



Communication on Progress – 2019

UN Global Compact Advanced Level

(updated 19 August 2016).

The present Communication on Progress (CoP) report, refers to the period from 1ST of January 2019 to 31ST of December 2019, and should be read in conjunction with the MYTILINEOS Sustainable Development Report 2019.



Chairman's statement of Continued Support

The new reality that COVID-19 has forced us into, has many facets primarily in the global health domain and consequently in the economic, causing mass impact on companies struggling to survive. Under these conditions MYTILINEOS has set three priorities. The first is to protect our workforce, both their health and livelihoods. The second is business continuity. The third is to be socially responsible as a company with over 3,600 direct and indirect employees under our roof. As a consequence the UNGC's Ten Principles which are universally accepted and cover the areas of human rights, labor, health and safety, the environment and anti-corruption, have become more timely than ever due to the impact on entrepreneurship and economic activity in pandemic conditions.

MYTILINEOS having been a signatory of the UNGC since 2008, is proud of the progress made in working towards the Compact's Principles. Moreover, we continue our Sustainable Development Goals journey. For us, the SDGs focus in areas around which we can innovate and collaborate in the search for solutions to critical local, national, and global sustainability challenges, while positioning competitively for the future.

Our Communication on Progress report below, highlights our actions for the year 2019. We also commit to share this information with our stakeholders through our website and our annual Sustainable Development Report. My wish, my hope and my commitment is to make MYTILINEOS sustainable for all in the many years to come. I am proud to be re-confirming our support for the United Nations Global Compact.

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

UN Global Compact Advanced COP 2019 Advanced Level

All information in MYTILINEOS's Communication on Progress 2019 is compiled from the company's:

- Sustainable Development Report 2019
- Annual Report 2019
- CSR policy
- Vision – Mission and set of Business Values
- Code of Business Conduct
- Suppliers & Partners Business Conduct
- The Sustainable Development section in the Company's official website and
- All Material issues DMAs*

*DMA: Disclosure Management Approach

All the publications listed above are available on our website.

The following pages are our self-assessment on how we have met the GC Advanced Level criteria and references to our implementation of best practices. According to UNGC CoP policy, we consider a criterion is met when we communicate on its implementation (at least one best practice) or planned implementation. Concerning the independent assurance letter, this can be found in our Sustainable Development Report 2019 page 160.



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

Best Practice 1:

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

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

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

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

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

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

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

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

Best Practice 2:

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

SDGs with relevance to the MYTILINEOS material issues:



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

<p>Best Practice 3: <i>Goals and indicators set by our company with respect to one or more SDGs</i></p>	<p>Please advise: MYTILINEOS CSR Policy: www.mytilineos.gr/Uploads/MYTILINEOS_CSR_Policy_en.pdf MYTILINEOS Sustainable Development Report 2019 (“Our approach to Sustainable Development” pages 30-35): www.mytilineos.gr/en-us/csr-reports/publications Please advise our tool: Generated Value Creation Scorecard 2019: https://scorecard.mytilineos.gr/index-en.html</p>
<p>Best Practice 4: <i>How one or more SDGs are integrated into the company’s business model</i></p>	<p>We consider SDGs as a risk framework because the challenges put forward by the SDGs reflect specific regulatory, ethical and operational risks which can be financially material across our business and the countries we operate. Please advise our Sustainable Development Report 2019 (“Materiality section” – pages 38-41): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 5: <i>The (expected) outcomes and impact of your company’s activities related to the SDGs</i></p>	<p>MYTILINEOS Sustainable Development Report 2019 (“Our approach to Sustainable Development” pages 32-35): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 6: <i>If the companies’ activities related to the SDGs are undertaken in collaboration with other stakeholders</i></p>	<p>MYTILINEOS Sustainable Development Report 2019 (“Our approach to Sustainable Development” pages 32-35): www.mytilineos.gr/en-us/csr-reports/publications Please advise our Sustainable Development Report 2019 (“Local Communities” Results section - pages 120-123): www.mytilineos.gr/en-us/csr-reports/publications</p>

Implementing the Ten Principles into Strategies & Operations

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

<p>Best Practice 1: <i>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company’s sustainability commitments and objectives</i></p>	<p>Our approach to Sustainable Development is embedded into MYTILINEOS business agenda through its Mission & its Code of Business Conduct. It expressed by a clear CSR policy which is attended with specific Disclosure Management Approaches (DMAs) related to material issues and it is supported by a certain CSR governance system. Generally, we operate on two scopes: a) creating as many positive impacts as possible from our activity, and b) reducing risks related to environmental, social, employee, human rights and anticorruption matters. The implementation of our sustainability strategy is primarily based on our CSR Governance System, with a certain structure. The integration of the CSR Governance System in the company’s organizational structure relies on a uniform set of procedures and on specific reporting hierarchy, to overcome any obstacles which might result from the characteristic of our different business activity sectors. Moreover, sustainability responsibilities are assigned to main departments of the company.</p>
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	<p>The main objectives of our CSR Governance system are:</p> <p>(a) To highlight the scope and breadth of the relevant concepts, with the goal to prevent social, environmental and governance risks,</p> <p>(b) to identify and implement policies and initiatives that will substantially contribute to the achievement of Sustainable Development,</p> <p>(c) to ensure the harmonization of company’s sustainability commitments with the CSR objectives of its activity sectors,</p> <p>(d) to balance the economic, social and environmental implications of the company’s business activities, while generating value for its shareholders and for all its other Stakeholder groups</p> <p>and</p> <p>(e) to guarantee that different business functions manage closely to maximize CSR performance.</p>
<p>Best Practice 2.: <i>Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy.</i></p>	<p>Our CSR approach, as a main practice to achieve sustainability, is a multifaceted and complex process characterized by our conscious self-commitment to continuous improvement. It is linked to all our business activity sectors and operations and defines the way in which we choose each time to move forward, taking steady steps towards achieving our continuous responsible development, guided by our mission and business values.</p> <p>In this context:</p> <ul style="list-style-type: none"> • We created and published specific DMAs according to the new GRI STANDARDS for all material issues with relevant specific targets, where available, to ensure the proper disclosure of our performance. • We have adopted the UN Sustainable Development Goals as an additional framework for measuring our impact. • We have established an open dialogue with our Stakeholders at local level. • We are participating in Sustainability related standards and initiatives, challenging ourselves to continues improvement of our operations (e.g. UN Global Compact, ISO 26000, CDP-Water Security, GRI STANDARDS, ISO 14001, ISO 14064, ISO 45001, OHSAS 18001, ESG International Indexes). <p>Also, our “Code of Business Conduct”, the “Suppliers and Business Partners Code of Conduct”, Environmental, Occupational Health & Safety and Quality Policies, are part of our CSR governance system and applied across all our business activity sectors.</p> <p>Moreover, the Heads of our Business Sectors are actively involved in the management of social and environmental issues, providing the respective CSR teams of their Sector with the necessary directions and ensuring that the Key Performance Indicators (KPIs) are in line with the Group’s strategic goals. The individual CSR teams operate within specific and clearly defined duties and obligations, to implement the central strategic goals and policies, as well as the CSR programs at the local level.</p>

<p>Best Practice 3: <i>Design CSR strategy to leverage synergies between and among issues areas and to deal adequately with trade-offs.</i></p>	<ul style="list-style-type: none"> • Corporate Social Responsibility (CSR) is a multi-faceted and complex practice for MYTILINEOS, mainly characterized by the company's conscious self-commitment to responsible entrepreneurship and continuous improvement. Moreover, it is directly related to its business activity sectors and operations, as it defines how the company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values. MYTILINEOS CSR Policy • Also, the Company understands CSR as a fundamental factor which contributes to the prevention of its economic, social and environmental risks, to build a context of trust in which can operate creating value for its Stakeholders. MYTILINEOS remains steadfast in its pledge to uphold the ethical rules and the principles that guarantee its unbroken alliance with Society, Employees and the Environment, especially so in the adverse economic juncture the country is facing, which makes the contribution of businesses as social partners more imperative.
<p>Best Practice 4: <i>Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.</i></p>	<p>MYTILINEOS CSR Committee reviews and approves the CSR strategic lines as well as the material issues that determine the structure of its annual Sustainable Development Report. It may also act in the capacity of advisor to the Group's Executive Management and to the relevant Board Committees on the sustainability issues, to assist in their implementation in a more complete manner.</p>
<p>Best Practice 5: <i>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.</i></p>	<p>Also, MYTILINEOS has encouraged the creation of CSR teams in each its business activity sector. Each CSR team is responsible for developing, implementing, and evaluating CSR initiatives according to the Company's CSR Action plan as well as general policies and targets.</p> <p>For more information please see our Sustainable Development Report 2019 ("CSR Governance: section, page 150) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 6: <i>Other established or emerging practices.</i></p>	<p>Spotlight: INTEGRATED VALUE CREATION SCORECARD.</p> <p>Through our strategy, we seek to create value for our key stakeholder groups: customers, employees, shareholders, and society.</p> <p>Value created by MYTILINEOS over time has two interrelated aspects – value created for the Group itself, which enables financial returns to the providers of financial capital and value created for others (i.e., stakeholders and society at large). The INTEGRATED VALUE CREATION SCORECARD tool, illustrates our efforts to provide our Stakeholders with concise, complete and transparent information about the value we create over time.</p> <p>SCORECARD structure</p> <ol style="list-style-type: none"> 1. Description of the MYTILINEOS basic figures (activity sectors, industrial and renewable energy sources plants, number of employees, number of suppliers, countries of operation, turnover and social product). 2. Basic description of the nature of capitals (financial capital, Industrial capital, natural capital, human capital and social capital) that Group's manages in the context of its activity. 3. Capitals trade-off. 3. Presentation of 2019 key outputs per capital. 4. Presentation of generated value (outcomes) with reference to concrete KPIs and comparative graphs in relation with UN SDGs.

Criterion 2: The COP describes value chain implementation

<p>Best Practice 1.: <i>Communicate policies and expectations to suppliers and other business partners.</i></p>	<p>As part of our efforts to communicate more effectively our values in our sphere of influence, we have published our “Suppliers and Business Partners Code of Conduct” which sets out more clearly our policies and expectations for a responsible supply chain management and aims to focus on communicating and promoting the principles of the UN Global Compact to our principal associates and suppliers.</p>
<p>Best Practice 2.: <i>Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company’s sphere of influence</i></p>	<p>According to our Suppliers & Business Partners Code of Conduct, MYTILINEOS may request to confirm the compliance of its key Suppliers / Business Partners with the ESG criteria in one of the following ways:</p> <p>Evaluations: The Group’s key Suppliers / Business Partners may be requested to complete a questionnaire on the coverage of the above ESG criteria.</p> <p>Onsite verifications: MYTILINEOS representatives or an authorised business partner of the Company acting on its behalf may contact key Suppliers / Business Partners to request permission to visit their premises to verify on-site the level of coverage of the ESG criteria.</p> <p>Compliance certificates: Company’s key Suppliers / Business Partners may be requested to produce relevant certificates or other official documents confirming their compliance with the ESG criteria.</p>

Robust Human Rights Management Policies & Procedures

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

<p>Best Practice 1: <i>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights).</i></p>	<p>MYTILINEOS respects all internationally recognized human rights as stated in its Code of Business Conduct and the relevant “Disclosure Management Approach of Labor Practices & Human Rights”. The Company complies with the Principles of the UN Global Compact, which are based on the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights.</p> <p>We promote the respecting of human rights in the following ways:</p> <ul style="list-style-type: none"> - In our business sectors by keeping our standards. - In our relationships with our significant suppliers. - By implementing social programs with NGOs.
<p>Best Practice 2: <i>Integrated or stand - alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</i></p>	<p>Our “Disclosure Management Approach of Human Rights” which express our commitment to respect and support Human Rights has been approved by the General Manager of Human Resources and is available to our internal and external stakeholders through our website and our Sustainable Development Report.</p>
<p>Best Practice 3: <i>Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services</i></p>	<p>MYTILINEOS takes all requisite measures to comply with the applicable laws in the developing countries and all other countries where it operates. Safe work management is governed by a series of actions that should be implemented for proper implementation of employees’ Health & Safety system and appropriate measures’ taking. In the contracts signed with contractors and suppliers, an explicit provision is mentioned about the company’s Code of Conduct to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.</p>

<p>Best Practice 4: <i>Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.</i></p>	<ul style="list-style-type: none"> - MYTILINEOS “CSR Policy” - MYTILINEOS “Code of Business Conduct” - MYTILINEOS “Human Rights Disclosure Management Approach” - MYTILINEOS “Suppliers & Business partner Code of Conduct” <p>are publicly available on our website</p>
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Criterion 4: The COP describes effective management systems to integrate the HR principles

<p>Best Practice 1: <i>Process to ensure that internationally recognized human rights are respected.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS ensures labour relations that foster mutual trust, constructive collaboration and two-way communication and recognition, while at the same time promotes the fundamental principles of the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work, including: (a) the respect of the freedom of association; (b) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; and (d) the elimination of all discrimination in respect of employment and occupation. • The company also subscribes to and complies with the Principles of the UN Global Compact, which are based on the internationally recognised principles on the protection of Human Rights. In this direction an internal Human Rights Self - Assessment process, using the Global Compact related tool, is scheduled to take place every 3 years. • Moreover, MYTILINEOS “Code of Business Conduct” applies to all employees and management teams (by signing a Consensus Form). • Company’s “Suppliers and Business Partners Code of Conduct”, includes a description of its minimum conditions and expectations from its supply chain, in CSR topics, as a prerequisite of commercial cooperation between the two parties. The Code applies to all suppliers and business partners and its sections cover matters such as Health and Safety, Working conditions and Human Rights, Ethics and Anti-Corruption, Environmental protection and management. <p>You can advise our Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2019 (pages 97, 105 & 112) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 2: <i>Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement / advocacy; partnerships and/or other forms of collective action.</i></p>	<p>Such programs are presented within our Sustainable Development Report 2019 (Social Investments section pages 120-123): www.mytilineos.gr/en-us/csr-reports/publications</p> <p>For example, we mention:</p> <p>The “Holistic Support for Families in Economic Difficulty and Social Exclusion” program, in collaboration with the Association “Together for the Child”.</p> <p>The Support program for the “Medium-Term Accommodation Facility for Women at Risk” in collaboration with the partnership with “Médecins du Monde” (MdM).</p>
<p>Best Practice 3: <i>Allocation of responsibilities and accountability for addressing human rights impacts</i></p>	<p>MYTILINEOS Human Resources Central Function is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to each company’s Business Activity Sector in coping with human resources & human rights related issues.</p>

	You can also refer to our Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2019 (pages 97, 105 & 112) www.mytilineos.gr/en-us/csr-reports/publications
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Criterion 5: The COP describes effective monitoring & evaluation mechanisms of HR integration

<p>Best Practice 1: <i>Leadership review of monitoring and improvement results.</i></p>	<p>As has been defined according to MYTILINEOS:</p> <ul style="list-style-type: none"> • CSR Governance system: Sustainable Development Report 2019 (page 150) www.mytilineos.gr/en-us/csr-reports/publications • MYTILINEOS’s Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2019 (pages 97, 105 & 112) www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2: <i>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders</i></p>	<p>In 2019, no Human Rights incidents have been identified across the Company. The process to deal with incidents, is presented within our Code of Conduct where the management of Code violations is assigned to the Administration Board of each Business Unit, which is composed of the Business Unit’s General Manager, the immediate supervisor of the employee who has committed the violation, the Legal and Regulatory General Manager, the Compliance Manager and the Human Resources General Manager. The Administration Board must inform the Company’s Audit Committee of the progress made in connection with any matters that arise.</p>
<p>Best Practice 3: <i>Outcomes of integration of the human rights principles.</i></p>	<p>Outcomes of the internal self-assessment: Please refer to our Sustainable Development Report (pages 114 – 115 related to the internal self-assessment outcomes) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Disclosure of main incidents involving the company: In 2019, no Human Rights incidents have been identified across the Company.</p> <p>Outcomes of remediation processes of adverse human rights impacts: In 2019, there were no grievances related to human rights filed, addressed by internal or external stakeholders and resolved through formal mechanisms.</p>

Robust Labour Management Policies & Procedures

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

<p>Best Practice 1: <i>Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff</i></p>	<p>MYTILINEOS plans to create within 2020, apart of its DMA, the following two specific polices: 1) Social policy & 2) Human Rights policy with the relevant targets & KPIs.</p>
<p>Best Practice 2:</p>	<p>MYTILINEOS’s DMAs on Occupational Health & Safety and Employment respectively as well as its “Code of Business Conduct” are aligned with</p>

<p><i>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies.</i></p>	<p>international references such as the Universal Declaration of Human Rights, the ILO relative to the principles and fundamental rights at work the ISO 45001 and OHSAS 18001 International Standards and the principles of the Global Compact, among others. Also, our significant suppliers, subcontractors and other business partners are required to comply with the Company's "Suppliers and Business Partners Code of Conduct", which include respect for the Fundamental Conventions of the International Labour Organization and local legislation, particularly in terms of the minimum wage, working time and health and safety.</p>
<p>Best Practice 3: <i>Reflection on the relevance of the labour principles for the company</i></p>	<p>According to our Materiality process the main social issues (concerning the Human capital) that may influence the assessments and decisions of our stakeholders are: 1) Occupational Health & Safety, 2) Employment and 3) Human Rights. Please refer to our Sustainable Development Report 2019 ("Materiality analysis" section (pages 38-41): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 4: <i>Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and engage in dialogue with representative organization of the workers (international, sectoral, national).</i></p>	<p>Please advise:</p> <ul style="list-style-type: none"> • MYTILINEOS's Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2019 (pages 97, 105 & 112) www.mytilineos.gr/en-us/csr-reports/publications • The Occupational Health & Safety section in our website: https://www.mytilineos.gr/en-us/ygeia-asfaleia/ygeia-asfaleia

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

<p>Best Practice 1: <i>Risk and impact assessments in the area of labour.</i></p>	<p>We are applying specific assessment schemes such as: 1) the annual Materiality process, 2) the annual employees performance review system and 3) the annual Stakeholders Dialogue Forum. In addition, risk assessments in all company's business sectors are applied, in the framework of the Occupational Health & Safety Management System, certified by ISO 45001 and OHSAS 18001 International Standards. This system is designed to minimize risk, by allowing the continuous adoption of measures to prevent and minimize accidents and occupational diseases, providing for ongoing employee training and strengthening a safe work culture.</p>
<p>Best Practice 2: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>MYTILINEOS Human Resources General Directorate is responsible for elaborating and applying a management & development framework for the relevant policies and practices and for the provision of professional support to the Business Activity Sectors in coping with human resources related issues.</p> <p>Also, according to the Company's EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market.</p>
<p>Best Practice 3: <i>Grievance mechanisms, communication channels and other procedures (e.g.,</i></p>	<p>Main engagement & communication channels with employees:</p> <ul style="list-style-type: none"> • Formal Stakeholder Engagement process. • Formal Materiality process. • Established annual employee performance and skills review process.

<p><i>whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.</i></p>	<ul style="list-style-type: none"> • Open & daily communication with all employees through the role of HR-Business Partner • Regular and ad hoc meetings between the Management and representatives of employees. <p>The reporting of Code of Conduct violations: www.mytilineos.gr/en-us/codes-and-policies/of-mytilineos#tab-code-of-conduct (page 20)</p>
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Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration.

<p>Best Practice 1:</p> <p><i>System to track and measure performance based on standardized performance metrics.</i></p>	<p>Please advise:</p> <ul style="list-style-type: none"> • MYTILINEOS's Occupational Health & Safety, Employment and Human Rights DMAs within our Sustainable Development Report 2019 (pages 97, 105 & 112) www.mytilineos.gr/en-us/csr-reports/publications • The Occupational Health & Safety section in our website: https://www.mytilineos.gr/en-us/ygeia-asfaleia/ygeia-asfaleia • MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility <p>Regular reviews ensure that we adhere to all applicable labour laws and regulations and internal standards. Also, we are committed to implementing and integrating international standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • ISO 45001-2015 • OHSAS 18001 International Standard • International Labour Organisation convention • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard
<p>Best Practice 2:</p> <p><i>Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</i></p>	<p>We have employee unions in 2 out of our 3 business activity sectors as well as regular and ad hoc communications practices with the management. Also, Health & Safety Committees are in operation in 66% of the company's Business Sectors, while employees are encouraged to submit their proposals with a view to improving safety conditions. Regular meetings with union representatives are conducted with the management throughout the year. Main topics cover among else wages and additional benefits, proposals to improve health and safety conditions at work and other topics raised by employees.</p> <p>Please advise our Sustainable Development Report 2019 ("Management & Employees relations" section (pages 106-107): www.mytilineos.gr/en-us/csr-reports/publications</p>

<p>Best Practice 3: <i>Outcomes of integration of the Labour principles.</i></p>	<ul style="list-style-type: none"> • Please advise our ESG statement in our Sustainable Development Report 2019 (pages 6-7) www.mytilineos.gr/en-us/csr-reports/publications • Please advise our Social Performance section in our Sustainable Development Report 2019 (pages 96-115) www.mytilineos.gr/en-us/csr-reports/publications • Also, MYTILINEOS received no fines for non-compliance with labour laws and regulations in 2019.
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Robust Environmental Management Policies & Procedures

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

<p>Best Practice 1: <i>Reference to relevant international conventions and other international instruments.</i></p>	<p>The adoption and implementation of international standards related to the environmental protection is a dynamic approach in the consideration of potential risks. We are committed to implementing and integrating these standards and the relevant guidelines which are completely aligned with strategic objectives into all our operations and policies.</p> <ul style="list-style-type: none"> • The EU Emissions Trading System (EU ETS) • International Aluminum Stewardship Initiative (ASI) • ISO 14001-2015 International Standard • ISO 14064 International Standard • The EU's environmental regulations and Best Available Techniques (BATs) • Carbon Disclosure Project (WATER Security) • The Global Reporting Initiative (GRI Environmental Standards). • The United Nations' Global Compact (UNGC) environmental principles and CoP Advanced level criteria. • The ISO 26000 CSR International standard
<p>Best Practice 2: <i>Reflection on the relevance of environmental stewardship for the company.</i></p>	<p>According to our Materiality process the main environmental issues that may influence the assessments and decisions of our stakeholders are: 1) Pollution prevention, 2) Natural Rehabilitation & Biodiversity, 3) Energy & Air emissions, 4) Water management, 5) Circular economy, 6) Climate Change adaptation. Please advise our Sustainable Development Report 2019 ("Materiality analysis" section (pages 38-41): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 3: <i>Written company policy on environment stewardship.</i></p>	<p>You can advise our Environmental Policy: https://www.mytilineos.gr/en-us/perivallon/perivallon#tab-environmental-policy</p> <p>Our environmental policy:</p> <ul style="list-style-type: none"> • is included in our new Code of Conduct. • is included in our Suppliers Code of Conduct. • is presented by our website through the new dedicated section on Corporate Social Responsibility. • is considered as a main discussion topic in annual Dialogue Forums with our Stakeholders groups. • is applied to all our subsidiaries and to all employees, irrespective of their position within the Group's hierarchy and promoting best practices, aiming at shaping the corporate image in the market.

<p>Best Practice 4: <i>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct (pages 7-8).</p>
<p>Best Practice 5: <i>Specific commitments and goals for specified years.</i></p>	<p>In terms of commitments & goals please advise MYTILINEOS:</p> <ul style="list-style-type: none"> • Please advise our ESG statement in our Sustainable Development Report 2019 (pages 6-7) www.mytilineos.gr/en-us/csr-reports/publications • Please advise MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • Please advise our Environmental Performance section in our Sustainable Development Report 2019 (pages 56-93) www.mytilineos.gr/en-us/csr-reports/publications

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

<p>Best Practice 1: <i>Environmental risk and impact assessments.</i></p>	<p>Core elements of the MYTILINEOS Environmental policy: https://www.mytilineos.gr/en-us/perivallon/perivallon</p> <p>We assess and prioritize environmental risks as part of our overall risk management process. Our Environmental Management System, aligned with the ISO 14001-2015 environmental standard, outlines our obligation to “manage the environmental risks of our activities” and stipulates that “environmental risk is part of the overall risk assessment which business units are required to complete on an annual basis.” We conduct environmental risk assessments in our production operations units. These include conservation and rehabilitation of nature and biodiversity, water and air pollution prevention, noise prevention, greenhouse gas stabilization & reduction, natural resource and water use and waste management. In addition, our CSR teams maintain ISO 14001-2015 certifications. Such compliance includes annual audits performed by external auditors, as well as preparatory internal audits.</p>
<p>Best Practice 2: <i>Allocation of responsibilities and accountability within the organization</i></p>	<p>According to the Company’s EHS structure a designated person is responsible for EHS issues by activity sector. In addition to that the head of HSE of the EPC Projects Sector has taken over a coordinating role on the EHS aspects of the MYTILINEOS, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market.</p>

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

<p>Best Practice 1: <i>System to track and measure performance based on standardized performance metrics.</i></p>	<ul style="list-style-type: none"> • The 100% of Company's activity sectors have in place an Environmental Management System certified in accordance with the ISO 14001-2015 international standard. Also, in EPC Project sector the ISO 14064 is applied which is related to greenhouse gas emissions. To manage and control our environmental impacts, we establish goals, targets and timetables for environmental performance improvement, which are supported by performance measure indicators and reporting processes. These are monitored and managed by the relevant departments in each activity sector, while in the Company level we have placed KPIs aligned with GRI Standards. • Regular reviews conducted to confirm compliance to all applicable environmental laws, regulations & internal standards • Environmental management systems and data are audited by independent parties.
<p>Best Practice 2: <i>Leadership review of monitoring and improvement results.</i></p>	<p>MYTILINEOS's Environmental performance per business activity sector is among the top (after the topic Occupational Health & Safety) on the Executive Council's agenda (on a monthly basis), which is led by the CEO of the company.</p>
<p>Best Practice 3: <i>Process to deal with incidents.</i></p>	<p>According to our Environmental Management System, all concerns are thoroughly investigated, and appropriate action is taken in case of non-compliance with MYTILINEOS environmental measures and principles. We have contingency plans (with trial application or application of emergency response procedures) and strategies in case of all types of pollution risks including accidental ones, or of other large-scale accidents such as significant spill or an uncontrolled and/or a controlled spill. As part of these plans, which are updated periodically, we identify the main weak points in the operated fields that require immediate attention if an event occurs.</p>
<p>Best Practice 4: <i>Outcomes of integration of the environmental principles.</i></p>	<p>The integration of the environmental principle has resulted the absence of any incidents involving a deterioration in the quality of the environment. Additionally, monitoring compliance with the approved environmental licenses (Environmental Terms Approval Decisions) for the company's operational units, is a process conducted internally, on a regular basis and by specialized personnel in each Business Sector, as well as annually, by a recognised independent organisation that undertakes to audit and certify the environmental management system in place. According to the results of the recent relevant audit for 2018, no deviations from the current environmental licenses were observed, which would necessitate the planning of investments for their rectification, while no cases of non-compliance with environmental rules and regulations were recorded.</p> <p>More specifically, we are reporting our performance according to GRI and more particularly in the following STANDARDS: Energy, Materials, Water, Emissions, Waste, Biodiversity, Pollution prevention and Climate Change adaptation.</p> <p>Please advise our Sustainable Development Report 2019 (pages 56-93): www.mytilineos.gr/en-us/csr-reports/publications</p>

<p>Best Practice 5: <i>Other established or emerging best practices</i></p>	<p>Spotlight: MYTILINEOS as a member of the international initiative «ASI».</p>  <p>In November 2019, MYTILINEOS joined the international Aluminium Stewardship Initiative (ASI) as a Production & Transformation member. The ASI Standard sets out 59 criteria under the three main pillars (Governance -Environment - Society) covering major issues such as climate change, biodiversity and human rights, with a view to ensuring compliance of the aluminium value chain with sustainability commitments. For MYTILINEOS, joining the ASI initiative reflects its solid commitment, fully aligned with the vision of the European Union, to move swiftly towards carbon-neutral production, as well as to achieve the target of 100% RES sourcing for its Metallurgy Sector by 2030.</p>
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Robust Anti-Corruption Management Policies & Procedures

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

<p>Best Practice 1: <i>Publicly stated formal policy of zero-tolerance of corruption.</i></p>	<p>Please advise our Anti-corruption DMA within our Sustainable Development Report 2019 (pages 141-142) www.mytilineos.gr/en-us/csr-reports/publications</p> <p>Our zero-tolerance against corruption:</p> <ul style="list-style-type: none"> • is included in our Code of Business Conduct • has been published in our annual Sustainable Development Report. • is presented by our website through the dedicated section on Corporate Social Responsibility. • is applied to all our employees, irrespective of their position within the Company's hierarchy.
<p>Best Practice 2: <i>Policy on anti-corruption regarding business partners.</i></p>	<p>Through our “Suppliers and Business Partners Code of Conduct” we expect from our new and significant partners to comply with the applicable national laws, regulations and the international anti - corruption conventions, as in force and to the extent to which the relevant provisions apply to the work that they provide on behalf of MYTILINEOS. Our detailed policies for our suppliers and business partners are specified within our related Code.</p>
<p>Best Practice 3: <i>Commitment to follow all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</i></p>	<p>Please advise our Fight Against Corruption and Bribery DMA within our Sustainable Development Report 2019 (pages 141-142) www.mytilineos.gr/en-us/csr-reports/publications</p>

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

<p>Best Practice 1: <i>Internal checks and balances to ensure consistency with the anti-corruption commitment</i></p>	<p>Please advise our Sustainable Development Report 2019 (page 141-143): www.mytilineos.gr/en-us/csr-reports/publications</p> <p>The Legal and Regulatory General Central Support Function, of which the Compliance Department forms part, has been entrusted with the creation and implementation of a system of safeguards to protect the company from corruption and bribery.</p>
<p>Best Practice 2: <i>Actions taken to encourage business partners to implement anti-corruption commitments</i></p>	<p>Please advise our Suppliers & Business Partners Code of Conduct: www.mytilineos.gr/en-us/responsible-management/of-local-suppliers</p>

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

<p>Best Practice 1: <i>Process to deal with incidents.</i></p>	<p>Although, the transparency due diligence process is under formation, all possibly concerns are thoroughly investigated, and appropriate action is taken (administrative and illegal measures are available in accordance with the Company's internal working regulations), in case of non-compliance with Company's anti-corruption policy. Also, MYTILINEOS financial statements are independently audited every year. The Company will continue to have financial statements audited annually.</p>
<p>Best Practice 2: <i>Public legal cases regarding corruption.</i></p>	<p>During the reporting period, there were no public legal cases regarding corruption or bribery.</p>
<p>Best Practice 3: <i>Outcomes of integration of the anti-corruption principle</i></p>	<p>Please advise our Sustainable Development Report 2019 (page 143): www.mytilineos.gr/en-us/csr-reports/publications</p>

Taking Action in Support of Broader UN Goals and Issues

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

<p>Best Practice 1: <i>Align core business strategy with one or more relevant UN goals/issues.</i></p>	<p>From the early beginning of 2017, in the framework of the corporate transformation, the Company has entered a new era of evolution which presents improved prospects for growth, to the benefit of all its Stakeholders. In moving forward to the next decade, the elements that define the framework for the achievement of the Company's objectives in the domain of Corporate Social Responsibility comprise continuous learning and self-improvement, response to Stakeholder concerns, and transparency and accountability in connection with Company policies,</p>
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	<p>decisions and performance, together with the recently enacted legislation. With its renewed, strong system of corporate governance and a new operational structure in place, the Company will work systematically and with enhanced effectiveness in order to promote sustainable practices across its value creation chain and develop partnerships that will promote the United Nations’ 17 Sustainable Development Goals.</p> <ul style="list-style-type: none"> • Please advise MYTILINEOS CSR Policy in the following address: https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • MYTILINEOS CSR issues and their connection with the Sustainable Development Goals (SDGs) https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • We participate actively in the UNGC Greece Local Network working groups and events such as the Human Rights Working Group, the Local Network meetings and expert group activities. • Since the December 2017, officially, our sponsoring & donations plan is aligned with SDGs and it is materialized through strategic alliances with local communities, NGOs and other associations aiming at sustainable communities. Please see: www.mytilineos.gr/en-us/empraktos/
<p>Best Practice 2: <i>Develop relevant products and services or design business models that contribute to UN goals/issues</i></p>	<p>Electric Power Sector The generation and supply of electric power from natural gas-driven plants operating at the highest possible efficiency rates and from RES plants.</p> <p>MYTILINEOS’s Electric Power Sector, actively participates in two research projects, funded by the European Commission through “HORIZON 2020” Program. Both projects concern the development of an innovative suite of software applications and solutions designed to introduce the concepts of #EnergyEfficiency and #DemandResponse to end users.</p> <p>Energy Efficiency (“UtilitEE” project) The “UtilitEE” project, which is expected to be implemented within the next three years, will provide a Behavioural Change Framework, oriented to the end user, via an open Information and Communications Technology (ICT) ecosystem. The “UtilitEE” project focuses on discovering, quantifying, and revealing energy-consuming activities, while sending meaningful feedback to the end user, to engage them into a continuous process of learning and improving their energy behavior. Furthermore, it will incorporate human-centric intelligent control features that use occupants’ everyday habits, to minimize energy waste and keeping occupants comfortable while preserving a healthy indoor environment.</p> <p>Demand Response (Holisder project) The “HOLISDER” project, will introduce a Holistic Demand Response Optimization Framework that aims to significant energy costs reduction for the end user. “HOLISDER” combines a wide range of state of the art technologies, and integrates them into an accessible and interoperable framework, which constitutes of a suite of tools, to ensure the end user’s empowerment into an “active market” player, through the deployment of a variety of implicit and hybrid Demand Response schemes.</p> <p>Net Metering services Electric Power Sector, in cooperation with EPC Project Sector, undertakes the installation and all the necessary procedures for the connection to a net metering system using solar panels, while making a</p>

tangible contribution to protecting the environment and combating pollution.

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

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

Electromobility

For more information please visit the following address www.protergia.gr/en/content/%CE%B5electromobility

Metallurgy Sector

The production of primary cast Aluminium products, made of one of the most environment-friendly metals, thus ensuring a safe work environment and the application of responsible and sustainable practices in the extraction process.

With respect to the circular economy, we further strengthened the already recognised innovation excellence of MYTILINEOS in the management of bauxite residues. MYTILINEOS environmental R&D activities is focused on the exploitation of bauxite residues and the implementation of innovative methods to produce alumina from alternative sources. In 2019, the programs “SCALE”, “REMOVAL” and “ENSUREAL” were continued, with €1.5 million investments at the aluminium plant involving the installation of one pilot unit to produce Scandium concentrate and one pilot pyrometallurgy unit, which are expected to operate in 2020. At the same time, the Company's Metallurgy sector launched its participation in two new five-year research projects, “BIORECOVER” and “AlSiCa”, in which it will provide know-how and by-products from the alumina production process.

EPC Project Sector

The construction of turn-key power plants with the minimum possible environmental footprint, in countries with substantial needs in energy infrastructure, thus helping ensure access to energy for thousands of people.

Please advise our Business model in our Sustainable Development Report 2019 (pages 28-29): www.mytilineos.gr/en-us/csr-reports/publications

<p>Best Practice 3: <i>Adopt and modify operating procedures to maximize contribution to UN goals / issues</i></p>	<ul style="list-style-type: none"> • We have in place an annual social investment plan which is based on the local communities needs such as: Quality in Education, Bolstering Employment, Good Health, Culture, and local infrastructure projects. • We have established strong relationships with NGO to contribute to Children's Rights and Health programs. • We have in our projects pipeline the formation of the due diligence process regarding to Anti-corruption and Human Rights protection. • Our “Code of Business Conduct” and “Suppliers and Business Partners Code of Conduct” based on UNGC 10 principles, the Universal Declaration of Human Rights, the United Nations Convention Against Corruption, ISO 26000 and the ILO International Labor Standards. <p>In our Sustainable Development Report 2019 a detailed presentation of MYTILINEOS' contribution to the achievement of the Global Sustainable Development Goals and the respective National Priorities (period 2016-2019) is presented. (pages 32-35): www.mytilineos.gr/en-us/csr-reports/publications</p>
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Criterion 16: The CoP describes strategic social investments & philanthropy

<p>Best Practice 1: <i>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS CSR Policy https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility <p>MYTILINEOS strategic focus areas concerning its social contribution are defined by the following SDGs: SDG-1: No poverty, SDG-2 Zero hunger, SDG-3 Good Health, SDG-4 Quality Education, SDG-10 Reduced Inequalities and SDG-11 Sustainable cities & communities. Our community funding was channeled into the above strategic areas in 2019. (For more information, please see the section “Local Communities” of the 2019 Sustainable Development Report, pages 120-123). www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 2: <i>Coordinate efforts with other organizations and initiatives to amplify - and not negate or unnecessarily duplicate - the efforts of other contributors.</i></p>	<ul style="list-style-type: none"> • In 2019 MYTILINEOS pursued the implementation of its social policy through a three-year Social Contribution Plan "IN PRACTICE" (2016-2019) raising its social expenditure by 51,5% compared to 2018, implementing actions in social sectors directly associated with the Global Sustainable Development Goals and the respective national priorities. In 2019 MYTILINEOS invested more than €3.4 million into community programmes.

Criterion 17: The CoP describes advocacy & public policy engagement

<p>Best Practice 1: <i>Publicly advocate the importance of action in relation to one or more UN goals/issues.</i></p>	<ul style="list-style-type: none"> • We work with industry associations to inform public policy on sustainability challenges, sharing our experience and advancing practical solutions. • In 2008, MYTILINEOS become one of the first members of the SEV Business Council for Sustainable Development (BCSD) which promotes business models in line with global sustainability goals. Through the Council initiatives, the company's CSR manager and other directors participated in key actions related mainly to SDG's promotion to further advocate our commitment to the goals.
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	<ul style="list-style-type: none"> • Since 2008, our CEO has been communicating publicly our commitment to the implementation of the principles of the Global Compact. • MYTILINEOS is an ambassador of the Greek Sustainability Code since 2015. The company was actively involved in Code's development, either by submitting its views and initiatives, through the open consultation or by participating in the relevant working groups. • Since 2016, the company is a voluntary participant in the global sustainable development initiative CDP - WATER, by disclosing extensive quantitative and qualitative information on the management of water resources in the context of its business activity. • Our "Code of Business Conduct" and our "Suppliers and Business Partners Code of Conduct" are publicly available to all our Stakeholders groups and is aligned with international references such as the Universal Declaration of Human Rights, the Universal Declaration of the ILO relative to the principles and fundamental rights at work and the principles of the Global Compact.
<p>Best Practice 2:</p> <p><i>Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues.</i></p>	<p>Spotlight: "200 CEOs Call on New EU Leaders for Sustainable Europe by 2030". MYTILINEOS CEO, E. Mytilineos, along with 34 other CEOs, participates in the Greek Delegation of CEOs Call to Action, an initiative promoting European strategy for Corporate Responsibility & Sustainable Development, culminating in 2030.</p>
<p>Best Practice 3:</p> <p><i>Other established or emerging best practices</i></p>	<ul style="list-style-type: none"> • MYTILINEOS CSR Policy https://www.mytilineos.gr/en-us/corporate-social-responsibility-policy/about-corporate-social-responsibility • MYTILINEOS Code of Conduct https://www.mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-kodikas-deontologias • MYTILINEOS Suppliers & Business Partners Code of Conduct https://www.mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-sustainable-sourcing • MYTILINEOS Stakeholders Engagement Process https://www.mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-stakeholder-engagement

Criterion 18: The CoP describes partnerships & collective action

<p>Best Practice 1:</p> <p><i>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.</i></p>	<ul style="list-style-type: none"> • Reinforcing Program "#skills4engineers", in collaboration with the Social Enterprise "Knowl". <p>Impact: The 3-month intensive skills development cycle #skills4engineers was completed with great success, while the results of the program's evaluation are also particularly positive. In particular, 1,415 training hours were offered covering 36 subject areas, thanks to the invaluable contribution of 41 distinguished Advisers/Trainers with many years of professional experience. A total of 18 young engineers have already found jobs that matched their professional goals, out of a total of 27 participants/beneficiaries who have successfully completed the program, while the remaining 9, fully empowered and motivated by the program, continue to actively seek a job in the labor market. It</p>
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	<p>should be noted that many of them have received job offers and are crediting it to the program, thanks to which they also feel surer and more confident of themselves in seeking job that is closer to their immediate interests.</p> <ul style="list-style-type: none"> • Support program for the “Medium-Term Accommodation Facility for Women at Risk” in collaboration with the “Médecins du Monde” (MdM). <p>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 MdM. With this initiative, the Company has contributed substantially 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 19 women and 7 children, 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 9 months.</p> <ul style="list-style-type: none"> • In the context of the circular economy, MYTILINEOS continues its intensified efforts for waste management and holistic utilization, either by discarding them to production of other industrial materials or by participating in European research and pilot programs. <p>The above partnerships projects are indicative. More projects can be found within our Sustainable Development Report 2019 (pages 120-123): www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 2: <i>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company’s positive impact on its value chain</i></p>	<p>Multi-stakeholder partnerships are critical to solving many sustainability challenges. To this end, MYTILINEOS is developing initiatives and is participating as an active member in voluntary national and international organizations, seeking to promote CSR and SDGs, to exchange views on sustainability-related issues, to improve its social and environmental contribution and to develop responsible practices in the broader business community.</p> <p>Participation in Socially Responsible Investment Indexes: MYTILINEOS by disclosing its performance on an annual basis, respond to specific analysts or companies’ assessments, in sustainable investing area.</p> <p>Please advise: https://www.mytilineos.gr/en-us/participation-in-socially-responsible-investment/details</p> <p>CSR & Sustainable Development commitments: MYTILINEOS voluntarily participates, cooperates, and supports the following Corporate Social Responsibility / Sustainable Development initiatives.</p> <p>Please advise: https://www.mytilineos.gr/en-us/memberships-initiatives-and-standards/about-corporate-social-responsibility</p> <p>Also see MYTILINEOS Sustainable Development Report 2019 (page 23) www.mytilineos.gr/en-us/csr-reports/publications</p>
<p>Best Practice 3: <i>Other established or emerging best practices</i></p>	<p>Spotlight: "200 CEOs Call on New EU Leaders for Sustainable Europe by 2030". MYTILINEOS CEO, E. Mytilineos, along with 34 other CEOs, participates in the Greek Delegation of CEOs Call to Action, an initiative promoting European strategy for Corporate Responsibility & Sustainable Development, culminating in 2030.</p>

Corporate Sustainability Governance and Leadership

Criterion 19: The CoP describes CEO commitment & leadership

<p>Best Practice 1: <i>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN GC.</i></p>	<ul style="list-style-type: none"> • Chairman's statement of Continued Support (CoP 2019) • Chairman's message (Sustainable Development Report 2019): www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2: <i>CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.</i></p>	<p>The CEO leads the Executive committee which takes place on a monthly basis. The issues that come first on the Council's agenda are the Environmental as well as the Health & Safety performance in all MYTILINEOS Business Sectors.</p>

Criterion 20: The CoP describes Board adoption & oversight

<p>Best Practice 1.: <i>Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</i></p>	<ul style="list-style-type: none"> • MYTILINEOS's Board of Directors supports the UN Global Compact. • The Executive Committee quarterly reviews and guides sustainability performance (mainly on Health & Safety, Environmental and Human Resources issues). The chairman is Mr. Evangelos Mytilineos, Chairman & CEO of the company. • Also, MYTILINEOS's CSR Committee, is primarily responsible for supervising and ensuring the correct implementation of the company's CSR Governance in terms of policies, actions, and results about environmental, social and ethical issues. The Committee reviews and approves the annual Sustainable Development Report ensuring that all material issues are addressed. Also, it may act as advisor to the Executive Management on the above issues, to assist their implementation in a more complete manner.
<p>Best Practice 2: <i>Board (or committee), where permissible, approves formal reporting on corporate sustainability (CoP).</i></p>	<ul style="list-style-type: none"> • The CSR Committee approves the material issues and their main disclosures for the formal CSR reporting purposes (e.g. Sustainable Development Report, UNGC CoP, and ISO 26000 CSR international standard).
<p>Best Practice 3: <i>Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.</i></p>	<p>More information about CSR Governance can be found within our Sustainable Development Report 2019 (page 150) : www.mytilineos.gr/en-us/csr-reports/publications</p>

Criterion 21: The CoP describes Stakeholders engagement

<p>Best Practice 1: <i>Publicly recognize responsibility for the company's impacts on internal and external stakeholders.</i></p>	<p>Proactively engaging with our key stakeholders is an important part of defining the issues that are material to our business, current and potential. The engagement with internal and external Stakeholders practically puts in place MYTILINEOS long standing commitment for responsible entrepreneurship and open, systematic and sincere social dialogue, as a key element of the social capital that the company uses, to ensure its sustainability and the added value creation for society.</p>
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	<p>For more information please advise our:</p> <ul style="list-style-type: none"> • Stakeholder Consultation process: https://www.mytilineos.gr/en-us/csr-core-subjects/csr-core-subjects#tab-stakeholder-engagement • Sustainable Development Report 2019 (“Materiality” section pages 38-41): www.mytilineos.gr/en-us/csr-reports/publications • Sustainable Development Report 2019 (“Stakeholder engagement” section pages 43-49): www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 2: <i>Define sustainability strategies, and policies in consultation with key stakeholders.</i></p>	<p>Proactively we are engaging with our key stakeholders as an important part of defining the sustainability issues that are material to our business, current and potential.</p> <p>Policies in consultation with key stakeholders (Metallurgy Sector):</p> <ul style="list-style-type: none"> • Training and skill development practices (Stakeholder Consultation 2019) • Suppliers policy & Business Partners code of Conduct (Stakeholder Consultation 2018) • Social Contribution policy (Stakeholder Consultation 2017) • Environmental policy (Stakeholder Consultation 2016) • Health & Safety Policy (Stakeholder Consultation 2015)
<p>Best Practice 3: <i>Consult stakeholders in dealing with challenges and invite them to take active part in reviewing performance.</i></p>	<p>Stakeholder engagement is an important element of our approach to sustainability. It builds trust, improves understanding of the impacts from our operations and addresses stakeholder concerns, while providing input to our materiality analysis process.</p> <ul style="list-style-type: none"> • Sustainable Development Report 2019 (“Materiality” section pages 38-41): www.mytilineos.gr/en-us/csr-reports/publications
<p>Best Practice 4: <i>Establish channels to engage with stakeholders to hear their ideas and address their concerns and protect ‘whistle-blowers’.</i></p>	<p>The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders’ specific needs and expectations.</p> <p>More information can be found within our Sustainable Development Report 2019 (“Stakeholder Engagement” section pages 43-49): www.mytilineos.gr/en-us/csr-reports/publications</p>