakeholder groups, which were taken into account in the policy finalization.
<div><div>1. MYTILINEOS addressed all its Stakeholder groups (1601 individuals and organizations) through a structured electronic questionnaire.</div><div>2. According to the approach adopted by MYTILINEOS, its policy should state the Company's commitment to the respect for all Human Rights, while it should focus on those issues that are directly related to its activity and to which it, as a business, it can have an increased contribution.</div><div>3. Topics: Health and Safety at Work - Appropriate working conditions (working environment, pay, leaves and working hours) - Harassment, intimidation and inhuman treatment - Forced labor and human trafficking (Modern slavery) - Child labor - Discrimination and equal treatment (gender equality, people with disabilities) - Protection of personal data - Right to the freedom of association - Rights of local communities in the vicinity of the Company's activities - Facility security practices (concerns staff behavior).</div><div>4. The rate of active participation, determined on the basis of the submissions of views or comments by Stakeholders out of all those who spoke during the consultation.</div></div>				

Consultation with NGOs 2020

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

During this consultation, the Company, faithful to its long-standing approach, focused on the following objectives:

- To further develop successful partnerships already in place with partner organizations.
- To identify and report any problems and to develop new opportunities for joint action within the existing partnerships.
- To become acquainted with new organizations and programs.

During this consultation, which took place with the participation of 12 NGOs, the following issues were raised and discussed:

- Evaluation of existing partnerships, continuation of current programs/preparation of new ones, and dealing with any problems.
- The Company informed the organizations about the goals of

its social policy for 2020 and about their correlation with the Sustainable Development Goals; for their part, the organizations informed the Company about programs of the NGOs that could serve these goals.

- Exchange of views about how best to capture the quantitative and qualitative results of programs and actions.
- The applicability of the Social Return on Investment (SROI) methodology to highlight the social impact of social programs, where feasible.

The results of the consultation confirmed that the mutually beneficial relationships of trust between the Company and the NGOs are maintained. Moreover, the organizations were informed about current developments in Sustainable Development and about the development of new innovative collaborations, to support actions along the key priority lines of the Company's social policy, towards further enhancing its positive impact on society.

Response to Stakeholders' requests

“Thematic Consultation 2019” “Education – Skills development and Creation of quality jobs”	
Key issues raised by the Stakeholders of the MYTILINEOS’ Metallurgy Business Unit who participated in the special thematic dialogue organized by the Company in 2019. ASI	Metallurgy Business Unit Response [GRI 102-44]
Actions/Partnerships regarding skills that a future employee would like to have before entering the labor market.	<ul style="list-style-type: none">• Participation of the Metallurgy Business Unit in two European programs, SPIRE-SAIS (4-year long) and En-Act (2-year long), whose aim is to develop the skills of staff, in order for enterprises to meet the European Union's Sustainable Development goals.• Participation of the Metallurgy Business Unit in a survey of the Hellenic Federation of Enterprises (SEV) on the identification the skills required to enhance the export activity of enterprises, as well as in a research of the National Technical University of Athens (School of Mining and Metallurgy Engineering) on skills development for students of the Mineral Resources sector regarding management and corporate social responsibility (RM Managers).
More training hours and new training initiatives for the employees of the Metallurgy Business Unit.	<ul style="list-style-type: none">• 26,300 training hours were implemented.• Due to the Covid-19 pandemic, the vast majority of the seminars that had scheduled before is outbreak did not take place, as they required the trainees’ physical presence. The seminars that were not implemented were only partially replaced by e-learning seminars.• The “Basic Seminar in Continuous Progress”, addressed to the large number of the Company’s Labor and technical staff, was developed in-house and will be implemented with the trainees’ physical presence as soon as conditions will permit.
MYTILINEOS should intensify its partnerships with local bodies, and the local bodies should do the same with other companies.	<ul style="list-style-type: none">• The Metallurgy Business Unit hosted and presented to students of the School of Mechanical Engineering of the University of Patras the internal titled “Seminar on the Management of Change”.• In the context of the Company’s collaboration with the Viotia Chamber for the needs of the postgraduate program in Business Administration, AoG hosted and presented to the participants in the program the internal seminar titled “Seminar on Management of Change”, while it also presented and discussed issues related to Personnel Management (Personnel, Industrial Relations, Labor Law, GDPR) & Remuneration Systems.
Support of new educational projects in schools.	<ul style="list-style-type: none">• The Metallurgy Business Unit offered 150 tablets and one laptop to schools in the wider region.



Financial performance 2020 & outlook for 2021

Financial performance 2020

<div>8</div> <div>RECENT WORK AND ECONOMIC GROWTH</div> 	<div>Impact on Sustainable Development</div> <div>4.00</div>	<div>Significance for Stakeholders</div> <div>3.45</div>
---	--	--

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: In the national economy and employment, in the local communities as well as in the economic transactions and the flow of money, between the Company and the main groups of the Stakeholders.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none"> In the economic liquidity and the guarantee of the Company's ability to finance and develop its activities with the aim of its sustainability. Further development of the Company's ability to respond to economic environmental and social challenges arise. In the utilization of financial resources with the aim of creating added value for the basic groups of its Stakeholders. 	<ul style="list-style-type: none"> Shareholders / Investors Local Communities NGOs Regulatory Bodies in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The effects are caused by the Company's Business Activities Sectors and its subsidiaries.		

“2020 was undoubtedly a year marked by unprecedented challenges worldwide. Especially the Greek economy, which while it had begun to recover from a ten-year period of recession, is called upon to face a new deepening of economic activity. In this context, the strong economic results that we are announcing today certify in the clearest way that, with the support of the strategic advantages of MYTILINEOS and the tireless effort of our people, we managed to effectively absorb the vibrations caused by the COVID-19 pandemic, we remained at last year's levels in operating profitability which I had set as a goal early in 2020, while at the same time we remained on a steady growth trajectory. In addition, in 2020 we accelerated the transformation process of MYTILINEOS, which now, through the new Business Units, focuses on the goals of energy transition and sustainability.”

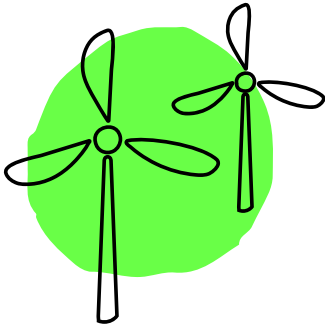
Evangelos G. Mytilineos
 Chairman of the Board of Directors and
 Chief Executive Officer

€1,899

m.
Turnover

€315

m.
EBITDA



Results [GRI 103-3a-ii]

- Turnover recorded a decrease of 16% and amounted to € 1,899 million compared to € 2,256 million in 2019 due to the weak price environment of the Metallurgy and Electricity & Natural Gas Sectors and the time shift in both the implementation and the contracting of new projects in the Renewables & Storage Development and Sustainable Engineering Solutions Business Units, due to the pandemic.
- Operating Earnings before Taxes, Interest and Depreciation (EBITDA) remained almost unchanged, as they amounted to

- €315 million compared to €313 million in 2019, benefiting from the strong performance of the Electricity & Natural Gas Sector.
- Net profit after taxes and minority interests amounted to €129 million compared to €145 million in 2019.
- Earnings per share (EPS) amounted to €0.911 compared to €1,014 in 2019.
- Proposed dividend of €0.36 per share (adjusted for own shares) corresponding to 41% of net profits compared to 35.5% in 2019.

Outlook for 2021 [GRI 102-6]

Metallurgy Business Unit ASI

The positive news for dealing with the pandemic led the commodity prices to high levels while the real economy also reacted positively. As a result, the premiums of the final products have strengthened, but pressures on the prices of energy and raw materials are beginning to appear.

The prospect of lifting travel restrictions, which will depend on the speed of vaccination of citizens, will maintain optimism and, consequently, the upward trend in product prices. On the contrary, any delays that are already evident in the field of approval of new vaccines raise concerns about the duration of price maintenance and there are moves to encapsulate the profits made in the previous period.

The "IFESTOS" program is in full swing and is expected to be completed within the year all the planned investments to increase production in EPALME and in the production of alumina in the Aluminium of Greece. The production rate in alumina and secondary aluminum will be gradually intensified and a record historical performance in annual productions is expected to be recorded, expecting even greater quantities in 2022 when investments will pay off for the first time.

Sustainable Engineering Solutions Business Unit

2020 was a turning point, with the transformation of the former Integrated Projects & Infrastructure Business Unit, which now has a new organizational structure and focuses on projects that promote the goals of Energy Transition and Sustainable Development. In this context, the European Recovery Fund is

expected to offer significant opportunities for the Greek economy and especially for companies with the ability and know-how to participate in projects that promote a sustainable development model (e.g. solid and liquid waste management projects, hybrid and off-grid energy projects, energy upgrade projects and execution of innovative first-of-kind energy projects).

The planning and prospects for the individual activities of SES BU can be summarized as follows:

- MYTILINEOS continues the construction of the new 826MW unit with natural gas fuel at its Energy Center in Agios Nikolaos, Boeotia. Abroad, MYTILINEOS continues to build projects in Ghana, Nigeria and Slovenia. Having now gained a leading position in the undertaking and execution of projects for the construction of gas-fired power plants, it claims the undertaking of new projects in Europe and Sub-Saharan Africa.
- The Sustainable Engineering Solutions Business Unit will continue to aim at undertaking hybrid projects / offline projects, capitalizing on the relevant experience and knowledge from similar projects that have been completed. At the same time, it will continue to implement the strategy of expanding and developing its presence in important energy upgrading and energy saving projects both in the Greek market and in selected foreign markets. Finally, it will intensify its presence in projects related to new technologies in combination with the provision of energy solutions, aiming at the development of new, diversified activities with added value.
- MYTILINEOS, having the relevant experience, claims a significant share for electricity transmission network projects in Greece, Europe and Africa.

- MYTILINEOS holds a 7th class contractor degree in Greece and part of its business planning is the selective claiming of the auctioned infrastructure projects, building, environmental and other projects mainly within Greece, through construction contracts, PPP contracts or concession contracts.
- In the field of Waste Management, MYTILINEOS identifies great opportunities for expansion based on its increased know-how in solutions of the circular economy. In particular, it extends to solid waste management through the development of biogas plants and waste management, where it selectively examines cases of project financing. In the field of sludge and wastewater management, it implements a plan for its systematic penetration initially in Europe, Middle East and Africa, making use of the added value provided by the special know-how of the ZEOLÓGIC subsidiary where it acts as a pioneering technology provider in this market.

Renewables & Storage Development Business Unit

The Renewables & Storage Development Business Unit continues to focus on the timely execution of existing contracts and new projects and investments in targeted markets, as companies and countries focus on faster integration of green energy into their energy efficient environmental footprint. In this context, the activities of MYTILINEOS through this Business Unit will be a "significant catalyst" for its operational profitability next year, with a significant increase in the projects that the BU will be called to implement, both in third party projects and in own investment projects through the development, construction and operation / sale of photovoltaic or energy storage projects.

Power & Gas Business Unit

MYTILINEOS, currently having an installed capacity of ~1.4 GW from thermal power plants and RES projects in operation, as well as the 1st place among the private suppliers, has consolidated its position as the largest private vertically integrated electricity and gas company, conquering the critical size required to make the most of the full liberalization of the domestic electricity and gas market.

2021 will be the first full year of operation of the electricity market under the Target Model, the new form of organization of the wholesale stock market of electricity, and is expected to be affected by both higher gas and CO₂ prices, as well as special features of the new regulated electricity market. Nevertheless, the economic results of the Power & Gas Business Unit are expected to be maintained at satisfactory levels due to:

- access to competitive and flexible sources of pipeline gas supply through direct long-term contracts with major international producers and suppliers,
- LNG supply, where MYTILINEOS has a significant advantage over its competitors, due to its long experience, and the developed network of suppliers,
- efficient management of the electricity and gas portfolio by optimizing the overall results,
- the increased volume and continuous expansion in the electricity and gas retail business,
- the expansion of electricity trading activity in additional countries.





Environment



Alignment to UN Global Compact Principles

PRINCIPLE	PRINCIPLE	PRINCIPLE
7 th	8 th	9 th

Material Topics

- Adaptation to climate change
- Energy & Air emissions
- Environmental restoration & Biodiversity
- Circular economy (Waste management)
- Water management
- Pollution prevention

Alignment to UN Sustainable Development Goals

6 CLEAN WATER AND SANITATION 	7 AFFORDABLE AND CLEAN ENERGY 	8 DECENT WORK AND ECONOMIC GROWTH 	12 RESPONSIBLE CONSUMPTION AND PRODUCTION
13 CLIMATE ACTION 	14 LIFE BELOW WATER 	15 LIFE ON LAND 	

Environmental policy

Measuring the impact of MYTILINEOS' business activity on the natural environment is an ongoing process that is constantly evolving. The Company **is committed to the stabilization and reduction of its environmental footprint**, through the implementation **of an integrated Environmental Management System certified in accordance with the ISO 14001/2015 international standard**. The system is supported by individual **environmental policies**, by **targeted investments aimed at upgrading its production processes**, by **taking advantage of new developments in related technologies**, and **by applying the Best Available Techniques in each Business Unit**.

Core elements of MYTILINEOS' Environmental policy:

- Adherence to the agreements and commitments that MYTILINEOS has undertaken over and above its statutory obligations.
- Integration of Sustainable Development principles in the Company's decision-making and operation processes.
- Assessment of the impacts of the Company's activities on the environment, identification and assessment of potential risks, adoption of the necessary precautionary measures, and conduct of regular inspections and audits to confirm their implementation and assess their efficiency.
- Control, continuous reduction and proper management of solid, liquid and gaseous waste, employing utilisation, reuse and recycling techniques where feasible.
- Responsible use of energy, water and other natural resources.
- Responsible use of water, beyond regulatory requirements, by reducing water withdrawals and discharges, and by minimizing water consumption.
- Protection of biodiversity and ecosystems.
- Prevention of all identified pollution risks.
- Satisfactory readiness and effective response to environmental emergencies and correction of all deviations, by implementing corrective plans.
- Study, maintenance and evolution of appropriate prevention and suppression means, especially in cases where installations are modified.
- Correction of all deviations identified, by introducing and implementing corrective and preventive action plans and rehabilitation plans.
- Continuous briefing, training and awareness-raising activities for personnel in all Business Sectors, in a manner that is adapted to the duties and needs of each employee and promotes an environmentally responsible culture.
- Acknowledgment of Stakeholders' needs and expectations regarding environmental issues, demonstrating increased awareness of them and promoting a climate of cooperation.
- Encouraging associates (contractors, suppliers, clients) to take action in connection with environment-related issues

- and strengthening of their environmental conscience.
- Organisation of regular internal and external inspections to assess the performance of the Environmental Management System, the achievement of the targets set and the application of the regulations and principles.

In the context of the organization and monitoring of the Environmental Management system, the environmental managers in each Business Unit of the Company safeguard on a daily basis the proper environmental operation of all industrial units, while the CEO and the Executive Committee are informed of and evaluate, every 3 months, the progress and performance on key environmental issues, giving appropriate directions when required.

Environmental legislation

Compliance with the environmental legislation is a core element of the business activity of MYTILINEOS and a major issue whose significance does not fall short of the other issues that the Company is managing in the context of its continuous and responsible development. This stance, which is a key component of the Company's overall environmental policy, is primarily based on the principle of adhering to the provisions of the law, as well as to the agreements concluded and the commitments voluntarily undertaken by the Company through its Business Units. To achieve this, the Company monitors and ensures its compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for its operational units. This is a process that is conducted internally, on a regular basis and by specialized personnel in each Business Unit, as well as annually, by a recognized independent external organization that undertakes to audit and certify the environmental management system in place.

Environmental expenditures

In 2020, the environmental expenditures of MYTILINEOS amounted to €71.6 million and concerned the disposal of waste, the management of air emissions including related costs, environmental restoration, and environmental prevention & management actions.

Adaptation to Climate Change



Impact on Sustainable Development	2.75	Significance for Stakeholders	3.52
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts of climate change may occur in the industrial units, RES plants, mines and construction sites of the Business Units and subsidiaries of MYTILINEOS, as well as within the boundaries of their operation.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Strengthening of the resilience and adaptability of its production process to natural disasters and the risks posed by climate change.The promotion of mechanisms to increase the ability to organize and manage activities related to climate change adaptation in the most sensitive areas of local communities.	<ul style="list-style-type: none">Local communitiesShareholders / InvestorsCustomersNGOsSustainable Development OrganizationsRegulatory BodiesAcademic communityMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to inform the Stakeholders about the steps to be taken by the Company in connection with its adaptation to climate change or, in other words, with the reduction of its vulnerability to the climate change phenomenon, by focusing on the following three main areas of work: (a) examining future climate forecasts at local level, in order to identify potential risks and the possibility of integrating the issue of adaptation to climate change into its business decision-making, (b) avoiding or minimizing climate-change-related damage and, where possible, taking advantage of opportunities to adapt to changing circumstances, and (c) implementing measures to respond to existing or projected impacts. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

MYTILINEOS owns coastal industrial facilities in Greece and operates in countries where the effects of climate change are more intense. Through its mining activity, which is directly related to natural resources, the Company may also face a range of challenges and problems caused by the changes in the climate. The main challenge for the Company is to assess the vulnerability of its activities to climate change, considering existing and expected climate events and the impacts that these are projected to have.

Major risks [GRI 102-15]

In response to the above challenge, in the coming years the Company may have to take significant action to address the following risks:

- Transition risks. Responding to extensive changes in the policies, laws and technologies concerning the measures for adapting to and mitigating climate change, in the broader context of the transition to a lower carbon emissions economy at the domestic, European and global level.
- Natural hazards associated with intense or longer-term natural changes which are considered important for the operation of the Company's industrial plants including, among others, the destruction of infrastructure due to extreme weather conditions, the reduction of available water resources due to lower rainfall, the rise in the sea level, the loss of working days due to extreme temperatures, the need to strengthen measures and actions to protect and restore the environment, etc. These natural hazards may have economic impacts, such as direct damage to assets, as well as indirect impacts due to the disruption of the supply chain.
- Additionally, climate change has been recognized as a potential source of reputational risk associated with changes in the Stakeholders' perception of the Company's contribution to a lower carbon economy.

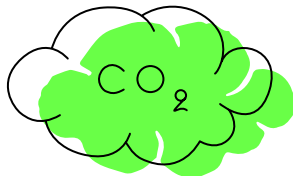
Risk Management / Control Practices [GRI 103-2a]

The Company has already incorporated in its strategic priorities the implementation of a study to identify the risks and opportunities from the impacts of climate change on its activity. In 2021, MYTILINEOS will join the **CDP Climate Change** international initiative, while according to its current planning, by the end of 2022 the Company intends to fully adopt the climate-related financial risk disclosures framework regarding the analysis of the risks and impacts of climate change, by following the relevant recommendations of the **Task Force on Climate-Related Financial Disclosures (TCFD)**. For more information about how the Company is managing the TCFD recommendations, please review the “TCFD Content Index” section of this Report.

Results [GRI 103-3a-ii]

The main activities which have already been initiated and seek to ensure the adaptation of the Company's activities to climate change are the following:

- In the Power & Gas Business Unit, the major risks have been assessed and there is no apparent need to adopt specific targeted measures has been identified. Regarding the Company's thermal plants, Emergency Response Plans have been developed to address the occurrence of extreme natural phenomena (heatwave, frost, storm, flood etc.), while special flood studies have also been carried out where streams are located in the vicinity of the Company's power plants. With regard to the operation of RES plants, wind turbines are fitted with safety systems which in the event of very strong winds switch the turbines off and move their blades to a secure position, while solar collector panels are hail resistant by manufacture.
- In the Metallurgy Business Unit, studies have already been carried out regarding the risks of flood, accidents and destructions, while existing infrastructures have been improved and new ones have been constructed to address the most extreme weather events. The relevant emergency response plans have also been developed. Moreover, in the context of mining activities no particular impacts have been identified so far in the Company's underground sites requiring the implementation of specific adaptation measures. **ASI**
- Regarding the Company's business activity abroad, appropriate protection measures against extreme weather events are adopted and implemented within the boundaries of the facilities and work sites, to ensure that all conditions resulting in deviations from the Business Unit's smooth operation are dealt with effectively.





ENVIRONMENT

Energy & Air emissions



Impact on Sustainable Development

3.80

Significance for Stakeholders

3.54

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: In the areas where the aluminum and alumina production plants as well as the Company's thermal power plants operate.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The increase in the percentage of renewable energy sources in the energy mix nationally.The improvement of energy efficiency and the promotion of investments in energy infrastructure and cleaner energy technology.	<ul style="list-style-type: none">Regulatory BodiesLocal communitiesSustainable Development OrganizationsAcademic communityShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are caused by the Metallurgy and Power & Gas Business Units of MYTILINEOS and by its subsidiary KORINTHOS Power, while key suppliers of the Company may also be indirectly involved in these impacts.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data MYTILINEOS' Stakeholder groups, so that they can understand how the Company is managing the unavoidable impact of its business activity on air quality. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The Company's electric power generation and aluminium production activities are the primary sources of its energy consumption and carbon dioxide (CO₂) emissions, with significant operating costs. CO₂ emissions contribute to the greenhouse effect and reinforce the phenomenon of climate change, with

impacts on the natural and man-made environment. **The commitment to gradually reduce its energy consumption and carbon footprint by 2030 and 2050, respectively, is one of the Company's most important challenges under its new Sustainable Development strategy.**

Major risks **[GRI 102-15]**

- Any deviations from the legislation in force on industrial emissions may cause additional atmospheric pollution and result in increased costs due to the purchase of extra emission allowances, affecting the Company's financial results as well as its capacity to retain its existing or attract new customers, investors or business partners.
- A further increase in the price of CO₂ emission allowances (€/t), as this may be shaped by the future EU policies on energy and climate, is likely to affect future compliance costs, either directly or indirectly through the consumption of electricity.

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

MYTILINEOS is committed to reducing its carbon footprint (carbon dioxide emissions), as well as its other air emissions, so as to minimize the impacts on air quality in the areas where it operates, as well as to addressing the overall causes and impacts of climate change in general. The Company promotes the use of natural gas as a stage of mild transition to the "green energy" era, in all its industrial plants as well as in its new business investments in the Power & Gas Business Unit, such as the new gas-fired combined cycle (CCGT) power plant, whose construction began in 2019 and which will be ready in late 2021. The plant will employ cutting-edge technology which will make it the most powerful and energy-efficient power plant in the country and one of the largest power plants in Europe.

MYTILINEOS has adopted a climate change strategy that is reflected in its overall environmental policy and serves to guide the Company's initiative to reduce its carbon dioxide emissions. The Company aims to achieve by 2030 a reduction by 30% of its direct and indirect carbon dioxide emissions, as these are defined by the Kyoto Protocol, and the Paris Agreement on Climate Change (COP21).

The reduction initiatives designed by the Company focus on the following areas: **ASI**

- **the strengthening of its presence in the production of electricity from RES, with further implementation of a significant portfolio of over 2.5GW of RES projects in Greece and abroad,**
- **the electrification of its metallurgical activities exclusively from renewable sources,**
- **the use of low carbon emission fuels in its activities,**
- **the application of state-of-the-art technologies and the exploitation of digital industrial processes in production stages, to improve energy efficiency and reduce emissions, such as the digitization of the smelter at the Aluminium plant in collaboration with General Electric, and the application of Metsol technology to reduce PFC emissions,**
- **the significant increase in the amount of secondary aluminium produced and in the amount of aluminium scrap used in the production of primary aluminium,**

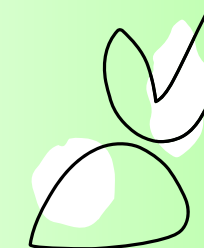
- **the use of electric power from RES and of batteries for energy storage at work sites,**
- **the use of electric vehicles,**
- **the replacement of gas-based office space heating installations with electric heat pumps.**

The Company has already begun work on breaking down the above initiatives into concrete actions, in order to determine their relevance to its business activity and accurately establish their economic parameters. Moreover, in 2021 the Company plans to develop a detailed activity plan specific to each initiative, including implementation deadlines and the specification of the supervision and coordination of the activities involved, together with a set of relevant performance indicators (KPIs), by Business Unit, in order to be able to disclose its progress against these targets on an annual basis, starting in 2022.

At the same time, MYTILINEOS:

- Is closely following the relevant developments in the legislation and takes preventive measures in order to minimize any potential adverse effects.
- Invests in renewable energy sources and in the use of digital industrial methods in the production stage with the aim of saving energy, reducing dependence on fossil fuels and reducing air emissions. Specifically, in 2020 the installed capacity of RES-based power plants was increased by 34.5 MW, with the addition of three (3) new Wind Farms, while the 10-year long collaboration of the Metallurgy Business Unit with General Electric for the implementation of the world's first Digital Smelter, an innovative digital solution in the electrolysis process, is continuing. **ASI**
- By expanding its activity in recycling aluminium scrap from end-of-life products and by acquiring the relevant know-how, it greatly strengthens its efforts to substantially reduce the use of raw materials (bauxite) and save energy. **ASI**
- By systematically applying Best Available Techniques (BATs) in its production processes and by using more environment-friendly fossil fuels such as natural gas -recognized as a transition fuel towards decarbonization- in nearly all its industrial units, it aims to improve its energy efficiency and reduce dust emissions.
- Ensures the proper maintenance and the best possible operation of the machinery in its industrial plants, while investing in their modernization with new technological installations, where feasible. In 2020, EPALME S.A., a MYTILINEOS subsidiary active in the production of secondary aluminium, proceeded to invest in the purchase of a new anti-pollution technology furnace, to ensure that the strict limits of its environmental license are not exceeded.
- Monitors on a monthly basis its emissions of CO₂, Fluorine and PFCs (Perfluorocarbons) and implements timely corrective actions and appropriate technical interventions to ensure that the respective annual emissions are below its statutory allowance and are maintained at the lowest possible level.

- Carries out checks of other pollutants emissions (NO_x, SO_x and dust) by means of continuous and periodic sampling measurements. In the Aluminium production plant, equipment has been installed to monitor and record dust emissions and take relevant measurements, in accordance with the environmental legislation and the Company's standards. In the Company's electric power generation plants (Combined Heat and Power plants and thermal plants), an online NO_x emissions measurement system is operation, which automatically activates alarms if the "high" values set (which in any case are lower than the maximum allowed ones) are exceeded. Measures to suppress diffuse dust are also taken, such as maceration of roads and raw materials, as well as tree-planting.
- It has taken care to ensure that in all its existing industrial plants all the statutory greenhouse gas emission licenses have been obtained. Moreover, appropriate emission monitoring and reporting infrastructure has been deployed and is in operation.
- In the production of electricity, due to the nature of this activity, the Company focuses on maintaining the operation of thermal power plants at the highest efficiency levels in Greece, making the best use of natural gas as a primary fuel. MYTILINEOS' thermal power plants use natural gas to generate electricity. This is a fossil fuel with a lower carbon content than other fossil fuels, with no release of SO₂ and particulates, lower NO_x emissions (mainly NO₂) compared to the limits allowed by applicable law, and low CO₂ emissions (by 70%) compared to lignite plants.
- Participates, through the Metallurgy and Power & Gas Business Units, in the EU Emissions Trading Scheme (EU ETS), according to which from 2013 onwards all procedures for calculating and verifying air emissions comply with the EU ETS Phase III (2013-2020) regulations, under which compliance costs are higher due to the allocation of fewer allowances relative to the actual emissions. **ASI**



Results [GRI 103-3a-ii]

The total energy consumption from the business activity of MYTILINEOS in 2020 recorded a slight **increase by 2.4%** compared to 2019, mainly due to the increase in the quantity of natural gas consumed in thermal power plants of the Power and Gas Business Unit for the generation of electricity, as well as in the Metallurgy Business Unit for the production of aluminium. In particular, the total energy consumption from conventional energy sources, (natural gas, gas oil, gasoline) **increased by 3%**, while the quantity of electricity purchased for consumption, which is 100% supplied from the grid, **remained almost unchanged** (marginally decreasing by 0.2%), with **nearly 28% of it coming from renewable sources**.

Total energy consumption (TJ)* [GRI 302-1]	2018	2019	2020
Energy consumption (Non-Renewable sources)	38,804.3	43,010.9	44,298.7
Natural Gas	38,421.8	42,577.9	43,860.3
Mazut	260.7	280.1	297.5
Gas oil	115.2	138.7	129.5
Heating oil	4.4	7.1	6.0
Gasoline	2.2	6.7	5.4
Energy purchased (Electric Power)	10,400.5	10,342.1	10,323.2
Non-Renewable Sources	10,400.5	8,093.5	7,457.2
RES (Renewable Energy Sources)	-	2,248.6	2,866.0
Quantity of energy produced	18,235.1	20,816.5	21,856.6
IPP (Thermal plants)	13,327.1	15,286.4	15,622.7
CHP (Combined Heat and Power Plant)	4,153.6	4,167.4	4,351.3
RES (Renewable Energy Sources)	754.4	1,362.7	1,882.6
Quantity of energy exported (sold)	18,235.1	20,816.5	21,856.6
IPP (Thermal plants)	13,327.1	15,286.4	15,622.7
CHP (Combined Heat and Power Plant)	4,153.6	4,167.4	4,351.3
RES (Renewable Energy Sources)	754.4	1,362.7	1,882.6
Total energy consumption	49,204.8	53,353.0	54,621.9

* **Total energy consumption** = Energy consumption from Non-renewable sources + Energy purchased for consumption + Energy produced - Energy sold.

In terms of energy intensities, the performance of the Metallurgy Business Unit was stabilized, as shown in the following table, while in the Power & Gas Business Unit **the specific energy consumption in production per TJ of electric power generated decreased by 5.9%** compared to the previous year. [ASI]

Metallurgy Business Unit Basic energy intensities [GRI 302-3]	2018	2019	2020
Specific consumption in bauxite production (GJ/t of production) ¹	0.125	0.118	0.134
Specific consumption in anhydrous alumina production (GJ/t of production) ²	3.15	3.21	3.12
Specific consumption in hydrated alumina production (GJ/t of production) ³	5.92	5.76	5.85
Specific consumption in primary electrolysis aluminium production (GJ/t of production) ¹	51.36	51.57	51.76
Specific consumption in primary smelter aluminium production (GJ/t of production) ²	1.62	1.83	2.10
Specific consumption in anodes production (GJ/t of secondary cast aluminium produced) ⁴	4.07	4.20	4.05

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

The MYTILINEOS Metallurgy and Power & Gas Business Units produced 99% of the Company's direct and indirect carbon dioxide (CO₂) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas), while indirect (Scope 2) emissions correspond primarily to the consumption of electric power. Despite the slight increase by 3% recorded in direct emissions, due primarily to the increase in the quantity of natural gas used, in 2020 **the Company's total direct and indirect emissions decreased by nearly 4%** compared to 2019. This total reduction is the result of the individual improvement by 14% of indirect Scope 2 emissions, caused by the evolving change of the energy mix in Greece during 2020, through the lignite phase-out and the increase in the use of power from renewable sources.

Regarding the other significant air emissions, the most significant changes compared to 2019 were the following:

- The **reduction** of the total quantity of **nitrogen oxide (NO_x) emissions by 4.7%**.
- The **significant reduction by 12.2% of the quantity of sulphur oxide (SO_x) emissions**. As part of the adaptation to Best Available Techniques, the Metallurgy plant imposed additional restrictions in the procurement of tar and coke for the production of electrodes, as regards their content in Sulphur (S). [ASI]
- The **significant reduction by 14.6% of the quantity of particulates**.
- The **slight increase by around 4%** in the emissions of PFCs, despite the constant efforts, the regular inspections and the appropriate technical interventions applied for their containment, in the anhydrous alumina electrolysis process for the production of primary aluminium. In response to the increase in PFCs emissions, the Metallurgy BU is already taking action to address and further reduce those emissions, in alignment with its carbon footprint reduction targets.

Air emissions (t CO ₂ eq)	2018	2019	2020
Direct greenhouse gas emissions (Scope1) [GRI 305-1]	2,555,713.6	2,798,068.3	2,885,465.3
Fuels (CO ₂ : 100%)	2,162,139.5	2,398,364.3	2,467,109.0
Processes (CO ₂ : 74% - PFCs: 26%)	388,437.4	396,284.3	412,671.6
Transport (CO ₂ : 100%)	5,136.7	3,419.7	5,684.7
Indirect greenhouse gas emissions (Scope2) [GRI 305-2]	1,819,624.6	1,841,255.3	1,573,958.2
Electricity (CO ₂ : 100%)	1,819,624.6	1,841,255.3	1,573,958.2
Total (Scope 1 & 2)	4,375,338.2	4,639,323.6	4,459,423.5
Indirect greenhouse gas emissions (Scope3) [GRI 305-3]	2,577.2	1,828.1	3,553.0
Transport & distribution of products (CO ₂ : 100%)	1,449.5	615.2	337.6
Business travel (CO ₂ : 100%)	675.0	736.9	2,412.3
Employee commuting (CO ₂ : 100%)	452.7	476.0	803.1
Other significant air emissions [GRI 305-7]	5,341.6	5,555.2	5,030.8
SO _x (t)	3,651.1	3,634.0	3,190.1
NO _x (t)	1,342.3	1,553.3	1,480.0
CF ₄ (t)	11.2	11.8	13.3
C ₂ F ₆ (t)	1.3	1.4	1.6
Fluorine (t)	261.5	258.3	262.2
Particulates (t)	74.2	94.3	80.5
Volatile organic compounds - VOC (t)	0.0	2.0	3.1
Persistent organic pollutants - POP (t)	0.0	0.0	0.0
Hazardous air pollutants (t)	0.0	0.0	0.0

1. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO₂eq). The figures used are those applicable at the end of the reporting period (the year 2020). The conversion factor values have been obtained using the NIR 2020 methodology.
2. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO₂eq). The figures used are those applicable at the end of the reporting period (the year 2020). The conversion factor values have been obtained using the European Residual Mix 2019 methodology.
3. Gross Location Base: Use of the emissions factor based on data published by the State at regional or national level. In addition, due to lack of other data for calculating market-based emissions, use was made of the average emissions factor for the total electricity generation in the country.
4. The quantity of pollutant emissions (Scope 3) is partly covered. In particular, data come from the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit except in the category of employee commuting, in which the respective performance of the Power & Gas Business Unit is also included.

At the level of specific CO₂ emissions (direct and indirect) reductions were recorded in the production of anhydrous and hydrated alumina, while a significant reduction by **19.8%** was observed in the production of primary aluminium. Specific emissions in secondary aluminium production remained at the same level as in 2019. **[GRI 305-4] ASI**

Metallurgy Business Unit Specific air emissions (t CO ₂ eq) [GRI 305-4]	2018	2019	2020
t CO₂ (scope 1&2)/t of hydrated alumina production	0.425	0.401	0.383
t CO ₂ (scope 1)/t of hydrated alumina production	0.003	0.004	0.003
t CO ₂ (scope 2)/t of hydrated alumina production	0.422	0.397	0.380
t CO₂ (scope 1&2)/t of anhydrous alumina production	0.180	0.185	0.177
t CO ₂ (scope 1)/t of anhydrous alumina production	0.170	0.175	0.169
t CO ₂ (scope 2)/t of anhydrous alumina production	0.010	0.010	0.008
t CO₂ (scope 1&2)/t of primary aluminium production¹	10.37	8.70	6.98
t CO ₂ (scope 1)/t of primary aluminium production	2.24	2.31	2.39
t CO ₂ (scope 2)/t of primary aluminium production	8.13	6.39	4.59
t CO₂ (scope 1&2)/t of secondary aluminium production	-	0.33	0.33
t CO ₂ (scope 1)/t of secondary aluminium production	-	0.25	0.26
t CO ₂ (scope 2)/t of secondary aluminium production	-	0.08	0.07

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

ENVIRONMENT

Environmental restoration & Biodiversity



Impact on Sustainable Development

3.60

Significance for Stakeholders

3.46

Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: In the area where the mining activity of the company DELPHI-DISTOMON takes place, as well as in protected areas of the Natura network where the RES plants of MYTILINEOS' subsidiaries operate.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The conservation of mountain ecosystems, including biodiversity.The restoration of the exploitable land affected by the business activity.The increase of forestry and reforestation at local and national level.	<ul style="list-style-type: none">Regulatory BodiesLocal communitiesSustainable Development OrganizationsAcademic communityShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are caused by the subsidiaries of MYTILINEOS: DELPHI-DISTOMON, Aeoliki Sidirokastrou S.A., Aeoliki Evia Pyrgos S.A., and Aeoliki Evia Chelona S.A.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide specific information and data to all MYTILINEOS' Stakeholder groups, so that they can understand the Company's approach, which relies on a combination of elements to prevent, manage and restore the inevitable impacts on the areas used for its business activity, while minimizing any effects on biodiversity. **[GRI 103-2b]**

Key Challenges/Impacts [GRI 103-1a] [GRI 102-15]

The key challenge for the Company is to safeguard biodiversity and restore the natural landscape in usable land areas associated with bauxite mining activities and with the development and operation of Renewable Energy Sources (RES) projects.

Major risks [GRI 102-15]

Effects on the flora and fauna in the wider area of the Company's activities. Ineffective prevention of negative impacts would lead to environmental degradation, raising issues of non-compliance with the legislation in force. In such a case, the loss of the Company's social license to operate would result in the suspension of all intentions and/or plans for business development and growth, due to the impact on its reputation and financial position.

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

In the Metallurgy sector, the Aluminium of Greece (AoG) plant, in compliance with the applicable legislation (including the plant's Environmental Terms Approval Decisions), has in place a series of prevention and control measures to contain emissions to the natural recipients, thus safeguarding their quality and, consequently, the conditions for the growth of the local flora and fauna. The prevention measures include investments in anti-pollution equipment such as state-of-the-art filters in chimneys and at the discharge points of wastewater treatment plants, installations for the treatment of process gases etc. **ASI**

The control measures include:

- Taking regular groundwater and sea water samples, whose results are confirmed by samples and analyses made by independent bodies.
- Operation of the air quality measuring station located in the Holy Monastery of Hosios Luke of Steiris.
- Assessment and ecological evaluation of the wider area of AoG's plant, by a study that was carried out in 2019 and also took account of the fact that the plant is developed purely on an area of land, which however is in direct contact with a sea area of the NATURA 2000 network (pSCI: GR2530007 – CORINTHIAN GULF), which is a proposed Site of Community Importance (SCI).

Information on the level of operation of critical operating equipment (filters etc.) and measurement equipment (continuous measurement analysts etc.), as well as the results of studies and checks on the physical recipients of the plant's wider area, carried out by the plant itself and/or by independent bodies, are the subject of regular documented updates that have been requested by the Competent Authorities.

- The mining activity of DELPHI-DISTOMON, a MYTILINEOS subsidiary, involves primarily **underground quarries in**

the area of Fokida and is carried out with respect for the biodiversity of the area. Before each new mining activity begins, **Environmental Impact Assessments and Environmental Rehabilitation Plans** are carried out and used as a basis for the mining phase but also for the rehabilitation phase. The extraction and remediation points are specified in detail, while all mining operations are planned so as to guarantee the **least possible alteration to the natural environment**. **ASI**

Measures taken to prevent significant adverse effects on the environment and alterations to the natural landscape:

- Use of the existing road network and prohibition of opening up new roads.
- Use of existing access land works and in-site installations.
- Prohibition of depositing or managing sterile limestone waste from the mining process on the soil.
- Systematic maceration of all mining work areas for suppressing dust emission.
- The management of all types of non-hazardous waste complies with the provisions of the applicable laws, while the disposal of this waste takes place only through certified bodies/contractors.

Moreover, a detailed mapping of the form and type of the vegetation is carried out, so that rehabilitation can be based on the unique features of the local ecosystem. **The environmental policy** of DELPHI-DISTOMON (alhellas.com/en-us/environmental-policy/environmental-policy) **emphasizes its commitment** to the protection of biodiversity both in the preparatory construction phase of a project and in the rehabilitation phase, helping to further contain any adverse effects, which are already quite limited in scope and temporary in nature. **ASI**

The Company is also committed to securing the financial resources required to ensure adherence to the environmental terms and the performance of rehabilitation works, whose costs are included in advance in the budget of the corresponding project.

The closing down and remediation plan for every worksite, which is updated regularly, is specified by the Environmental Terms Approval Decision and is regularly updated, while the project manager is obliged to submit to the competent Environment Department of the Regional Unit of Fokida, in the first month of each year, a topographical diagram (to a scale of 1:2000) together with a technical report, which presents and describes the progress of the remediation works.

DELPHI-DISTOMON has been systematically active for more than 48 years in environmental rehabilitation and all its inactive quarries have been restored. Environmental remediation is carried out by systematically planting approximately 15-20,000 trees per year, while during 2020, **16,960 forest seedlings** were planted. **ASI**

Until today, DELPHI-DISTOMON has planted approximately 1,175,420 trees covering a total afforested area measuring over 1.82 km². In addition, 77 km of fencing have been installed (to protect the tree planting), together with a 734 km long network of watering – irrigation pipes for those trees. **ASI**

It should also be mentioned that over the last 5 years, on average, 300,000 tons of sterilized limestone are produced during the mining process. This quantity is disposed of in already existing sinkholes of surface and underground sites and thus **not a single square meter of land had to be reserved for the disposal of this type of waste.**

In the Power & Gas Business Unit, with respect to the activities which concern the construction of wind farms located near or inside areas designated as Special Protection Areas, a key prerequisite is the development of the respective environmental impact studies foreseen (specific ecological assessment, annual monitoring of the protected area), to confirm that there are no impacts or, in cases where there are impacts, to describe the measures which may be adopted in order for these impacts to be avoided. In cases where measures cannot be taken, the project is redesigned to ensure the absence of impacts or to allow for measures that will help reduce them as much as possible. **In line with the above, the impacts in the locations of the Company's activities are negligible in terms of pollution (gaseous, solid or liquid waste), the movement of animals is not obstructed as there is no fencing, and the disturbance to the local population of birds is negligible, while where this is necessary, technical systems for the protection of birds are installed.** Furthermore, concerning the restoration of the environment in the context of new wind farms, the Company applies and systematically promotes the obligation to reforest areas – of a size equal to that of the wind farms – that have been destroyed by fire (areas under reforestation), as well as to restore illegal or inactive quarries, in accordance with the applicable laws and the instructions of the corresponding Forest Departments. **Over the next two years, it is estimated that the Company will have reforested over 907,600 m² of such areas, also carrying out special technical forest works and recreational forest projects.**

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

Results [GRI 103-3a-ii]

- During 2020, **no incidents occurred involving a deterioration of biodiversity** as a result of the Company's activities, while the works scheduled for the rehabilitation of used areas were carried out as planned.
- Concerning mining operations, at the end of 2020: (a) the total area of land used for mining operations stood at 120,000 m², **the same** as in 2019, (b) the total area of land in the process of remediation stood at 187,000 m², **decreased by 9.2%** from the previous year, while (c) the area of land whose soil has been rehabilitated since the beginning of the mining activity, as a percentage of the total land area of land used for mining operations, stood at **83.31%, increased by 1.26%** from 2019. **ASI**
- Regarding the activities of construction and operation of wind farms, in 2020 three bird population monitoring studies were carried out, while **reforestation of a total area of 617,700 m²** (increased by 8% from 2019) was successfully completed, including also a recreational forest project.

The table below lists the very limited impacts of the construction and operation of the Company's wind farms located in protected areas (e.g. Natura 2000 Network).



Operational sites under lease by MYTILINEOS in protected areas [GRI 304-1]

1. Wind Farm in the locality “Koryfi” of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 17.0MW, in operation, owned by the company Aeoliki Sidirokastrou, situated at an average distance of 1.0 km from the outer boundaries of the Natura 2000 area “GR 1260001” and at a distance or of more than 7.5 km from the area “GR 1260008”.

Concerns the lease of 0.082 km² of land from Public Properties Company S.A.
Area of operational site: 0.12 km².

2. Wind Farm in the locality “Koryfi” of the Municipality of Sintiki (Regional Unit of Serres), with a power output of 15.0 MW, in operation, owned by the company Aeoliki Sidirokastrou, situated at an average distance of 1.0 km from the outer boundaries of the Natura 2000 area “GR 1260001” and at a distance or of more than 7.5 km from the area “GR 1260008”.

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

3. Wind Farm in the locality “Pyrgos” of the Municipality of Karystos (Regional Unit of Evia), with a power output of 15.3 MW, in trial operation since April 2019, owned by the company Aeoliki Evias Pyrgos, situated as follows:
(a) At a maximum distance of 1,000 m from the outer boundaries of the area with code number “GR 2420012”, which is the “Mt Ochi, Coastal Area and Islets” Special Protection Area (SPA) for birds. Seven (7) Wind Turbines are located within this area.
(b) At a maximum distance of 200 m from the outer boundaries of the area “GR 2420001”, which is the Special Management Area” (SMA) “Mt Ochi – Karystos Plain – River – Cape Kafireas – Marine coastal area” of the Natura 2000 Network. Two (2) Wind Turbines are located within this area.

Lease of 0.0579 km² from private land owners holding the ownership rights to the “Dafniza-Kalipeti” private forest. Area of operational site: 0.103 km².

4. Wind Farm in the locality “Chelona” of the Municipality of Karystos (Regional Unit of Evia) with a power output of 8.1 MW, in trial operation since October 2019, owned by the company Aeoliki Evias Chelona, situated at a maximum distance of 200 m from the outer boundaries of the Special Protection Area (SPA) for Birds “Mt Ochi, Coastal Zone and Islets”, with code number “GR 2420012”, belonging to NATURA 2000 network. Seven (7) Wind Turbines are located within this area.

Area of operational site: 0.130 km².

Biodiversity value of protected area [GRI 304-2]

The “GR 1260001” area encompasses wetlands and mountainous ecosystems of great national and international importance. It supports rich –in terms of both numbers and diversity– bird populations, including rare and endangered species. The wetland is of great importance as a feeding ground for birds of prey nesting in the nearby forests, as a winter site and stopover site for migratory birds, as well as a breeding ground for a significant number of birds. The increased biological productivity, the existence of rare plant species and of equally rare and diverse fauna (fish, mammals, amphibians, reptiles), increase even more the area’s biodiversity value.

As was the case in 2018 and in 2019, an annual bird fauna monitoring study was carried out in the area of the Wind Farms in 2020 and is pending submission, expected to take place within the first six months of 2021, to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management of the Ministry of Environment, Energy and Climate Change. The observations for the months of February to April 2020 were affected by the travel restrictions due to the COVID-19 pandemic. However, the number of observation days lost was recovered in the following months of 2020, while the period during which the observation days were lost (winter and early spring) did not affect the quality of the study.
No impacts on the protected area, as the operation areas of the Wind Farms are located in the area’s peripheral zone, away from the Priority Habitats. **An automated bird collision avoidance system has been installed in the second one of these Wind Farms. No bird killing incident has been observed.**

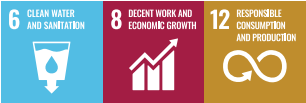
In the Natura area “GR2120012” (Mt Ochi, Coastal Area and Islets), 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The protected area “GR2420001” (Mt Ochi – Karystos Plain – River – Cape Kafireas – Marine coastal area) is mainly mountainous, with a relatively wild and difficult to access coastline in the north-eastern foothills of Mt Ochi. 16 habitats in this area are listed in Annex I of Directive 92/43/EEC, of which Habitat 1120* – Marine vegetation areas with Posidonia (Posidonion oceanicae) is a priority habitat. Four (4) species of reptiles, two (2) of invertebrate and two (2) of mammals are listed in Annex II of Directive 92/43/EEC and in article 4 of Directive 2009/147/EC. The two species of mammals (Mediterranean monk seal and otter) are priority species. As was the case in 2018 and in 2019, an annual bird fauna monitoring study was carried out to assess the limited impact of the Wind Farm’s trial operation on the area’s fauna, to ensure compliance with the relevant Environmental Terms Approval Decisions. The observations for the months of February to April 2020 were affected by the travel restrictions of the researchers due to the COVID-19 pandemic. However, the number of observation days lost was recovered in the following months of 2020, while the period during which the observation days were lost (winter and early spring) did not affect the quality of the study.
Limited impacts on the area’s flora from the operation of the Wind Farm in accordance with the relevant License granted by the Environmental Terms Approval Decision. **No bird killing incident has been observed.**

The Natura area “GR24200012” (Mt Ochi, Coastal Zone and Islets) is mainly mountainous, with a relatively wild and difficult to access coastline in the steep northern and eastern foothills of Mt Ochi. 55 species of birds listed in Annex I of Directive 79/409/EEC have been recorded, together with 38 important species of migratory birds. The species that characterize the Special Protection Area (SPA) are Puffinus yelkouan (Yelkouan shearwater), Larus audouinii (Audouin’s gull), Hieraaetus fasciatus (Bonelli’s eagle), Bubo bubo (Eurasian eagle-owl) and Emberiza caesia (Cretzchmar’s bunting), whereas its delimitation species are Phalacrocorax aristotelis (great cormorant), Circaetus gallicus (short-toed snake eagle), Falco eregrinus (peregrine falcon), Apus melba (pallidswift), Lullula arborea (woodlark), Anthus campestris (tawny pipit).

As was the case in 2018 and in 2019, an annual bird fauna monitoring study was carried out and is pending submission, expected to take place within the first six months of 2021, to the competent Department of Protected Areas of the Directorate of Natural Environment and Biodiversity Management of the Ministry of Environment, Energy and Climate Change. The observations for the months of February to April 2020 were affected by the travel restrictions of the researchers due to the COVID-19 pandemic. However, the number of observation days lost was recovered in the following months of 2020, while the period during which the observation days were lost (winter and early spring) did not affect the quality of the study.
Limited impacts on the area’s flora from the operation of the Wind Farm in accordance with the relevant License granted by the Environmental Terms Approval Decision. **An automated bird collision avoidance system has been installed in this Wind Farm. No bird killing incident has been observed.**

ENVIRONMENT

Circular economy (Waste management)



Impact on Sustainable Development	2.75	Significance for Stakeholders	3.53
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts occur in the industrial units of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">• Customers• Local communities• Sustainable Development Organizations• Shareholders / Investors• Academic community• Media representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts are primarily caused by the MYTILINEOS Metallurgy Business Unit and by potential indirect contributions from the Company’s business partners.	<ul style="list-style-type: none">• The reduction of waste through prevention, reduction, recycling and reuse.• The reuse of materials, expanding the life cycle of products in order to reuse them, creating additional economic value.• The reduction of wastewater that does not undergo treatment, and to the substantial increase in the recycling and reuse of water at national level.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS’ Stakeholder groups, so that they can understand how the Company manages the waste resulting from its production process and way in which their proper management contributes to its efficient operation and to its compliance with the environmental legislation, while minimizing the environmental impacts for all recipients. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The collection, management and reduction of waste are key elements of MYTILINEOS’ environmental policy. Waste (bauxite residues) generated as a result of the production process in the Metallurgy Business Unit accounts for the largest volume of the Company’s solid waste. A key challenge for MYTILINEOS is to improve in this area, which depends to a large extent on the utilization of this waste either by itself, through its participation in European pilot programs or by making it available for the production of other industrial materials. Until its final disposal, this particular type of waste is accumulated in a specific designated area which, for the purposes of measuring MYTILINEOS’ environmental footprint, is considered as

a Controlled Landfill for Non-Hazardous Waste operating in accordance with the licensing acts of the Sterea Regional Administration and the Viotia Prefectural Administration.

Additional permanent challenges for the Company in this area are (a) the management of all hazardous and non-hazardous waste, placing emphasis on reuse and recycling methods and, in the particular case of bauxite residues, on utilization methods, and (b) the reduction of the amount of waste to be landfilled, thus helping minimize the impact on the environment and on human health while also reducing operating costs.

Major risks [GRI 102-15]

The gradual reduction of available bauxite disposal sites constitutes a key environmental risk for MYTILINEOS' Metallurgy Business Unit, with possible negative effects on the Company's financial performance.

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

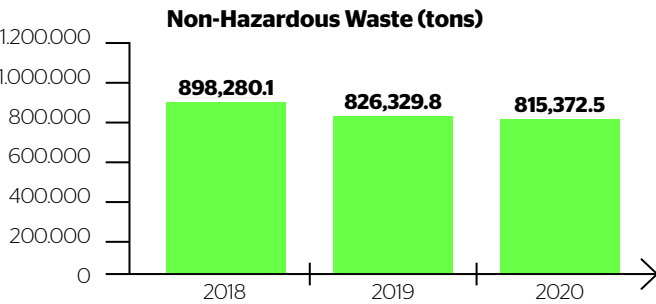
- The management and reduction of waste are key elements of the Company's environmental policy. A network for the collection of waste for reuse and recycling has been designed and is in operation in every production facility.
- In cases where recycling cannot be completed on-site (i.e. in the Company's facilities), waste is disposed of through the Company's cooperation with alternative waste management systems which have the statutory approvals of the Hellenic Recycling Agency, as well as with licensed (per waste category) waste collection, transportation, management and recovery contractors in Greece and abroad.
- The Company continues to consistently invest in the installation of pilot units for the development of research in the exploitation of bauxite residues, by participating in European programs concerning the use of energy-efficient "green" technologies for the production of useful products and materials, as well as for the development of technologies for the extraction of rare earth elements.
- In the Metallurgy Business Unit, which accounts for 99% of the Company's total waste (of which 95% are bauxite residues), the aluminium production plant maintains and uses specially configured sites for the final disposal of waste (Controlled Landfill for Hazardous Waste and Controlled Landfill for Non-Hazardous Waste), **while bauxite residues (non-hazardous waste) are deposited at the same gradient with that of the natural relief of the disposal site.** **ASI**
- **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).** **ASI**
- To reinforce the circular economy, increase the Company's recycling rates and support the national efforts for increasing the aluminium recycling rate, the Metallurgy Business Unit has set ambitious targets regarding the production of secondary aluminium and the quantity of recycled (scrap) aluminium

used. More specifically, for 2021 the targets for the use of recycled aluminium and the production of secondary aluminium are 28,522 t and 27,160 t respectively, while for 2025 these targets rise to 33,234 t and 31,010 t respectively. **ASI**

- As regards the management of the water discharges resulting from MYTILINEOS' activity, this is fully controlled and takes place in accordance with the parameters determined by the environmental terms and regulations under which the facilities of the company's Business Units have obtained their environmental licenses.
- In the Metallurgy Business Unit, which produces the largest quantity of liquid waste, the largest part of this waste is recycled within the production process itself. More specifically, the aluminium production plant uses an underground system of water or effluents collection pipes, which leads to a liquid industrial waste treatment plant featuring settling basins, an oil separator and a multi-layered activated carbon filter. The pH value, temperature and flow are constantly measured and monitored online. There is also a safety tank with a capacity of 1,330 m³, to which waste is fed, when necessary, by an automatic diversion system. **ASI**
- Moreover, three Biological Treatment Facilities are in operation in the Metallurgy Business Unit, covering the aluminium production plant's and the local communities' needs in water: The Biological Treatment Facility in Aspra Spitia & Antikyra with a capacity of 10,000 residents, the Biological Treatment Facility in Agios Nikolaos, with a capacity of 200 residents, serving the homonymous settlement, and the Plant's Biological Treatment Facility with a capacity of 2,000 people, serving the plant's population. The Biological Treatment Facility in Aspra Spitia & Antikyra was the first biological treatment facility for urban waste water in Greece and was built together with the settlement, by the company Degrémont France. Following its upgrade in 1995, the facility has a capacity of 10,000 people. In accordance with the Environmental Terms Approval Decision, monthly analyses are carried out by the scientific quality control laboratory, which has been accredited by the Hellenic Accreditation System in accordance with the ELOT EN ISO 17025 standard. During the bathing season (May - September), seawater samples are taken at eight (8) locations in the Antikyra Bay, while seawater quality is also assessed annually by an independent external organization. These locations include the sea point exit of the treated water pipe from the Biological Treatment Station of Aspra Spitia & Antikyra. The results related to this location have demonstrated that the samples taken comply with the legally required limits for exceptional-quality coastal water. **ASI**

Results [GRI 103-3a-ii]

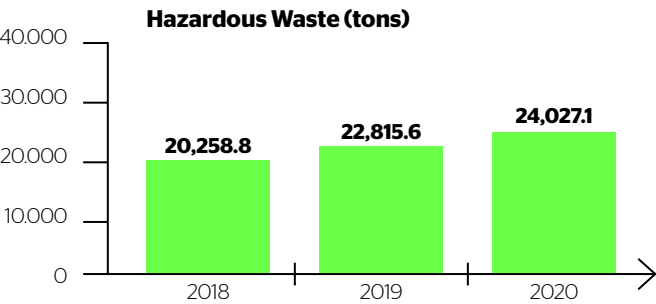
In 2020, the Company's total waste amounted to 839.4 thousand tons, marginally reduced by 1.1% from 2019 (849.1 thousand tons), which came mainly from the individual reduction by 3.6% of non-hazardous waste in the Metallurgy Business Unit. Almost 93% of the total quantity of waste produced concerned waste rock and residues of bauxite, while the remaining 7% included aluminium, industrial and urban waste and materials that are collected and include various types of metal scrap (e.g. iron and steel), batteries of vehicles, tires, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, lamps and printer and photocopier consumables. **ASI**



Non-hazardous waste (tons) [GRI 306-2]	2020
Controlled Landfill (Accumulation site for Bauxite Residues)	650,022.0
Controlled Landfills for Non-Hazardous Waste	3,952.0
Recycling/Reuse internally and at third-party facilities	151,409.1
Storage for recovery	9,939.3
Storage in third-party facilities	38.8
Recovery/Exchange	11.3
Incineration	0.0
Total	815,372.5

MYTILINEOS' environmental R&D activities focus on **the exploitation of bauxite residues and the implementation of innovative methods for the production of alumina from alternative sources. In 2020, the Metallurgy Business Unit participated in 22 research projects funded by the EU under the H2020 program, by EIT RawMaterials, by ERA-MIN 2 and by the Greek General Secretariat for Research and Technology (GSRT). The total funding for these 22 projects stands at over €95 million, of which €6.9 million represents the funding for MYTILINEOS' Metallurgy Business Unit.**


The total **waste reused, recycled and utilized** in various ways, either by the Company itself or through third parties, **reached 18.6%** (2019: 17.8%) of the total waste produced (including bauxite residues). In this respect, around **124,000 tons of bauxite residues and waste rock** were made available to the cement industry and for other industrial uses. **By adopting this practice, the Company has already significantly reduced the annual quantity of Bauxite residues deposited in the area it has designated for this purpose, by about 13% since 2016.** **ASI**




Hazardous waste (tons) [GRI 306-2]	2020
Controlled Landfills for Hazardous Waste	18,804.5
Recycling/Reuse internally and at third-party facilities	4,891.1
Recovery/Exchange	33.5
Storage for recovery	284.7
Incineration	13.2
Storage in third-party facilities	0.1
Total	24,027.1

- These projects focus on the following areas:
- Exploitation of bauxite residues for producing scandium, iron, alumina, cement additives and construction products.
 - Production of alumina from alternative (secondary) sources.
 - Recovery of Ga/V from the alumina production line (Bayer method).
 - Exploitation of carbon by-products of the alumina electrolysis.
 - Heat recovery and the use of RES in aluminium production.
 - New tools and training courses for engineers and workmen employed in the raw materials/metallurgy sector.
 - New aluminium recycling technologies.

More specifically:


 2020 saw the continuation of the research project **SCALE** (Production of Scandium compounds and Scandium-Aluminium alloys from European resources), which aims to obtain Rare Earths and, in particular, Scandium (Sc) compounds and Scandium-Aluminium alloys from residues of the European metallurgical industry, such as Bauxite Residues. This project, with a total budget of €7 million, **is coordinated by MYTILINEOS' Metallurgy Business Unit** and implemented by a consortium of 19 partners from 10 European countries, among which is the National Technical University of Athens (NTUA). **In 2020, the Research and Sustainable Development activity of the Metallurgy Business Unit which manages these projects, put in operation two (2) pilot units for testing hydrometallurgy and pyrometallurgy processes. The “SCALE” hydrometallurgy unit was used to successfully extract scandium (Sc) from 8 tons of Bauxite Residues, producing 12 cubic meters of solution which will then be treated using SIR technology by the company II-VI, to produce scandium concentrate with a content of up to 25% by weight. The overall process is expected to achieve a scandium concentration up to 2.500 times from Bauxite Residues at low treatment costs.**

Scandium is a metal, classified as a rare earth element, whose global production does not exceed 15 tons (mainly from industrial by-products) and is used in “emerging” technological applications such as: (a) "Electrolytic" gas-fired power generation (SOFC), whose efficiency is twice that of today's thermal power plants, (b) very high resistance Aluminium-Scandium alloys, such as the Al-Sc-Mg alloy used by AIRBUS in 3D component printing technology (scale-project.eu/). **ASI**

 The ENSUREAL (Ensuring sustainable alumina production) research project, aiming to develop new methods of alumina production from alternative sources such as poorer bauxite deposits and bauxite residues, is progressing. In the framework of this project, the extraction of cast iron and alumina from bauxite residues will be tested on pilot basis in MYTILINEOS' Business Unit, using a combination of pyrometallurgy and hydrometallurgy treatments. The first medium-scale smelting tests using Greek bauxite and bauxite residues were carried out successfully in Norway. **In 2020, the “ENEXAL” pyrometallurgy unit operated again and was used to test the treatment of Bauxite Residues to produce cast iron and slag suitable for the alkaline extraction of alumina (Pedersen process). From the quantity of the slag obtained, 500 kg will undergo hydrometallurgy treatment in the facilities of the Metallurgy Business Unit in the first semester of 2021 to produce hydrated alumina, thus achieving the full utilization of both the iron and the alumina contained in the original bauxite deposit.** (ensureal.com/).


The Greek bauxite processed in the Metallurgy Business Unit

contains approximately 60% aluminium oxides and 20% iron oxides. During the processing of Bauxite in the alumina plant - 90% of the aluminium oxides are recovered, while the rest is concentrated, together with other Bauxite oxides, in the co-product called “Bauxite Residues”.

 November 2020 saw the launch of the research project “ReActiv: Industrial Residue Activation for Sustainable Cement Production”, coordinated by LafargeHolcim and implemented by a consortium which, in addition to MYTILINEOS, includes six (6) other alumina producers. The purpose of ReActiv is to convert Bauxite Residues into a material that could replace clinker in cement mixes. Of the project's three (3) pilot tests of Bauxite Residues conversion technologies, two (2) will take place at the Metallurgy Business Unit, while the materials produced will be tested at the facilities of LafargeHolcim.

Concerning liquid waste, during 2020 the efforts for their best possible management continued for yet another year, in order to protect the natural environment as well as to benefit the human health. The table in the next page presents the Company's water discharges and their respective treatment methods. Data on the quality of discharged water are also displayed, which, as noted, are lower –and, in several cases, much lower– than the statutory limits. The total quantity of pollutants in the treated wastewater discharged to the water recipients stood at 11.3 t, broken down as follows: BOD: 2.6 t, COD: 5.2 t, TSS: 3.5 t, TN: 0 and TP: 0.

Table of water discharges [GRI 306-1]					
Business Unit	Water discharge category	2020 (m³)	Destination	Quality of water discharges, including treatment method (2020)	
Metallurgy Business Unit ASI	From the cooling process of the Combined Heat and Power (CHP) plant	159,408,092	Discharge to the sea (determined by legislation)	Results	Limits
				Temperature	
				22.4°C	34°C
	Wastewater, including rainwater, measured at the point of exit from the primary treatment facilities	428,308	Discharge to the sea (determined by legislation)	pH	
				8.2	6 - 9
				Primary treatment (Settlement of floating particles, filtration of supernatant fluid, chlorination, discharge)	
				Temperature	
				22.3°C	35°C
				pH	
				7.6	6 - 9
				Biochemical Oxygen Demand (BOD ₅)	
				<6 mg/l	40 mg/l
				Chemical Oxygen Demand (COD)	
				11.75 mg/l	150 mg/l
				Total Dissolved Solids (TDS)	
				670 mg/l	1500 mg/l
Power & Gas Business Unit	Brackish water discharge	3,419,200	Discharge to the sea (determined by legislation)	Total Suspended Solids (TSS)	
				8.05 mg/l	40 mg/l
				Sulphides	
				Not detectable	1 mg/l
	Wastewater from the mining process	197,294	Subsoil	No particular treatment. Concerns clean water from licensed boreholes used exclusively in the cooling circuit of the Foundry and of the Anodes Production line. The temperature of the discharged brackish water is 27°C, significantly lower than the maximum temperature limit of 35°C specified in the Environmental Terms Approval Decision.	
				No particular treatment. Waste water (from licensed boreholes or collected in underground mining sites) used in the mining process, which with the addition of inert bauxite or limestone dust (depending on the particular mining activity), becomes a liquid mix that ends in the aquifer.	
				No particular treatment. Concerns water from licensed boreholes.	
	Water used for road wetting, Watering – Environmental rehabilitation	18,400	Subsoil	pH	
				8.04	6.5 - 8.5
				Biochemical Oxygen Demand (BOD ₅)	
	Wastewater measured at the point of exit from the primary treatment facilities	11,667	Asopos River (determined by the legislation)	2.0 mg/l	<25 mg/l
				Chemical Oxygen Demand (COD)	
				16.0 mg/l	<125 mg/l
				Suspended solids 103°C	
				4.16 mg/l	<25 mg/l
				Total dissolved solids 180°C	
				335 mg/	<1,500 mg/l
	Wastewater from mining site workshops	250	Watering of rehabilitated areas	Cleaning of liquid waste from sites using a system of physical separation. The results of the analyses (BOD, COD, E-coli, TSS, chlorine, nitrogen & phosphorus) provide water suitable for irrigation.	
				In the amount of industrial service water intended for disposal to Motor Oil, pH is set to be within a specific range (6.5 - 9) and temperature is set to < 45°C.	
	Industrial service water in the power generation process	22,025	Disposal to a MotorOil liquid waste treatment plant	Discharged to the sea through the Motor Oil pipeline.	
	Wastewater from the desalination process	200,000			



“There is no dilemma between good climate policies and profitability, you can do both”

Water management



Impact on Sustainable Development	3.70	Significance for Stakeholders	3.44
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts occur in the areas (e.g. Corinthian Gulf) of the industrial plants, across all Business Activity Sectors and in the subsidiaries of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Ensuring access to safe, accessible drinking water and sanitation facilities for workers and local settlements.The efficient use of water, ensuring its sustainable withdrawal in the context of the Company's industrial activity.Encouraging the participation of the local communities in improving water management.	<ul style="list-style-type: none">CustomersLocal communitiesRegulatory BodiesAcademic community <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS’ Stakeholders, so that they can understand how the Company is managing water resources, seeking to maximize the overall social and environmental benefits of its business activity. Meeting the water supply needs of the industrial units of the Company's Metallurgy and Electric Power sectors, as well as the water supply needs of its local communities in the region of Viotia, require the extraction and use of significant quantities of water. Recognizing the importance of this natural resource, the Company takes initiatives to ensure the efficient use of water, the conservation of the water resources used and the controlled management of water discharges. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Maintaining the rational withdrawal, use, consumption and discharge of water is a key challenge for the Company, which is a major user of seawater and a consumer of ground water in specific sectors and areas of activity.

Major risks [GRI 102-15]

- The potential reduction of aquifer reserves (ground water) which the Company uses for its production activities as well as for covering the water supply needs of its local communities’ settlements. This potential risk may result in the reduction or suspension of production, in complaints from the local communities and in increased operating costs through the use of water supplied by public utilities as an alternative source.
- An additional potential risk concerns possible future changes in the water withdrawal limits and water discharge parameters provided for in the Environmental Terms Approval Decisions of the Company's industrial plants, in particular in the Metallurgy and Electric Power sectors, which may result in increased capital costs and in operational maintenance costs associated with the development of alternative water reserves.

Risk Management / Control Practices

[GRI 103-2a] [GRI 303-1]

- The use of water in all Company activities is in full compliance with the Environmental Terms Approval Decisions and the Water Use Licenses of all its industrial plants.
- Water withdrawals from ground water in the Metallurgy sector are obtained from a controlled network of wells (boreholes) **which allows water to be replenished naturally after withdrawal (renewable sources)**. A special study carried out by the Company in 2019 regarding the management of water withdrawals from the network of boreholes in relation to the total capacity of the wider area's aquifer, showed that the average quantity of water entering the aquifer on an annual basis (rainfalls, snowfalls etc.) reaches 83.3 million m³. According to the Water Use License issued, the Company has the right to withdraw 6.75% of this total quantity, however its actual withdrawal rate is even lower, **standing at approximately 6% and ensuring the preservation of the water level in the aquifer and consequently in the boreholes, something that is also confirmed by the regular checks of the water level at all the wells**. Moreover, in 2020, the Metallurgy Business Unit commissioned a specialist firm to perform a Risk & Impact Assessment of the area's aquifer, as well as a series of hydro-geological studies, which are currently under way and whose findings are expected in the first half of 2021. **ASI**
- Water recycling and reuse programs are implemented to the maximum extent possible in the production processes or secondary uses in the Metallurgy sector, together with rainwater collection and utilization practices. **ASI**
- Internal water consumption targets are set on an annual basis for each production sector.

- As regards the management of the water discharges resulting from MYTILINEOS’ activity, this is fully controlled and takes place by monitoring the parameters determined by the environmental terms and regulations under which the facilities of the company's Business Activity Sectors have obtained their environmental licenses. In the Metallurgy sector, which produces the largest quantity of liquid waste, most of this waste is recycled within the production process itself. The specifications and maximum water discharge limits for the water resulting from each activity are determined by the applicable Environmental Terms Approval Decision and the Water Use License. To control the quality of the disposal of the treated liquid industrial waste, measurements are taken, on a continuous basis, of the quantity, pH and temperature, while analyses are also made once a month, at the exit point of the treatment plant, of the effluent's temperature, suspended solids, total dissolved solids, COD, BOD₅, pH, and content in sulphides and fluorides. Regarding the characteristics of the sea effluent to which the discharge takes place, its physical and chemical characteristics are monitored for compliance with the Environmental Quality Standards (EQS). **[GRI 303-2]**
- With regards to priority substances, their definition and the determination of the maximum discharge limits are specified by the Environmental Terms Approval Decision of each unit. During 2020 no incidents of non-compliance with the legislation, regarding priority substances occurred. **[GRI 303-4d] ASI**
- To identify and assess the likelihood of future regulatory changes affecting sustainability issues, including water, the Company communicates regularly with the competent authorities and with the regulatory bodies involved.
- Aiming to constantly improve and enrich its practices in this area, the Company participates voluntarily since 2016 in the **CDP - Water Security** global sustainable development initiative, by disclosing comprehensive data about its practices in the management of water resources and having its impact and performance compared to those of the largest companies globally.
- The environmental officers in each one of the Company's Business Activity Sectors ensure that the progress made towards the targets set is monitored and that water resources are managed responsibly in the context of the activities of all the Company's industrial plants.

Results [GRI 103-3a-ii]

In 2020, no water withdrawal source was negatively affected by the activity of MYTILINEOS.

In total, almost 170,327.5 ML of water were withdrawn for use, **461 ML less than in 2019**. Concerning the discharge of water and liquid waste, the efforts to manage them effectively continued in 2020, to ensure the protection of the environment but also the observance of hygiene conditions, which in times of pandemic are of increased importance. The quantity of used water which was returned to the water recipients after quality treatment and in accordance with the approved environmental terms per sector of activity, stood at 163,724.1 ML, reduced by nearly **531 ML** compared to 2019. As a result, **water consumption** remained at the same level as in 2019, reaching **6,603.4 ML**.

Only **2.2%** of total consumption concerned water supplied by the **public water supply company**. While **1,158.5 ML**, representing **17.5% of total water consumption** or **22.6%** of **ground water consumption**, concerned the supply of drinking water to the settlements of Aspra Spitia, Antikyra and Agios Nikolaos in Viotia, to meet their needs. The increase in the consumption of drinking water in these settlements by 1.7% compared to 2019 is due to the rise in their population (visitors, persons contracted for works performed at the plant), as well as to significant leakages of drinking water in the settlements’ water supply networks, due to the latter’s outdated infrastructure, which are now under repairing. **ASI**

Regarding the Company’s efforts for the effective management of water in the production process and especially in the Metallurgy sector, which handles 99.8% of the total quantity of withdrawn water, the specific water consumptions registered slight increases, both per ton of hydrated alumina produced and per ton of primary aluminium produced, mainly due to the increase in the production of alumina and in the consumption of drinking and industrial-use as a result of the works performed in the AoG plant. **ASI**

The amount of water reused in other Company plants, **thus preventing an equivalent volume of water withdrawals, amounted to 6,757.5 ML** (2019: 6,726.2 ML), corresponding to **3.95%** of total water withdrawals, **registering a slight increase by 0.7% from 2019**. Of this total quantity, 99.9% concerns water recycled/reused in the Electric Power sector and, in particular: **(a) the reuse of 6,702.2 ML of discharged seawater** from the cooling network of the Combined Heat and Power (CHP) plant, for cooling the thermal power plant in the area of Ag. Nikolaos, Viotia, and **(b) the recycling of 30.3 ML** of liquid waste from the Heat Recovery Boiler of the combined-cycle thermal power plant in Agioi Theodoroi, Korinthia. The remaining quantity concerns the use of **7 ML of rainwater**, collected as a good practice in the bauxite mining activity.

Moreover, 2020 saw the continuation of the implementation, in the Metallurgy sector, of the **“Black Belt” project, a major initiative for saving drinking and industrial-use water that has helped achieve a remarkable reduction by 27% (67 ML) in the consumption of drinking water in the aluminium plant since 2018**, after the water-cooled air conditioning units (which used drinking water for their operation) were replaced with air-cooled ones. **ASI**

Finally, in 2020 MYTILINEOS was evaluated **for the 5th consecutive year** by the CDP international organization for Sustainable Development, in the Water Security category, for its management of water resources in the context of its activity. On the basis of this evaluation, the Company was upgraded to level B from B- (on a D-/A scale), achieving the highest performance in the second-best category of the index (“Management Level”). The official report issued for the Company and the relevant evaluation details are available from its corporate website, at: (mytilineos.gr/sustainability/participation-in-socially-responsible-investment-indexes/)

Total water consumption (all activities)	2018	2019	2020
Total water withdrawals (ML)	171,404.8	170,788.2	170,327.5
Total water discharges (ML)	165,700.7	164,254.7	163,724.1
Total water consumption (ML)	5,704.1	6,533.6	6,603.4

Metallurgy Sector ASI Specific water consumptions	2018	2019	2020
Water consumption/ton of hydrate alumina production (m³)	4.09	3.98	4.32
Water consumption/ton of primary aluminium production (m³)	2.49	2.43	2.57

Water withdrawal sources and quantities 2020 [GRI 303-3]		All areas	Environmentally vulnerable areas (water stress areas)
1. Sea (ML)			
Volume of seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy sector. The limit to the volume of water withdrawn annually has been determined by the Water Resources Management Directorate of the Sterea Regional Administration.	Subtotal	161,133.7	0.0
	Fresh water¹	0.0	0.0
	Other water types²	161,133.7	0.0
2. Ground water (ML)			
Volume of industrial-use, brackish and drinking water used primarily to meet the manufacturing/ processing, energy and water supply needs of the Company's industrial facilities. This quantity is obtained primarily from a network of 17 wells (boreholes), owned by the Metallurgy sector, which the company operates in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration.	Subtotal	8,564.8	0.0
	Fresh water	5,131.3	0.0
	Other water types	3,433.5	0.0
3. Surface water (ML)			
Volume of water withdrawn from a stream in the vicinity of DELPHI-DISTOMON, and of rainwater which is collected.	Subtotal	28.3	0.0
	Fresh water	28.3	0.0
	Other water types	0.0	0.0
4. Water produced (ML)			
Volume of ground water resulting from the bauxite mining process of DELPHI-DISTOMOM, a subsidiary of MYTILINEOS, which is collected using pumps and transferred for treatment prior to its final discharge.	Subtotal	180.0	0.0
	Fresh water	180.0	0.0
	Other water types	0.0	0.0
5. Third parties (ML)			
Volume of water from municipal reserves and public water supply services that meets the needs of the buildings and especially of industrial facilities of MYTILINEOS, as well as seawater returned by Motor Oil and used in the desalination process for the production of industrial use water in a thermal power plant of the Electric Power sector.	Subtotal	420.7	0.0
	Fresh water	146.1	0.0
	Other water types	274.6	0.0

Total water withdrawals (Subtotals 1+2+3+4+5)	170,327.5	0.0
Fresh water	5,485.7	0.0
Other water types	164,841.8	0.0

Water discharge by destination 2020 [GRI 303-4]		All areas	Environmentally vulnerable areas (water stress areas)
1. Sea (ML)			
<ul style="list-style-type: none">Metallurgy Sector Volume of seawater and brackish water from the cooling process of the Combined Heat and Power (CHP) plant, of brackish water from wells which is used for cooling the heat exchangers of the smelter in AoG's aluminium production plant, and of wastewater, including rainwater, measured at the point of exit from the primary treatment facilities.Electric Power & Gas Trading Sector Volume of water discharged from the desalination process.			
	Subtotal	163,460.3	0.0
	Fresh water	0.0	0.0
	Other water types	163,460.3	0.0
2. Ground water (ML)			
Volume of water for drilling during the bauxite mining process of DELPHI-DISTOMON.			
	Subtotal	17.3	0.0
	Fresh water	17.3	0.0
	Other water types	0.0	0.0
3. Surface water (ML)			
Discharge of the wastewater produced by the bauxite mining plant, water used for wetting the roads and for watering the surrounding restored area, and waste water from the secondary aluminium processing plant, after primary treatment.			
	Subtotal	209.9	0.0
	Fresh water	209.9	0.0
	Other water types	0.0	0.0
4. Third parties (ML)			
Household liquid waste discharged to public water supply and sewerage companies, as well as industrial-use water used in the electricity production process, disposed of to a waste treatment plan of Motor Oil, after first having its pH and temperature regulated.			
	Subtotal	36.6	0.0
	Fresh water	13.9	0.0
	Other water types	22.7	0.0

Total water discharges (Subtotals 1+2+3+4)	163,724.1	0.0
Fresh water	241.1	0.0
Other water types	163,483.0	0.0

Consumption by water type 2020 [GRI 303-5]	All areas	Environmentally vulnerable areas (water stress areas)
Total water consumption	6,603.4	0.0
Fresh water	5,244.6	0.0
Other water types	1,358.8	0.0

1. Water with a concentration of total dissolved solids equal to or less than 1,000 mg/L).
2. Water types with a concentration of total dissolved solids higher than 1,000 mg/L).

Pollution prevention



Impact on Sustainable Development	3.45	Significance for Stakeholders	3.64
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts occur in the areas of operation of the industrial plants, across all Business Units and in the subsidiaries of MYTILINEOS.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The prevention of all land and marine pollution.The environmentally robust management of all waste in accordance with internationally agreed frameworks and to the reduction of their emissions into the air, the water and the soil, in order to reduce its impact on human health and the environment.The reduction of waste production through prevention, recycling and reuse.	All Stakeholder groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: Directly involved in these impacts are the Metallurgy and Power & Gas Business Units of MYTILINEOS and its subsidiaries DELPHI-DISTOMON and KORINTHOS Power, while key suppliers of the Company may be indirectly involved.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS’ Stakeholder groups, so that they can understand how the Company is managing the risks of pollution and spills directly associated with its safe and socially and environmentally responsible operation. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

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

Major risks [GRI 102-15]

- The possible deterioration of the quality of the air, the surface and ground waters and of the marine environment, as well as the pollution of the soil from industrial accidents, are permanent potential risks.
- In addition, key production and transport activities of the Company involve the risk of leakages, following unforeseen malfunctions or accidents, into the marine environment, since they are adjacent to it.

Failure to prevent and manage the above risks could have a significant impact on the Company’s social, economic and industrial capital, limiting its ability to create value either by increasing the financial costs for dealing with these incidents or through possible administrative sanctions or the Company’s potential ability to continue to smoothly conduct its activities.

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

Pollution risk management is directly linked to the safe, socially and environmentally responsible operation of all the facilities of the Company. To address this risk, preventive and suppressive response measures are implemented in all Business Units of MYTILINEOS. In particular:

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

- The main pollution risk prevention measures implemented in the Business Unit consist in the following:
- Strict compliance with the approved Environmental Terms of the metallurgical activity.
 - Continuous measurement and monitoring of air emissions and suspended particulates.
 - Measurement and monitoring of water discharges from point sources.
 - Compliance with the measures provided for in the Safety Study (SEVESO III - implementation of Joint Ministerial Decision 172058/2016).
 - Final disposal of non-hazardous waste in insulated areas with the construction of a geological barrier of low water permeability, as well as the corresponding disposal of hazardous

- waste in specially constructed and geomembrane- and geotextile-insulated cells (controlled landfill sites).
- Implementation of Best Available Techniques in the management of infrastructure and industrial waste (electric filters, bag filters, primary industrial waste treatment, biological wastewater treatment, safety oil traps, sewer oil traps, tank level meters, waste quality meters, custom-designed waste disposal sites, etc.).
 - Performing chemical analyses of wastewater at workshops and facilities, as well as specific analyses of wastewater discharged for various chemical parameters (e.g., Al, Cr, Cr⁶, Fe, BOD₅, COD, etc.).
 - Good knowledge of and training in Emergency Response Plans (EPs).
 - Storage and use of chemicals by following the instructions of the Safety Data Sheets.
 - Systematic visual inspections of facilities.
 - Unloading of heavy fuel oil from tankers using as a precaution a floating anti-pollution dam.
 - Constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against standard quality values. An example is the discharge of the seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy Business Unit, where in addition to the strict compliance with the relevant provisions of the law determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authoritative organization (Hellenic Centre for Marine Research - HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed. The studies carried out by the Company in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change, and the Water Management Directorates of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of the recent studies, carried out in 2018 and 2019, show a stable ecological status, with improvement trends at several observation stations. These studies will be continued for at least five more years.
 - Operation of a fire protection department, which is equipped with 2 fire engines, staffed by a permanent fire-fighting team, and coordinates and trains a team of volunteer firefighters.

In what moreover concerns small-scale, localized incidents involving spills of lubricants in the context of mining activities in the tunnels of underground quarries, which are of a limited extent and affect surface soil only, mainly caused by wear and tear of lubricant pipes and by damages to machinery by falling stones or rocks, the subsidiary DELPHI - DISTOMON takes steps to prevent and reduce the annual number of such incidents by adopting the following practices: (1) Purchasing supplies (lubricant pipes) with the best quality available in the market, to ensure their maximum possible durability, (2) implementing, on an annual basis, custom-developed seminars to raise

awareness among personnel of the need to report and log such incidents, in line with the Company's policy on the protection of the environment, as well as of specific techniques to contain the extent of the spills in the soil, (3) responding immediately to such incidents, collecting the quantity of contaminated soil in the area of the spill and forwarding it to the hazardous waste disposal area for appropriate handling, and (4) regular and preventing maintenance of the equipment and its parts.

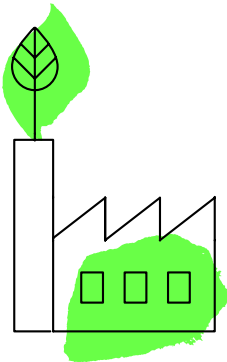
In the Power & Gas, Sustainable Engineering Solutions (SES) and Renewables and Storage Development (RSD) Business Units, intensive efforts are made in all production units (thermal plants, RES plants, complex construction plants and work sites), to identify potential risks, so that these are addressed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

- All procedures provided for in the Environmental Management Systems and Emergency Response Plans, as well as the operating and maintenance instructions for installations.
- The instructions for monitoring air emissions
- The best available options for the re-use, recycling and disposal of the various types of waste produced.
- Training of personnel and readiness exercises for handling spills.
- Preventive maintenance programs.
- Selection of state-of-the-art equipment.
- Safety oil basins.
- Systematic visual environmental inspections of installations.
- Annual audits by independent external organizations for the certification of the Environmental Management Systems in place.

Results [GRI 103-3a-ii]

During 2020, no incidents occurred involving any form of pollution of the natural environment from production activities or pollution-related industrial accidents in all Business Units of the Company. Concerning air emissions, these remained below the statutory maximum limits for yet another year.

Regarding the incidents of small-scale, localized oil spills from machine failures in the context of the mining process, a total of 112 incidents occurred in 2020, 22% less than the corresponding number in 2019 (143 incidents), with the total volume of spillage amounting to 12,869 lt⁹ and remaining stable compared to 2019 (12,808 lt). [GRI 306-3]



9. The quantity of 12,869 lt corresponds to 0.08 kbls.

ENVIRONMENT

Other significant Environmental topics

Raw & other materials

As regards the use of natural resources, the quantity of bauxite used in the Metallurgy Business Unit to produce aluminium and alumina in 2020 remained stable compared to 2019, while the total quantity of natural gas used in the Power & Gas Business Unit increased by 3.5%. The Sustainable Engineering Solutions (SES) and Renewables Development & Storage (RSD) Business Units do not manage primary natural resources, but instead use semi-ready or finished products.

In detail:

In the **Metallurgy Business Unit**, approximately 2.53 million tons of raw materials were used in 2020, to produce primary aluminium products, a quantity marginally increased from 2019. Of this total quantity, 74% was bauxite, while the remaining 26% regarded the use of other raw materials from non-renewable sources. MYTILINEOS, in its effort to limit the consumption of natural resources and to reduce the energy required in aluminium production, has adopted in its production process the practice of recasting aluminium waste (scrap) that replaces the use of raw materials. Furthermore, in this direction, the Company has also expanded its activities in the industrial production, treatment and trading of metals and in particular of aluminium alloys and their products, investing in the know-how for the optimal treatment of aluminium scrap, so as to be able, in the years to come, to produce raw materials again, spending a much lower quantity of energy, thus significantly cutting costs and mitigating the impact on the environment. [ASI]

The Sustainable Engineering Solutions (SES) and Renewables & Storage Development (RSD) Business Units do not manage primary natural resources, but instead use semi-finished or finished products, according to the detailed plans/ drawings and procedures for each project, which specify with great accuracy each material to be used, its manufacturing method and its exact position and operation. The percentage of recycled materials used in the implementation of projects in the SES Business Unit showed a notable increase **by 6.2%**. Additionally, a key criterion in the design stage of the projects that this Business Unit is carrying out is the maximum possible use of recyclable materials. The Company's requests for proposals and contracts with suppliers of materials and equipment contain a specific clause regarding their compliance with the requirements of the ISO-14001 International Standard, specifically referring to the prohibition of using environmentally hazardous materials and the obligation to make the maximum possible use of recyclable materials.

In the **Power & Gas Business Unit**, the raw material used in power plants is natural gas, which is the fuel for the transition towards an economy with lower greenhouse gas emissions. The annual consumption of natural gas in the Company's thermal units is linked to the fluctuations in the generation of electricity on an annual basis, and in 2020 recorded a slight increase by 3.5% compared to 2019. Regarding the materials used in the production process and not incorporated in the end final product, such as lubricating oils and chemicals, in 2020 these remained at their 2019 levels.

Weight (in tons) of materials used in the production and packaging of the Company's main products [GRI 301-1]

	2018	2019	2020	Main Materials
Metallurgy Business Unit ASI				
Raw materials	2,230,842	2,265,428	2,278,815	Bauxite, Alumina, Aluminum Scrap
Materials (not incorporated in the end product)	231,059	237,665	250,133	Anodes, Lime, Soda, Coke
Packaging materials	980	1,309	1,192	Pine planks
Total	2,462,881	2,504,392	2,530,140	
Recycled materials	2,885.6	39,922	49,012	Aluminium scrap
Percentage of recycled input materials [GRI 301-2]	0.12%	1.59%	1.94%	
Sustainable Engineering Solutions (SES) Business Unit				
Materials (not incorporated in the end product)	252.7	256.0	309.9	Welding gases, Oxygen
Semi-finished products	577.9	649.3	1,043.2	Steel, welding materials, paints
Packaging materials	6.4	4.5	8.2	Nylon, plastics
Total	837.0	909.8	1,361.3	
Recycled materials	191.1	235.2	372.6	Steel
Percentage of recycled input materials [GRI 301-2]	24.3%	25.8%	27.4% ¹	

1. Of the 1,051.4 tons of total weight of materials used and incorporated in the end product, steel (in the form of plates, merchant bars or other project materials) accounted for approximately 931.4 tons. Around 40% of the EU's total steel production comes from electric arc furnaces, in which steel is produced from 100% recycled raw material (scrap) (Source: eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0407:FIN:EL:PDF, Strasbourg, 11.6.2013.COM(2013) 407 final, p.27). Thus, 372.4 tons (40% of 931.4 tons) correspond to recycled steel.

ESG KPIs

E Environmental KPIs	2018	2019	2020
Percentage of industrial units & RES units with ISO 14001-2015 certification	82.6%	84.1%	87.5% ¹
Total bauxite consumption (t) ASI	1,873,622	1,871,395	1,878,949
Total natural gas consumption (mio Nm³)	1,031.4	1,133.7	1,177.0
Total water consumption (ML) ²	5,704.1	6,533.6	6,603.4
Environmental expenditures (mio €) ³	32.8	61.0	71.6
Direct GHG emissions (Scope 1, CO₂ thousand tons)	2,555.7	2,797.8	2,885.5
Indirect GHG emissions (Scope 2, CO₂ thousand tons)	1,819.6	1,841.3	1,573.9
Other emissions (Scope 3, CO₂ thousand tons) ⁴	2.58	1.82	3.55
Total NO _x emissions (t)	1,342.3	1,553.3	1,480.0
Total SO _x emissions (t)	3,651.1	3,634.0	3,190.1
Particulate emissions (t)	74.2	94.3	80.5
Fluorine emissions (t)	261.5	258.3	262.2
CF ₄ emissions (t)	11.2	11.8	13.3
C ₂ F ₆ emissions (t)	1.3	1.4	1.6
Total energy production (TJ)	18,235.1	20,816.5	21,856.6
Energy production from RES (% of total energy production)	4.1%	6.5%	8.6%
Total energy consumption (TJ)	49,204.8	53,353.0	54,621.9
Electricity consumption (% of total energy consumption)	21.1%	19.4%	18.9%
Specific energy consumption in secondary aluminium production (GJ/t of secondary aluminium production)	-	4.82	5.05
Specific product consumption (TJ//TJ of electricity produced)	-	1.7	1.6
Total water withdrawals (ML)	171,404.8	170,788.2	170,327.5
Total water withdrawal from surface waters (ML)	162,930.0	162,296.5	161,162.0
Total water withdrawal from groundwater (ML)	8,133.2	8,223.6	8,564.8
Total water withdrawal from public water supply companies (ML)	99.8	74.6	146.1
Water savings in the production process (% of total water withdrawals)	2.9%	3.9%	3.9%

E Environmental KPIs	2018	2019	2020
Water consumption/ton of hydrated alumina production (m³) ASI	4.09	3.98	4.32
Water consumption/ton of primary aluminium production (m³) ASI	2.46	2.38	2.57
Total solid waste production (thousand tons)	918.5	849.1	839.4
Total hazardous waste (thousand tons)	20.2	22.8	24.0
Total non-hazardous waste (thousand tons)	898.2	826.3	815.4
Solid waste reused or recycled (% of total solid waste produced)	17.7%	17.8%	18.6%
Rehabilitation percentage of total land areas used in the mining process (%) ASI	81.1%	82.27%	83.31%
Incidents of non-compliance with environmental laws and regulations and relevant fines	0	0	0

1. 3 new plants (2 industrial and 1 RES) were added, of which 2 did not have this certification and are planned to obtain it by 2021.
2. The difference between the total quantity of water withdrawals and the total quantity of water discharges.
3. Environmental Expenditures: Costs for waste disposal, emissions management, purchase of CO₂ rights, environmental remediation and costs for overall prevention and environmental management.
4. The quantity of Scope 3 emissions concerns the Product transport, Business travel and Employee commuting categories of employees of the Sustainable Engineering Solutions Business Unit. The last category also includes the performance of the Power & Gas Business Unit.



Social Performance

Alignment to UN Global Compact Principles

PRINCIPLE	PRINCIPLE	PRINCIPLE	PRINCIPLE
1 st	2 nd	3 rd	4 th
PRINCIPLE	PRINCIPLE		
5 th	6 th		

Material Topics

- Occupational Health and Safety
- Employment
- Human Rights
- Sustainability of local communities
- Emergency Response Plans
- Customer Health and Safety
- Communication & Marketing

Alignment to UN Sustainable Development Goals

1 NO POVERTY 	2 ZERO HUNGER 	3 GOOD HEALTH AND WELL-BEING 	4 QUALITY EDUCATION
5 GENDER EQUALITY 	8 DECENT WORK AND ECONOMIC GROWTH 	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	10 REDUCED INEQUALITIES
11 SUSTAINABLE CITIES AND COMMUNITIES 	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	

Occupational Health & Safety



Impact on Sustainable Development	4.00	Significance for Stakeholders	3.72
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: To the employees themselves, their families but also to third parties who work or visit the work areas of the Company's Business Units, subsidiaries and permanent contractors and suppliers.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The promotion of safe working conditions for all employees without discrimination.The reduction of fatalities and work accidents, and the reduction of road accidents at national level.Decent work and the creation of quality jobs..	All Stakeholder groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts are caused by the Company's Business Units and its subsidiaries, as well as by the independent contractors and main suppliers who cooperate with the Company.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to help MYTILINEOS’ Stakeholders establish the best possible understanding of how the Company is managing this material topic, whose contribution to its responsible and sustainable development is crucial. [GRI 103-2b]

Occupational Health and Safety has always been fundamental to the operation of MYTILINEOS and a primary business goal. As a responsible organization, MYTILINEOS acknowledges its responsibility to ensure the best possible Health & Safety conditions in all its work areas, as well as the right of its employees and of the employees of the independent contractors executing operations in its premises, to work without exposing themselves to any risk of injury or occupational disease. [GRI 103-1a]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Because of the nature of their operation, the activities of the Company's Business Units may involve incidents related to Health & Safety at the workplace (light accidents, accidents with work time loss, occupational diseases and fatalities) which can have significant or less significant social impacts, not only for the employees themselves and their families but also for third parties such as the employees of independent contractors, the Company's business partners, student trainees and trainee employees, as well as all types of visitors to their premises. In addition, these issues may cause impacts involving loss of employee satisfaction and morale, increased accident/absenteeism management costs and adverse effects on the image and reputation of MYTILINEOS. The Company acknowledges that the elimination of accidents and occupational disease incidents at the workplace and especially at its production facilities, promotes continuous, sustainable and productive employment and decent work, while it also plays a decisive role in boosting its competitiveness.

Major risks [GRI 102-15]

- Direct or Indirect Accident Risks:** Indirect Accident Risks create the conditions which lead to accidents and include the physical layout, functionality, access-evacuation routes, lighting and temperature of work areas. Direct Accident Risks lead to accidents or occupational diseases and include natural, chemical and biological factors.
- Non-Accident Risks** concern organizational, psychological and ergonomic factors that may not lead to an accident but affect the physical and mental health of employees in the short or the long run.

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

- Occupational Health and Safety is a line of responsibility that begins from the Management and the General Divisions and extends across all stages of production of all MYTILINEOS Business Units. To address the relevant risks, the Company has in place and is strictly implementing security systems and safety measurements to assess their impact on the employees and to identify any need for interventions in all its work areas (offices and industrial facilities). At the same time, continuous progress and self-improvement depends greatly on both the preventive actions undertaken and the broader experience that the Company gains from every individual incident and near accident it analyzes, while educating and training its personnel is crucial in order to maintain and further develop an accident prevention mentality.
- Hazards are identified using safety tools, whose purpose is to prevent hazardous actions and situations that could lead to accidents or occupational diseases and are described in a series of internal procedures in every Business Unit. Relevant examples include Management Safety Visits, Risk Identification and Inspections of Health and Environmental Safety Plans (HESP) for indirect employees, Written

Occupational Risk Assessment (WORA), which is prepared in accordance with the respective procedure and is in place for every job, risk management for energy centers, and work instructions for RES plants. Reporting of risks and hazardous situations takes place through the hazardous situations reporting process and the risk identification process, as well as through the reporting system of the Company's Code of Business Conduct. As regards the procedure used to investigate work-related accidents, the Company has in place and follows procedures for recording accidents in the accident book, for reporting and analyzing incidents, for characterizing and investigating incidents, while at a higher level, selected incidents are analyzed using the “Cause Tree Analysis” method. At the same time, the conduct of internal inspections and external audits ensures the quality of procedures and the continuous improvement of the Occupational Health & Safety system. [GRI 403-2] [GRI 403-7]

- MYTILINEOS implements occupational health practices to identify and minimize Health & Safety risks. These practices include, among others, the operation of a clinic with the continuous presence of nurses and the regular presence of doctors, regular visits and inspections of the work areas by a specialist Occupational Physician, and medical services provided on a daily basis at the clinic of the Company's Head Offices at no cost to all employees. In 2020, due to the SARS-CoV-2 pandemic, additional occupational health practices were implemented, the most important of which were the conduct of free COVID-19 tests for all personnel on the basis of an established schedule or in the event of an extraordinary incident occurring, the provision of teleworking as a precaution for groups of vulnerable employees, as well as for other groups of employees, the regular distribution of a special personal COVID protection kit to all employees, as well as special trainings and updates regarding the prevention measures adopted by the Company. [GRI 403-3]
- MYTILINEOS adheres to the applicable Greek and European laws in force and the regulatory provisions on Occupational Health & Safety. In many cases, the compliance of the operation of the Company's Business Units with the relevant legislation is achieved by the Company imposing itself much stricter limits through the relevant management programs and systems in place.
- The systematic and continuous efforts to foster and promote a Health and Safety culture that encourages all personnel to act responsibly for their own personal safety as well as for the safety of those around them, is a long-standing commitment in daily operations.
- MYTILINEOS also takes action in order to safeguard the health of its employees. In addition to access to public health structures, the Company provides them with an additional private health and medical care program. It also provides them with general medical services on a daily basis, at the clinic operating in its facilities, and implements a targeted vaccination programme for specific categories of personnel. During the pandemic, the Company covered the costs of molecular (PCR) COVID-19 tests for its personnel and also organized

- awareness-raising and information campaigns regarding the protection against SARS-CoV-2. Finally, voluntary blood donation programs are organized in the Company's facilities at regular intervals. **[GRI 403-6]**
- Moreover, MYTILINEOS develops and implements processes and actions that further improve the level of Health and Safety, by building on the findings of planned or emergency safety inspections carried out by specially trained Company personnel, customers, business partners, public bodies and independent organizations.
 - In all its Business Units, the Company, in addition to complying with the minimum statutory requirements, also applies an integrated and certified Occupational Health & Safety Management System designed to minimize risk, by allowing the continuous adoption of measures to prevent accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture. The system has been based on and certified in accordance with the OHSAS 18001 and ISO 45001:2018 international standards and, at the end of 2020, covered 84% of the Company's production and RES plants in operation. MYTILINEOS is already in the process of transitioning the certification of its Occupational Health and Safety Management System in all its production units to the new ISO 45001:2018 standard by the end of 2021. The Health & Safety system in place covers all the 3,856 direct and indirect employees in all the Company's Business Units. In addition, 98% of employees are covered by a Health & Safety system that is subject to external audit, while 91% of employees are covered by a Health & Safety System that is audited or certified by an independent external body. **[GRI 403-1] [GRI 403-8]**
 - The individual relevant policies, which result from the respective commitments (mytilineos.gr/sustainability/occupational-health-and-safety#tab-main-target-and-commitments) by Business Unit, make a crucial contribution to the improvement of Health and Safety performance by applying best practices as a primary business objective.
 - In addition, every three months the CEO and the Executive Committee are informed of and assess the Company's progress and performance regarding Health & Safety and provide appropriate guidance.

Key elements of the MYTILINEOS Occupational Health and Safety policy:

- Full compliance with the applicable laws on Occupational Health and Safety and with other relevant rules and regulations.
- Constant identification and assessment of occupational risks and adoption of measures to control and mitigate them.
- Establishment of preventive action programs to improve work conditions, as well as of preventive and corrective action plans, procedures and instructions, so as to ensure that risks are minimized or altogether eliminated.
- Systematic measurement, assessment and effort to reduce the levels of exposure to harmful factors, and continuous monitoring of the employees' health.

- Open and transparent communication on all issues regarding Health and Safety.
- Briefings and systematic awareness-raising activities and trainings in Health and Safety issues for the Company's personnel, to eliminate incidents at the workplace.
- Systematic inspection of the organization and of the processes and procedures in place, to ensure their continuous updating and improvement, the respect of rules and the achievement of the targets set.
- Constant efforts to ensure alignment with the relevant international standards and implementation of Occupational Health and Safety best practices.

In terms of the organization of the Occupational Health and Safety function, relevant Departments are in operation at each MYTILINEOS' Business Unit. Moreover, the Company ensures that the employees exercise their right to put forward comments, proposals and views on the procedures, policies and management practices for safeguarding and developing a positive culture promoting the safety and health of MYTILINEOS' human capital. In line with this approach, special Health & Safety Committees are in operation in key activities in the Metallurgy and Sustainable Engineering Solutions (SES) Business Units. These Committees cover both direct and indirect employees, who are represented in it and take active part in the procedures to determine how health and safety are managed at the workplace. **[GRI 103-2c-iv]**

In the Metallurgy Business Unit (anhydrous and hydrated alumina and primary aluminium production and other related activities, and operation of port facilities for the loading and unloading of products and raw materials), an official Plant Health & Safety Committee (PHSC) is in place, in which 100% of the Company's employees and 65% of the employees of independent contractors are represented. The Committee consists of 6 members who are elected by the Business Unit's employees. The PHSC has extended responsibilities and its members participate in all key procedures, committees or working groups. Most of all, however, it is the employees themselves, from all levels in the management hierarchy, who play a leading role in a continuous, systematic and methodical process that involves them in the formulation of safety rules and regulations. Moreover, the following additional Safety Committees have also been established, led by Management Executives and composed of representatives from all Plant departments: Work at a Heights Committee, Lockout-Tagout & Confined Spaces Committee, Circulation Committee, Contracting and Training Committee. The issues discussed by the Committees cover the ones related to the Plant's main processes, while proposals for the improvement or revision of these procedures are also discussed. **[GRI 403-4] ASI**

In the Sustainable Engineering Solutions (SES) and the Renewables & Storage Development (RSD) Business Units, the Health & Safety Committees operate at facility level (in every work site or plant) and represent 100% of the

Company's direct employees and over 90% of the employees of independent contractors. More specifically, at the Volos Plant there is a three-member Health & Safety Committee consisting of employees, trade union representatives and members of the Management, which is set up in accordance with the provisions of the Greek law. Additionally, the Plant's Safety Technician and the Occupational Physician work closely and are in constant communication with the Committee regarding issues related to hygiene, safety and the protection of employees. The Committee members, the Safety Technician, the Occupational Physician and the Company's representatives, participate in training programs on Health & Safety and in relevant official information days. Moreover, in every work site facility, specialized personnel are constantly present for handling Health & Safety issues, First Aid provision services (personnel & equipment) are in place, while an ambulance and an Occupational Physician are present to offer first aid and deal with emergencies. **[GRI 403-4]**

In the Power & Gas Business Unit, no official Occupational Health & Safety (OHS) Committee has been set up. A consultation process on these issues is however applied, with the active participation of personnel from the company's Energy Centers, in the context of the OHSAS 18001 Occupational Health & Safety Management System. Relevant consultations take place twice per year, in order to promote the implementation of the Company's OHS policy in force, to communicate information on OHS actions and programs and to involve the employees, through their active participation in the consultation process, in the management of occupational risk. Moreover, in the context of the OHS audits carried out in accordance with the OHSAS 18001 Management System, a mechanism has been established to monitor the enforcement of the OHS regulations in the facilities and activities of the Company's Energy Centers, Head Offices, retail stores and RES plants. **[GRI 403-4]**

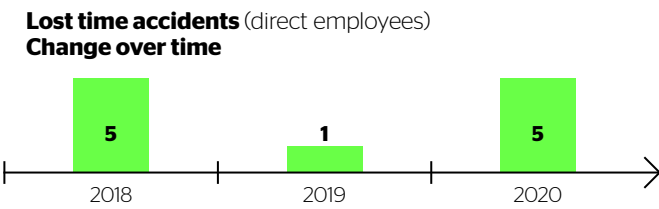
Health and hygiene issues are also key to the quality of life of employees and of the communities in which the Company operates. MYTILINEOS has been consistently investing in this area, monitoring, assessing and controlling all work environment parameters in an effort to constantly improve the good health of employees and ensure healthy living conditions at the workplace. Exposure to dust, noise, high temperatures and substances such as fluorine compounds, sulphur dioxide, carbon monoxide and aromatic polycyclic hydrocarbons, are the main parameters monitored systematically. Employees also undergo regular medical examinations as a function of their job, while additional examinations by the Occupational Physicians ensure comprehensive monitoring of their health. Finally, in order to constantly improve the health of employees, the Occupational Physicians help promote a healthy lifestyle at the workplace, while the Company also offers medical care plans, over and above the statutory ones.

Results **[GRI 103-3a-ii]**

- MYTILINEOS attaches the utmost priority to the Health & Safety of its employees in the work areas of all its Business Units daily. **In line with its commitment, the Company continues to take constant care to ensure the achievement of the only acceptable target “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES”**, which is one of the major challenges for the industrial and construction sectors. The Company's key concern is to maintain Health & Safety indicators at the best possible level in all its facilities (offices, industrial plants and work sites).
- Safety conditions and performance in almost all MYTILINEOS activities are assessed on an annual basis. In 2020, **33 inspections and audits were successfully carried out in all** the Company's Business Units (21 by independent bodies, 9 by customers and 3 by the Labor Inspectorate).
- MYTILINEOS understands that the best approach to fulfilling its core Health and Safety objective and commitments is by constantly striving to create a uniform culture, through information updates, training and awareness-raising activities addressed to all employees. The Company's relevant awareness-raising practices in this area are presented here: mytilineos.gr/sustainability/occupational-health-and-safety/

Direct employees

- **The zero work-related fatalities and zero serious incidents from work-related accidents and occupational diseases targets were achieved. [GRI 403-10]**
- The total number of recorded accidents stood at **14 and the corresponding accident rate per 200,000 work hours was 0.53 accidents.**
- Five (5) lost time accidents were recorded, **resulting in a rate of 0.19 accidents per 200,000 hours worked.** The employees involved in these accidents sustained fractures and sprains. All incidents were analyzed using the “Cause Tree Analysis” method, in order to establish their causes and communicate the results of their investigation, so as to ensure that they will not happen again. At the end of 2020, all employees had returned to their jobs in good health.
- The total number of visits to the medical stations stood at **9, decreasing by 67% compared to 2019.**
- In the Metallurgy Business Unit, **one more year of operation without accidents with interruption of work for 3 or more days was completed. ASI**
- **No employees** were involved in activities with a risk of exposure to work-related diseases.



For yet another year, particular attention was also paid to the prevention of serious accidents through training. A total of **10,423 man-hours of training** in Health and Safety were implemented in all Business Units, attended by 54% of direct employees. The training, which covers both general and specialized Health & Safety topics, focused on the following key modules: **[GRI 103-2c-vii] [GRI 403-5]**

- Identification of Risks
- Fire protection – Use of fire extinguishers
- Rescue Techniques at Heights
- Safety of new employees
- Safe Work at Heights – Falls
- Work in Confined Areas
- Hazard Assessment
- Health & Safety Issues in underground mining sites
- Safe movement of Pedestrians, Machinery & Vehicles
- Harmful agents in underground premises (inhalable-respirable)
- Musculoskeletal risks
- Lifting Machinery
- Electricity – Electrocution
- Emergency Plans
- Safety of High-Pressure Hydraulic Tools
- Safe performance of electrical work
- Protection against explosions
- Safety of Metal Scaffoldings
- Lockout-Tagout of Facilities
- Health & Safety in the offices
- Emergency First Aid at Work
- “Safety at Work” introductory training
- Safe lifting of loads
- Scaffolding installation
- Cleanliness of premises
- Emergencies
- Fire safety and evacuation of buildings
- Information updates about COVID-19
- Mental health at the workplace (COVID-19)

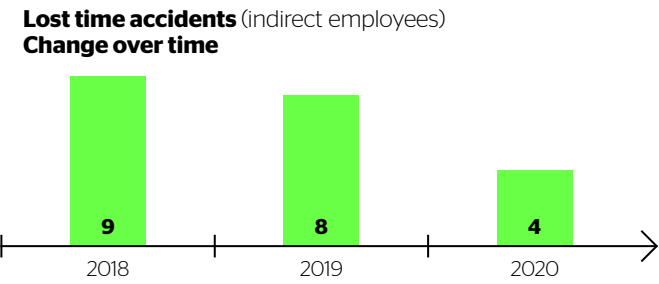
Health & Safety Indicators [GRI 403-9]	2018	2019	2020
Fatality Rate (FR) / 200,000 work hours			
FR (Total)	0	0	0
FR (Men)	0	0	0
FR (Women)	0	0	0
High Consequence Injury Rate (HCIR) / 200,000 work hours			
HCIR (Total)	n/a	n/a	0
HCIR (Men)	n/a	n/a	0
HCIR (Women)	n/a	n/a	0
Total Recordable Injury Rate (TRIR) / 200,000 work hours			
TRIR (Total)	n/a	n/a	0.53
TRIR (Men)	n/a	n/a	0.60
TRIR (Women)	n/a	n/a	0.21
Lost Time Injury Rate (LTIR) / 200,000 work hours			
LTIR (Total)	0.25	0.04	0.19
LTIR (Men)	0.24	0.05	0.18
LTIR (Women)	0.30	0	0.21

- FR (Fatality Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate).
- The High Consequence Injury Rate (HCIR) is disclosed for the first time in accordance with the specifications of the new GRI 403-4 (2018) standard. This indicator does not include fatalities.
- The Total Recordable Injury Rate (TRIR) is disclosed for the first time in accordance with the specification of the new GRI-403-4 (2018) standard. It includes all fatalities and all accidents resulting in days away from work, limited work or transfer to another job, medical treatment in addition to first aid or loss of consciousness or significant injury or ill health diagnosed by a doctor or other authorized health care professional. Includes all fatalities and accidents that occurred during the employee's travel between his/her private place of activity (e.g. residence) and a place of work or work area and only when such travel has been organized by the Company.
- The Lost Time Injury Rate (LTIR) includes lost time accidents involving the loss of ≥ 3 work days.

Indirect employees

Managing the safety of the personnel of independent contractors is a particular challenge for MYTILINEOS. The Company is consistent in its efforts in this area and focuses on the need to alter everyone's behavior and mentality about accident prevention. For example, contractors who employ a significant number of personnel at the facilities of the Metallurgy Business Unit's aluminium plant, are required to implement an OHSAS 18001 or ISO 45001 certified Occupational Health & Safety management system, while the Company evaluates regularly their performance using specific criteria. Similarly, the management of Health and Safety issues in the Sustainable Engineering Solutions (SES) Business Unit is governed by a series of actions that must be implemented by associated contractors, to ensure that the Occupational Health & Safety Management System, which is drawn up separately for each project, is correctly implemented, and that they take the appropriate measures in the context of the specific work that they undertake. **ASI**

- Despite the efforts made, it is with regret that we report one (1) fatality due to electrocution, involving an employee of a contractor in the Power & Gas Business Unit.
- The total number of accidents recorded **stood at 11** and **the accident frequency rate per 200,000 work hours was 0.38 accidents**.
- Four **(4) lost time accidents** were recorded, **resulting in a rate of 0.14 accidents per 200,000 hours worked**.
- A total of 11 visits of employees to the medical (first aid) stations were recorded, a number decreased by 78% compared to 2019.



With a view to strengthening and consolidating a common safety culture among all MYTILINEOS' business partners, 13,123 man-hours of training were delivered to over 10,000 indirect employees. **[GRI 103-2c-vii] [GRI 403-5]**

- "Safety at Work" introductory contractor training
- General Risks and Regulations at the Plant
- Specific Electrical Hazards in the Electrolysis Line
- Safe Work at Heights – Falls
- Lockout-Tagout of Facilities
- Safety in confined spaces
- Fire safety – Use of fire extinguishers
- Information update on the COVID-19 pandemic
- Use of Personal Protective Equipment
- Safe work in underground premises
- Emergency First Aid at Work
- Hazard Assessment
- Information updates on the following: Proper handling of loads
- Night work
- Emergency Plans
- Handling of chemicals
- Written Occupational Risk Assessment
- Road Safety
- Narcotics and alcohol
- HIV

Health & Safety Indicators [GRI 403-9]	2018	2019	2020
Fatality Rate (FR) / 200,000 work hours			
FR (Total)	0	0	0.03
FR (Men)	0	0	0.04
FR (Women)	0	0	0.00
High Consequence Injury Rate (HCIR) / 200,000 work hours			
HCIR (Total)	n/a	n/a	0.03
HCIR (Men)	n/a	n/a	0.04
HCIR (Women)	n/a	n/a	0.00
Total Recordable Injury Rate (TRIR) / 200,000 work hours			
TRIR (Total)	n/a	n/a	0.38
TRIR (Men)	n/a	n/a	0.38
TRIR (Women)	n/a	n/a	0.41
Lost Time Injury Rate (LTIR) / 200,000 work hours			
LTIR (Total)	0.27	0.19	0.14
LTIR (Men)	0.28	0.19	0.11
LTIR (Women)	0.00	0.00	0.41

• FR (Fatality Rate), HCIR (High Consequence Injury Rate), TRIR (Total Recordable Injury Rate), LTIR (Lost Time Injury Rate).
• The High Consequence Injury Rate (HCIR) is disclosed for the first time in accordance with the specifications of the new GRI 403-4 (2018) standard. This indicator does not include fatalities.
• The Total Recordable Injury Rate (TRIR) is disclosed for the first time in accordance with the specification of the new GRI-403-4 (2018) standard. It includes all fatalities and all accidents resulting in days away from work, limited work or transfer to another job, medical treatment in addition to first aid or loss of consciousness or significant injury or ill health diagnosed by a doctor or other authorized health care professional. Includes all fatalities and accidents that occurred during the employee's travel between his/her private place of activity (e.g. residence) and a place of work or work area and only when such travel has been organized by the Company.
• The Lost Time Injury Rate (LTIR) includes lost time accidents involving the loss of ≥ 3 work days.

Finally, 88 (2019: 59) incidents involving both direct and indirect employees –which, if left unexplored, could pose a potential risk for employees (near accidents)– were reported in production processes and investigated, representing an increase of 49%. At the same time, the collection of health-related data in the Company's core activities was continued, contributing to the effort to ensure a safe working environment.

Employment



Impact on Sustainable Development	3.70	Significance for Stakeholders	3.36
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: In all work areas of MYTILINEOS' Business Units and subsidiaries.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">EmployeesShareholders / InvestorsRegulatory Bodies <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/suppliers may also be indirectly involved.	<ul style="list-style-type: none">Curbing unemployment and poverty at local and national level.Strengthening the economy of local communities.Enhancing employability in the industrial sector.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholders, so that they can understand how the Company is managing its Human Capital in the framework of its new operational structure. [GRI 103-2b]

As an employer, MYTILINEOS contributes to one of the most widely accepted social goals, namely to improve living standards through full-time and safe employment and decent work. Retaining existing jobs and focusing on creating new ones is a strategic choice which the Company has made in order to achieve growth in all areas directly or indirectly related to its activities. The Company's labor practices comply as a minimum with all the provisions of the legislation force and respect the fundamental principles laid down in the International Labour Organisation's (ILO's) Declaration on Fundamental Principles and Rights at Work. [GRI 103-1a]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

- Employment is an internationally recognized objective related to economic and social progress. It is considered as extremely important issue for MYTILINEOS' Business Units, because of the high localization and large number of employees. Creating opportunities for long-term employment does not only benefit the Company's business activities but has also a positive impact on its local communities, contributing to their sustainability.
- In addition, issues concerning decent working conditions (such as, for example, working environment, wages, benefits, working time, rest periods, leaves of absence, disciplinary and redundancy practices, protection of motherhood and other welfare issues) are of top priority for the Company, as they directly affect the satisfaction of its employees and are key factors for their retention.

Major risks [GRI 102-15]

The decline in employee satisfaction, commitment and effectiveness and the departure of talented employees, which may be due to the lack of opportunities for hierarchical advancement, to market mobility and the supply of attractive jobs, to the compensations and benefits offered and their competitiveness, as well as to the employees' lack of adaptability to changes in corporate organization and processes, and to their difficulty in assimilating the Company's values and understanding its Code of Business Conduct. This risk may result in the loss of valuable knowledge and expertise gained through their employment, as well as in loss of the financial investment made and of the time dedicated to their training. The Company may also incur increased costs due to the need to replace specialist personnel.

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

- To address these risks, the Company has implemented systems and practices concerning:
- The timely and continuous provision to employees of information about changes in structures and processes due to the growth of the Company's activities and to the adoption of best practices in its operating model.
 - The development of programs for formulating the new integrated corporate culture, based on the employees' shared values and their behaviors.
 - The implementation of employee training and development programs aimed at strengthening personal and technical skills and capabilities required to address the current and future challenges in the Company's business activities, while at the same time supporting the personal development of employees.
 - The provision of incentives, in terms of compensations and benefits as well as in terms of opportunities for advancement and development, aimed at increasing the employees' commitment and retention.

Key elements of the Company's approach to Employment

- Attraction and retention of competent executives, continuous improvement of employer-employee relations and implementation of modern systems for employee performance evaluation.
- Establishment of an attractive compensations and benefits framework on the basis of market data and specialized surveys for critical areas of the Company's activity.
- Promotion of the Code of Business Conduct to all personnel and ensuring that the latter are fully familiar with it, and avoidance of direct or indirect discrimination in all work practices.
- Recognition of the importance of healthy and secure employment for all personnel and business partners, and continuous improvement in this area.
- Focus on localization, giving priority to the recruitment of employees from the Company's local communities, and bolstering local employment at domestic and international level based on the Company's activities.
- Ensuring the flow of information and the timely communication of organizational changes, through the appropriate communication channels, including the corporate intranet, e-mails, the SharePoint application and non-electronic means of communication, such as evening consultation events with members of the top Management, written announcements posted in production work areas and, more generally, open communication with employees through the HR-Business Partner role in each Business Unit.
- Protection of the personal data of employees, allowing their use only by authorized persons and only in cases where this is required by the law for purposes related to the functioning of industrial relations and to the Company's business activity.
- Ensuring, through the individual Labour Regulations and the Code of Business Conduct, the elimination of all arbitrary or discriminatory practices in terminating employment relationships with employees.
- The Human Resources General Division of MYTILINEOS is responsible for establishing and implementing the framework for the management and development of the relevant policies and practices, as well as for providing professional support for the Business Units for dealing with issues regarding human resources.

Management - Employee relations

One of the main goals of MYTILINEOS, as an important social entity, is the fulfilment of its social role. The Company seeks to ensure the well-being of its employees, as it considers them as an important factor for its growth. Therefore, employees are considered to be "integrated" within the Company, beyond the employment-remuneration provision relationship that formally connects them with it, in the sense that the continuous improvement of their capabilities and skills, and of the outcome of their work, are inextricably linked to the Company's progress. The Company's has set as its priorities the safety of its employees and the protection of their interests and rights in the framework of sound corporate management, given that one of the key success factors is the employees' full dedication to their duties. Thus, employees can communicate with authorized

members of the Management about all matters of concern to them and are provided with timely answers and solutions. MYTILINEOS also ensures that its employees are informed in a timely manner prior to the implementation of major changes in corporate operations which might affect them significantly, and has included a specific clause to this effect in its business collective bargaining agreements. Although the duration of the notice period set by a notice of change is not determined, this varies depending on the significance of the change and the Business Unit involved.

The following examples are indicative: **[GRI 402-1a]**

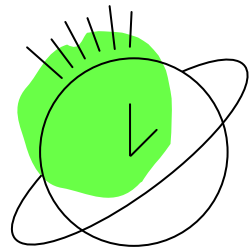
- In the Metallurgy Business Unit, the Plant Steering Committee (PSR) holds weekly meetings to discuss matters concerning Safety, the Environment, Production and Finance, as well as organizational/operational changes (if any), with the participation of all Company Managers. The results of these meetings are immediately communicated to all other employees by the Company's Executives. **[ASI]**
- In the Sustainable Engineering Solutions (SES) Business Unit, a reasonable notice period applies, depending on the circumstances and in consultation with the employees' elected representatives, to ensure that employees are notified in the best possible way. The Management meets regularly with the Board of the Employees' Union, to inform them of any issues that may concern them. In extraordinary cases, the meeting and the provision of information by the Company to the Board of the Employees' Union precedes the implementation of any positive or negative change that affects employees, with provisions made for the time necessary to disseminate the information and hold consultations.
- The Company's Executive Committee holds monthly meetings. The information on issues that require dissemination and concern the employees, are communicated to the corporate organization by each General Manager.

Results **[GRI 103-3a-ii]**

- The Company is currently following the new, revised recruitment policy and procedure, which was established in 2020. The purpose of the policy is to ensure adherence to meritocracy and equal treatment in the selection of personnel, based on the candidate's capabilities and their suitability, given the requirements of the particular jobs, as well as optimal leverage of the employees' potential with regard to their development and career path prospects in the Company.
- **Direct employment**, as recorded at the end of 2020, increased marginally **by 0.8%**, despite the unprecedented conditions created by the pandemic. The total number of the Company's direct employees stood at **2,455 persons** (2019: 2,436), of which 90% are employed in Greece.
- In 2020, the total number of employees of permanent independent contractors executing significant operations for the Company (such as mining, construction of new projects, maintenance services, transport etc.), including also the persons employed by MYTILINEOS under long-term work contracts or work contracts, stood at **1,401** (2019: 1,226), raising the number of the Company's **direct and indirect employees to 3,856 persons, thus increasing total employment by 5.3% from 2019**.
- In terms of bolstering local employment, the Company maintained for yet another year its very high rates, as **9 out of 10** of its direct and indirect employees come from the communities in the immediate vicinity of its industrial units as well as from the wider local area.
- Total new hires reached 395, of which 20% involved women, **whose participation in direct employment rose to 19%** (2019: 18%). A total of **34 new jobs** were created in the Company.
- Moreover, MYTILINEOS, as a supporter of the "GEFYRA" program, **created 65 quality "pre-labor-market" posts**, based on the concepts of apprenticeship, internship and traineeship, with the aim of bridging the skills gap and transforming a number of these posts into permanent jobs.
- **The retention rate of full-time employees was over 90%, while the low rates of part-time and Fixed-term employment in the Company** were maintained, confirming, for one more year, its intention to maintain long-term relations with its people.

In all regions where MYTILINEOS operates, the compensation and benefit plans offered to its employees are as a minimum in full compliance with the labor legislation and with the business collective bargaining agreements, where applicable. Any compensations over and above the statutory ones are based on the employees' individual performance, which is reviewed and assessed annually. The objective in adopting this approach is to ensure meritocracy in earning levels, guarantee competitive earnings as a function of the conditions in the business environment that affect the company's competitiveness, and lay the foundations for the long-term retention of its people.

Moreover, MYTILINEOS provides a number of benefits to permanent employees in all levels of its hierarchy, which remained unchanged in 2020. These benefits vary between Business Units and include medical care, life insurance, disability/incapacitation coverage, retirement provision, retention programs, maternity/paternity leave, and the granting of loans in cases of emergency. These benefits are non-discriminatory and are governed by the principles of equal treatment and transparency, setting clear policies in each personnel category. **[GRI 401-2]**



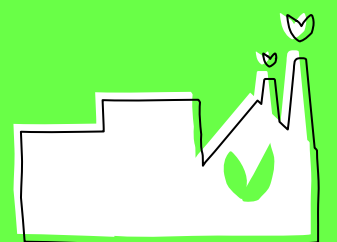
Workforce data (direct employees) [GRI 102-8]	2018	2019	2020
Analysis / Gender			
Total	2,087	2,436	2,455
Men	1,723	1,996	1,987
Women	364	440	468
Analysis / Employment contracts by gender			
Permanent	1,873	2,147	2,161
Men	1,559	1,779	1,760
Women	314	368	401
Fixed-term	214	289	294
Men	164	217	227
Women	50	72	67
Analysis / Employment contracts by country			
Permanent	1,873	2,147	2,161
Greece	1,845	2,001	2,058
Ghana	6	2	2
United Kingdom	8	25	31
Spain	2	20	16
Puerto Rico	3	-	-
Saudi Arabia	1	1	1
Turkey	3	4	5
Chile	5	44	29
Kazakhstan	-	36	-
Australia	-	11	10
Uganda	-	3	-
Korea	-	-	6
Slovenia	-	-	1
Mexico	-	-	2
Fixed-term	214	289	294
Greece	103	163	133
Algeria	7	6	5
Ghana	60	56	59
United Kingdom	12	-	-
Spain	3	47	25
Kazakhstan	14	-	17
Nigeria	8	8	8
Uganda	4	-	2
Chile	3	-	26
Korea	-	6	1
Tunisia	-	3	1
Slovenia	-	-	2
Australia	-	-	15
Analysis / Employment types by gender			
Full-time	2,069	2,420	2,442
Men	1,721	2,002	1,984
Women	348	418	458
Part-time	18	17	13
Men	2	4	3
Women	16	13	10

Workforce data (direct employees) [GRI 401-1]	Recruitment (New hires)				Departures			
	2018	2019	2020		2018	2019	2020	
Analysis / Gender								
Total	429	665	395	16%¹	384	384	361	15%
Men	311	507	315	16%	314	301	280	14%
Women	118	158	80	17%	70	83	81	17%
Breakdown by age group								
< 30 years old	210	299	169	66%	151	193	150	58%
30 – 50 years old	197	321	190	11%	180	147	157	9%
> 50 years old	21	45	36	7%	53	44	54	11%
Analysis / Country								
Greece	346	441	324	15%	339	310	290	13%
Algeria	2	1	-	-	9	2	1	20%
Ghana	38	40	14	23%	7	42	11	18%
United Kingdom	6	15	7	22%	7	11	4	13%
Nigeria	4	-	-	-	3	-	-	-
Iran	3	-	-	-	9	-	-	-
Spain	5	62	4	10%	-	-	28	68%
Uganda	4	3	-	-	-	-	1	50%
Puerto Rico	-	-	-	-	1	-	-	-
Kazakhstan	14	33	1	6%	8	10	1	6%
Chile	7	49	37	67%	1	5	21	38%
Turkey	-	1	2	40%	-	4	1	20%
Australia	-	11	3	12%	-	-	2	8%
Korea	-	6	1	14%	-	-	-	-
Tunisia	-	3	-	-	-	-	1	100%
Slovenia	-	-	2	67%	-	-	-	-

1. As a percentage of the total number of employees of the respective category.

Overview of performance in 2020

- The **high rate (88%) of employees** working under a **permanent employment contract was maintained**. (2019: 88.1%).
- **The retention rate of full-time employees stood at 91.0%** (2019: 93.0%).
- The low rates of **fixed-term employees (12%)** and **part-time employees (0.5%)** were maintained, supporting the long-term relations between the Company and its people.
- **The participation of women in direct employment rose to 19%, increased by 9.3%** compared to the base year (2018).
- Also, **the percentage of female full-time employees rose to 18.6%, increased by 11.4%** compared to the base year (2018).
- **More than 5 out of 10 employees are covered by business collective bargaining agreements.** **[GRI 102-41]**
- Finally, the **return-to-work rate of employees who took parental leave stood at 94%**, while the **retention rate of these employees after 12 months from their return stood at 87%**. **[GRI 401-3]**
- A total of **34 new jobs were created**, covering the needs in all the Company's Business Units.
- Concerning personnel turnover:
 - **the voluntary turnover rate** stood at **6.0%** (2019: 5.2%);
 - **the non-voluntary turnover rate** was **1.3%** (2019: 0.9%).
- Total **new hires reached 395**, of which **20% involved women**, while nearly **43% of the new hires** involved young **employees under the age of 30**.





Human Rights



Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: In all work areas of the Business Units and subsidiaries of the Company and of its contractors and suppliers.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">• The protection of labor rights.• Strengthening social and economic integration for all, irrespective of age, gender, disability, race, nationality, origin, religion, economic situation or other characteristic.• Strengthening employability in the industrial sector and enhancing corporate culture with the elements of diversity and equality.• The elimination of any form of child or forced labor (modern slavery).	<ul style="list-style-type: none">• Employees• Suppliers• Shareholders / Investors• NGOs• Academic community• Regulatory Bodies• Media representatives <p>in the context of their cooperation with MYTILINEOS.</p>

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS’ Social Partner groups, so that they can understand the way the Company is managing its Human Capital, in the framework of its new operational structure. [GRI 103-2b]

MYTILINEOS ensures labor relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promoting the fundamental principles of the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) respect for the freedom of association and the effective recognition of the right to collective bargaining, (b) elimination of all forms of forced or compulsory labor; (c) effective abolition of child labor, and (d) the elimination of all discriminations in respect of employment and occupation.

Key Challenges/Impacts [GRI 103-1a] [GRI 102-15]

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

Major risks [GRI 102-15]

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

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

- MYTILINEOS is committed to the first six Principles of the UN Global Compact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights. The Company's commitment to monitoring and publishing the impacts of its activity in this area, together with the Code of Business Conduct, which is addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's working environment.
- **In 2020, MYTILINEOS developed a specialized Human Rights Policy** with the aim of creating a framework for the promotion of respect and protection of Human Rights, both in the Company's internal environment and within its sphere of influence. **The Policy expresses MYTILINEOS' zero tolerance of violations of Human Rights:** this is implemented by not participating (directly, passively or implicitly) in such violations, as well as by avoiding all transactions and contacts with third parties that may have caused or may cause violations of these rights. The Policy also aims at raising awareness and ensuring the commitment of MYTILINEOS employees, suppliers and business partners to respecting and protecting Human Rights, in all Business Units of the Company,

including its subsidiaries. **In the context of the preparation of the Policy, the Company's Stakeholder Engagement process for 2020 was dedicated to this issue and was implemented by means of a custom electronic questionnaire mailed to all Stakeholder groups, with a strong focus on the Company's employees. In accordance with international practices, the Company listened to and incorporated the views of all Stakeholders on the key points of the Policy.**

- MYTILINEOS monitors the relevant labor legislation (national, European, ILO), including reports on child labor, respect for human rights and work conditions, and is fully aligned with the collective bargaining agreements and the relevant international conventions. The Company's employees may without any restriction whatsoever participate in trade unions and professional associations.
- Labor rights are an issue of major significance for all employees. The Company's direct employees are covered by business or collective bargaining agreements, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. Furthermore, Employees' Unions are in place in the Metallurgy Business Unit and the Sustainable Engineering Solutions (SES) Business Unit. In the latter, a first-degree trade union body is established and functions at business-unit level (Volos plant), whose members are elected by the general assembly of the plant's employees, with representatives also elected to the second-degree trade union organization (Volos Labor Centre) and to the Panhellenic Metal Workers' Federation (POEM).
- The Company, through the basic grievance mechanism provided for in its Code of Business Conduct for reporting violations of the Code (anonymous or named reports by phone, fax, post, as well as by e-mail to the Regulatory Compliance Division), enables its employees to raise any concerns, as well as to report incidents of Human Rights violations. Moreover, the Company warrants that no action shall be taken against any employee who reports in good faith any actual or alleged inappropriate conduct. **The Company is already engaged in the process of aligning the basic grievance mechanism in place for reporting violations (Whistle-blowing) with the guidelines of Directive EU 1937/2019.**
- As regards its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that must be followed by all, to ensure that the Health & Safety system for employees is properly implemented and the appropriate measures are taken. At the same time, the contracts signed with contractors and suppliers include an explicit provision about the Company's Code of Business Conduct, to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.
- Finally, the Company is committed to conducting regular risk assessments of its main production plants and its Business Units, to identify potential impacts on key Human Rights protection areas, in accordance with the methodology proposed

by the Global Compact (Global Compact Self-Assessment Tool - Human Rights section), and to publish the relevant findings. This process is supported by both daily communication and employee management procedures and systems implemented by the Human Resources General Division.

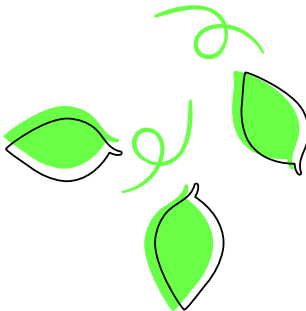


MYTILINEOS
Human Rights Policy

mytilineos.gr/media/rp3edd3u/politiki_anthrwpinwn_dikalwmatwn_en.pdf

Results [GRI 103-3a-ii]

- In 2020, the Company implemented for the 4th consecutive year the self-assessment process regarding the protection of Human Rights in its Business Units, in line with the methodology recommended by the Global Compact (Global Compact Self-Assessment Tool - Human Rights). According to the results of the self-assessment process, no areas were identified in which the deficiencies observed could jeopardize the protection of Human Rights in the Company's activities. The key areas examined in accordance with the above process, which was also supported by daily communications and by the management systems of the Human Resources General Division, are summarized in the table below. **[GRI 412-1]**
- As part of the training in the Code of Business Conduct, **the Company provided to its Executives a special e-learning training programme which also covered Human Rights topics**, during which 77 employees were informed about 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.
- Finally, **in 2020 no incident of Human Rights violation was reported to the Human Resources General Division** or to the Regulatory Compliance Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct.



Assessment Areas	Results
Occupational Health & Safety	<p>During the self-assessment exercise, no deficiencies were established in terms of procedures or policies regarding the Health and Safety of employees.</p> <ul style="list-style-type: none">• The Company guarantees that its workers are provided with safe and healthy work facilities.• It also ensures that its workers are supplied with the necessary protective equipment and training to perform their tasks safely.• The Company promotes the active participation of its employees in the Health and Safety procedures at the workplace.• Overall, the policy, the scheduled planned actions for the achievement of the targets set and the initiatives adopted voluntarily by the Company to ensure the Health and Safety of employees, are rigorously applied, as presented in the relevant section of this Report.
Personnel Work Hours, Wages And Leaves	<p>For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates.</p> <ul style="list-style-type: none">• The Company confirms that all employees have a formal employment status.• It also ensures that weekly work is limited to 40 hours; however, due to the workload in various activities, groups of employees may be called upon to work beyond 40 hours.• The Company has procedures in place for planning, recording and monitoring each employee's work hours to check any overtime, while also providing employees with a reasonable break time during work (as laid down by the law and the industrial standards).• The Company ensures the wages of its employees in all cases of sick or parental leave and holiday leave, in accordance with the international standards.• <p>No incident of a violation of these rights was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct.</p>
Fair Treatment of Employees	<p>In accordance with the Code of Business Conduct and the Internal Regulation Code, the Company:</p> <ul style="list-style-type: none">• Protects its employees from all forms of harassment at the workplace, as well as from physical, verbal, sexual or psychological abuse and harassment and from threats of any kind.• Respects the privacy of its employees' personal data whenever it collects personal information or checks work areas. <p>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the company's Code of Business Conduct.</p>
Freedom of Association	<p>The legal framework on labor includes provisions on the recognition and safeguarding of the employees' right to freedom of association and collective bargaining, which MYTILINEOS fully respects. The employees' right to freedom of association is recognized in all its Business Units. During 2020, no areas were identified and no incidents were reported in connection with a threat to or violation of this right. This has been the result of the implementation of a specific social negotiation process, whose fundamental prerequisite is the commitment of the Company's Management and of its employees to detailed arrangements on social and labor issues, taking into consideration the rights and interests of both sides.</p> <p>No incident of a violation of this right was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the company's Code of Business Conduct. [GRI 407-1]</p>

Assessment Areas	Results
Impact on Local Communities	<ul style="list-style-type: none">• The Company, through the mechanisms for formal and informal interactions with local communities which it maintains in each one of its Business Units, except in the case of industrial units located in demarcated Industrial Areas, ensures that the concerns of local communities regarding any general impact of its activity are recorded and takes, where necessary, appropriate measures.• It also takes the necessary measures to ensure that the security system of its premises or such arrangements in place are consistent with the international law enforcement principles and the use of power. <p>In this respect, in 2020 no circumstances were identified to justify the likelihood of incidents of human rights violations at community level. The Company's activity does not limit but on the contrary, ensures access by the citizens to resources or various other methods of living. For example, in the case of the Metallurgy Business Unit, the Company's drilling network serves local communities with more than 900,000 m³ of drinking water annually. Moreover, the consultation process and the cooperation with the local Municipalities during the development and operation of RES projects is systematic, with the Company investing significant funds in the development and improvement of local infrastructure with mutual benefits.</p>
Child Labor	<p>MYTILINEOS does not employ persons under the age of 15 or 18 for work. As a result, no Company activity in Greece presents any risk (significant or non-significant) of child labor incidents or of conditions likely to drive young employees to hazardous work. [GRI 408-1]</p>
Forced Labor	<p>In compliance with the Constitution of Greece (art. 22 par. 4), which protects the freedom of work, MYTILINEOS prohibits all forms of forced or compulsory labor in its work areas. As a result, no Company activity in Greece presents any significant risk of conditions that may lead to incidents of forced labor.</p> <p>In 2020, no complaint or incident of forced or compulsory labor was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 409-1]</p>
Discrimination	<p>MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.</p> <p>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 406-1]</p>



SOCIAL PERFORMANCE

Sustainability of local communities



Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: Mainly in the communities adjacent to the Company's industrial units in Greece and abroad, but also in the wider Greek territory.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">Upgrading local infrastructures and paying particular attention to the needs of those who are in a vulnerable situation, such as women and children.Strengthening the local and national economy and development.The protection and preservation of the cultural and natural heritage.	<ul style="list-style-type: none">Local communitiesRegulatory BodiesAcademic communityNGOsShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: Impacts are caused by the Business Units of MYTILINEOS, as well as by Voluntary & Non-Governmental Organizations and the municipalities, in the context of their cooperation with the Company for the implementation of its social policy.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide MYTILINEOS’ Stakeholders with access to information regarding the development of the Company's social role as a responsible corporate citizen. The Company's objective is to familiarize itself with the needs and priorities of its local communities, so that its development efforts are as compatible as possible with the needs and priorities of its local communities and of the broader Greek society. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Social engagement reinforces the preventive approach policy adopted by MYTILINEOS, mitigating the unpredictable non-financial risks and contributing to the preservation of its “social license to operate” along with its good reputation. A key challenge for the Company is to match its contribution to the needs and priorities of the communities in which it operates, taking into account local issues as well as the national priorities for Sustainable Development. Information exchange, consultation and negotiation are useful tools in fostering a

participatory approach to the identification and implementation of MYTILINEOS’ social investments. This is a constantly evolving effort taking various forms, whose combination results in the Company's commitment to respond to the diverse expectations of its local communities, contributing to the protection of the environment, to the promotion of health and safety, to the efforts to combat poverty, to strengthening social inclusion and ensuring access to education, and to assist in development of the professional skills of the new generation.

Major risks [GRI 102-15]

The Company’s failure to promptly identify and manage the changing social, economic and cultural characteristics of its local communities may negate the existing assumption that the Company is fully integrated in these communities and has common interests with them. This may affect the preservation of the Company’s “social license to operate”, and may possibly restrict its future growth.

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

- The General Management of each Business Unit of MYTILINEOS is responsible for managing relationships with the local communities where that Business Unit operates. The main objective is to identify any negative impacts from the Company’s business activity and to minimize them through its responsible business conduct and activity.
- A Corporate Social Responsibility team has been appointed and is operating in each Business Unit. This team is managing the implementation of the Company’s social policy, the annual Stakeholder engagement process, the use of local social media and the organization of visits of members of the local community to the Company’s facilities, when this is requested.
- The Company communicates with its local communities in a clear and transparent way, opting for an “open door” policy, applied primarily in the areas where the Company’s industrial plants are located.
- The collaboration of MYTILINEOS with the wider society as well as with the local communities where it operates are ongoing, multi-dimensional and substantial. The initiatives taken by the Company are linked to the needs of each community and of the wider region, and are shaped through open dialogue with the local social partners, by conducting surveys for the identification of material topics as well as opinion surveys, and by organizing annual thematic or general open consultations with representatives of the local communities for following up and discussing specific topics of local interest.

Key elements of MYTILINEOS’ social policy: [GRI 103-2c-ii]

- **Bolstering local employment:** As the core activities of MYTILINEOS are primarily located in the Greek regions, the Company acknowledges and accepts its share of the responsibility to contribute to the development and preservation of the prosperity of the local communities. In all the geographical regions where the Company’s operations are located, its human resources come in their majority from the local population.
- **Supporting local economic growth:** All Business Units of the Company subscribe to the same principle of giving priority to the selection of local suppliers for the purchase of products and services, provided that these meet their specific needs and particular requirements. (For more information on this topic, please consult the 2nd study on MYTILINEOS’ Socio-economic Impact in Greece, available at the following address: mytilineos.gr/sustainability/how-we-create-value/)

Making a substantial contribution through the annual Social Investment Program, under which social programs and initiatives are implemented: The Company aspires to help strengthen social cohesion, strategically seeking to maximize its mobilization by participating in selected actions in sectors directly connected to: (a) its culture and corporate values, (b) the impacts of its business activity, (c) the basic social needs that have emerged during the financial crisis and the consequences of the COVID-19 pandemic, and (d) the Sustainable Development Goals. (More information is available at the following address: sdactionsmap.mytilineos.gr/en/)

- **Building further on the constructive relationship it has established with social bodies over the years,** MYTILINEOS applies an electronic system of managing and evaluating social requests, which reinforces transparency, ensures the sustainability of its social investments and offers opportunities for the development of new partnerships. (More information is available at the following address: mytilineos.gr/sustainability/in-practice-social-requests-management-system/)
- Specialized executives in each Business Unit manage the Company’s relations with its local communities and, in collaboration with the Corporate Social Responsibility Central Function of MYTILINEOS, implement the annual stakeholder and local communities’ consultation process at local level, in order to record local needs and explore new partnership opportunities.

Goal [GRI 103-2c-iii]

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

Results [GRI 103-3a-ii]

Stakeholder Engagement

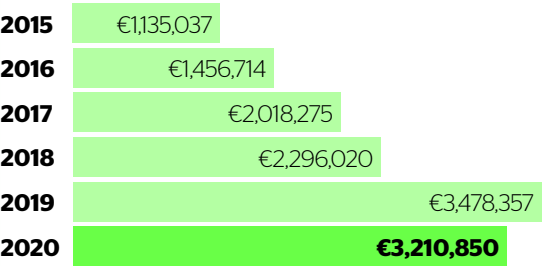
For the last eleven years, MYTILINEOS has been consistently holding its established Open Social Dialogue events with its Stakeholder groups. The Company is one of Greece’s pioneers in this field, as this approach has created the conditions for defining new attitudes and practices in its relationships with the various social groups. In line with the above, in 2020 it held centrally its 6th consecutive thematic consultation with its Stakeholders, entitled: **“Creating a Corporate Human Rights policy”**. (Relevant details are presented in the corresponding section of this Report).

Local employment and growth

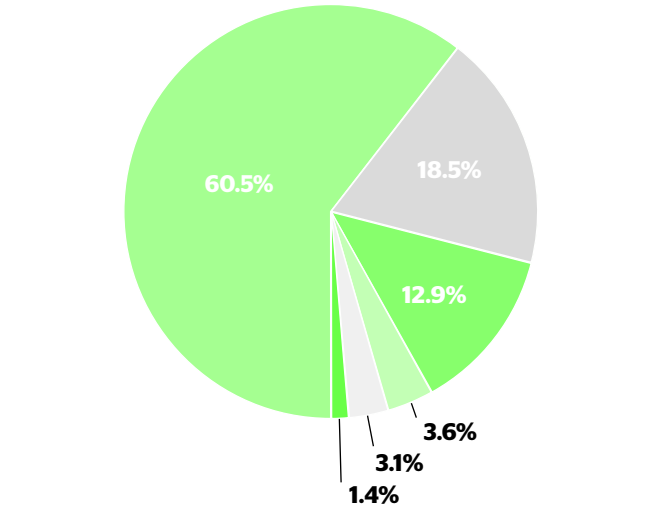
Over the last 11 years, MYTILINEOS has created nearly 1,000 new jobs, taking also into account the Company’s employment figures for 2020. Moreover, the Company, acknowledging its significant share of the responsibility to generate income in its local communities, maintains recruitment from its local communities at a very high level, **with more than 9 out 10 direct and indirect employees coming from the local population**. The Company also supported the national and local supply chain by sourcing from it income-generating products, services, jobs **(retaining more than 1,400 indirect jobs from direct suppliers in connection with all Company activities during 2020)**, creating wages consumed in the market and generating induced jobs, wages and taxes paid to the State.

Social Investments [GRI 203-1] [GRI 413-1a-iv]

In 2020, the Company, continuing to implement its **social policy**, invested over €3.2 million in the implementation of actions in basic social sectors that contribute to the Sustainable Development Goals (SDGs). Most notable was its contribution to SDG 3 (Good Health and Well-Being), to which over 60% of the total amount invested was allocated, with a strong focus on addressing and mitigating the effects of the SARS-CoV-2 pandemic. The amount invested in local infrastructure and public benefit services stood at over €590,000.



Analysis of Social Investments in 2020		
Social Sectors	Relevant Sustainable Development Goals	% of total social investments
Access to health services	SDG 3	60.5%
Local infrastructure & services	SDG 11	18.5%
Support of culture/sports	SDG 11	12.9%
Reinforcing quality education	SDG 4	3.6%
Alleviation of poverty and unemployment	SDG 1	3.1%
Reduction of food insecurity	SDG 2	1.4%



Social benefits from the development of RES projects

The added value created by the Company’s business operation over time, through the development of Renewable Energy Sources (RES) projects by its Power & Gas Business Unit, refers not only to its contribution to the achievement of the national environmental goals but also to the significant associated benefits offered to the local communities. Thus, in 2020, the total investment in supporting infrastructure and services projects aimed at improving the lives of local residents in Municipalities where new RES projects are in operation or are to be developed, stood **at over €470,000**. Over the years, these investments have mainly involved the following: Asphalt paving and maintenance of main and rural roads, extension of water supply networks of settlements, repair or construction of municipal buildings and facilities in cooperation with the municipalities concerned and according to their needs, as well as donations of vehicles and equipment necessary for the operation of municipal services and fire protection.

Key Social Initiative & Programs

INITIATIVE

“Digital School for All”, in collaboration with Bodos-saki Foundation.

Impact: The public health crisis caused by the pandemic created opportunities for the modernization, digitalization and upgrading of education. The need to ensure access to distance learning on equal terms for all school students in the country is imperative, as it is not a temporary solution but the new reality that students and teachers alike are called upon to integrate into their life. In line with the above, MYTILINEOS supported the public education system by offering **100 tablets to students of 21 schools in the Prefecture of Aitolokarnania coming from financially vulnerable families**, to facilitate their participation in the new form of education.

PROGRAM

“Emergency financial assistance to vulnerable families seriously affected by the measures adopted to contain the COVID-19 pandemic”, in collaboration with the association “Together for Children”.

Impact: The outbreak of the pandemic has seriously affected many families which, apart from facing not serious financial problems, also have among their members people with disabilities or chronic illnesses, and are thus unable to meet the requirements for specialist treatments and medications for these members. MYTILINEOS decided to assist the program, by enabling **18 families (36 adults & 44 children)** to obtain vouchers for redemption at Retail Food Chains for a period of three months. At the same time, the beneficiary families received, through the program, free counselling from the psychologists and social workers of the 11525 Helpline and Counselling Center.

INITIATIVE

“We protect our Grandparents”, in collaboration with the “Mission ANTHROPOS” organization.

Impact: MYTILINEOS, with a strong sense of responsibility and remaining constantly vigilant in order to address the effects of the pandemic, decided to assist the program “We protect our Grandparents”, by covering needs that arose in non-profit Homes for the Elderly. **105 senior citizens and 51 administrative and nursing staff were offered 3,400 masks, 30,000 gloves and 60 liters of antiseptic solution.**

INITIATIVE

In 2020, MYTILINEOS continued to provide financial support to 321 families that have joined the “AROGI” (‘ASSISTANCE’) foundation of the Holy Metropolis of Thebes & Levadia, facing serious financial and health problems. The Company supported their daily subsistence needs, offering 616 vouchers for purchases from a Retail Food Chain. It also supported the operation of the Social Grocery of the Municipality of Karystos, **directly benefiting 130 families and a total of 105 children and 16 persons with disabilities.**

PROGRAM

“Medium-Term Accommodation Facility for Women at Risk”, in collaboration with the “Doctors of the World/Médecins du Monde – Greece” medical humanitarian NGO.

Impact: Recognizing the lack in accommodation facilities for homeless women and mothers with children, **MYTILINEOS was the first company to support “RAMONA”, the new medium-term accommodation facility of “Médecins du Monde – Greece” (Mdm).** With this initiative, the Company has contributed substantially, for the second consecutive year in 2020, to the objective of finding sustainable integration solutions for these individuals, which it closely monitors in collaboration with Mdm. More specifically, the Company: (a) covered the maintenance costs for the building where the Facility is housed, (b) provided a total of 8 women and 5 minors, ruling out all forms of discrimination, with accommodation in their own individual rooms with private shower and a refrigerator, as well as with personal and baby hygiene products, food and coverage of their subsistence expenses for a period of 6 months.

INITIATIVE

#HoMellon, in collaboration with the “KnowI” Social Entrepreneurship Network.

Impact: MYTILINEOS implemented a holistic and personalized 6-month training program based on the Mellon skills accelerator methodology, to support the **Reintegration of Homeless people in the Labor Market**. The program’s 25 beneficiaries attended an Intensive Professional Skills Program, receiving 2,111 hours of online and face-to-face training in 28 thematic areas thanks to the valuable assistance of 19 trainers, and were also provided with clothing and personal care, technological equipment and advice for interconnecting with the labor market. Currently, **13 beneficiaries are already employed, 3 have their own residence**, while the remaining 12, empowered and motivated by the program, continue to improve their lives.

INITIATIVE

“DIATROFI” (“NUTRITION”), in collaboration with the PROLEPSIS Institute.

Impact: MYTILINEOS ensured the distribution of **34,309** healthy meals in total, for the third consecutive year, to **319 students of 9 schools in the Prefectures of Attica and Viotia**, reducing the individual high food insecurity indexes while at the same time helping the students improve their dietary habits.

PROGRAM

“Upgrading of Emergency Departments in Hospitals and Pediatric Clinics in the country”, in collaboration with the “Pediatric Trauma Care” Society.

Impact: By offering the necessary medical equipment, MYTILINEOS has helped upgrade **3 new Emergency Departments** at: (1) Amfissa General Hospital, (2) Florina General Hospital, and (3) Ag. Nikolaos General Hospital in Crete, **which now serve 18,100 children on an annual basis**. Moreover, it published 20,000 custom-designed leaflets entitled “Beware of Burns”, which were distributed in 34 presentations of the “Child

Accident Prevention” program, **disseminating related information to 1,569 people (children and teachers).**

PROGRAM

“Making children smile”, in collaboration with the “mission ANTHROPOS” organization.

Impact: The Company 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. To assess the program’s social impact, use was made of the **“Social Return On Investment” (SROI)** methodology. The total investment in the program created a social value of €479,019.90, yielding 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.

PROGRAM

Financial assistance for cardiac surgery of children in need, in collaboration with the **“Hearts for All”** humanitarian organization.

Impact: MYTILINEOS covered the costs of 3 **cardiac surgeries** for destitute and uninsured children aged 10, 15 & 17, with congenital or acquired heart disease. Specifically, the Company covered the costs of surgery, hospitalization (ICU & 10 day-stay in hospital), medicines, medical examinations and special medical equipment.

PROGRAM

“Lending Libraries”, in collaboration with the Greek Book Club.

Impact: MYTILINEOS **created 5 new school libraries** in an equal number of Primary and Secondary schools in the Prefectures of Magnesia and Preveza, which **already serve 476 children and 75 teachers.**

PROGRAM

“Scholarships”

Impact: The Company **secured 13 scholarships for children of its employees**, in the framework of its collaboration with the Athens University of Economics and Business for the implementation of the 11th Youth Entrepreneurship Summer School, which was held online for the first time, in compliance with the national and international guidelines for prevention and protection against the effects of the COVID-19 pandemic.

PROGRAM

“S.T.E.M. Education – Renewable Energy Sources”,

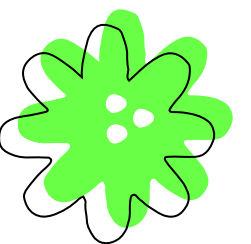
in collaboration with the Educational Robotics & Science Organization “WRO Hellas”.

Impact: **10 “Gigo Light and Solar Energy” and “Gigo Wind Power” kits** were offered to an equal number of High Schools in the regions of Aitolokarnania, Evia and Serres, enabling students to experiment as modern engineers with various applications of renewable energy sources, namely photovoltaics and wind turbines.

PROGRAM

«The Tipping Point», in collaboration with the Organization “The Tipping Point”.

Impact: The program was implemented for the second consecutive year in **30** schools around Greece, where by using technology and after attending 30 minutes of live mentoring, **1,133 students, assisted by 32 teachers**, regardless of geographical area, economic and social status, could speak with successful professionals and obtain answers to questions about their future.



“We want this new move, ESG,
to be part of the DNA of
the company”



Emergency Response Plans



Impact on Sustainable Development	3.50	Significance for Stakeholders	3.60
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts can occur in the Company's industrial plants and facilities as well as in the nearby local communities.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The implementation and promotion of integrated policies and plans to effectively manage emergencies at all levels, so as to protect the natural environment and the well-being of society at local and national level.	<ul style="list-style-type: none">Local communitiesEmployeesRegulatory BodiesAcademic communityCustomersShareholdersMedia representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: The impacts may be caused by MYTILINEOS' Business Units, its subsidiaries and the strategic suppliers and contractors working with them.		

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to inform MYTILINEOS’ Stakeholders about how the Company responds to emergencies in its facilities and areas of activity. The Company's objective is to deal effectively with emergencies, in order to protect the environment and safeguard the health and safety of all those within its facilities and areas of activity. [GRI 103-2b]

Key Challenges/Impacts [GRI 103-1a] [GRI 102-15]

The Company's high degree of readiness and prompt response to extraordinary incidents both within and outside the boundaries of its activity, ensuring the uninterrupted operation of both its industrial plants and its operational installations (underground mining sites and construction sites).

Major risks [GRI 102-15]

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

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

Appropriate **Emergency Prevention and Response Plans** (for fire, explosion, leakages, natural phenomena, extreme weather conditions etc.) are applied in all Business Units of the Company, in order to deal effectively with all identified incidents that result in deviations from their normal operation with serious consequences for the environment and for the health and safety of employees and the local communities.

- In the Metallurgy Business Unit, an Emergency Response System has been developed in the facilities of Ag. Nikolaos, Viotia, covering the following areas: (a) an integrated Internal Emergency Plan (IEP) which also includes special evacuation plans of the facilities, (b) systematic training of personnel, and (c) planning and implementation of emergency preparedness exercises in accordance with the annual plan and their adaptation to the requirements of the IEP. Regarding the risks related to the use of industrial substances, both the prevention measures and the response plans follow the provisions set out in the SEVESO III Directive and described in the relevant Plant Safety Study, which is registered in the National Registry established for such installations. **ASI**
- In the Power & Gas Business Unit, a package of emergency response measures is applied in the Unit's energy centers, RES plants and offices, comprising the following: (a) Emergency Team or Emergency Manager, (b) documented Emergency Incident / Accident Response Procedures, (c) implementation of Emergency Management Plans, and (d) implementation of personnel exercises and trainings in accordance with the special Evacuation Plans and the Building Emergency Instructions.
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, appropriate Emergency Prevention and Response Plans are in place to effectively address all emergencies. Emergencies (extraordinary incidents) are considered to be those events that result in deviations from the Business Unit's smooth operation with serious consequences for the environment and for the Health and Safety of the employees. In order to protect the workforce and the environment in the event of such an incident, Emergency Plans have been prepared and are applied. Each construction site has its own emergency plan, appropriate to the nature of its activities and to the risks identified and assessed. The emergency plans are documented, accessible and clearly communicated to all personnel, who are trained -by means of regular emergency preparedness exercises- to understand these plans and to thoroughly familiarize themselves with their roles and responsibilities in the event of an emergency.

Results [GRI 103-3a-ii]

- In 2020, **there were no industrial accidents or environmental incidents** with an impact on the natural environment or on public health.
- A total of **61 emergency preparedness exercises were carried out in all production units, construction sites and office buildings of the Company**. In particular:
 - In the Company's **Central Functions, a preparedness exercise was carried out** with the participation of all office personnel, covering how to deal with a major external event (earthquake, fire).
 - In the **Metallurgy Business Unit, a total of 15 exercises were carried out** covering fire emergencies (in facilities, onboard a ship, in a fuel tanks) and rescue operations in enclosed spaces, attended by 145 employees in total. The exercises were carried out in the context of the operation of the **"Mobile Emergency Response Unit"**, which consists of 18 Fire Protection Team employees. The staff is well trained in fire safety and facility maintenance and this team is actively supported by approximately 100 volunteer firefighters from the plant's other units, who receive proper training and are periodically retrained. In addition to conducting and analyzing emergency response exercises, the Fire Protection team uses appropriate certified mobile equipment and the related means of assistance to help local authorities address incidents in the wider area, offering effective and prompt assistance as needed. The particular circumstances of the pandemic did not affect the preparedness of the team, which responded promptly to all events inside and outside the plant. In addition, evacuation-preparedness (alarm) exercises were carried put in the aluminothermic process, as well as exercises covering a potential gas explosion and dealing with polluted firefighting water. **ASI**
 - In the **Sustainable Engineering Solutions (SES) Business Unit, 21 emergency preparedness exercises were conducted**, involving general evacuation exercises as well as exercises involving the evacuation of a building due to an explosives threat, to a leakage and to the occurrence of a COVID-19 incident, as well as fire and earthquake response exercises and rescue exercises at heights and in enclosed spaces.
 - In the **Renewables & Storage Development (RSD) Business Unit, 10 fire response exercises were carried out**.
 - In the **Power & Gas Business Unit, 14 preparedness exercises were carried out**, involving the evacuation of a building in case of (forest) fire and evacuating a station due to severe weather phenomena and lightning strikes.

Customer Health & Safety



Impact on Sustainable Development	2.20	Significance for Stakeholders	3.58
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: Impacts can occur in the areas where MYTILINEOS operates as well as in the areas of activity of its corporate customers who market the Company's final products for use.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">• Employees• Regulatory Bodies• Academic community• NGOs• Customers• Suppliers• Shareholders• Media representatives <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: Impacts are caused by the Business Units of MYTILINEOS, its subsidiaries and the Company's corporate customers.	<ul style="list-style-type: none">• To the protection of the consumers' health and safety when using products and services of the Company.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide MYTILINEOS’ Stakeholders with access to information about the steps that the Company takes in order to safeguard the quality of its products so that they are safe, irrespective of the existence or otherwise of legal and regulatory safety requirements. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

- In the Metallurgy Business Unit, the impacts of the Company's primary products on health and safety are related to the final use of the secondary products to result from its manufacturing clients. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accordance with the expectations and requirements of its clients. **ASI**
 - In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, in addition to taking into account the internationally applicable regulations on the design of all manufacturing and RES
- projects, the Company monitors in detail their quality metrics and characteristics, from the supply of materials to their industrialization and assembly/integration into a final product, in order to ensure that the clients' stated requirements are met.

 - In the Power & Gas Business Unit, it is very important for MYTILINEOS to ensure the highest possible availability of its thermal plants for the generation of electric power, as well as the continuous improvement of the quality of the energy supplied and of the services accompanying it, while at the same time taking advantage of new developments in areas such as electromobility, energy efficiency and net metering.

Major risks [GRI 102-15]

Any deviation from the quality specifications of the Company's products and services affects its responsible operation, which in turn impacts on its customers' satisfaction levels, its good reputation and credibility and, by extension, its financial results.

Risk management / Control Practices [GRI 103-2a]

- All Business Units of the Company apply an **ISO 9001/2018** certified Environmental Management System, which is supported by individual Quality policies specific to each Business Unit.
- In the Metallurgy Business Unit, the Company's laboratories, whose role in the quality program is pivotal, systematically control all production stages, from raw materials to finished products. In this respect, the officially issued Safety Data Sheets (SDS) describe the risks associated with the product as well as all necessary precautions which must be taken to avoid these risks. The Company is committed and takes steps to ensuring the best quality in its products, in response to the expectations and requirements of its clients, providing them with products (alumina and primary aluminium) and related services that fully meet their quality requirements. Moreover, the Business Unit's activities have been aligned with the provisions of the EU “REACH” Regulation on the effective management of the chemical substances used in industrial processes, while methodologies for the identification and analysis of operational risks as well as of opportunities for improvement, such as risk assessment, are also applied in the framework of ISO 9001/2015. Finally, the Business Unit's quality control laboratory has been accredited by the Hellenic Accreditation System S.A. (ESYD) in accordance with the requirements of the ISO 17025:2005 International Standard, for the chemical analysis of bauxites, alumina and aluminium and its alloys. **ASI**
 - In the Sustainable Engineering (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the strictest international quality criteria and the requirements of specialized international specifications and codes are applied, in order to ensure the quality of the heavy and/or complex metal structures which the Business Unit undertakes to produce. For every construction project undertaken by the Company and prior to the start of construction, a Hazard and Operability Study (HAZOP) is carried out. The purpose of this study is to identify and resolve problems which may represent risks to personnel or equipment and which have not been identified at the project study and design stages.
 - In the Power & Gas Business Unit, the target is to ensure the reliable supply of electricity to the Independent Power Transmission Operator (IPTO) and of natural gas to businesses, professionals and households, meeting the customers' needs for competitive prices through a range of specially configured, modern and reliable energy conservation procedures, advice & services. In addition, in order to enhance the efficiency of the Business Unit's Commercial

Division and identify the potential for improvements, Customer Satisfaction Surveys are conducted, on an annual basis, to measure the satisfaction of retail customers. In 2020, two such surveys were assigned to a specialized company and were carried out via telephone calls, applying specific statistical criteria. The customer satisfaction rates obtained from the customers who responded to the two surveys were 76% and 81% respectively.

Results [GRI 103-3a-ii]

- In 2020, there were no cases of non-compliance with regulations and voluntary codes related to the impact on health and safety of the MYTILINEOS products and services. **[GRI 416-2]**
- In the Metallurgy Business Unit, where labelling requirements apply to the products for sale, for every consignment a “Certificate of Conformity” is issued, containing all the necessary product information. **ASI**
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the Company's projects and services are in full agreement with the terms of the respective contracts and with the Company's contractual obligations to its customers, to whom all Health, Safety and Environment related information is delivered, such as: (a) Use, maintenance and disposal instructions for the entire equipment (Operation & Maintenance Manuals) and for all the materials supplied, (b) clearly visible labelling of all materials and equipment (trademarks, warnings and related instructions), and (c) instructions for use-recycling, in the form of Material Safety Data Sheets (MSDS) for all hazardous materials.

Communication & Marketing



Impact on Sustainable Development	3.60	Significance for Stakeholders	3.00
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: Impacts can occur within the operational boundaries of the Company and of its subsidiaries, as well as in the broader business environment and in society as a whole.	The management of the topic by MYTILINEOS contributes to the Sustainable Development:	<ul style="list-style-type: none">Media representativesCustomersShareholders / InvestorsNGOsEmployeesLocal communitiesBusiness OrganizationsSuppliers <p>in the context of their cooperation with MYTILINEOS.</p>
By whom are the impacts caused: Impacts are caused by MYTILINEOS’ Business Units, its subsidiaries, and its corporate clients and retail customers and consumers.	<ul style="list-style-type: none">Ensuring the provision to Stakeholders of timely and accurate information about the Company’s Strategy and activities.	

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide MYTILINEOS’ Stakeholders with access to information regarding the Company’s communication and marketing strategy. The aim of the Company is to provide timely and accurate information about its activities, enhance transparency and create a climate of trust with its Stakeholder groups. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

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

Major risks [GRI 102-15]

- Communication & marketing, including advertising, promotion and sponsoring of products and services, are subject to many regulations, codes and laws. The risk of potential non-compliance with legislative and regulatory frameworks, apart from immediate financial consequences, such as fines and penalties, has consequences for the Company’s reputation and also affects the loyalty and satisfaction of its customers.
- Any spreading of false news about the Company or its executives may cause stock market turbulence and, more generally, may also affect the consumption of the Company’s products and services.
- In addition, any failures in communication and marketing tactics may offend consumers or competitors, or provide incorrect information, thus requiring the withdrawal of communication material, with adverse effects on the Company’s reputation and good standing.

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

- MYTILINEOS keeps abreast of developments in the relevant legislation and voluntary codes of conduct, in order to ensure the lawfulness of its communication and promotions. In this respect, the Company’s communication associates are bound by the Greek Code of Advertising-Communication Practice, compliance with which is established on an advisory, preventive and/or suppressive basis by the Communication Control Board, in line with Greek laws. The Code’s principles require all promotions to be lawful, decent, honest and truthful, prepared with a due sense of social responsibility and in line with the principles of fair competition, as this is generally accepted in the market.
- Communication and marketing plans are designed and implemented by the Communication and Marketing Strategy General Division, yet their scope is of relevance to all Company General Divisions and activities. For this reason, mechanisms have been developed for cooperation between all General Divisions and Committees of the Company, as well as with the Company’s Management, and internal procedures have been built to facilitate both the planning and the implementation of the Company’s strategic plans. Proper implementation of the communication strategy contributes to the achievement of the Company’s goals and to its robustness.
- MYTILINEOS implements an annual communication strategy plan and individual sub-plans, depending on the business objectives. These plans are in turn evaluated, in order to examine whether corrective or updated actions are required.
- The Company also participates in institutional bodies such as the Hellenic Federation of Enterprises (SEV), the Hellenic Capital Market Commission (HCMC) and the Hellenic Advertisers Association, membership of which is conditional

on the acceptance of obligations, commitments and rules which MYTILINEOS embraces and takes into account for its Communication and Marketing activities.

- In order for communication and marketing to be more systematic, policies have been drawn up and relevant procedures are followed. These are accessible to all employees and executives of the Company.
- Finally, the Managing Director and the Executive Committee are kept informed and evaluate the progress and performance of the Communication and Marketing Strategy General Division at regular intervals.

Results [GRI 103-3a-ii]

- During the implementation of the Company’s communication strategy in 2020, there were no incidents of non-compliance with the regulations and voluntary codes on marketing communications, including product promotion and sponsorships. [GRI 417-3]**
- Moreover, **the Company’s products are not subject to any restrictions as regards their sale to specific markets and no significant issues of concern were raised** by the Company’s Stakeholder groups in connection with products and their marketing communication.
- Regarding the provision of verifiable and clear information on its products for the purposes of labelling, MYTILINEOS complies fully with the relevant requirements. In all cases, customers have at their disposal the tools allowing them to check all significant information provided and to proceed to the corresponding tests, if they so wish. **In 2020, there were no incidents of non-compliance with the regulations regarding information and labelling of the Company’s products. [GRI 417-2]**

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

Major categories of products subject to the following information requirements	Aluminium	Alumina
Information on the origin of product elements or ingredients.	100%	100%
Information on content, particularly regarding substances which may have an environmental or social impact.		
Information on the safe use of the product or service.	Non-applicable requirements	
Information on the product's disposal method and its potential environmental/social impacts.		
In the Metallurgy Business Unit, the above labelling requirements apply to all end products for sale (aluminium billets and slabs), as well as to calcined and hydrated alumina. For each aluminium or alumina cargo, a "Certificate of Conformity" is issued containing the necessary quality specifications for that cargo, and the Safety Data Sheet (SDS) of each product is also available.		

Other significant Social topics

Employee Training & Evaluation

The activity of MYTILINEOS in diverse sectors causes differing training needs, while offering to employees a wide range of knowledge and giving them the opportunities to develop managerial and problem resolution skills, as they are confronted with new challenges each day. The Company's vocational training and development program for its personnel continued in 2020, aimed at improving the employees' professional skills and capabilities required to cope with the current and future business challenges as well as their personal life. In particular, €247,859 was invested for the implementation of 38,476 training man-hours (2019: 59,789), an amount decreased by 36% compared to the respective number of hours in 2019 due primarily to the effects of the SARS-CoV-2 pandemic. The Company's training program, which was attended by 65% of its direct employees, focused primarily on the following four key areas, which absorbed nearly 94% of the total number of training hours: **[GRI 404-2]**

- 1. Development of Technical Skills
- 2. Occupational Health & Safety
- 3. Development of skills and personal competencies
- 4. Induction program
- 5. Foreign languages
- 6. Internal Procedures & Management Systems
- 7. Professional Certification
- 8. Management Development
- 9. Leadership Development
- 10. Corporate Social Responsibility (CSR)
- 11. Compliance
- 12. Training in technological systems & tools

Moreover, the employee performance evaluation procedure was continued in 2020, in accordance with the Company's uniform evaluation system, with almost 80% of the employees from all categories of personnel who met the conditions for inclusion in the annual performance evaluation procedure, participating in it. The Performance Management System is under review, with the aim of proceeding, in 2021, to its optimized and differentiated implementation with regard to a number of key points. The objectives of the Performance Management System are the following:

- To support the implementation of the strategy through individual, measurable goals.
- To enhance the employees' understanding of the Company's expectations (quantitative results) and of the skills required of them.
- To provide the framework for productive discussions on performance and developmental feedback.
- To empower Team Leaders to reward high performance, reinforce the people's engagement and contribute to the corporate results. **[GRI 404-3]**

Workforce data (direct employees)	Average training man-hours per employee [GRI 404-1]			Percentage of employees who received a performance evaluation review ^{1,2} [GRI 404-3]		
	2018	2019	2020	2018	2019	2020
Analysis / gender						
Total	21.6	24.55	15.67	72.9%	55.9%	51.9%
Men	22.6	26.14	16.15	76.6%	59.2%	53.9%
Women	13.5	17.32	13.65	55.6%	40.8%	43.4%
Analysis / employee category						
Executives	32.6	24.45	17.08	78.8%	48.2%	61.1%
Administrative employees	14.5	16.67	17.61	62.4%	48.6%	47.9%
Workers and technical staff	24.5	29.07	32.98	80.5%	64.1%	54.0%

1. Percentage of the total number of direct employees. The corresponding percentage for employees who met the conditions for inclusion in the annual performance evaluation procedure (i.e. excluding those working in the Company for less than 6 months, as well as special categories of employees based on their role/scope of work) reaches 80%.

2. It refers to an evaluation carried out within the calendar year 1/1/2020 - 31/12/2020 regardless of whether the evaluation concerned another reference year.

Diversity & Equal opportunities

The provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to the abilities that they have in order to respond to their assigned roles, is a core practice of MYTILINEOS, as stipulated in the Company's Human Rights Policy. Developed in 2020, this policy covers issues related to Diversity and Equal opportunities, such as the following:

- MYTILINEOS is committed to offering equal opportunities while prohibiting discrimination and harassment. The 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, gender, color, national or social origin, religion, age, disability, sexual orientation and political beliefs.

Diversity of MYTILINEOS' Governance bodies and executive / administrative personnel [GRI 405-1]	2018	2019	2020
Board of Directors			
Men	81.8%	80.0%	80.0%
Women	18.2%	20.0%	20.0%
<30 years old	0.0%	0.0%	0.0%
30 - 50 years old	27.3%	20.0%	20.0%
>50 years old	72.7%	80.0%	80.0%
Executive Committee			
Men	83.3%	83.3%	86.7%
Women	16.7%	16.7%	13.3%
<30 years old	0.0%	0.0%	0.0%
30 - 50 years old	33.3%	33.3%	26.7%
>50 years old	66.7%	66.7%	73.3%
Executives			
Men	81.2%	82.2%	80.6%
Women	18.8%	17.8%	19.4%
<30 years old	2.4%	0.0%	1.7%
30 - 50 years old	68.2%	70.6%	60.6%
>50 years old	28.8%	29.4%	37.7%
Employees of nationalities other than Greek	9.4%	2.5%	0.0%
Administrative employees			
Men	64.6%	65.8%	62.7%
Women	35.4%	34.2%	37.3%
<30 years old	11.5%	15.9%	13.0%
30 - 50 years old	67.7%	65.4%	65.6%
>50 years old	20.7%	18.7%	21.4%
Employees of nationalities other than Greek	6.6%	2.7%	0.0%
Workers & technical staff			
Men	97.5%	98.4%	96.7%
Women	2.5%	1.6%	3.3%
<30 years old	11.8%	10.3%	9.5%
30 - 50 years old	74.7%	73.8%	71.6%
>50 years old	13.5%	15.9%	18.0%
Employees of nationalities other than Greek	5.3%	4.0%	0.7%

- The Company does not tolerate any kind of offensive or inappropriate behavior, 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.
- In the context of gender equality at work, the Company is committed to taking appropriate measures in order to eliminate all kinds of discrimination against women in the areas 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 work areas.

In addition, the Company, faithful to its commitment to apply best practices of Corporate Governance, intends to apply the Diversity principle (the basic parameters being, inter alia, gender, age, experience, skills and knowledge) in the composition of its Board of Directors, in its senior executives' force and in all direct employees across its activities, where feasible. With the main part of the company's activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the requirements of each Business Unit) are the main issues in promoting equal opportunities and diversity at the workplace.

For 2021, MYTILINEOS places at the heart of the activities of the Human Resources Division the formulation of policies and practices that are based on objective criteria and ensure equal pay for men and women. In 2020, work began on the formulation of a data collection and analysis methodology that will allow, at a first step, a better understanding of the relevant indicators, to be followed by the setting of targets and the continuous improvement of these indicators. According to the preliminary analyses, the difference between men's and women's earnings in the category of Executives appears to be less than 10%. However, due to the complexity of the operations and the diverse nature of MYTILINEOS' business activities, the Company's priority, before disclosing specific indicators, is to identify the various reasons that cause these deviations in each category of personnel, namely Executives, Administrative employees and workers and technical staff. The objective for 2021 is to determine the average difference and the indicators to be monitored, so that in 2022, targets can be set and an action plan can be established for the gradual elimination, in well-measured steps, the differences in earnings between men and women. **[GRI 405-2]**

Based on the preliminary findings, an action plan for 2021 is currently under establishment, in order to update the relevant policies and procedures, and provide MYTILINEOS' staff with information and training, so that any difference can be decreased or altogether eliminated over the next few years. The following are some indicative actions under this plan:

- Adoption by MYTILINEOS of the United Nations Women's

- Empowerment Principles (UN WEPs) and joining of the WEPs community as a signatory.
- Analysis and assessment of salary grades, in order to identify areas in which short and long-term corrective interventions could possibly be made. The objective of this activity is to create an action plan (deliverable) aimed at reducing the pay gap over the next three years.
 - Apart from the Code of Business Conduct and the Human Rights Policy, in which explicit provisions are made for the prohibition of discrimination at the workplace, MYTILINEOS will evaluate the human resources policies in place and will formulate new ones, in order to -among other things- reinforce equality at work.
 - In 2021, Senior Executives will be trained by specialist associates in issues related to unconscious bias at the workplace.

Supply chain management

Geared towards strengthening its competitive position, MYTILINEOS seeks to optimize its supply chain by establishing and maintaining value-added relationship with its suppliers, focusing on reducing the total cost of products or services, on transparency in cooperation and on the promotion of a responsible supply chain.

MYTILINEOS develops long-term partnerships with a number of suppliers, while it manages others on a short-term horizon, based on the competition in the market. Depending on the scope and nature of a specific purchase, priority is given to local suppliers,¹⁰ who are selected on the basis of their solvency, reliability in terms of quality and punctuality in terms of delivery, cost of products or services, available capacity to ensure the quantities required, and capability to meet the requirements of the particular purchase in accordance with the specifications set by the Company's Business Units.

The "Suppliers & Business Partners Code of Conduct" of MYTILINEOS sets out the Company's minimum requirements/expectations from its supply chain actors regarding issues related to Responsible Entrepreneurship, as a key precondition for entering into any commercial association with them. The sections of this Code address issues such as the Protection of the Environment, the Safeguarding of Health & Safety, Work Conditions, Ethics & Integrity. This initiative aims at committing suppliers to good sustainable development practices which will in turn bring two-way benefits.

At the end of 2020, the number of MYTILINEOS' active suppliers and business partners in Greece and abroad stood at over

10. The term "local suppliers" generally refers to suppliers of materials, products or services, both industrial and non-industrial, operating in Greece.

9,500. Compared to 2019, no changes affecting the Company's activity were recorded in the basic structure of its supply chain, other than the integration of approximately 1,500 suppliers of the new Renewables & Storage Development (RSD) Business Unit of MYTILINEOS. **[GRI 102-10]**

In 2020, MYTILINEOS' total outlays to its suppliers for the production of its products, the supply of services and the development of its projects amounted to nearly **€1.7 billion**, while the share of this total amount allocated to domestic suppliers exceeded 52%, thus indirectly contributing for yet another year to the preservation of jobs and the creation of incomes. **[GRI 204-1]**

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. 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

Basic description of MYTILINEOS' supply chain [GRI 102-9]			
Basic business activities requiring services or products from the supply chain	<ul style="list-style-type: none">• Production & Maintenance of alumina chemical industry and of primary aluminium metallurgy.• Plant production for the purchase of raw or other materials.• Production of secondary aluminium from recycled aluminium (scrap).• Construction for the purchase of equipment for the implementation of EPC and RES projects.• Logistics regarding the methods and time of products' delivery in various countries.• Operation and maintenance of Energy Centers (thermal power stations).• Development, construction and maintenance of Renewable Energy Sources projects (wind farms, solar parks, hydroelectric projects).• Retail activity.• Studies - Investments.• Administrative, Financial, Legal and other services.		
	<ul style="list-style-type: none">• Raw material producers.• Energy and Natural Gas suppliers.• Subcontractors.• Manufacturers.• Distributors/Forwarders.• Suppliers of spare parts/materials.• Wholesalers.• Suppliers of consultancy services & studies.		
Supply Chain Data	2018	2019	2020
Total number of suppliers	7,283	9,639	9,543
Geographical distribution	Greece: 82% Abroad: 18%	Greece: 82.6% Abroad: 17.4%	Greece: 52.3% Abroad: 47.7%
Total expenditure	€1,206,607,399	€1,954,923,114	€1,661,972,526
Geographical distribution [GRI 204-1]	Greece: 69.9% Abroad: 30.1%	Greece: 40% Abroad: 60%	Greece: 52.5% Abroad: 47.5%

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.

ESG KPIs

S Social KPIs	2018	2019	2020
Direct employees	2,087	2,436	2,455
Indirect employees	1,292	1,226	1,401
Employee turnover ¹	5.8%	5.2%	6.0%
Percentage of full-time employees covered by business collective bargaining agreements	60%	53%	52%
Retention rate of full-time employees	90%	93%	91.5%
Percentage of women (direct employees)	17.4%	18%	19%
Percentage of women in positions with extended responsibility ²	18.8%	17.8%	19.4%
Percentage of employees <30 years old (direct employees)	10.9%	12%	10.4%
Number of employees who received formal performance evaluation reviews ³	72.9%	55.9%	51.9%
Average training man-hours (Executives)	-	24.4	17.1
Average training man-hours (Workers and technical staff)	-	29.1	33.0
Training man-hours (direct employees)	43,950	59,794	38,476
Average training man-hours per employee	21.6	24.5	15.7
Total training cost (€)	392,362	406,322	247,859
Training cost per employee (€)	188.0	166.7	101.0
Human Rights Policy	No	No	Yes
Human Rights violation incidents ⁴	0	0	0
Discrimination incidents	0	0	0
Percentage of industrial plants & RES units with OHSAS 18001 or ISO 45001:2018 certification	82.6%	83.3%	83.3%
Number of fatalities (direct & indirect employees)	0	0	1
Lost-Time Injury incidents (direct employees)	5	1	5
Lost-Time Injury incidents (indirect employees)	9	8	4
Total number of recordable accidents ⁵ (direct employees)	n/a	n/a	14
Total number of recordable accidents ⁵ (indirect employees)	n/a	n/a	11

S Social KPIs	2018	2019	2020
Recordable Injury rate per 200,000 working hours (direct employees)	n/a	n/a	0.53
Recordable Injury rate per 200,000 working hours (indirect employees)	n/a	n/a	0.38
Lost-Time Injury Rate per 200,000 work hours (direct employees)	0.25	0.04	0.19
Lost-Time Injury Rate per 200,000 work hours (indirect employees)	0.27	0.19	0.14
Training man-hours in Occupational Health & Safety (direct & indirect employees)	46,580	47,017	23,547
New jobs ⁶	45	281	34
Percentage of employees from local communities (direct & indirect employees)	93.6%	93.6%	90.5%
Social investments (mil. €)	2.29	3.47	3.25
Incidents of non-compliance with laws and regulations on labor and social issues	0	0	0

1. Number of voluntary departures to the average number of direct employees of the Company in the specific year. (Terminations of fixed-term contracts are not considered as voluntary departures for the purposes of calculating this index).

2. Percentage of the total number of Company Executives.

3. Percentage of the total number of direct employees. The corresponding percentage on the total number of eligible employees is nearly 80%. The term "eligible" includes employees who meet the requirements for inclusion in the annual performance evaluation process. In particular, employees working in the Company for less than 6 months, as well as special categories of employees based on their role/scope of work, are not included.

4. Includes issues such as: forced and child labor, health and safety, working hours, staff salaries and leaves, fair treatment, freedom of association, restriction of the rights of local community populations etc.

5. New method of counting accidents, according to the new GRI 403-9 (2018) standard. Includes all accidents resulting in death, days away from work, limited work or transfer to another job, medical treatment in addition to first aid or loss of consciousness or significant injury or ill health diagnosed by a doctor or other authorized health care professional. Includes all fatalities and accidents that occurred during the employee's travel between his/her private place of activity (e.g. residence) and a place of work or work area and only when such travel has been organized by the Company.

6. The difference between the total number of new hires and the total number of departures in the specific year.



Governance



Alignment to UN Global Compact Principles

PRINCIPLE
10th

Material Topics

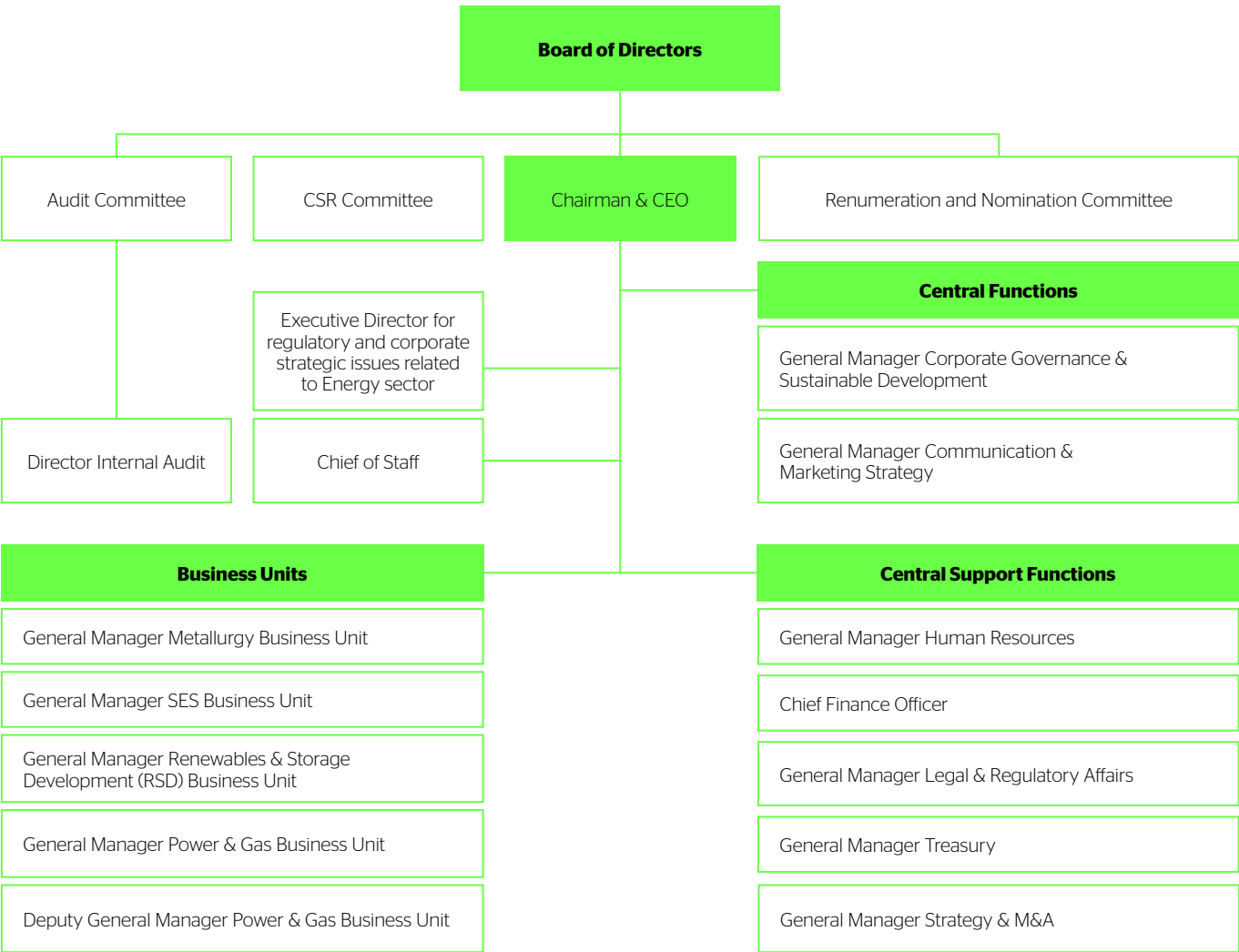
- Anti-Corruption and Bribery
- Legal Compliance

Alignment to UN Sustainable Development Goals



Corporate Governance [GRI 102-18]

This section briefly describes the Corporate Governance framework of MYTILINEOS. Detailed data are presented in the “Corporate Governance Statement” section of the Company's Annual Report. The corresponding indicators reported in the GRI Content Index (p. 168-178), which also includes references to the Company’s Annual Report and to this Report.



Corporate Governance Code

As of 01.01.2019, following a relevant resolution of its Board of Directors, adopted on 15.11.2018 and aimed at ensuring transparency and responsible operation in all its areas of activity, the Company voluntarily adopted the UK Corporate Governance Code (THE UK CORPORATE GOVERNANCE CODE – 2018), as posted on its website (mytilineos.gr/who-we-are/governance/corporate-governance/corporate-governance-code/) and on the website of the UK Financial Reporting Council (FRC) (frc.org.uk/directors/corporate-governance-and-stewardship/uk-corporate-governance-code).

Based on the highest international standards of entrepreneurship, MYTILINEOS strives for closer engagement with its investors, with the ultimate aim of unlocking further value for its shareholders. Drawing on the best corporate governance practices, the Company formulates its strategy and develops the general guidelines, policies, principles and values that govern its operation, while at the same time ensuring transparency and safeguarding the interests of its shareholders

The Board of Directors and its Committees – Organizational Structure

The Company is managed by a Board of Directors consisting of eleven (11) members with a high degree of independence. The Board of Directors sets the tone regarding the corporate governance standards. To this end, the Board of Directors decided to voluntarily adopt the UK Corporate Governance Code as of 01.01.2019, acknowledging that this code is widely recognized as the best model of corporate governance.

The Board of Directors is responsible for managing (administering and disposing of) the Company's assets as well as for representing it, with the aim of strengthening its economic value and profitability and of safeguarding the Company's interests. The Board of Directors holds regular meetings at least once per month, and extraordinary meetings whenever important issues arise or decisions need to be made. The regular meetings of the Board of Directors are usually attended by all Board members. Until today, there has never been a case in which the Board of Directors could not adopt a resolution due to lack of quorum. The Board of Directors functions effectively for the purpose of

serving the long-term interests and sustainability of the Company. It has a high degree of independence and diversity, while its members have the appropriate level of knowledge, skills and experience required to achieve the expected result. Its two committees, the Audit Committee and the Remuneration and Nomination Committee, are fully independent. Moreover, the Board of Directors has appointed a Lead Independent Director (LID), who is available for dialogue with investors and acts as spokesperson for the Board of Directors on issues related to corporate governance, as well as the Company's Corporate Governance Director as Corporate Secretary, so that the latter can also provide the Board of Directors with the necessary guidance and advice on corporate governance issues. The Company has clearly allocated responsibilities between the Management and the Board of Directors, as described in the Articles of Association.

The organizational structure, i.e. the allocation to Business Units of the business activities that create the Company's added value

and the establishment of the Central Support Services and Central Functions that ensure support, synergies, and compliance with the applicable laws and regulations, operates under the responsibility of the CEO, supported by the CEO's Office which acts as the organization's coordinator and resolves matters for which the CEO's intervention is not necessary.

The Company's organizational chart was revised by resolution of the Board of Directors on 04.02.2020 and is available at: mytilineos.gr/who-we-are/leadership/organizational-chart/.

Major Developments in 2020

- In 2020, the first Corporate Governance Road Show was organized for the investor stewardship teams. The Board Remuneration Report describes how the views of major institutional shareholders of the Company were taken into account, as they emerged from the consultation with the investor stewardship teams.
- The Remuneration and Nomination Committee prepared the very first Board Remuneration Report in accordance with the applicable legislation and the EU Shareholders Rights Directive (SRDII), as well as with the guidelines of the European Commission. The Report describes how the 2019 Remuneration Policy was implemented, taking into account the basic principles of remuneration, the remuneration planning, as well as the performance achieved at Company level and at the level the individual executives in 2019. The Report was submitted to the 2020 Annual General Meeting for an advisory vote and received 99.56% positive votes. The external auditors (statutory auditors) drew up a report on the conduct of pre-agreed procedures.
- The Board of Directors also appointed a new Lead Independent Director, as the previous director's term in office had exceeded nine years. In addition, during the fourth quarter of 2020, the meetings of the Non-Executive members of the Board of Directors, held without the presence of its executive members and chaired by the Lead Independent Director, took place for the first time, and will continue. This approach further balances the dual role of the Chairman.
- An evaluation of the effectiveness of the Remuneration and Nomination Committee was carried out for the first time, with the support of an independent external consultant, under the responsibility of the Remuneration and Nomination Committee. The results were discussed during a meeting of the Board of Directors and improvement actions were decided, including but not limited to the following: (a) to upgrade the role of the Lead Independent Director (LID) and (b) to launch the meetings of non-executive members of the Board of Directors only.
- Finally, in the last quarter of 2020, the Company launched the implementation, for the first time, of a succession planning project, under the supervision of the Remuneration and Nomination Committee and the auspices of the Chairman & CEO. The project covers the Chairman & CEO, the executive members of the Board of Directors and the Senior Management, and is expected to be completed in March 2021. Support is provided by an independent external consultant.



GOVERNANCE

Anti-corruption & Bribery



Impact on Sustainable Development	3.35	Significance for Stakeholders	3.71
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 "Not significant" and 4 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts of corruption in all its forms are an obstacle to Sustainable Development and can occur across the entire range of the Company's operation, with consequences for its local communities, the wider business environment and society as a whole.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none"> To the elimination of all forms of corruption and bribery. 	All Stakeholder groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts may be caused by MYTILINEOS' Business Units, employees, subsidiaries, business partners and supply chain.		

Management Approach [GRI 102-11] [GRI 103-2c]

MYTILINEOS acknowledges that ensuring transparency in all transactions arising in the context of its business activities is a key issue for sustainability and for the Company's its further growth in the context of its international activity. The purpose of this disclosure is to inform MYTILINEOS' Stakeholders about the way in which the Company manages the need for both limiting its exposure to corruption & bribery and strengthening the culture of compliance with the anti-corruption legislation. [GRI 103-2b]

Addressing corruption and bribery is of major significance for MYTILINEOS, because: (a) it helps improve risk identification, assessment and management, as well as compliance with the laws, which for MYTILINEOS is a non-negotiable principle in every geographical region or country where it operates, (b) it serves its business goals (such as fulfilling the relevant tendering requirements for the award of construction projects by private clients or financial institutions), and (c) it strengthens the Company's protection against fraud, embezzlement and abuse, further enhancing its corporate image.

Key Challenges/Impacts [GRI 103-1a] [GRI 102-15]

MYTILINEOS acknowledges that corruption, bribery, fraud and money laundering undermine the moral environment of businesses and have a wide range of negative effects that include violations of Human Rights, adverse impacts on the environment, distortion of healthy competition and impediments to the distribution of wealth and to economic development. These impacts are a serious obstacle to Sustainable Development, have a disproportionate impact on poor communities, and erode the very fabric of society.

Major risks [GRI 102-15]

By operating in developing countries with high energy needs, which according to the annual Transparency International Corruption Index are countries with a high risk of corruption, MYTILINEOS may be exposed to risks involving facilitation payments or the extension of other benefits to the local partners in order to ensure the continuation of the projects' smooth operation. Any deviation from the Company's principles and ethical practices jeopardizes its good reputation and credibility, the Stakeholders' confidence in it and, by extension, its financial results and its ability to undertake new projects.

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

Addressing corruption and bribery is a key element of the MYTILINEOS "Code of Business Conduct" and "Suppliers and Business Partners Code of Conduct." **Moreover, the reference for the Company when it comes to addressing this issue is the principle of integrity, which relates to its long-standing commitment to zero tolerance towards corruption and bribery. The implementation of this commitment is realized by the rigorous screening of third parties before entering into any agreement with them or making any payments to them, as well as by avoiding all transactions and contacts with any third party which may be guilty or suspect of encouraging conditions giving rise to corruption, extortion or bribery.**

- MYTILINEOS has been formally committed to the 10th principle of the UN Global Compact, according to which "Businesses should work against corruption in all its forms, including extortion, bribery and facilitation payments". This principle acts as a catalyst in establishing a culture of ethics across the Company.
- As part of the Enterprise Risk Management activities, MYTILINEOS conducts on an annual basis a study on its potential exposure to corruption and bribery risks in its various business activities, and specifies measures to minimize these risks.
- MYTILINEOS has in place prevention and detection systems and controls to ensure that suppliers are properly selected, disputed payments are avoided and the payments due are made correctly and are entered in the Company's accounting books in an accurate and transparent manner.

- In countries with a high risk of corruption, the Company establishes a grievance mechanism, to which all direct or indirect employees have access for the purpose of submitting complaints, made anonymously or under the complainant's name, of violations of the Company's policies on personal data protection, bribery and corruption, as well as violations of human rights or of the Company's Code of Business Conduct. The Company protects complainants from eventual retaliation, on condition that the complaint is made in good faith, even if it is not corroborated by the result of the investigation undertaken in response to it.
- MYTILINEOS' "Suppliers and Business Partners Code of Conduct" aims at tackling conditions of corruption and bribery in the supply chain. Unannounced audits on suppliers intend to ensure the Code's application and to offer recommendations for corrective measures likely to be required.

Key elements of MYTILINEOS' policy on the prevention of corruption and bribery

- Analysis of the prevailing conditions and identification of potential risks or threats which may encourage the occurrence of such incidents in the corporate environment, through a third-party screening and due diligence process. This practice covers corporate activities that involve the risk of occurrence of incidents of corruption and bribery, such as charitable contributions, sponsorships, gifts and hospitality, third-party audits in relation to lists of individuals or entities subject to restrictions in connection with the financing of terrorism and human rights violations, brokering services and advisory services, with a view to establishing respective prevention procedures where these are not in place. In 2020, the Regulatory Compliance Division developed an in-house application to support the rigorous screening of third parties and the decision-making process of the Company on whether or not to cooperate with them. The application supports the classification of third parties according to the Company's exposure to regulatory risk, the in-depth audit of third parties according to their risk category, the interactions between the commercial departments, Regulatory Compliance and the Management with the necessary documentation, and the retention of all the supporting documents supplied and the responses given by the third party. The application has successfully completed the testing phase and will enter into full productive operation in 2021.
- Ensuring that all transactions carried out on behalf of the Company by its shareholders, employees and major business partners and suppliers, are characterized by a high level of integrity. Through established procedures, applying primarily in the Purchases-Procurement Departments and in project management for the selection of suppliers and other business partners, controls are carried out annually of the conditions under which every single transaction takes place, in order to identify and eliminate those that may possibly give rise to incidents of corruption or fraud.
- Systematic training of personnel, by category of exposure to

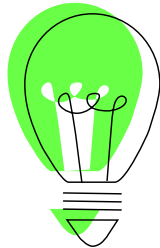
regulatory risk, in the issues covered by the Code of Business Conduct, including an in-depth analysis of corruption and bribery, healthy competition, fraud, rigorous screening of business partners and conflicts of interest.

- The Company's operation as a "Responsible Corporate Citizen" is demonstrated by its participation in international transparency advocacy initiatives (UN Global Compact), national working groups and, more generally, by its commitment to ethical business practices and sound corporate governance.

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.

Results [GRI 103-3a-ii]

- In 2020, MYTILINEOS applied all necessary internal procedures to safeguard its policy. Through the screening mechanisms applied in the Purchases-Procurement Departments of the Company's Business Units, which have investigated both the process for the selection of business partners and all types of transactions, **no confirmed incidents of corruption were identified** that could possibly lead to dismissal or disciplinary action against employees on the grounds of corruption, nor any corruption-related incidents resulting in the termination or non-renewal of cooperation with business partners or public judicial cases against the Company or its employees for corruption. [GRI 205-3]
- The Regulatory Compliance Division has distributed the updated Code of Business Conduct (November 2018) to all employees and subsidiaries of the Company, against the recipients' signed proof of receipt and commitment to the Code. This procedure, which applies to every new employee, is expected to be repeated for existing employees also, in the event of major revisions/renewals of the Code.



Legal compliance



Impact on Sustainable Development	4.00	Significance for Stakeholders	3.71
-----------------------------------	------	-------------------------------	------

Materiality assessment process results.
Scale: [0–4] where 0 “Not significant” and 4 “Very significant”

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]		Topic of increased significance to:
Where the impacts occur: The impacts of non-compliance with laws and regulations occur primarily within the operational boundaries of the Company and of its subsidiaries, strategic partners and suppliers. They can also extend to the entire economy and – in the context of sustainable development – to the environment, as well as to society as a whole.	The management of the topic by MYTILINEOS contributes to the Sustainable Development: <ul style="list-style-type: none">The enforcement of and compliance with non-discriminatory laws aimed at promoting sustainable development	All Stakeholder groups in the context of their cooperation with MYTILINEOS.
By whom are the impacts caused: The impacts may be caused by MYTILINEOS' Business Units, employees, subsidiaries, business partners and supply chain.		

Management Approach [GRI 102-11] [GRI 103-2c]

For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the laws in force and the principles of operation applicable in every geographical region or country where the Company operates. Compliance with the legislation (environmental, social and product-related) is a core element of the Company’s business activity and a major issue of equal significance with the other issues that the Company is managing in the context of its ongoing and responsible development. This stance is based, first and foremost, on the principle of adhering to the provisions of the law, as well as to the agreements concluded and the voluntary commitments made by MYTILINEOS through its Business Units. [GRI 103-2b]

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

Maintaining regulatory compliance at environmental, social and product level, in order to ensure that the overall corporate activity is lawful and corresponds to high standards of responsible entrepreneurship, strengthening the climate of trust between the Company and its Stakeholders in their interactions with it (customers, employees, suppliers, administrative authorities etc.). Cases of non-compliance could have a significant impact on the profitability, financial position and cash flows of MYTILINEOS and, consequently, on its ability to meet its obligations.

Major risks [GRI 102-15]

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

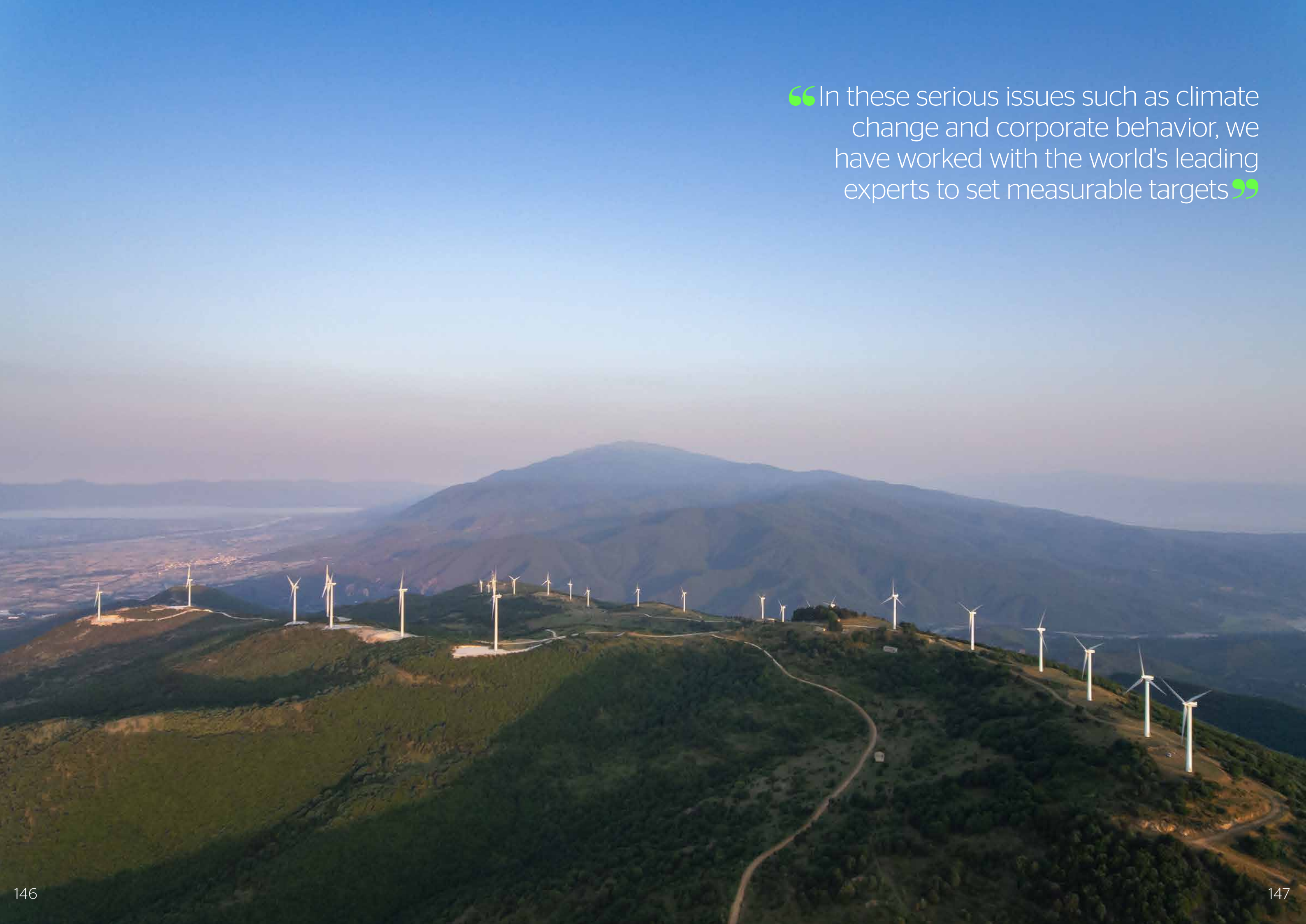
Risk Management / Control Practices [GRI 103-2a]

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

Results [GRI 103-3a-ii]

- In 2020, the Company's compliance with the applicable legislation, coupled with the application of controls to ensure observance of the rules concerning its activity, **resulted in the absence of incidents of non-compliance with the legislation and with the applicable regulations at environmental, social and economic level.** [GRI 307-1] [GRI 419-1]
- In 2020, the Regulatory Compliance Division developed two training programs for the Company's personnel, which covered training in personal data protection (GDPR) and in MYTILINEOS' Code of Business Conduct. Both trainings make use of remote access (distance learning), given the requirements for teleworking and limiting face-to-face meetings due to the pandemic, and are implemented online in asynchronous mode, checking that the employees have fully attended them and are fully familiar with the issues covered. The trainings combine effectively theory, analyses of case studies from everyday work, awareness-raising of upcoming risks, and incident response and escalation methodology, where required. All employees, including the employees of MYTILINEOS' subsidiaries, were classified in terms of the nature of their work and duties, in order to attend relevant trainings according to their exposure to risk. The training in the protection of personal data has been fully completed for 2020, while the training in the Code of Business Conduct started in December 2020 and is scheduled to be completed after 2.5 months.
- Finally, in 2020 no cases were brought to court against the Company for anti-competitive behavior or for antitrust or monopolistic practices. [GRI 206-1]

“In these serious issues such as climate change and corporate behavior, we have worked with the world's leading experts to set measurable targets”



Other significant Governance issues [GRI 102-18]

Governance of Corporate Social Responsibility

Management of the issues related to Corporate Social Responsibility and Sustainable Development is exercised by the Senior Management Team of MYTILINEOS and covers all policies and actions aimed at meeting the expectations of its Stakeholders, over and above the Company's legal and regulatory obligations. The management of these issues is implemented through the CSR corporate governance system, with the following objectives:

- To highlight the scope and breadth of the relevant concepts, with the ultimate goal of preventing business, social and environmental risks.
- To adopt initiatives and actions that will substantially contribute to the Global Sustainable Development Goals (2030 Agenda) and to the respective national priorities
- To balance the economic, social and environmental implications of MYTILINEOS' activities and, at the same time, enhance the value created not only for the Company's shareholders but also for all its key Stakeholder groups.

MYTILINEOS' Corporate Social Responsibility governance system has the following structure:

CSR Committee [GRI 102-32]

The Corporate Social Responsibility Committee ensures that the Company's mission is implemented, through the activity of MYTILINEOS, with respect and responsibility towards employees, the natural environment and the wider society, and that this approach is an essential element of all Company decision-making. The Committee may also act in an advisory capacity to the Company's Executive Committee in connection with matters pertaining to Sustainable Development. It also reviews and approves the material topics that determine the structure of the annual MYTILINEOS Sustainable Development Report.

The Corporate Social Responsibility Committee was established by resolution of the Board of Directors dated 17.11.2010. Its composition, as amended by the Board of Directors' resolution of 07.06.2018, comprises seven (7) members, as follows: Three members of the Board of Directors, of which one (1) executive member and two (2) non-executive members, the Special Advisor to the CEO on CSR, the Human Resources General Manager, and the Corporate Communication Manager. The Chairman is appointed by the Committee members in a meeting of the Committee held for this purpose and may be replaced by unanimous decision of the Committee members.

General Division For Corporate Governance and Sustainable Development

With its crucial coordinating role, the Sustainable Development Division sets the short-term strategic priorities as well as the long-term overall CSR strategy of the Company. It is

also responsible for providing support to the CSR teams in the Company's Business Units, to ensure compliance with the relevant standards and with the CSR goals of MYTILINEOS.

Risk Management System

MYTILINEOS Risk Management System identifies and manages threats and opportunities related to Sustainable Development Material Topics of the Company including safety valves and control mechanisms in all of its Business Units.

Business Units

The Heads of the Business Units are actively involved in the management of social and environmental issues, providing the respective CSR /ESG teams of their Unit with the necessary directions and ensuring that the Key Performance Indicators (KPIs) are in line with the strategic goals of MYTILINEOS. The individual CSR teams operate within the scope of specific and clearly documented duties and obligations, to implement the central strategic goals and policies as well as the individual social programs at the level of the individual Business Units.

Consultations With Stakeholders & Local Communities

The institution of Consultation with Stakeholders and Local Communities is a long-established principle of MYTILINEOS' responsible operation, contributing to greater transparency and to the further improvement of the responsible entrepreneurship initiatives of the Company's Business Units.

Codes of Conduct

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

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

(b) The MYTILINEOS "Suppliers and Business Partners Code of Conduct", which describes the Company's minimum requirements/expectations of its supply chain actors regarding ESG-related issues as a prerequisite for the establishment of a commercial cooperation with them.

Organization and implementation of risk management [GRI 102-11] - [GRI 102-15]

The Company has defined risk as a set of uncertain and unpredictable situations that may affect all its activities, its business operation and its financial performance, as well as the implementation of its strategy and the achievement of its goals.

In line with the above, it has established a specific risk management approach in all its areas of activity where certain risks have been recognized, consisting of the following steps:

- Identification and assessment of risk factors.
- Planning of the risk management policy.
- Implementation and evaluation of the risk management policy.

The Company has established specific and comprehensive Enterprise Risk Management (ERM) processes, which are incorporated into all activities of MYTILINEOS, in order to:

- identify risks affecting the company's activities;
- allocate appropriate resources to the most significant risks;
- reduce uncertainty in achieving its objectives;
- improve risk response decisions;
- develop a culture of risk awareness;
- improve its Internal Control System;
- increase the Company's resilience to unexpected events.

In 2020, the Company made improvements to the Risk Management Framework by introducing periodic reports with specific content, which facilitates communication with the parties involved and improves the understanding of the Company's overall exposure to risk.

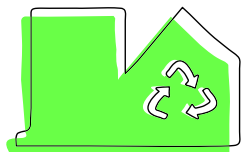
In addition, in each General Division and significant entity, the role of the Risk Partner was established, who supports the Heads of the respective General Divisions and entities in the implementation of the Risk Management Process and is responsible for maintaining the Risk Record of the entity it supports. The Risk Partner also ensures the prompt and systematic communication of risks and response plans to the parties involved and the Enterprise Risk Management Division.

All senior executives are involved in the systematic identification and assessment of risks affecting business activities and, in addition, supervise the formulation and timely implementation of the risk management plans. Moreover, they regularly assess the effectiveness of the risk management plans and, where appropriate, make modifications to achieve optimal risk management.

At the same time, the prompt and systematic communication of the Risk Records helps the Management Committees, as well as the Management off each legal entity, to understand the type and extent of the risk they undertake in pursuing their goals, to improve their decisions, and to assess the need

to adapt the Company's strategy to changes in its operating environment. With regard to Non-Financial Information, since 2010 the Company has introduced a specific Stakeholder engagement process for evaluating the materiality of the sustainability issues which are related to its sectors of activity. This process, combined with the corresponding prioritization of these topics by the Company's Business Units, is at the core of the accountability policy applied by the Company. The process for determining the material sustainability topics is an ongoing exercise that is constantly developed and improved. The purpose of this process is to highlight the topics that reflect the Company's significant environmental and social impacts and influence substantially the decisions of its Stakeholders. By identifying and understanding the material sustainability issues, the Company formulates and develops its uniform business strategy and its aims, targets and social and environmental initiatives.

Last but not least, the Company conducts regular internal audits to ensure the appropriate and effective implementation of the risk identification and assessment processes and of the management policies for such risks.



Personal Data Protection

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

Although MYTILINEOS does not process special categories of data (sensitive data), the business activity of Protergia in the retail sales of electricity and natural gas as well as the size of MYTILINEOS in terms of the number of its active business partners, require the processing of personal data on a large scale. The assignment by MYTILINEOS of parts of such processing to third parties (processors) does not also transfer the responsibility for the processing to them, as the Company remains responsible for such processing and is bound by specific obligations and responsibilities. In addition, transactions with business partners outside the European Union, especially in countries with less rigorous data protection legislation, create the need for transferring personal data whose protection should be ensured.

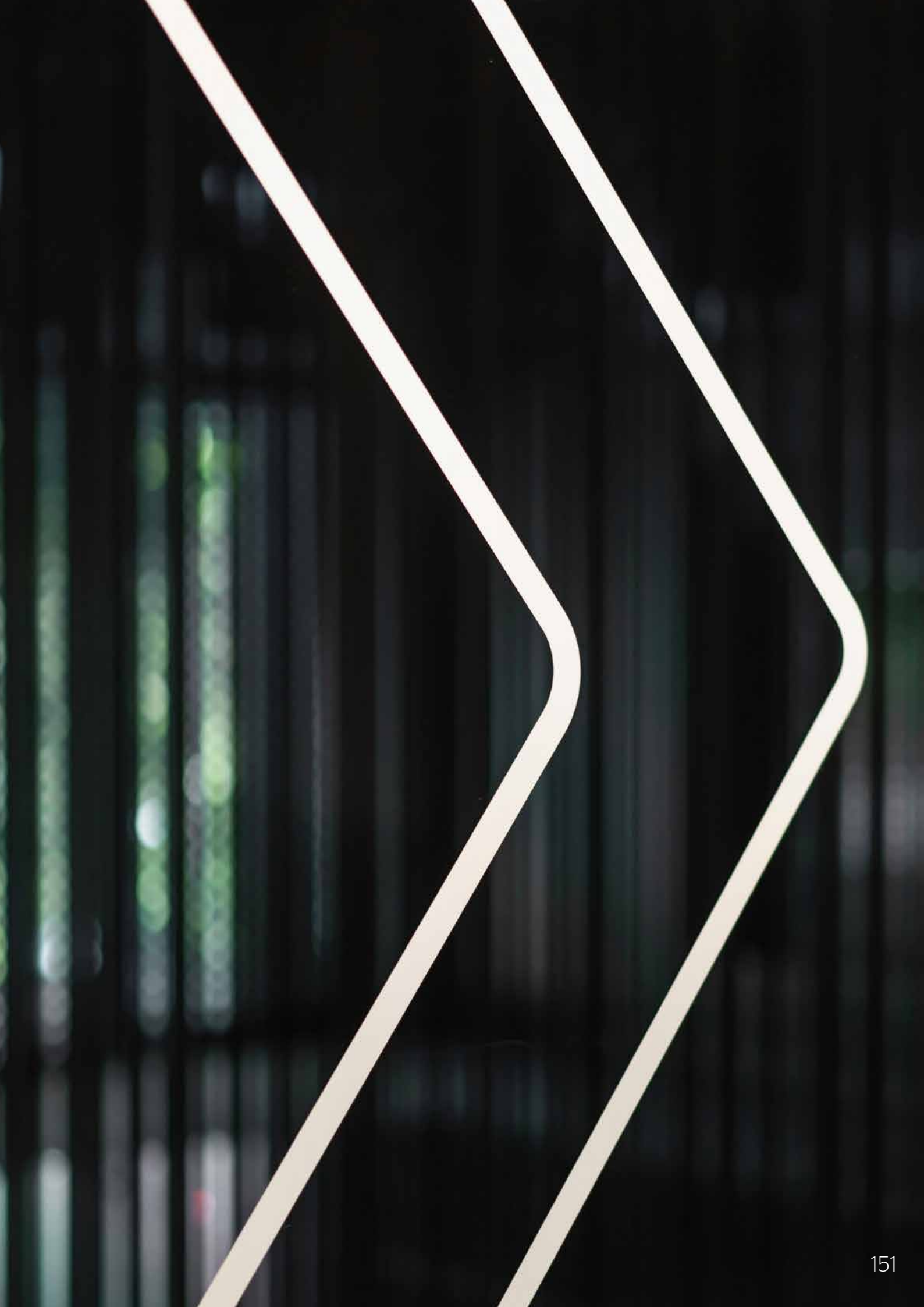
The Company may face various risks related to the protection of personal data, which may be financial in nature, such as from possible sanctions imposed by European data protection authorities or from claims of personal data subjects that have suffered damage, as well as risks related to negative publicity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

For this reason, MYTILINEOS has taken a number of steps to ensure, as far as possible, the protection of the personal data it manages. More specifically, the Company (a) has in place since 2018 a Data Protection Officer (full-time employee) and has duly notified the competent Authority of the details of this person, (b) has carried out a study on the deviations from the General Data Protection Regulation and has taken appropriate corrective action since 2018, (c) has established a data protection policy for all its employees and subsidiaries, as well as for its business partners, and has communicated it to all the parties concerned, (d) has completed impact studies (Data Privacy Impact Assessments) regarding the processings required, (e) has established and operates a mechanism for recording any personal data breaches and for notifying them to the competent Data Protection Authority as well as to the affected data subjects, if required, while (f) in terms of training, it has provided by the end of 2020 face-to-face as well as online trainings to over 700 employees who either process personal data or supervise their processing.

In addition, the risks related to the protection of personal data are included in the Company's Risk Management System and are continuously monitored. In 2020, a data protection audit

was launched in the Metallurgy Business Unit, by means of an internal audit. During 2020, the Company carried out a total of 15 on-the-spot in-depth checks of processors to verify their compliance with the General Data Protection Regulation (GDPR). **ASI**

MYTILINEOS' compliance with the applicable legislation and the implementation of controls to confirm observance of the rules concerning its activity, resulted in the absence of incidents of non-compliance with the legislation on personal data during 2020. Moreover, in 2020 one personal data breach incident occurred in the Company's Renewables & Storage Development (RSD) Business Unit, which involved unauthorized access to personal data of a professional nature. The incident, which was not materially disruptive, was reported to the competent Authority within the prescribed time limit, the data subjects were immediately informed, and the necessary technical and organizational measures were taken. **[GRI 418-1]**



ESG KPIs

G Governance KPIs	2019	2020
Corporate Governance		
Corporate Governance Code	UK Corporate Governance Code - 2018	UK Corporate Governance Code - 2018
Diversity Policy	Yes	Yes
Board Members ¹	11	10
Board Members' term of office (years)	4	4
Average age of Board Members (years)	58.6	60.9
Chairman's duality	Yes	Yes
Appointment of Lead Independent Director	Yes	Yes
Independent Members on the Board	3	3
Non-Independent Members on the Board ²	8	7
Independent, Non-Executive Members on the Board ²	7	5
Women on the Board ³	2	2
Voting standard	Majority	Majority
Number of Board Meetings	50	58
Number of Board Members present in <75% of Board meetings	0	0
Remuneration & Nomination Committee	Yes	Yes
Independent Board Members on the Remuneration & Nomination Committee (%)	100%	100%
Audit Committee	Yes	Yes
Independent Board Members on the Audit Committee (%)	100%	100%
Corporate Social Responsibility Committee	Yes	Yes
Corporate conduct		
Code of Business Conduct	3 rd Edition 2019	3 rd Edition 2019
Suppliers & Business Partners Code of Conduct	3 rd Edition 2019	3 rd Edition 2019
Publication of business model & value creation process	Yes	Yes (p. 30-33)

G Governance KPIs	2019	2020
Materiality process	Yes	Yes (p. 46-48)
Political contributions	Not allowed	Not allowed
External assurance of published information	Yes	Yes (p. 156-160)
Financial sanctions imposed for violations of the Code of Business Conduct (€)	0	0
Confirmed incidents of non-compliance with laws and regulations (regarding economic, environmental, labor & social matters)	0	0
Confirmed incidents of corruption and bribery	0	0
Confirmed cases of anti-competitive behavior	0	0

1. Number of Board Members as of 2/2/2021: 11
2. Number of Independent, Non-Executive Board Members as of 2/2/2021: 6
3. Number of women on the Board of Directors as of 2/2/2021: 3



Sustainability Standards & Assurance



Independent Limited Assurance Report to the Management of MYTILINEOS S.A.

KPMG Advisors Single Member S.A. was engaged by MYTILINEOS S.A. (further referred to as the “Company”) to provide limited assurance over selected aspects of the Greek version of the report titled “Sustainable Development Report 2020” (further referred to as the “Report”) for the reporting period 1 January 2020 - 31 December 2020.

Scope of our assurance engagement

Our engagement was designed to provide limited assurance in accordance with ISAE 3000¹ and the requirements for a Type 2 assurance engagement under AA1000AS v3 (2020)² on the following aspects of the Report (“Assurance Scopes”) on a sample basis:

- 1 The application of AA1000AP (2018)³ principles, as described in the section titled “Accountability Principles Standard AA1000 Index” of the Report.
- 2 The reliability of the General Disclosures required by the Global Reporting Initiative (“GRI”) Standards for the “Core” option, marked with the symbol “●” in the “GRI Content Index” of the Report.
- 3 The reliability of the Topic-Specific Disclosures and the respective “Management Approaches” (“MA”) for the “Material Topics” as they have been identified by the Company and its stakeholders, marked with the symbol “●” in the “GRI Content Index” of the Report.
- 4 The reliability of the Topic-Specific Disclosures for the “Other significant issues” marked with the symbol “●” in the “GRI Content Index” of the Report.
- 5 The linking of the Sustainable Development Goals (“SDG”) of the United Nations (“UN”) with the material issues of the Report.
- 6 The Report has been developed taking into account the United Nations Global Compact Advanced level criteria as described in the section titled “UN Global Compact Communication on Progress (Advanced level)” and the respective table of the Report.

Our work in relation to the GRI “in accordance” criteria, was to review the Company’s assessment that the appropriate indicators have been reported for the GRI “Core” option.

The nature, timing and extent of evidence-gathering procedures for limited assurance is less than for reasonable assurance, and therefore a lower level of assurance is provided for the data and objectives under the limited assurance scope. Readers should note that moderate level of assurance in AA1000AS v3 (2020) is consistent with limited assurance in ISAE 3000.

We have not been engaged to provide assurance over any prior reporting period data, information and corporate documents presented or mentioned in the Report.

Reporting criteria used by the Company

The Company applies the AA1000AP (2018) criteria for the four principles of inclusivity, materiality, responsiveness and impact as described in the section of the Report titled “Accountability Principles Standard AA1000 Index”.

For the Report, the Company applies the GRI Standards as declared in the section of the Report titled “Parameters of the Sustainable Development Report” as well as relevant internal guidelines.

The Company follows the United Nations Global Compact Advanced criteria taking them into account for the development of the Report as described and declared in the section of the Report titled “UN Global Compact Communication on Progress (Advanced level)” and the respective table.

The Company adopts and aligns with the global Sustainable Development Goals (SDGs) of the UN taking them into account in the linking of the material issues of the Report with the respective SDGs as described

and declared in the “Table of material and other sustainable development issues” in the section of the Report titled “Materiality process”.

Our conclusions are based on the appropriate application of the abovementioned criteria.

Exclusions from the scope of our assurance engagement

The scope of our work did not include the financial data of the Company in the Report, which are subject to the statutory auditor’s responsibility. Where financial information (text and/ or data) subject to the statutory auditor’s scope has been utilized within the scope of our work, KPMG’s work was limited to the reliability check of the transfer of these text/ data from the audited and published Annual Financial Report 2020 of the Company to the relevant -within our agreed scope- sections of the Report. To obtain a thorough understanding of the Company’s financial results and financial position, the relevant 2020 audited financial statements should be consulted.

The scope of our work did not include the review / testing of the operating effectiveness of the information systems used to collect and aggregate data in relation to the agreed assurance scope.

Assurance standards we used

We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS v3 (2020). A Type 2 Assurance Engagement covers not only the nature and extent of the organization’s adherence to the AA1000AP (2018), but also evaluates the reliability of selected sustainability performance information.

As explained in more detail at the section “Responsibilities”, we conducted our engagement in accordance with the International Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code) which requires, among other things, the independence of the members of the assurance team and of the assurance organization, including not being involved in writing the Report. The Code contains detailed requirements regarding the integrity, objectivity, confidentiality and professional competence and behavior. KPMG has internal systems and processes to monitor compliance with this Code and to prevent potential conflicts regarding independence. Our engagement was conducted by a multidisciplinary team with extensive experience in sustainability (including environmental, social and financial aspects) and sustainability assurance.

Work performed to reach our conclusions

We planned and performed our work to obtain all the evidence, relevant documentation, information and explanations that we considered necessary in relation to the above scope. Our work included the following procedures using a range of evidence gathering activities which are further explained below:

- Inquiries of management to gain an understanding of the Company’s processes for determining the material issues for its key stakeholder groups inclusive of an evaluation of the results of the Company’s stakeholder consultation processes and their methodology.
- Interviews with senior management and relevant managerial staff of the Company concerning sustainability strategy and policies for material issues and the implementation of these across the business.
- Interviews with relevant Company representatives and staff responsible for providing information in the Report, during which we also reviewed on a sample basis, systems and/ or processes for information management, internal control and processing of the qualitative and quantitative information, at the Company level. In this context, we tested on sample basis, the reliability of the underlying text and/ or data references mentioned in the General Disclosures and the Topic-Specific Disclosures of our agreed assurance scope.
- Review on a sample basis, of the section of the Report titled “UN Global Compact Communication on Progress (Advanced level)” and the respective table of the Company’s response to the 10 Principles of the UN Global Compact in relation to the relevance of the table’s cross-references within the Report and against the respective criteria for the advanced level of the UN Global Compact which are mentioned in the document “GC Advanced COP Self-assessment”.
- Review, on a sample basis, of the table titled “Table of material and other significant sustainability topics” in the section of the Report titled “Materiality process” against the criteria for linking the SDGs

¹ International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or reviews of Historical Financial Information, issued by the International Auditing and Accounting Standards Board.
² AA1000 Assurance Standard (AA1000AS v3, 2020), issued by AccountAbility.
³ AA1000 Accountability Principles (2018), issued by AccountAbility.

with the material issues of the Report based on the document “Linking the SDGs and the GRI standards”.

- Enquiring, on a sample basis, about the Company’s assertions within our agreed assurance scope through evidence collection, covering internal and external documentation such as correspondence, minutes of meetings, reports, presentations and research and survey results.
- Interviews, with personnel from the central offices of the Company in Athens, which were selected on the basis of a risk analysis including the consideration of both quantitative and qualitative criteria.
- A media analysis and an internet search for references to the Company during the reporting period.
- Review of the Report and in relation to the assurance scope mentioned above, to ensure there are no material disclosures that are misrepresented or inconsistent with our findings.
- Checking the table “GRI Content Index” provided by the Company, in respect to its consistency with the GRI “in accordance - Core” option criteria in order to verify the relevant statement of the Company.

Our conclusions

The following conclusions should be read in conjunction with the work performed and scope of our assurance engagement described above.

Assurance Scope 1: On the AA1000AP principles of Inclusivity, Materiality, Responsiveness and Impact (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the Company’s description of its alignment with the AA1000AP (2018) principles in the section titled “Accountability Principles Standard AA1000 Index” of the Report, is not fairly stated in all material respects. Without affecting our conclusion, the following are recommended:

- In relation to the principle of inclusivity, it is proposed that the Company continue to apply the practices (such as the implementation of thematic consultations in Business Activity Sector level or Central level, the training of suppliers for sustainability issues, the special consultation with Non-Government Organizations) in the context of stakeholder engagement. Moreover, in the context of continuous improvement the Company could investigate the organization of focus groups in pursuance of the further commitment of specific stakeholder groups into this process.
- In relation to the principle of materiality, the Company should maintain its current procedures that are characterized by regular materiality analysis which encapsulates the perception of internal and external stakeholders.
- In relation to the principle of responsiveness, the Company could further enhance its response to climate change issues by capitalizing the new sustainable development strategy and the relevant initiatives it has planned.
- In relation to the principle of impact, the Company could maintain the current approach by continuing, based on the planning of the Company, the regular implementation of the socio-economic impact study ensuring that the impacts identified through the study reflect the current trends of society and/or stakeholder needs.

Assurance Scopes 2, 3 and 4: On the reliability of the General Disclosures and the Topic-Specific Disclosures within our assurance scope (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the General Disclosures and the Topic-Specific Disclosures which are mentioned in the “Scope of our assurance engagement” above (as “Assurance Scopes” 2,3,4), are not fairly stated in all material respects.

Assurance Scope 5: For the linking of the UN Sustainable Development Goals with the material issues of the Report (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the Company’s description for the linking of the UN Sustainable Development Goals with the material issues of the Report, as mentioned in the table titled “able of material and other significant sustainability topics” in the section of the Report titled “Materiality process”, is not fairly stated in all material respects.

Assurance Scope 6: The Report has been developed taking into account the United Nations Global Compact Advanced level criteria (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the Company in the development of the Report has not taken into account the criteria of the Global Compact Advanced level in all material respects, as described in the section of the Report titled “UN Global Compact Communication on Progress (Advanced level)” and the respective table.

Without prejudice to our conclusions for all the assurance scopes, as presented above, we provide to the Company’s management an internal report presenting in more detail specific findings and areas for improvement.

Responsibilities

The Company’s Management are responsible for preparing the Report, and the information and statements within it. They are responsible for the identification of stakeholders and material issues, for defining objectives with respect to sustainability performance and for establishing and maintaining appropriate performance management and internal control systems from which reported information is derived.

Our responsibility is to carry out a limited assurance engagement and to express a conclusion based on the work performed for the agreed scope, as described above. We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS v3 (2020). ISAE 3000 standard requires that we plan and perform the engagement to obtain limited assurance about whether selected aspects of the Report are free from material misstatement. KPMG applies ISQC 1⁴ and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants’ International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our assurance report is made solely to the Company in accordance with the terms of our engagement. Our work has been undertaken so that we might state to the Company those matters we have been engaged to state in this assurance report and for no other purpose. We do not accept or assume responsibility to anyone other than the Company for our work, for this assurance report, or for the conclusions we have reached.

KPMG Advisors Single Member S.A.



George Raounas
Partner
Athens, May 21st, 2021



⁴ International Standard on Quality Control 1 (ISQC 1): Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, issued by the International Auditing and Assurance Standards Board.



The Greek Sustainability Code

The Greek Sustainability Code constitutes a structured system with regard to the transparency and self-commitment tool of Greek Organizations /Enterprises and has been developed in the framework of the "Sustainable Greece 2020" initiative. It responds to the need for measuring the economic, environmental and social performance of Organizations /Businesses with the goal of strengthening their competitiveness in terms

of incorporating the principles of Sustainable Development and Corporate Responsibility in their operation and of their compliance requirements of the EU Non-financial Reporting Directive. The table below presents MYTILINEOS' response to the Greek Sustainability Code criteria (**LEVEL A**), which are based on the following international standards: GRI, GLOBAL COMPACT, EFFAS, ISO & EMAS.



Pillar	Criteria	References (Sustainable Development Report 2020)
Strategy	Strategic Analysis & Action	<ul style="list-style-type: none">• ESG Performance Statement (p. 6-9)• Message from the Chairman (p. 13-15)• Strategic Priorities (p. 26-29)• Sustainable Development Strategy (p. 36-41)• Climate Change and Energy transition (p. 44-45)• Materiality Process (p. 46-48)
	Materiality	<ul style="list-style-type: none">• Materiality Process (p. 46-48)
	Objectives	<ul style="list-style-type: none">• Sustainable Development Strategy (p. 36-41)• Key ESG Targets (p. 8-9)
	Supply Chain Management	<ul style="list-style-type: none">• Supply Chain Management (p. 132-133)• Stakeholder Engagement (p. 49-54)
Management Procedure	Responsibility & Accountability	Governance <ul style="list-style-type: none">• Anti-Corruption and Bribery (p. 141-143)• Legal Compliance (p. 144-145)
	Rules & Processes	<ul style="list-style-type: none">• Sustainable Development Strategy (p. 36-41)• Materiality Process (p. 46-48)• Corporate Governance (p. 138-139)
	Monitoring	<ul style="list-style-type: none">• ESG KPIs (p. 8-9)• Sustainable Development Strategy (p. 36-41)• Participation in Socially Responsible Investment indicators• CSR & Sustainable Development commitments• Integration Value Creation Scorecard• Parameters of the Sustainable Development Report (p. 10-11)
	Remuneration policies & incentives for Sustainable Development	<ul style="list-style-type: none">• Annual Report 2020 (Remuneration Policy and Remuneration of Board Members) (p. 155-163)
	Stakeholder Engagement	<ul style="list-style-type: none">• Stakeholder Engagement (p. 49-54)
	Product responsibility and innovation	Society <ul style="list-style-type: none">• Customer Health & Safety (p. 126-127)
Environment	Usage of natural resources	Environment <ul style="list-style-type: none">• Environmental Policy (p. 62)• Adaptation to Climate Change (p. 64-65)• Energy & Air emissions (p. 67-72)• Environmental restorations & Biodiversity (p. 73-76)• Circular Economy (Waste management) (p. 77-81)• Water management (p. 84-87)• Pollution prevention (p. 88-90)
	Resource Management	
	Air emissions & Climate Change	
Society	Labor rights	Society <ul style="list-style-type: none">• Occupational Health and Safety (p. 96-103)• Employment (p. 104-109)• Human Rights (p. 111-115)• Sustainability of local communities (p. 117-121)• Emergency Response Plans (p. 124-125)• Customer Health & Safety (p. 126-127)• Employee training & evaluation (p. 130)• Diversity & equal opportunities (p. 131-132)• Supply chain management (p. 132-133)

ESG Reporting Guide 2020

Athens Stock Exchange

The Athens Stock Exchange has been participating since 2018 in the Sustainable Stock Exchanges (SSE) initiative of the United Nations, which promotes the dissemination of best practices for the disclosure and integration of non-financial information, aiming to develop sustainable investments in local capital markets. Following the call for action of the organizations that promote sustainable development, the Athens Stock Exchange issued the “ESG Reporting Guide”, seeking to promote and strengthen

the ESG-related information disclosure practices applied by Greek listed companies. The table below presents MYTILINEOS’ response to the indicators of the Athens Stock Exchange ESG Reporting Guide (where C: Basic metrics, A: Advanced metrics, SS: Sector-Specific metrics), which are based on practices aligned with international sustainability guidelines and reporting frameworks such as GRI, SASB, GLOBAL COMPACT, IIRC, CDP, TCFD, and the Greek Sustainability Code.

ESG Classification	ID	Metric Title	References (Sustainable Development Report 2020)
E Environment	C-E1	Direct emissions (Scope 1)	Material topic: Energy & Air emissions (p. 67-72)
	C-E2	Indirect emissions (Scope 2)	
	C-E3	Energy consumption with the organisation	
	A-E1	Other indirect emissions (Scope 3)	
	A-E2	Climate change risks & opportunities	Material topic: Adaptation to climate change (p. 64-65)
	SS-E1	Emissions management strategy	Climate change and Energy transition (p. 44-45) Material topic: Energy & Air emissions (p. 67-72)
	SS-E2	Air pollutant emissions	Material topic: Energy & Air emissions (p. 67-72)
	SS-E3	Water consumption	Material topic: Water management (p. 84-87)
	SS-E4	Water management	
	SS-E5	Waste management	Material topic: Circular economy (p. 77-81)
S Society	SS-E8	Critical raw materials	Raw and other materials (p. 91) The Company does not use the 27 critical raw materials identified by the European Commission ¹
	SS-E9	Chemicals in products	Material topic: Customer Health & Safety (p. 126-127)
	C-S1	Female employees	ESG KPIs (p. 134-135)
	C-S2	Female employees in managerial positions	
	C-S3	Employee turnover rates	
	C-S4	Employee training	Employee Training & Evaluation (p. 130)

1. European Commission. (2019). [Critical Raw Materials](https://ec.europa.eu/growth/sectors/raw-materials/specific-interest/critical_nl) (ec.europa.eu/growth/sectors/raw-materials/specific-interest/critical_nl)

ESG Classification	ID	Metric Title	References (Sustainable Development Report 2020)
G Governance	C-S5	Human rights policy	Material topic: Human Rights (p. 111-115)
	C-S6	Collective bargaining agreements	ESG KPIs (p. 134-135)
	A-S1	Stakeholder engagement	Stakeholder Engagement (p. 49-54)
	A-S2	Employee training expenditure	ESG KPIs (p. 134)
	A-S5	Revenues from sustainable products	Key Figures (p. 21)
	SS-S1	Product recalls	They do not exist
	SS-S2	Customer privacy	Personal Data Protection (p. 150)
	SS-S4	Labour law violations	Material topic: Legal Compliance (p. 144-145)
	SS-S5	Fines for breaches of data security and confidentiality	Personal Data Protection (p. 150)
	SS-S6	Health & Safety performance	Material topic: Occupational Health and Safety (p. 96-103)
	SS-S7	Marketing practices	Material topic: Communication & Marketing (p. 128-129)
	SS-S8	Customer satisfaction	Material topic: Customer Health & Safety (p. 126-127)
	C-G1	Sustainability Oversight	Governance of Corporate Social Responsibility (p. 148)
	C-G2	Business ethics policy	Material topic: Anti-Corruption and Bribery (p. 141-143) Code of Business Conduct mytilineos.gr/who-we-are/governance/corporate-governance/regulations-policies/
	C-G3	Data Security policy	mytilineos.gr/privacy-policy/
	A-G1	Business Model	How we create value (p. 30-33)
	A-G2	Material Topics	Materiality process (p. 46-48)
	A-G3	ESG Targets	Key ESG Targets (p. 8-9)
	A-G5	External assurance	Independent Assurance Statement (p. 156-160)
	SS-G1	Business ethics violations	ESG KPIs (p. 152-153)

TCFD Content Index

Reflecting the Company’s commitment to climate change related disclosures, the following table shows the alignment of MYTILINEOS’s disclosure with respect to the **Task force on Climate-related Financial Disclosures (TCFD)** of the

Financial Stability Board, which published specific recommendations for the voluntary reporting of the financial impact of climate risks in June 2017.

Recommendations of the TCFD (Task Force on Climate-related Financial Disclosures)		
Recommended Disclosures		How and when we are to meet the relevant disclosures
Governance Disclose the organization's governance around climate-related risks and opportunities.	Disclose the organization's governance around climate related risks and opportunities.	In 2021 MYTILINEOS, in respect of its new sustainability strategy, will place a decarbonization implementation operating model and it will set up the transformation governance (governance, roles & responsibilities, cooperation principles) through a sustainability transformation team to meet the Governance standards and to assign climate-related responsibilities to a specific new board committee and management-level positions. Also, will define the associated reporting lines to the board. Company's alignment with these specific recommendations will be published in its 2021 Sustainable Development Report.
	Describe management's role in assessing and managing climate-related risks and opportunities.	
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.	Describe the climate related risks and opportunities the organization has identified over the short, medium, and long term.	Section: "Adaptation to Climate Change" (p. 64-65). MYTILINEOS intension is to discuss this subject in more details in the forthcoming Sustainable Development Reports. However, high-level climate change risks and opportunities include: Risks: <ul style="list-style-type: none">Unfavorable climate conditions for the generation of electric energy from renewable energy sources.Our operations (mainly in Metallurgy sector) may be materially adversely affected by unplanned business interruptions caused by events such as inclement weather and natural disasters.Moreover, a number of governments or governmental bodies have introduced or are contemplating legislative and regulatory change in response to the potential impacts of climate change. We will likely see changes in the margins of greenhouse gas-intensive assets and energy-intensive assets because of regulatory impacts in the countries in which we operate. These regulatory mechanisms may be either voluntary or legislated and may impact our operations directly or indirectly through customers or our supply chain. Inconsistency of regulations may also change the attractiveness of the locations of some of the company's assets. The potential impact of future climate change legislation, regulation and international treaties and accords are uncertain, given the wide scope of potential regulatory change in countries in which we operate. Opportunities: <ul style="list-style-type: none">We are also enhancing our circular economy credentials by producing aluminium with a lower environmental footprint, which not only uses recycled materials instead of bauxite in the production process, but also requires considerably less electricity, thereby reducing our carbon footprint.The new focus of our Sustainable Engineering Solutions business unit towards sustainability-related projects is expected to further boost our efforts to support the environment, global energy transitioning targets and the circular economy.
	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	<ul style="list-style-type: none">MYTILINEOS is the first Greek industrial that set specific and robust emission targets for 2030 and 2050. We are committed to reducing our absolute emissions (Scope 1+2) by at least 30% by 2030 compared to 2019, and we pledge to reach net-zero emissions by 2050, in line with the well below 2°C temperature pathway as has been introduced by the Science Based Targets initiative (SBTi).In order to achieve this target, a specific climate strategy has been designed (page 44) which includes specific initiatives and certain actions per Business Unit.MYTILINEOS is a frontrunner in the effort to decarbonize the Greek electricity mix by replacing highly polluting lignite-based electricity generation with renewables and low-carbon natural gas. We are materializing an ambitious RES deployment plan. MYTILINEOS is leading the national strive, which will call for >9 GW of additional renewable capacity and >1.5GW of gas-based capacity by 2030, according to the Greek National Energy & Climate Plan.
	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	

Recommendations of the TCFD (Task Force on Climate-related Financial Disclosures)		
Recommended Disclosures		How and when we are to meet the relevant disclosures
Risk Management Disclose how the organization identifies, assesses, and manages climate-related risks.	Describe the organization's processes for identifying and assessing climate related risks.	<ul style="list-style-type: none">The most significant climate-related risks and opportunities are included in the Company's Risk Management System, and they are analyzed and assessed. The climate related risks and opportunities are at the core of MYTILINEOS strategy, decision-making and operations. Also, there is an annual oversight of the progress against the GHG reduction emissions targets and the climate change management procedures.MYTILINEOS intension is to disclose its fully compliance with these specific recommendations in its 2022 Sustainable Development Report the latest.
	Describe the organization's processes for managing climate related risks.	
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	
Metrics & Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	<ul style="list-style-type: none">The basic metrics used to measure and manage climate-related risks are described within the present report in the sections "Adaptation to Climate Change" and "Energy & Air Emissions".Furthermore, we provide a climate-related opportunity metric the revenue from low-carbon products and services which reached the 22.7% of the total company's revenue in 2020. MYTILINEOS will discuss more on this issue in its following publications and aims to disclose its fully alignment with these specific recommendations in its 2022 Sustainable Development Report.
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	
	Describe the targets used by the organization to manage climate related risks and opportunities and performance against targets.	

UN Global Compact Communication on Progress (Advanced level)

The United Nations Global Compact is a commitment platform and a practical framework for businesses which voluntarily declare their pledge to serve the Sustainable Development agenda and promote responsible business practices. MYTILINEOS has declared in writing, since 2008, its commitment to uphold the ten principles of the Global Compact, disclosing on an annual basis its relevant performance in

the context of its broader activity. The table below presents the company's response to the 10 Principles of the Global Compact, while at the address: mytilneos.gr/sustainability/sustainable-development-commitments/, is available its independent report about the fulfilment of the 21 criteria under the **UNGC Advanced CoP Self-Assessment 2018 (Updated 19 August 2016)**.



The 10 Principles of UN Global Compact		References (Sustainable Development Report 2020)
1 st	Businesses should support and respect the protection of internationally proclaimed human rights.	Society <ul style="list-style-type: none">Occupational Health & Safety (p. 96-103)Employment (p. 104-109)Human Rights (p. 111-115)Sustainability of local communities (p. 117-121)Emergency Response Plans (p. 124-125)Customer Health & Safety (p. 126-127)Diversity & equal opportunities (p. 131)Supply chain management (p. 132-133)Legal compliance (p. 144-145)Personal Data Protection (p. 150)
2 nd	Businesses should make sure that they are not complicit in human rights abuses.	
3 th	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	
4 th	Businesses should uphold the elimination of all forms of forced and compulsory labour.	
5 th	Businesses should uphold the effective abolition of child labour.	
6 th	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	
7 th	Businesses should support a precautionary approach to environmental challenges.	Environment <ul style="list-style-type: none">Environmental Policy (p. 62)Adaptation to Climate Change (p. 64-65)Energy & Air emissions (p. 67-72)Environmental Restorations & Biodiversity (p. 73-76)Circular economy (Waste management) (p. 77-81)Water management (p. 84-87)Pollution prevention (p. 88-90)Legal compliance (p. 144-145)
8 th	Businesses should undertake initiatives to promote greater environmental responsibility.	
9 th	Businesses should encourage the development and diffusion of environmentally friendly technologies.	
10 th	Businesses should work against corruption in all its forms, including extortion and bribery.	Governance <ul style="list-style-type: none">Corporate Governance (p. 138-139)Anti-Corruption & Bribery (p. 141-143)Legal compliance (p. 144-145)



This is our Communication on Progress in implementing the principles of the United Nations Global Compact.
We welcome feedback on its contents.

ESG Content Index Metallurgy Business Unit

The **Aluminum Stewardship Initiative (ASI)** is an international standardization and certification body that encourages and aligns companies in the aluminum industry with a view to sustainable development and responsible manufacturing. The acquisition of the ASI Performance Standard is related to the creation and

maintenance of responsible environmental and social standards as well as Governance criteria, in order to ensure the responsible production and rational use of aluminum. In this context, the performance of the activities that fall within the scope of the standard for the Metallurgy Business Unit is presented.. **ASI**

Environmental Metrics	AoG Aluminium Plant	DELPHI-DISTOMON
Direct GHG emissions (Scope 1 - CO ₂ e thousand tons) ¹	1,263.4	4.2
Indirect emissions (Scope 2 - CO ₂ e thousand tons) ²	1,557.5	3.2
Total NO _x emissions (t)	677	0.0
Total SO _x emissions (t)	3,190.1	0.0
Particulate emissions (t)	80.1	0.0
Fluorine emissions (t)	262.2	0.0
CF ₄ emissions (t)	13.3	0.0
C ₂ F ₆ emissions (t)	1.6	0.0
Total energy consumption (TJ)	25,367.3	77.5
Total water withdrawals (ML)	169,765.3	215.5
Total water withdrawal from surface waters (ML)	161,133.7	28.3
Total water withdrawal from groundwater (ML)	8,534.3	7.2
Total water withdrawal from mining operations (ML)	-	180.0
Total water withdrawal from public water supply companies (ML)	97.4	0.0
Water discharges (ML)	163,255.6	215.5
Water consumption (ML) ³	6,509.7	0.0
Water consumption (m ³ /ton of hydrated alumina production)	4.32	-
Water consumption (m ³ /ton of primary aluminium production)	2.57	-
Non-hazardous solid waste (t)	790,293.9	24.0
Hazardous solid waste (t)	23,890.8	34.7
Solid waste reused or recycled (% of total waste produced)	16.3%	52.4%
Total volume of spills (lt)	-	12,869
Incidents of non-compliance with environmental or social laws and regulations	0	0
Significant fines and number of non-financial sanctions for non-compliance with environmental or social laws and regulations	0	0
Political contributions	Not allowed	Not allowed

1. The calculation of direct greenhouse gas emissions (SCOPE 1) is performed using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalents (CO₂e). The numbers at the end of the reference period (year 2020) are used. The NIR 2020 methodology has been used for the values of the conversion factors.
2. The calculation of indirect greenhouse gas emissions (SCOPE 2) is performed using conversion factors of energy from consumption electricity, heating, cooling, and steam (in TJ) to carbon dioxide equivalents (CO₂eq). The numbers at the end of the reference period (year 2020) are used. The European Residual Mix 2019 methodology has been used for the values of the conversion factors.
3. The difference between the total amount of water withdrawals and the total amount of water discharges.

GRI Content Index - General Disclosures [GRI 102-55]

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
GRI 101 Foundation 2016	[GRI 101 does not include any disclosures]				
General Disclosures					
GRI 102 General Disclosures 2016	ORGANISATIONAL PROFILE				
	102-1 Name of the organization	(p. 18)			●
	102-2 Activities, brands, products, and services	(p. 18)			●
	102-3 Location of headquarters	(p. 23)			●
	102-4 Location of operations	(p. 23)			●
	102-5 Ownership and legal form	mytilineos.gr/en-us/shareholders/information			●
	102-6 Markets served	(p. 18, 58)			●
	102-7 Scale of the organization	(p. 21)			●
	102-8 Information on employees and other workers	(p. 107)	8, 10		●
	102-9 Supply chain	(p. 133)			●
	102-10 Significant changes to the organization and its supply chain	(p. 133) Annual Report (p. 28-36)			●
	102-11 Precautionary Principle or approach	(p. 64, 67, 73, 77, 84, 88, 96, 104, 111, 117, 124, 126, 128, 141, 144, 149)			●
	102-12 External initiatives	(p. 28) - mytilineos.gr/en-us/participation-in-socially-responsible-investment/details			●
	102-13 Membership of associations	(p. 28) - mytilineos.gr/en-us/participation-in-socially-responsible-investment/details			●
	STRATEGY				
	102-14 Statement from senior decision-maker	(p. 13)			●
	102-15 Key impacts, risks, and opportunities	(p. 65, 67, 68, 74, 77, 78, 85, 89, 97, 105, 112, 117, 118, 124, 126, 127, 128, 142, 145, 149)			
	ETHICS & INTEGRITY				
	102-16 Values, principles, standards, and norms of behavior	(p. 17)	16		●
	GOVERNANCE				
	102-18 Governance structure	(p. 138, 139, 148), Annual Report a.: (p. 125, 134, 140-141, 155, 165-166, 171), b.: (p. 173)			●
	102-19 Delegating authority	Annual Report (p. 125)			
	102-20 Executive-level responsibility for economic, environmental and social topics	Annual Report b.: (p. 135)			

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
	102-21 Consulting stakeholders on economic, environmental, and social topics	Annual Report a: (p. 127), b: (p. 127)	16		
	102-22 Composition of the highest governance body and its committees	Annual Report a-i, a-ii, a-iii, a-iv, a-v, a-vii: (p. 129-137, 153-162, 163-173, 183-187)	5, 16		
	102-23 Chair of highest governance body	Annual Report a: (p. 129), b: (p. 129, 153-155)	16		
	102-24 Nominating and selecting the highest governance body	Annual Report a: (p. 129-137, 153-158, 183-187), b-i, b-ii, b-iii, b-iv: (p. 129, 137-140, 153-158, 183-187)	5, 16		
	102-25 Conflicts of interest	Annual Report a: (p. 128), b-i, b-iii: (p. 128, 159)	16		
	102-26 Role of highest governance body in setting purpose, values, and strategy	Annual Report (p. 129, 135)			
	102-28 Evaluating the highest governance body's performance	Annual Report (p. 133-137)			
	102-32 Highest governance body's role in sustainability reporting	(p. 148)			
	102-35 Remuneration policies	Annual Report a-i, a-ii, a-iii, a-v: (p. 145-153), b: (p. 147)			
	102-36 Process for determining remuneration	Annual Report a: (p. 151), b: (p. 151), c: (p. 151)			
	102-37 Participation of interested parties in the determination of fees	Annual Report a: (p. 152)	16		
STAKEHOLDER ENGAGEMENT					
	102-40 List of stakeholder groups	(p. 50-51)			●
	102-41 Collective bargaining agreements	(p. 109)	8		●
	102-42 Identifying and selecting stakeholders	(p. 49)			●
	102-43 Approach to stakeholder engagement	(p. 50-52) - mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects			●
	102-44 Key topics and concerns raised	(p. 50, 51, 54)			●
ORGANIZATIONAL PROFILE					
	102-45 Entities included in the consolidated financial statements	(p. 11)			●
	102-46 Defining report content and topic Boundaries	(p. 46, 56, 64, 67, 73, 77, 84, 88, 96, 104, 111, 117, 124, 126, 128, 141, 144)			●
	102-47 List of material topics	(p. 47)			●
	102-48 Restatements of information	(p. 11)			●
	102-49 Changes in reporting	(p. 11)			●

GRI Content Index - Material Topics

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
	102-50 Reporting period	(p. 10)			●
	102-51 Date of most recent report	June 2020			●
	102-52 Reporting cycle	(p. 10)			●
	102-53 Contact point for questions regarding the report	(p. 11)			●
	102-54 Claims of reporting in accordance with the GRI Standards	(p. 11)			●
	102-55 GRI content index	(p. 168-178)			●
	102-56 External assurance	(p. 156-160)			●

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
Economic performance					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: Annual Report (p. 5-12) b. Boundaries: (p. 56) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: Annual Report (p. 5-12) b. Purpose of the management approach: Annual Report (p. 5-12)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 57) – Annual Report (p. 5-12)		-	
GRI 201 Economic Performance	201-1 Direct economic value generated and distributed	(p. 30)	8, 9	-	●
	201-3 Defined benefit plan obligations and other retirement plans	Annual Report (p. 292)		-	
GRI 204 Procurement Practices	204-1 Proportion of spending on local suppliers	(p. 133)	8	-	●
Environment					
Adaptation to climate change					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 65) b. Boundaries: (p. 64) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 65) b. Purpose of the management approach: (p. 64) c. Management Approach: (p. 64)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 65) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 201 Economic performance	201-2 Financial effects and other risks and opportunities for the organization's activities due to climate change	(p. 124-125)	13	The Company has already committed to conducting a study to determine the risks and opportunities from the effects of climate change on its activity. By 2022, the Company plans to adapt its financial information to the analysis of the risks and effects of climate change, following the recommendations of the Task Force on Climate - Related Financial Disclosures (TCFD), as well as its integration into the international standard. CDP Climate Change in 2021.	

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
Energy & Air emissions					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 67) b. Boundaries: (p. 67) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 68) b. Purpose of the management approach: (p. 67) c. Management Approach: (p. 67)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 70) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 302 Energy	302-1 Energy consumption within the organization	(p. 70)	7, 8, 12, 13	-	●
	302-3 Energy intensity	(p. 70)	7, 8, 12, 13	-	●
GRI 305 Emissions	305-1 Direct (Scope 1) GHG emissions	(p. 71)	3, 12, 13, 14, 15	-	●
	305-2 Energy indirect (Scope 2) GHG emissions	(p. 71)	3, 12, 13, 14, 15	-	●
	305-3 Other indirect (Scope 3) GHG emissions	(p. 71)	3, 12, 13, 14, 15	-	●
	305-4 GHG emissions intensity	(p. 72)	13, 14, 15	-	
	305-6 Emissions of ozone-depleting substances (ODS)	There are no such emissions	3, 12	-	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	(p. 71)	3, 12, 14, 15	-	●
Environmental restoration & Biodiversity					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 74) b. Boundaries: (p. 73) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 74) b. Purpose of the management approach: (p. 73) c. Management Approach: (p. 73)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 75) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 304 Biodiversity	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	(p. 76)		-	●
	304-2 Significant impacts of activities, products, and services on biodiversity	(p. 76)		-	●
Circular economy (Waste management)					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 77) b. Boundaries: (p. 77) c. Specific limitation regarding the topic Boundary: None		-	●

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 78) b. The purpose of the management approach: (p. 77) c. Management Approach: (p. 77)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 79) a-iii. Major Adjustments: There have been no major adjustments		-	●
GRI 306 Waste	306-1 Water discharge by quality and destination	(p. 81)	3, 6, 12, 14	-	
	306-2 Waste by type and disposal method	(p. 79)	3, 6, 12	-	●
	306-3 Significant spills	(p. 90)	3, 6, 12, 14, 15	-	
Water management					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 85) b. Boundaries: (p. 84) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 85) b. Purpose of the management approach: (p. 84) c. Management Approach: (p. 84)		-	●
	103-3 Evaluation of the management approach	a-i Evaluation: Internal review & external verification a-ii. Results: (p. 86) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 303 Water	303-1 Interactions with water as a shared resource	(p. 85)	6,12	-	
	303-2 Management of water discharge-related impacts	(p. 85)	6,12	-	●
	303-3 Water withdrawal	(p. 87)	6	-	●
	303-4 Water discharge	(p. 85, 87)	6		●
	303-5 Water consumption	(p. 87)	6		●
	307-1 Non-compliance with environmental laws and regulations	(p. 145)	16		●
Pollution prevention					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 89) b. Boundaries: (p. 88) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 89) b. Purpose of the management approach: (p. 88) c. Management Approach: (p. 88)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 90) a-iii. Major Adjustments: There have been no major adjustments		-	
	306-2 Waste by type and method of disposal	(p. 79)	3, 6, 12	-	●
	306-3 Significant spills	(p. 90)	3, 6, 12, 14, 15	-	

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
	303-2 Management of water discharge-related impacts	(p. 85)	6		●
	307-1 Non-compliance with environmental laws and regulations	(p. 145)	16	-	●
Other significant Environmental topics					
GRI 301 Materials	301-1 Materials used by weight or volume	(p. 91)	8, 12	-	●
	301-2 Recycled input materials used	(p. 91)	8, 12	-	●
Society					
Occupational Health and Safety					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 96-97) b. Boundaries: (p. 96) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 97) b. The purpose of the management approach: (p. 96) c. Management Approach: (p. 96, 103)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 99) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 403 Occupational Health and Safety	403-1 Occupational health and safety management system	(p. 98)	8	-	●
	403-2 Hazard identification, risk assessment, and incident investigation	(p. 97)	8	-	
	403-3 Occupational health services	(p. 97)	8	-	●
	403-4 Worker participation, consultation, and communication on occupational health and safety	(p. 99)	8, 16		
	403-5 Worker training on occupational health and safety	(p. 100, 102)	8		●
	403-6 Promotion of worker health	(p. 98)	3, 8		●
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	(p. 97)	8		
	403-8 Workers covered by an occupational health and safety management system	(p. 98)	8		●
	403-9 Work-related injuries	(p. 101, 103)	3, 8, 16		●
	403-10 Work-related ill health	(p. 100)	3, 8, 16		●

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
Employment					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 104, 105) b. Boundaries: (p. 104) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 105) b. Purpose of the management approach: (p. 104) c. Management Approach: (p. 104)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 106) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 401 Employment	401-1 New employee hires and employee turnover	(p. 108)	5, 8, 10	-	●
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	(p. 107)	3, 5, 8	-	●
	401-3 Parental leave	(p. 109)	5, 8		
GRI 402 Labor / Management Relations	402-1 Minimum notice periods regarding operational changes	a. (p. 106)	8	-	
Human Rights					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 112) b. Boundaries: (p. 111) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 112) b. Purpose of the management approach: (p. 111) c. Management Approach: (p. 111)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 113) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 406 Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	(p. 115)	5, 8	-	●
GRI 407 Freedom of Association and Collective Bargaining	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	(p. 114)	8	-	
GRI 408 Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor	(p. 115)	8, 16	-	
GRI 409 Forced or Compulsory Labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	(p. 115)	8	-	
GRI 412 Human Rights Assessment	412-1 Operations that have been subject to human rights reviews or impact assessments	(p. 113)		-	●

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
Sustainability of local communities					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 117) b. Boundaries: (p. 117) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 118) b. The purpose of the management approach: (p. 117) c. Management Approach: (p. 117, 118)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 119) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 203 Indirect Economic Impacts	203-1 Infrastructure investments and services supported	(p. 119)	5, 9, 11	-	●
GRI 413 Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	a-iv. Local community development programs based on local communities' needs: (p. 119-121)		-	●
GRI 415 Public Policy	415-1 Political contributions	Not allowed under the Company's Code of Conduct mytilineos.gr/en-us/codes-and-policies/of-mytilineos (p. 14)	16	-	
Emergency Response Plans					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 124) b. Boundaries: (p. 124) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 125) b. Purpose of the management approach: (p. 124) c. Management Approach: (p. 124)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 125) a-iii. Major Adjustments: There have been no major adjustments		-	
MYTILINEOS: Internal Index	Implementation of Emergency Preparedness Exercises	(p. 125)			
Customer Health and Safety					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 126) b. Boundaries: (p. 126) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 127) b. Purpose of the management approach: (p. 126) c. Management Approach: (p. 126)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 127) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 416 Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	(p. 127)	16	-	●

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
Communication & Marketing					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 128) b. Boundaries: (p. 128) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 129) b. The purpose of the management approach: (p. 129) c. Management Approach: (p. 128)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 129) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 417 Customer Health and Safety	417-1 Requirements for product and service information and labeling	(p. 129)	12	-	●
	417-2 Incidents of non-compliance concerning product and service information and labeling	(p. 129)	16	-	●
	417-3 Incidents of non-compliance concerning marketing communications	(p. 129)	16	-	●
Other significant Social topics					
GRI 404 Training & Education	404-1 Average hours of training per year per employee	(p. 130)	4, 5, 8, 10	-	●
	404-2 Programs for upgrading employee skills and transition assistance programs	(p. 130)	8	-	
	404-3 Percentage of employees receiving regular performance and career development reviews	(p. 130)	5, 8, 10	-	●
GRI 405 Diversity & Equal opportunities	405-1 Diversity of governance bodies and employees	(p. 131)	5, 8	-	●
	405-2 Ratio of basic salary and remuneration of women to men	(p. 132)	5, 8, 10	-	
GRI 204 Procurement Practices	204-1 Proportion of spending on local suppliers	(p. 133)	8	-	●
GRI 418 Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	(p. 150)	16	-	●
Governance					
Anti-Corruption and Bribery					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 142) b. Boundaries: (p. 141) c. Specific limitation regarding the topic Boundary: None		-	
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 142) b. The purpose of the management approach: (p. 141) c. Management Approach: (p. 141)		-	●
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 143) a-iii. Major Adjustments: There have been no major adjustments		-	

GRI Standard	Disclosure	p. number(s) and/or URL(s)	SDGs	Omission	External Assurance
GRI 205 Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	(p. 143)	16	-	●
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	(p. 145)	16	-	●
Legal Compliance					
GRI 103 Management Approach	103-1 Explanation of the material topics and its boundaries	a. Why the topic is material: (p. 145) b. Boundaries: (p. 144) c. Specific limitation regarding the topic Boundary: None		-	●
	103-2 The management approach and its components	a. How the organization manages the topic: (p. 145) b. Purpose of the management approach: (p. 144) c. Management Approach: (p. 144)		-	
	103-3 Evaluation of the management approach	a-i. Evaluation: Internal review & external verification a-ii. Results: (p. 145) a-iii. Major Adjustments: There have been no major adjustments		-	
GRI 307 Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	(p. 145)	16		●
GRI 419 Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	(p. 145)	16	-	●
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	(p. 145)	16	-	●
Other significant Governance topics					
GRI 418 Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	(p. 150)	16	-	●

Accountability Principles Standard AA1000 Index

Principle applied	Methods	Reference in the Report
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	How we create value (p. 30–33) Sustainable Development Strategy (p. 36–41) Stakeholder Engagement (p. 49–54) Materiality Process (p. 46–48)
Materiality	Identification of issues which are important to the company and its stakeholders	Materiality Process (p. 46–48) Stakeholder Engagement (p. 49–54)
Responsiveness	Responsiveness to key issues and transparency on performance	MYTILINEOS’ response to the SARS-CoV-2 pandemic (p. 24–25) Strategic priorities (p. 26–29) How we create value (p. 30–33) Sustainable Development Strategy (p. 36–41) Stakeholder Engagement (p. 49–54) Sustainability of local communities (p. 117–121) Emergency Response Plans (p. 124–125) Customer Health & Safety (p. 126–127) Human Rights (p. 111–115) Communication & Marketing (p. 128–129)
Impact	Analysis of direct and indirect impact of the company's actions	ESG Performance Statement (p. 6–9) Strategic priorities (p. 26–29) Sustainable Development Strategy (p. 36–41) How we create value (p. 30–33) Materiality process (p. 46–48) Economic Performance (p. 56–59) Adaptation to Climate Change (p. 64–65) Energy & Air Emissions (p. 67–72) Environmental Restoration & Biodiversity (p. 73–76) Circular Economy (Waste Management) (p. 77–81) Water Management (p. 84–87) Pollution Prevention (p. 88–90) Occupational Health & Safety (p. 96–103) Employment (p. 104–109) Human Rights (p. 111–115) Sustainability of local communities (p. 117–121) Emergency Response Plans (p. 124–125) Customer Health & Safety (p. 126–127) Communication & Marketing (p. 128–129) Anti-Corruption & Bribery (p. 141–143) Legal Compliance (p. 144–145)

Index of Key Terms

Direct employees

Total number of employees who are employed by the Company and are included in its payroll system in accordance with national law.

Direct greenhouse gas emissions (Scope 1)

Direct greenhouse gas emissions (SCOPE 1) come from sources (natural units or processes that release greenhouse gas emissions into the atmosphere). Direct greenhouse gas emissions include, among other things, emissions of CO₂ equivalents from fuel consumption.

Recycled raw materials

Materials that replace primary materials and are purchased or acquired from internal or external sources and that are not by-products and outflows of the Company.

Recycling and reuse of water

The treatment of used water and sewage through another cycle before rejection for final treatment and disposal in the environment.

R.E.S. (Renewable Energy Sources)

Energy sources that can be renewed in a short time through a natural cycle (e.g. Geothermal, Wind power, Solar, Hydroelectric, Biomass).

Restorations (Restored Areas)

Areas where there is operational activity or affected by operational activities and in which rehabilitation measures have restored the environment to its original state or to a state where a healthy and functional ecosystem exists.

Wind Farm

Wind Power Plant

Self-assessment of human rights

Corporate internal evaluation process that applies a number of criteria for respecting and supporting human rights. The issues included in the evaluation indicatively are: forced & child labor, health and safety, working hours, staff salaries and leave, fair treatment, freedom of association,

restriction of population rights of local communities, etc.

Sustainable development

Growth in a way that respects the environment and uses natural resources harmoniously so as not to affect the ability of future generations to meet their needs.

Parental permission

Permission granted to male and female employees due to childbirth.

Discrimination

The action and effect of unequal treatment of individuals by imposing unequal burdens or deprivation of benefits instead of equal treatment of each individual based on his value. Disturbance, which is defined as a series of comments or actions that are undesirable, or reasonably considered undesirable by the person to whom they are addressed, can also be considered as discrimination.

Leakage

Unexpected release of a dangerous substance that can affect human health, soil, vegetation, surface and groundwater.

Fatalities

The death of an employee that occurs during the current reference period and is due to an injury at work or illness that he suffered or was transmitted to while working at the Company.

Indirect employees

Total number of self-employed workers and permanent independent contractors who perform very important tasks for the company on a long-term basis.

Indirect greenhouse gas emissions (Scope 2)

Emissions resulting from the production of electricity, heating, cooling energy and steam purchased or acquired and consumed by the company.

Impact

The term refers to important economic, environmental and social effects that

are: positive, negative, existing, potential, direct, indirect, short-term, long-term, voluntary, involuntary.

Employees from local communities

Peoples who have either been born or have the legal right to reside for an indefinite period of time in the same geographical location as the Company's operating facilities. The geographical definition of the term "local" may include society around activities, an area within a country or a country.

Vulnerable groups

A vulnerable group is a group or subgroup of individuals with a particular physical, social, political or economic status or a trait that puts the group at greater risk of being harmed or at risk of being severely affected by the social, economic or environmental impacts resulting from Company functions. Vulnerable groups may include children and young people, the elderly, people with disabilities, refugees, households affected by HIV / AIDS, indigenous people and ethnic minorities.

Committees on Health & Safety issues

Occupational Health and Safety Committees

Supply chain

A series of activities or partners that provide products or services to the Company.

Lost Days Index

The impact of occupational accidents and diseases as expressed through the time that workers were left out of work. It is expressed in the total number of lost days per 200,000 working hours of human resources during the reference period

Occupational disease index

The incidence of occupational diseases per 200,000 hours of work in the whole workforce in the reporting period.

Employee Mobility Index (Voluntary Departures)

It concerns the number of voluntary

departures to the average number of direct employees of the Company in the reporting year.

Injury Index

The frequency of injuries with work interruption per 200,000 hours of work in the whole workforce in the reporting period.

Carbon Dioxide Equivalent (CO₂ eq)

Equivalent to CO₂ (carbon dioxide) is the global unit of measurement used to compare greenhouse gas emissions, based on the planet's gas heating potential. The equivalent CO₂ of a gas is determined by multiplying the tones of the gas by the corresponding global heating potential.

Forced labor

Any work or service required by a person under the threat of punishment and for which that person has not been voluntarily offered (DOE 29, Forced Labour Convention).

Water consumption

The amount of water that results from removing the total amount of water pumped is the amount of water returned to the original pumping source (after treatment).

Social investment

Total investment in local communities refers to actual expenditure incurred during the reference period. The Company calculates the investments made to the local communities as the sum of the voluntary donations plus the capital investments in the wider local community. Voluntary donations and financial resources investments to the wider local community may include: (a) charitable donations / contributions, NGOs and academic or research (b) funds to support local community infrastructure (such as sports facilities or sports facilities). c) the direct costs of social programs, d) costs / sponsorships of cultural and educational events / actions. Investments in the local community include investing in infrastructure that is primarily driven by basic business needs

or facilitates the Company's business operations such as compensatory benefits in the development of RES projects. The Company monitors donations and investments to local communities in cash at the end of the reporting period

Social product

The total amount referred to as a Social Product of MYTILINEOS includes: a) fees and benefits to employees, b) expenses to domestic suppliers, c) total taxes to the Greek state, d) payments to capital providers, e) investments, f) environmental protection costs and g) social investment.

Circular Economy

The circular economy is an economic model that focuses on reducing the waste of resources used in the production process, emphasizing the utilization of renewable resources, the recovery and reuse of products, but also the production of energy from the waste of production processes, the preservation of a product, in good working order for a long time, the use of products to provide services to multiple users and the use of the service offered by a product.

Waste disposal method

The method by which waste is treated or disposed of, including the following: reuse, recycling, recovery, landfill, storage at the Company's facilities, etc.

Non-renewable materials

Resources that are not renewed in the short term, such as minerals, metals, oil, gas, or coal.

Non-renewable energy sources

Energy sources that cannot be renewed, reproduced, increased or produced in a short period of time through a natural cycle. Non-renewable energy sources include: Fuel refined from petroleum or crude oil such as gasoline, diesel, heating oil - Natural gas such as compressed natural gas (CNG) and liquefied natural gas (LNG) - Combustion gas and oil refining - Coal - Nuclear energy.

NGOs

Non-governmental organization

Material Topics

Issues that reflect the economic, environmental and social effects of the Company's activity and at the same time significantly affect the evaluations and decisions of its Stakeholders.

Priority substances

Substances that may pose a significant risk to the aquatic environment. These substances are defined by Directive 2013/39 / EU of the European Parliament

Environmentally sensitive areas (water stress areas)

Areas that are significantly affected by water pumping either in terms of water availability, quality or accessibility

Environmental laws and regulations

It refers to the regulations related to any type of environmental issue (i.e. emissions, liquid effluents and waste, as well as the use of materials, energy, water, and biodiversity) that apply to the Company

Areas with high biodiversity

Areas that are not subject to legal protection but have been recognized due to the important biodiversity characteristics of some governmental and non-governmental organizations.

Reference period

Specific time covered by the published data. For MYTILINEOS, the reference period is the year that begins in January and ends in December

Global Sustainable Development Goals (SDGs)

On September 25, 2015, at the UN headquarters in New York, 193 representatives of states and governments from around the world pledged to adopt 17 Global Targets to take action against three major challenges over the next 15 years (up to in 2030): extreme poverty, inequality and climate change

Percentage of full-time employees at work

Number of full-time employees at the end of the reference period × 100 / Number of full-time employees at the end of the previous year

Significant functional changes

Changes in the operation of the Company that have significant positive or negative consequences for employees. Such changes may include, for example, restructuring, assignment to third parties, closure, expansion, new opening, acquisitions, sale of all or part of the entity or mergers

Significant impact on biodiversity

Effects that may adversely affect the integrity of a geographical area or region, either directly or indirectly. This happens through the substantial change of ecological features, structures and functions of the whole area in the long run. This means that the habitat, the level of its population and the specific species that make the habitat important cannot be maintained

Total water withdrawal

The total water extracted within the body's limits from all sources (including surface and groundwater, rainwater and public water supply) for each use during the reference period

Total water discharge

All liquid effluents discharged during the reference period in groundwater, surface water, sewers leading to rivers, oceans, lakes, wetlands, treatment plants, and groundwater.

B.A.S.

Business Activity Sector

Local community

Individuals or groups of people who live and/or work in areas that have a positive or negative economic, social or environmental impact from the organization's activities. The local community may include individuals living close to the organization's activities and even isolated settlements within walking distance of the activities,

and which may be affected by the operation of those activities.

Local supplier

An organization or individual who provides a product or service to the organization and which has its headquarters in the same geographical market as the organization that compiles the report. The geographical definition of the term "local" may include society around activities, an area within a country or a country.

Fresh water

Water with a total dissolved solids concentration equal to or less than 1,000 mg/l.

