



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"> Environmental Restoration & Biodiversity Energy & Air emissions Adaptation to climate change Pollution prevention Water management Circular Economy (Waste Management)
<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"> Anti-Corruption & Bribery Legal Compliance
<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 Human Rights
<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 Emergency Response Plans
<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: Sponsorships, Donations and Social Programs Management Scheme
<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. Developing responsible value chain by expanding the commitment of the company's main suppliers and associates to Sustainable Development. 	3,12 & 16	<ul style="list-style-type: none"> Customer Health & Safety Sustainable Sourcing
<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"> CSR & Sustainable Development commitments

Governance of the CSR

The management of responsible entrepreneurship matters is performed at the top management level of MYTILINEOS. The Corporate Social Responsibility governance system implemented by the Company is presented in the table below:

Description of MYTILINEOS CSR Governance System
<p>CSR COMMITTEE</p> <p>The Committee is mainly responsible for the supervision and proper implementation of Corporate Social Responsibility, while also controlling and approving material issues that determine the structure of the company's annual Sustainable Development Report. Moreover, it may provide consultancy to MYTILINEOS Management in environmental, social and ethical issues. <i>(Rules of Procedure of the Committee pdf)</i></p>
<p>GENERAL MANAGEMENT OF CORPORATE GOVERNANCE AND SUSTAINABLE DEVELOPMENT</p> <p>The Management of Sustainable Development, through its crucial and coordinating role, determines the short-term strategic priorities but also the long-term overall CSR strategy of the company. It is also responsible for supporting all CSR teams per Business Unit concerning CSR standards and objectives of MYTILINEOS.</p>
<p>RISK MANAGEMENT SYSTEM</p> <p>MYTILINEOS' risk management system identifies and manages the threats and opportunities related to the Company's Material Sustainable Development issues including safeguards and control mechanisms in all areas of its Business Activity Sectors.</p>
<p>CSR TEAMS OF BUSINESS UNITS</p> <p>The General Management of Business Activity Sectors are involved in the management of social and environmental issues, giving the necessary directions to the respective CSR teams ensuring that Key Performance Indicators (KPIs) are in line with MYTILINEOS strategic objectives. Also, the CSR teams operate, according to specific and recorded clear competences and obligations, towards the implementation of the central strategic goals and policies, as well as of the individual CSR programs.</p>
<p>STAKEHOLDERS ENGAGEMENT</p> <p>The process of Consultation with Stakeholders is a long-standing principle of responsible operation of MYTILINEOS, contributing to enhancing transparency and further improving the CSR strategy and initiatives of the company's individual Business Sectors.</p>
<p>CODES OF ETHICS</p> <p>The following Codes are significant for CSR governance purposes: 1. The "Business Code of Ethics" of the company, addressing the rules of MYTILINEOS Management acceptable behavior towards the employees, the principles of professional ethics, as well as the rules governing employees' behavior towards third parties. 2. The "Suppliers and Business Partners Code of Conduct", describing the company's minimum expectations from its supply chain in matters related to Corporate Social Responsibility, as one of the main conditions for commercial cooperation.</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 in [national and international sustainable development initiatives/standards](#), 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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