

Corporate Social Responsibility (CSR) Policy

Prologue

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 the business operations, as it defines how the company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values.

The CSR philosophy at MYTILINEOS

Through CSR, MYTILINEOS expresses its continuous commitment to attaining Sustainable Development. The company perceives CSR as a fundamental factor that contributes to social and environmental risks prevention, as well as the prevention of risks related to human resources management and the company's presence in the market, contributing to the development of a climate of trust, in which the company can carry out business and innovate, creating value for all its Stakeholder groups. CSR at MYTILINEOS is a practice with significant human, environmental and social aspects going beyond legislative compliance (Law 4403/2016). It is an ongoing self-improvement and an incessant learning process aimed at increasing the company's positive impact on the greater society, in combination with the range and nature of its economic activity, while also serving as a key mechanism for renewing its "social" operating permit, also improving its competitiveness at national and international levels.

Sustainable Development Goals (Agenda 2030)

MYTILINEOS, since 2008, is a signatory of the United Nations Global Compact (UNGC). In September 2015, the United Nations adopted 17 Sustainable Development Goals that comprise a new, universal set of objectives, goals and indicators that UN Member States are expected to use in formulating their agendas and policies up until 2030. The company's current CSR policy has been aligned with these Goals, being also used as a common basis for dialogue and cooperation with its Stakeholder groups.

The strategic lines of MYTILINEOS CSR policy

The CSR policy of MYTILINEOS mainly derives from its business mission and is closely related to the minimization of its environmental impacts, the increase in its social effect and contribution, as well as the enhancement of the prevention/precaution principle within the context of its activities. To achieve its objectives, the company operates based on specific strategic lines, as presented in the table below:

Strategic lines of MYTILINEOS CSR policy	Sustainable Development Goals	Management Approaches
<ul style="list-style-type: none"> Ensuring a working environment free of accidents and occupational diseases. 	3 & 8	<ul style="list-style-type: none"> Occupational Health & Safety
<ul style="list-style-type: none"> The continuous mitigation of environmental impacts and the climate change adaptation. 	6,7,12,13,14 & 15	<ul style="list-style-type: none"> Climate change, energy & air emissions Water Management Circular Economy & raw and other materials Pollution Prevention
<ul style="list-style-type: none"> Maintaining regulatory compliance and constant vigilance for addressing conditions that may facilitate corruption incidents at all company levels and activities. 	16	<ul style="list-style-type: none"> Business Ethics Regulatory Compliance Cybersecurity
<ul style="list-style-type: none"> Developing, managing and retaining dedicated human resources with practices that promote inclusion, equal opportunities and respect for human rights. 	4,5,8,9 & 10	<ul style="list-style-type: none"> Employment and Labour practices Human Rights & Equal Opportunities
<ul style="list-style-type: none"> Systematic and honest dialogue with key Social Partner groups, with a view to preserving mutual trust and understanding more comprehensively the impact of the company's operation. 	17	<ul style="list-style-type: none"> Stakeholder Engagement
<ul style="list-style-type: none"> The contribution to the development of the local infrastructures and in general to the prosperity and the respect of the rights of the citizens of the local communities that are adjacent to the to the company's industrial plants. 	8 & 11	<ul style="list-style-type: none"> Sustainability of local communities Business Continuity
<ul style="list-style-type: none"> Implementing actions of high social value, also through the development of the employees' volunteerism (related to corporate or individual initiatives) addressed to a wide range of social groups, taking into account both the current social and economic conditions, as the case may be, and the cultural priorities and challenges. 	1,2,3,4 & 11	<ul style="list-style-type: none"> «In Practice»: Submission Platform for social requests
<ul style="list-style-type: none"> Emphasis on the quality and safe use specifications of the company's products, as well as on the continuous support, service, and customers' satisfaction. 	3,12 & 16	<ul style="list-style-type: none"> Customer Privacy Product Quality & Safety Responsible Supply Chain
<ul style="list-style-type: none"> Developing responsible value chain by expanding the commitment of the company's main suppliers and associates to Sustainable Development. 		
<ul style="list-style-type: none"> Voluntary participation in domestic business networks and international organizations and sustainable development initiatives promoting MYTILINEOS CSR goals and philosophy. 	17	<ul style="list-style-type: none"> Sustainable Development commitments

Sustainable Development Governance

The management of Sustainable Development is exercised by at senior management level at MYTILINEOS. The Sustainable Development governance system of MYTILINEOS has the following structure:

Description of MYTILINEOS Sustainable Development Governance System
<p>Sustainability Committee of the Board of Directors</p> <p>The purpose of the Committee is to assist the Board of Directors in strengthening the Company’s long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG) issues. More information is available in the Terms of Reference of the Sustainability Committee.</p>
<p>General Division for Corporate Governance and Sustainable Development</p> <p>With its crucial coordinating role, the General Division for Corporate Governance and Sustainable Development sets the short-term strategic priorities as well as the long-term overall Sustainable Development strategy of the Company. It cooperates directly with the Central Functions on sustainability issues, and is responsible for supporting all the newly established Sustainability / ESG teams in each Business Unit regarding Sustainable Development standards and MYTILINEOS targets</p>
<p>Enterprise Risk Management System</p> <p>The operation of MYTILINEOS’ Enterprise Risk Management System seeks to limit the likelihood and the impacts of risks and to maximize the benefit from the opportunities that are presented and are related, inter alia, to the Company’s material for Sustainable Development topics.</p>
<p>Business Units</p> <p>The General Divisions of the Business Units define the directions to their respective Sustainability / ESG teams, in cooperation with the General for Division for Corporate Governance and Sustainable Development, ensuring that the Key Performance Indicators (KPIs) are aligned with the strategic objectives of MYTILINEOS.</p>
<p>Consultations with Stakeholders & Local Communities</p> <p>The institution of Consultation with Stakeholders and Local Communities is a long-established principle of MYTILINEOS’ responsible operation, contributing to greater transparency, solidifying the Company’s “social license to operate” and helping further improve its responsible entrepreneurship and sustainable development initiatives.</p>
<p>Codes of Conduct</p> <p>The following codes play an important role in the governance of Sustainable Development: (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 “Suppliers and Business Partners Code of Conduct”, which describes the Company’s minimum requirements / expectations of its supply chain actors regarding environmental, social and governance (ESG) related issues as one of the main prerequisites for the establishment of a commercial cooperation with them.</p>

The CSR policy is monitored regularly; is subject to review/revision whenever required and is approved by the CSR Committee.

With a view to supporting and further strengthening its CSR policy, MYTILINEOS participates voluntarily, cooperates, and supports the following [Corporate Social Responsibility / Sustainable Development initiatives](#), whereas its performance is recorded on an annual basis in the framework of [special evaluations of analysts, socially responsible investment companies \(Social Responsible Investments\) and Sustainable Development](#).

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