



**CENTRAL FUNCTION  
FOR CORPORATE GOVERNANCE AND SUSTAINABLE DEVELOPMENT**

**Responsible Supply Chain  
Policy**

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## 1. Introduction

The Responsible Supply Chain Policy ("Policy") was adopted based on MYTILINEOS Sustainable Development Strategy and has been approved by decision of the Board of Directors on 20/09/2023.

For MYTILINEOS, creating a responsible supply chain is a key pillar of its overall Sustainable Development Strategy and the pursuit of continuous improvement. At the same time, it is directly linked to its business operations, determining the way in which MYTILINEOS chooses to conduct its collaborations and procurement, actively contributing, proportionally, to the Sustainable Development Goals (SDGs) and specifically to Goal 8 "Decent Work and Economic Growth" and Goal 12 "Responsible Consumption and Production".

For the purposes of the Policy, any natural or legal person who provides, sells, or leases materials, products, or services directly to MYTILINEOS, including all Central Function (CF), Businesses Sectors and its subsidiaries in Greece and abroad, is considered a supplier/partner of MYTILINEOS.

## 2. Purpose & Objective

The Policy confirms MYTILINEOS' commitment to promoting responsible entrepreneurship and thus enhancing the sustainability of its supply chain.

The purpose of the Policy is to promote responsible business practices in the activity of its suppliers and partners with the goal of developing collaborations and partnerships to better understand the impacts on Sustainable Development and to mutually harmonize relevant objectives and expectations.

The aim of the Policy is to contribute to the achievement of the overall Sustainable Development Strategy of MYTILINEOS, by integrating it into procedures and policies governing its broader procurement and supply activities. Specifically, the Policy assists in carrying out the actions followed to ensure that all MYTILINEOS suppliers<sup>1</sup>, pursuant to the principles of proportionality and materiality, and primarily those with whom MYTILINEOS has or wishes to have an established business relationship, are approved and operate in accordance with the basic principles of integrity, transparency, competence, professionalism as well as the ESG criteria.

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<sup>1</sup> For instance: Raw Materials Producers. • Energy and Natural Gas Suppliers • Sub-Contractors • Manufacturers • Distributors / Freight Forwarders • Spare Parts/Materials Suppliers • Wholesalers • Suppliers of advisory services & studies.

### 3. Approach

The Policy is based on MYTILINEOS' conscientious self-commitment to responsible entrepreneurship in line with the [UN Universal Declaration of Human Rights](#), the [ILO Declaration on Fundamental Principles and Rights at Work](#), the [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#), the [UN Global Compact](#) and the [OECD Guidelines for Multinational Enterprises](#).

The approach of MYTILINEOS to implementing responsible practices in its supply chain focuses on respecting and protecting human rights, expressed in the Corporate [Human Rights Policy](#), improving working conditions, aspects of which are covered in the Corporate [Code of Business Conduct](#), protecting the environment, which is reflected in the Corporate [Environmental Policy](#), and promoting transparency and fair trade.

MYTILINEOS understands that the performance of its suppliers in Sustainable Development is an important aspect for creating added value and increasing the positive impact of its activity, and in this direction encourages and commits them not only to comply with the existing legal requirements on the above-mentioned issues, but also to exceed them, by implementing the above-mentioned guidelines, declarations, and the UN Global Compact.

Therefore, for MYTILINEOS, the development of responsible procurement/purchasing and the commitment of its suppliers and partners to Sustainable Development is one of the General Principles of the [Corporate Social Responsibility Policy](#). Moreover, including environmental, social and governance (ESG) criteria in the supplier evaluation process is fully in line with [Suppliers & Business Partners Code of Conduct](#) of MYTILINEOS, reinforcing it.

### 4. Key Principles

In accordance with its values and operating framework, MYTILINEOS is committed to:

- operate with integrity both in the selection of suppliers/partners through documented procedures, and for their timely payment, especially to small and medium-sized enterprises, for services and products they offer in accordance with the official payment time periods set by the purchasing and procurement departments of the Central Function, the BSs and subsidiaries of MYTILINEOS, as well as the respective terms of the contracts for each type of cooperation.
- give priority to cooperation with local suppliers and encourage small and medium-sized enterprises - where possible - depending on the scope and type of the required purchase or supply, according to their capacity in terms of financials, quality and time, the cost of their products or services, as well as their ability to ensure the required quality; but also to meet the procurement's needs based on the defined specifications set by the Central Function, the Business Sectors and the subsidiaries of the Company.
- define and renew, when required, the key standards of ethical business conduct, based on the principles of Responsible Entrepreneurship as described in the "Suppliers and Business Partners Code of Conduct", which it expects all its Suppliers/Business Partners to adopt; but also in turn to promote in their interactions with their employees, suppliers, contractors, and customers.
- integrate ESG criteria into purchasing and procurement decision-making processes, as well as in procurement policies and other relevant practices, encouraging the purchase of goods and services

from suppliers who in turn act to minimise their own environmental and social impacts, to ensure their alignment with the “Suppliers & Business Partners Code of Conduct” and to avoid potentially controversial ESG practices on their part.

- incorporate the "Suppliers and Business Partners Code of Conduct" into all cooperation contracts with the aim to create a firm commitment to responsible, ethical, and sustainable practices by its suppliers, partners, and business partners.
- implement the due diligence process to identify, prevent, mitigate, terminate, and minimise the extent of potential and actual adverse impacts on human rights (including trafficking in human beings and modern slavery) and the environment throughout its supply chain based on the principles of proportionality and materiality. Meanwhile, it also undertakes to use its influence on the subsidiaries where it holds a stake equal to or less than 50% which are associated with the adverse effects, and/or if required, increase this influence, so that the subsidiary can take action to prevent and mitigate the adverse impact.
- ensure that its suppliers/partners take appropriate measures to avoid the use of materials that are considered to be the result of illegal mining or are raw materials from Conflict Affected and High-Risk Areas (CAHRAs) or a combination of the above. In addition, MYTILINEOS undertakes to immediately suspend or terminate its cooperation with suppliers when it identifies a reasonable risk that they are committing such activity or are procuring from or are affiliated with any other third party that has such an activity.
- evaluate its suppliers and partners with whom it has established business relationships, based on ESG criteria, and depending on the results, consult with them to create and monitor the implementation of plans for improvement and adaptation plans to the requirements of the "Suppliers and Business Partners Code of Conduct" of MYTILINEOS. Assessments may also be carried out by third parties, including certification and procedure inspections, as well as on-site audits.
- monitor on an annual basis the level of suppliers’ indirect (scope 3) emissions based on the principles of proportionality and materiality.
- consider and, where feasible, provide support to its suppliers and partners, including raising their awareness on Sustainable Development issues for the adoption of best relevant practices, and providing additional assistance (for example, know-how, knowledge acquisition or other resources) to meet socially responsible behaviour objectives and gradually being able to achieve strong and verifiable sustainability performance.
- continuously provide education and training of its employees in Purchasing and Procurement departments on issues related to the Policy and the Suppliers and Business Partners Code of Conduct.
- terminate its cooperation or exclude suppliers from contracting if they fail to meet minimum ESG requirements, within a specified mutually agreed timeframe.

## 5. Suppliers

MYTILINEOS expects its suppliers and partners to share its commitment to ethical, safe and responsible business practices in the conduct of their business activities, emphasising, inter alia, on:

- their full alignment with the "Suppliers and Business Partners Code of Conduct" of MYTILINEOS,
- the implementation of control practices across their entire activity spectrum, for the universal protection of Human Rights (including trafficking in human beings and modern slavery),
- measuring their carbon footprint and water consumption (for those companies that the issues emerge as important/material), as well as setting targets and actions to reduce them,
- their full response and close cooperation with MYTILINEOS in the context of ESG assessments, as well as their participation in the consultation process for the creation of improvement plans where required,
- promotion of responsible entrepreneurship and ESG criteria within their internal environment, as well as in their own supply chain.

## 6. Governance

MYTILINEOS has the appropriate resources and assigns clear roles, responsibilities, and competences within its structure for the implementation of this Policy. Specifically:

- The Policy and any amendment thereto shall be approved by the Board of Directors ("BoD") of the Company upon the recommendation of the Sustainable Development Committee, which is responsible for the preparation, review and monitoring of the Policy's implementation through the CF for Corporate Governance and Sustainable Development
- The Sustainable Development Committee may be assisted:
  - as regards the preparation, review, and possible amendment of the Policy, by the CF for Corporate Governance and Sustainable Development within the framework of its responsibilities,
  - as regards implementation monitoring, by the CF for Corporate Governance and Sustainable Development, the Internal Audit Division, and the Regulatory Compliance Division, each within the framework of its responsibilities. The Regulatory Compliance Division in particular is responsible for monitoring, receiving, and managing any reports of violation of the terms of the Policy.
- The CFs, BSs, as well as the subsidiaries of MYTILINEOS, assisted by their respective Procurement and Purchasing Departments, in Greece and abroad, implement the Policy in their supply chain and submit suggestions for improvement actions to the CF for Corporate Governance and Sustainable Development.

## 7. Transparency & Compliance

- The Policy is available to all interested parties (MYTILINEOS, subsidiaries, suppliers).

- Respecting the Principle of Transparency, MYTILINEOS is committed to evaluate and publish its progress in the context of the implementation of the Policy for all its activities.
- The Policy, through internal communication tools is communicated to all MYTILINEOS employees in Greece and abroad, either directly or indirectly linked to the purchasing departments, and is publicly accessible on the Company's website.
- MYTILINEOS implements a whistleblowing line at central level for reporting violations in relation to the Policy and is committed to defending both its suppliers and their employees without fear of retaliation against those who report actual or suspected violations of this Policy.
- Suppliers, their employees, indirect workers, or contractors may report actual or suspected violations of this Policy by email using the address: [compliance@mytilineos.com](mailto:compliance@mytilineos.com). Reports may be submitted confidentially and anonymously (where permitted by law).
- MYTILINEOS undertakes to investigate any complaint that may arise and inform the supplier of the relevant findings. In turn, the supplier must assist in this investigation and provide access to any information reasonably requested by MYTILINEOS.
- Where remediation action is required, the supplier shall prepare and inform MYTILINEOS of the remedial actions and implementation plans and the timetable for the effective and prompt resolution of the violation.
- Any failure to comply with this Policy (including any failure by a MYTILINEOS employee or anyone acting on its behalf) of which the supplier is aware, shall be reported to MYTILINEOS as soon as possible. Failure to do so, will be a violation of this Policy. MYTILINEOS takes violations of its Policies seriously and depending on the severity of the violation, the consequences can range from a warning to termination of employment, if it concerns an employee, or termination of the supply relationship, if it concerns its supplier.