



MYTILINEOS

Energy & Metals

MYTILINEOS SA collects, stores, processes, and distributes information on a continuous basis in the context of the execution of its business operations, which relate to the Energy and Metal Sectors. The protection of information and its processing systems is of strategic importance to achieve its short- and long-term objectives and to protect its know-how.

For the continuous protection of information, the company has developed an Information Security and Privacy Management System consisting of policies, procedures and guidelines aimed at:

- Ensure the confidentiality, integrity, and availability of all the information it manages, including Personal Data,
- the compliance with all applicable legal and regulatory requirements in the countries where it operates,
- compliance with the requirements arising from contracts with customers, partners, and suppliers, which clearly describe the responsibilities of each party,
- the protection of the company's interests,
- maintaining and improving the reliability of its information resources; and
- the achievement of the business objectives set by the company.

Roles and responsibilities have been defined for the maintenance of the Information Security and Privacy Management System, the most significant being that of the Information Security Manager. However, information security is the responsibility of all employees and partners of the company.

MYTILINEOS SA informs its employees and partners of the requirements regarding Information Security and Privacy through training and awareness-raising sessions.

The environment in which the Company operates and the threats arising from it play a major role in the measures taken, which are identified through the periodic performance of an Information Security and Privacy Risk Assessment.

MYTILINEOS SA carries out internal audits at technical and organizational level in order to examine compliance with the stipulated in the Information Security and Privacy Management System. Corrective measures are taken when non-compliances or deviations are observed.

Any deviation from the provisions of the Information Security and Privacy Management System, as well as any attempt to circumvent them, which could lead to the leakage, alteration or destruction of the information managed by the company, constitutes a security incident, and must be reported immediately, investigated, addressed, and evaluated as soon as possible and with the aim of eliminating any threat.

The purpose of all the measures that have been taken, as well as those that will be taken in the future based on the company's needs, is the continuous improvement of the Information Security and Privacy Management System to which the Top Management is committed.

The Top Management and employees of the Company are committed to implementing the Policies, Procedures and Guidelines of the Information Security and Privacy Management System in accordance with the requirements of ISO 27001:2013 and ISO 27701:2019 with which they fully comply and the applicable Legal and Regulatory requirements, and to achieving its objectives.

MYTILINEOS SA's policy is fully binding for every employee at all levels of the organizational structure and is reviewed at least annually to keep it up-to-date and appropriate.