

## **Anti-Bribery Policy - ISO 37001 Summary**

Bribery and corruption are major threats to good governance, sustainable development, business ethics, good faith among traders and undermine efforts to achieve economic growth.

MYTILINEOS S.A. (hereinafter referred to as MYTILINEOS) manages, with zero tolerance, incidents of bribery and corruption, fully complies with the relevant legislation, as well as with the requirements of an Anti-Bribery Management System in accordance with the International Standard ISO 37001:2016.

The Management of MYTILINEOS is committed to contribute in any way it can to the prevention and combating of bribery and corruption, and always acts with ethics and integrity in mind. To this end, it ensures that all its partners apply similar practices. Any form of bribery, including facilitation payments, is expressly prohibited, even if a payment is small or even acceptable according to local customs and traditions. The term 'facilitation payment' refers to situations where a small sum of money is offered to an employee to secure or expedite the performance of an ordinary or necessary action to which the person making the payment is legally entitled.

It is the policy of MYTILINEOS not to make any donations to political organizations or persons associated with these.

This policy is not intended to prohibit gift and hospitality practices that are reasonable, properly documented and legal in the jurisdiction in which they occur. Practices aimed at creating and/or strengthening relationships and promoting the objectives of MYTILINEOS must be carried out transparently and must not create any expectation for the recipient to reciprocate, either by performing or omitting to perform any other action in return.

Our Staff, Partners and Third Parties are encouraged to honestly report, without this entailing adverse consequences for them - such as fear of reprisals - incidents of bribery and corruption related to MYTILINEOS' activities to the appropriate reporting channels. The Company's aim is to enhance transparency and, for this reason, the Management shall investigate all relevant reports. Reports must be made honestly and in good faith under this policy regarding suspicious incidents, even if these suspicions ultimately prove to be false.

MYTILINEOS has an independent Compliance Division which is responsible for the design and implementation of the Anti-Bribery Management System, provides guidance and advice to its staff, ensures the compliance of the Management System according to the requirements of ISO 37001:2016, acts with the aim of continuous improvement, and reports on the operation of the system to the Company's Top Management.

In addition to the legal actions that may be applied, any employee or partner who violates this policy is subject to disciplinary actions, which may lead to the termination of his contractual relationship with the Company.

This Policy is reviewed on an annual basis and failure to comply with it may result in Administrative and/or Criminal actions as described in MYTILINEOS Code of Conduct or termination of cooperation as described in the Code of Conduct for Suppliers and Partners.