

2022

LME AL (Aluminium)	\$/t	+ 50	- 50
EBITDA	m. €	8,9	(8,9)
Net Profit	m. €	8,9	(8,9)
Equity	m. €	8,9	(8,9)

API (Alumina)	\$/t	+ 10	- 10
EBITDA	m. €	0,3	(0,3)
Net Profit	m. €	0,3	(0,3)
Equity	m. €	0,3	(0,3)

Exchange Rate €//\$	€//\$	-5%	+5%
EBITDA	m. €	43,1	(40,4)
Net Profit	m. €	37,7	(35,0)
Equity	m. €	37,7	(35,0)

NG Price	€/MWh	- 5	+ 5
EBITDA	m. €	16,0	(16,0)
Net Profit	m. €	16,0	(16,0)
Equity	m. €	16,0	(16,0)

CO ₂ (€/t)	€/t	- 1	+ 1
EBITDA	m. €	1,7	(1,7)
Net Profit	m. €	1,7	(1,7)
Equity	m. €	1,7	(1,7)

2021

LME AL (Aluminium)	\$/t	+ 50	- 50
EBITDA	m. €	7,8	(7,8)
Net Profit	m. €	7,8	(7,8)
Equity	m. €	7,8	(7,8)

API (Alumina)	\$/t	+ 10	- 10
EBITDA	m. €	2,7	(2,7)
Net Profit	m. €	2,7	(2,7)
Equity	m. €	2,7	(2,7)

Exchange Rate €//\$	€//\$	-5%	+5%
EBITDA	m. €	32,3	(30,3)
Net Profit	m. €	30,8	(28,8)
Equity	m. €	30,8	(28,8)

NG Price	€/MWh	- 5	+ 5
EBITDA	m. €	34,7	(34,7)
Net Profit	m. €	34,7	(34,7)
Equity	m. €	34,7	(34,7)

CO ₂ (€/t)	€/t	- 1	+ 1
EBITDA	m. €	2,1	(2,1)
Net Profit	m. €	2,1	(2,1)
Equity	m. €	2,1	(2,1)

VI. Payments report to governments

The Group's exposure in price risk and therefore sensitivity may vary according to the transaction volume and the price level. The aforementioned analysis reflects the nominal exposure to the above factors and does not include any effect from the use of contracts/forwards through which the Group hedges risk.

Mylíneos Group, according to article 6 of law 3557/2007, paid to the Hellenic Government, for the year ended at 31st of December 2022, an amount of € 103 thousand, due to the mining activity of its subsidiary company.

The above mentioned amount is related to the Mining Rights of Delphi-Distomon SA subsidiary company.

VIII. Non financial information

1. Introduction

This report has been prepared in accordance with the requirements of the European Directive on Non-Financial Reporting and provides balanced information on the evolution of the relevant performance of MYTILINEOS, as well as the description of the main sustainable devel-

opment risks and challenges the Company faces, according to its size and the complexity of its activities.

1.1. Disclosure requirements

This information (which is supplemented and completed with the issuance of the Company's Sustainable Development Report) focuses on the thematic aspects, as defined in the "Non-Financial Information Report" of circular 62784/2017, in accordance with the provisions of Law 4403/2016 in conjunction with the provisions of Law 4308/2014 concerning the Material issues of sustainable development (environmental, social and governance) of the Company.

1.2. Boundaries

The data refer to the four Business Units¹ of MYTILINEOS and its main subsidiaries in Greece, the Renewable Energy Sources (RES) units and the construction sites it maintains, through the Sustainable Engineering Solutions Business Unit and the Renewable Energy Sources and Storage Projects Development Divi-

¹ Data related to the Zinc/Lead Metallurgy Sector are not included

sion, in foreign countries. In addition, in accordance with the requirements of this legislation, the Company issues on an annual basis a Sustainable Development Report presenting more and detailed information on the management of all material sustainability issues mentioned in this report.

1.3. Reference period

The information contained in this report concerns the period from 1/1/2022 until 31/12/2022.

1.4. Reference framework

To better understand the approach of the sustainable development issues, the information published in this report is based on the principles and guidance of key international sustainability reporting standards such as:

1. the Global Reporting Initiative (GRI STANDARDS),
2. the Principles of the United Nations Global Compact (UNGC),
3. the International Integrated Reporting Council (IIRC) -in the business model description session,
4. the recommendations of the international initiative TCFD in particular on the disclosure of climate-related information,
5. the Global Sustainable Development Goals (SDGs),
6. the ISO 26000 Corporate Social Responsibility standard.

They are also supported by ESG key performance indicators (KPIs) proposed by the Sustainability Accounting Standards Board (SASB), maintained by the Company and which meet both the requirements of domestic and international investment initiatives, as well as the special assessments implemented by analysts and socially responsible investment companies.

The information presented in this report is subject to limited assurance in the context of the Sustainable Development Report, where the relevant Independent Assurance statement is published.

In order to enhance the transparency of the data and to further develop the disclosure of the way in which MYTILINEOS manages sustainable development issues, this report presents information on both the identification and definition process as well as the management of each Material issue with emphasis on the challenges, potential risks and impacts for the Company, the coping tactics as well as the main results of the policies implemented. The Company's briefing to shareholders and its Stakeholders on the Non-Financial Information will be completed with the issuance of the Sustainable Development Report 2022, at the Annual General Assembly Meeting of Shareholders, in June 2023.

2. Disclosures related to the SARS-CoV-2 impact on the Company's activities

The Covid-19 pandemic has been a great challenge for MYTILINEOS, proving at the same time the effectiveness of the mechanisms already formulated by the Company for the safety of its staff and the working environment. The real challenge for MYTILINEOS focused on the wide range of its activities, with industrial units and construction sites in 32 countries on all 5 continents. The Company maintained the precautionary measures it has been implementing since the beginning of the pandemic, having as main priorities the assurance of the continuity of its business activities and the maximum protection of its employees and their families, especially through new ways of working. Also, in the course of events and the special conditions set by the pandemic, the factors that contributed to the achievement of these priorities were:

i. The speed of response of the company's top management. Given the complexity and geographical dispersion of operations, the company left no room for doubting the risk and consequences that the pandemic could have. The Company also did

neither question the degree of necessity to integrate this new reality into its daily life, nor treating it as an emergency.

ii. The creation of a management network. The pandemic management team, in which the company's doctors participated, made decisions in a timely manner and effectively coordinated the initiatives of the specialized Covid teams created in each field of activity. Through this approach, an aligned and rapid implementation of all necessary measures and prevention actions was achieved, including teleworking, preventive tests, etc.

iii. The constant dialogue with the people of the company. Initially, an electronic information portal was developed, where all applicable instructions and communications regarding the evolution of the pandemic were posted, so that the current information is always available. The Company, responding to the legitimate concerns and questions of its employees regarding the pandemic, created a specialized telephone line providing clarifications and instructions under the responsibility of the Human Resources department, which provided support to the work of the teams of health scientists who provided information on medical issues.

The company's welfare and emphasis on the health and safety of its people, contributed to responding effectively and effectively to the challenge of the pandemic.

Winning the bet of technological development even during the pandemic

One of the challenges that MYTILINEOS had to face was the transition to a teleworking environment that would ensure uninterrupted operation during the lockdown period. It lasted only a few hours as it had already integrated programs and functions in a cloud environment that enabled remote work. Thus, the company could operate, making 800 video-calls and virtual collaboration meetings.

The gradual digitalisation of a number of administrative procedures and processes, which had already started in 2020 and continued intensively in 2021, accelerated further in 2022 resulting in the full digitalisation of internal workflows to improve the efficiency and speed of day-to-day operations. In particular, there is full digitization of internal workflows in various sectors to improve the efficiency and speed of process processing. Typical examples: approvals of holiday's permits, business trips, applications and purchase orders, automation of registration of materials' receipts in Central Services, registrations of security incidents, etc. ensuring its accessible from anywhere and from all devices in a secure manner. MYTILINEOS has already adopted a digitalized system of incoming documents, works with digital signatures, while the approval and conclusion of contracts is taking place digitally. An important development is also remote training (e-learning), with the use of a platform for lifelong learning, providing the opportunity to all employees to have access at any time both from all facilities as well as outside the company's network.

Based on the above we can be measured in terms of excellence, as the pandemic has been a multi-layered challenge in managing health and safety. We immediately adopted with the help of the medical staff, procedures for the protection of employees, we protected the company by creating the appropriate infrastructure for remote work, creating new infrastructure, turning the disadvantage of the pandemic into an advantage for employees and the company. As a result, there was no interruption of administrative and production operations throughout 2022 in the business sectors and subsidiaries, nor was there any negative impact on the achievement of MYTILINEOS' business and sustainability goals.

3. Sustainable Development

Sustainable Development is an extremely dynamic and constantly evolving sector, as the importance of both challenges and society's knowledge of the sustainability issues is rapidly increasing.

3.1. The Company's approach to Sustainable Development management

Sustainable Development is part of MYTILINEOS' long-term business strategy, but also the driving force through which it aspires to remain competitive over time, to address modern challenges (climate change, biodiversity loss, social inequalities, etc.) and at the same time to take advantage of opportunities arising from the energy transition, contributing to a new efficient and socially inclusive growth model, as reflected through the Global Sustainable Development Goals.

Over the years, MYTILINEOS has developed a systematic approach to Sustainable Development management that aims to identify the most important issues related to its activity and the underlying challenges, as well as to further integrate sustainability into its operation. The following table shows the key elements of this approach.

Sustainable Development Management	
1	External environment analysis We monitor Sustainable Development and ESG trends, international standards and legislative requirements by analyzing their relevance to the Company and how they affect its ability to create value.
2	Relations with Stakeholders We identify the main groups of our Stakeholders and ensure dialogue with them at central and local level.
3	Materiality We define the Sustainability/ESG Material Issues, based on their actual and potential effects, from our activity, on Sustainable Development (outward impacts).
4	Risk Management & Opportunity Utilization We ensure the integration of all material sustainability issues into the company's integrated Risk Management System (ERM).
5	Strategy We develop the overall Sustainable Development strategy, the relevant policies, the Codes of Conduct as well as the annual action plan of the Company, at a central level.
6	Targets We set goals that support the Company's commitment to Sustainable Development and are consistent with the Company's business strategy.
7	Continues improvement We monitor the implementation of the strategy and objectives by introducing new Sustainable Development initiatives and actions to continuously improve our ESG performance, per Business Unit.
8	Reporting & Assurance We implement a specific disclosure strategy in accordance with international standards ensuring the validity and completeness of the published data through an independent auditor.
9	Governance We ensure, through the Company's governance system and organizational model of Sustainable Development, that the Company's business strategy is aligned with the principles of Sustainable Development.

3.2. Sustainable Development Strategy

The Company's Sustainable Development strategy aims to create long-term and sustainable value for shareholders and other groups of its Social Partners (stakeholders), through a holistic approach that combines financial stability with social and environmental sustainability. It is implemented through three main levels, which are inextricably linked to each other, while it is governed by specific Principles that ensure completeness (Principle of Materiality of Sustainable Development issues), quality (Principle of Inclusiveness of Social Partners) and transparency (Accountability Principle) throughout the range of its activity. Specifically:

Level 1 - Climate Change: It focuses on the Company's commitment adapting to and tackling climate change, as well as its contribution to a new low-emission economy. MYTILINEOS was the first Greek industry to set specific, measurable, and ambitious targets for reducing CO₂ emissions and carbon neutrality in 2030 and 2050, thus setting the reduction of its carbon footprint as a priority of its Sustainable Development strategy.

Level 2 - ESG Approach: It highlights the systematic alignment of MY-

TILINEOS with the ESG criteria, which are primarily linked to its activity, enhancing its ability to create long-term value and manage significant changes in the environment in which it operates. In this way, it responds both to the modern sustainability requirements of the investment community, capital markets and financial institutions, as well as to society's growing expectations for commitment and transparency on these issues.

Level 3 - Corporate Responsibility: Expresses the responsible operation of MYTILINEOS that has been systematically cultivated, over the last 15 years, through the implementation of the Responsible Entrepreneurship framework and the Company's commitment to the 10 Principles of the UN Global Compact. Responsible Entrepreneurship is for MYTILINEOS a continuous process of self-improvement and continuous learning, while it also functions as a basic mechanism for the renewal of its "social" license to operate, while improving its competitiveness at national and international level.



We create long-term and sustainable value for all our Stakeholders, contributing to the Global Sustainable Development Goals and the corresponding national priorities



Sustainable Development Strategic Framework

Climate Change	We participate substantially in tackling climate change and in the national effort to transition to a low-emissions economy by:			
	Decarbonisation of all our activity sectors by 2050.	Ambitious targets and initiatives to reduce our carbon footprint by 2030.	The development of new business activities in Sustainable Development projects.	
	We enhance the valuation of our corporate value through:			
ESG Approach	Identifying and managing material ESG risks, as well as growth opportunities.		The continuous improvement of our already excellent ESG performance and disclosure.	The fully integration of ESG criteria into our core operations and investment decisions.
	We operate responsibly towards:			
Corporate Responsibility (CSR)	To our People		The Environment	Society
	The Market			



<p>Principle of Materiality: The material issues that represent our significant economic, environmental and social impacts and influence the decisions of our Stakeholders, lay the foundations for the implementation of our Sustainable Development strategy.</p>	<p>The Principle of the Stakeholders inclusiveness: Through an open and systematic consultation process, we seek to build quality relationships of trust and cooperation with our Stakeholders, in order to jointly contribute to Sustainable Development.</p>	<p>Principle of Accountability: We are delivering on our commitment to transparency and to the regular provision of information of all our Stakeholders by publishing annually, and for more than 13 years, our Sustainable Development Report, which contains valuable data on our Non-Financial Performance.</p>
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3.3. Alignment of the Company's strategy with the Global Goals for Sustainable Development

The adoption of the 17 Sustainable Development Goals (SDGs) by all UN member states in 2015 is a milestone for the international community. For Greece, the targets provide an important opportunity for recovery and transition towards a new growth model, with emphasis on all 3 main pillars: environment, society and economy, with the central aim of "leaving no one behind" through the removal of inequalities of all kinds. MYTILINEOS, since 2016, by applying the UN's "SDG Compass Tool", has identified the relevance of the Global Goals to its business activity and identified ways to contribute to their achievement, to the extent that it deserves. Since then, it has consistently contributed to the achievement of 40 sub-objectives, expressed by the following 6 main directions:

1. TACKLING CLIMATE CHANGE (SDGs: 7 & 13). MYTILINEOS believes that the recovery of the economy and employment, especially after the pandemic, can be realized through the transition towards a new socio-economic model that is climate neutral, resilient, sustainable, and inclusive. In this context, and in line with its activity, the Company has highlighted Global Goals 7 (affordable and clean energy) and 13 (climate action) as its key strategic priorities, implementing an ambitious renewable energy investment plan, as well as specific initiatives to reduce total carbon (CO₂) emissions by -30% by 2030 and achieve a carbon neutral footprint by 2050.

2. SUPPORTING INNOVATION AND SUSTAINABLE INDUSTRIALISATION (SDGs: 9 & 12). As one of the leading industrial and energy companies, MYTILINEOS invests in the circular economy, the development of innovative waste recovery methods and the application of "clean" industrial methods, through its participation in 24 European research projects. At the same time, the Company steadily enhances employability in the domestic industrial sector and creates the conditions for a responsible supply chain, in all areas of its business activity. In this way, it actively contributes, to the extent that it deserves, to Global Goals 9 (industry & innovation) and 12 (responsible consumption and production).

3. PROMOTION OF SAFE & PRODUCTIVE EMPLOYMENT (SDGs 3 & 8). MYTILINEOS, in the context of its contribution to Global Goals 3 (good health and well-being) and 8 (decent work and economic growth) promotes and ensures safe and healthy working conditions for its direct and indirect employees with a view to prevention. Almost all of its production units have occupational Health & Safety management systems (ISO 45001: 2018) certified by independent bodies, while from the first moments when the threat of the pandemic was identified, MYTILINEOS implemented a multifaceted action plan that continues to focus on protecting its employees and their families, as well as ensuring its uninterrupted operation. The Company, in parallel with its economic growth, continues the integration of new policies & practices to enhance full and productive employment, through the creation of decent jobs without discrimination.

4. PROMOTING THE REDUCTION OF INEQUALITIES (SDGs: 5 & 10). MYTILINEOS, as it develops, promotes in its working environment policies and practices that enhance equal opportunities, respect for Human Rights, and the strengthening of equality between the sexes. In this way, it strengthens the participation of women at all hierarchical levels, the integration of young workers aged 30< into its potential as well as its effort for the integration of people with disabilities into the labor market, contributing directly to Global Goals 5 (gender equality) and 10 (fewer inequalities).

5. COMMITMENT TO THE PROTECTION OF THE NATURAL ENVIRONMENT (SDGs: 6, 14 & 15). In the context of the Company's commitment to further reduce its environmental footprint, Best International Techniques are applied for the proper management and the reduction to a minimum of the environmental impact per Business Area. Investments are made to upgrade the production process, utilizing new technologies, while almost all production units of the Company have environmental management systems certified with the most modern international standards (ISO 14001: 2015), as well as environmental rehabilitation plans of exploitable areas, where required, thus contributing directly to Global Goals 6 (water management), 14 (life below water) and 15 (life on land).

6. CONSISTENCY IN SOCIAL RESPONSIBILITY (SDGs 1, 2, 3, 4 & 11). MYTILINEOS contributes indirectly to the other Global Goals by consistently implementing its social policy with actions and initiatives that enhance the harmony of coexistence with its local communities and the wider society. Aiming at the 250,000 beneficiaries of its social policy for the five-year period 2020-2025, it continues to invest in the development of local employment and economy by creating new jobs (Objective 1), in strengthening local suppliers and infrastructure (Objective 11), in reducing food insecurity for vulnerable social groups (Objective 2), in implementing programmes and actions aimed at promoting health (Objective 3), the implementation of training programmes in areas of new technologies in schools, as well as programmes for the development of the professional skills of the younger generation (Objective 4).

The Sustainable Development Report 2022 presents cumulatively the contribution of MYTILINEOS to the achievement of the Global Sustainable Development Goals and the corresponding National priorities for the period 2016-2022.

3.4. The Principle of Materiality

MYTILINEOS has as its main criterion, of the approach to disclosing sustainability information, the definition of issues related to its ability to create value and are therefore essential for both the Company and its Social Partners (stakeholders). The definition of material issues is a dynamic practice, which is constantly reviewed, being a key tool of the responsible operation of MYTILINEOS, while at the same time contributing to the enrichment and formulation of its strategy for sustainable development.

According to the Sustainable Development Management System of MYTILINEOS, the evolution of material issues is reviewed every two years, taking into account the changes in the business environment, the particularities of the business sectors and the trends in the needs and expectations of its social partners.

In addition to the traditional² sources used in the exercise of recognition of Sustainable Development issues, the sources of information that allow the Company to identify additional material issues include:

- i) ESG (Environmental, social and governance) criteria used by institutional investors and asset managers to select their investment portfolios.
- ii) ESG requirements used by specialized indicators and rating agencies for the Company's analysis.

2 1. MYTILINEOS Sustainable Development Strategy, 2. The relevant legislation, 3. International or voluntary agreements that are of strategic importance for the Company (UNGC, SDGs), 4. Risks that are important to the Company, 5. The ESG standard Materiality Map of SASB (Sustainability Accounting Standards Board) publications, 6. International standards, Corporate Social Responsibility (CSR) initiatives and Sustainable Development initiatives (e.g., GRI, ISO 26000, TI, etc.), 7. The results of the annual Social Partners (stakeholders) Consultation.

iii) Publications and recommendations issued by international organisations influencing the scope covered by the ESG theme; and

iv) ESG requirements expressed by customers in the context of the Company's day-to-day business relationships and transactions.

During the implementation of the process in 2022, the Company prioritized the recognized issues, through the 4 areas of its business activity, in terms of the importance of the effects that each one represents on Sustainable Development. The findings of this internal exercise were combined with the corresponding findings of a relevant electronic survey conducted on more than 2,400 individuals, institutions, and organizations from all groups of the Company's Social Partners, on the same recognized issues, in order to determine the importance for them.

The validation of the Material issues and the final approval for their disclosure in the Annual Report and the Sustainable Development Report of the Company was given by the Sustainable Development Committee in which the steps of the relevant methodology as well as its individual results, were presented in detail in a special meeting.

The conclusion for the year 2022 is that the main sustainability issues for the Company continue to be: occupational health and safety, energy & air emissions, water management, human rights, pollution prevention, circular economy, sustainability of local communities, responsible supply chain, employment, equal opportunities, business ethics, cybersecurity, and climate change adaptation.

The Sustainability Report 2022 presents in more detail the materiality process, the list of relevant topics, as well as their correlation with both the Global Sustainable Development Goals and the ESG criteria.

3.5. The principle of Stakeholders Inclusiveness

The relationships and cooperation of MYTILINEOS with its Stakeholder groups contribute to the further understanding of the impacts of its activities, as well as to the Company's effort to consistently meet their expectations by building mutual relationships of trust with them.

The Stakeholders of MYTILINEOS are identified through an internal exercise, implemented every 3 years, in which the General Divisions of the Business Units and selected Central Support Services of the Company participate. The main criteria used to define and prioritize groups are the criteria of a) dependence, b) responsibility, c) intensity, d) influence and e) perspective, according to the international standard AA1000 Stakeholder Engagement – 2015.

MYTILINEOS has various ways of communication and cooperation with its Stakeholders, the frequency of which derives from the type of relationship it has developed with each group. At the same time, the institution of Consultation that the Company has been implementing with absolute consistency for 12 years and at a local level, enhances its ability to ad-

dress contemporary sustainability issues, to understand and actively respond to the needs of individuals, organizations, and businesses with which it interacts, enhancing the trust and social acceptance of its operation.

The Sustainable Development Report 2022 presents in detail the results of the exercise of the prioritization of the Stakeholder groups, the diachronic ways of cooperation of the Company with them, as well as the issues that emerged.

3.6. Policies and certified systems management

MYTILINEOS has a set of corporate policies that contain the guidelines governing the actions of the Business Units of the Company and its subsidiaries, as well as the actions of its directors, executives, and employees in the context of its responsible operation. The core values and policies of MYTILINEOS, aiming at identifying, preventing, and mitigating existing and potential adverse impacts on Sustainable Development, are the following:

- i. Corporate Mission and Corporate Values
- ii. Code of Business Conduct
- iii. Code of Conduct for Suppliers and Partners
- iv. Corporate Social Responsibility Policy
- v. Environmental Policy
- vi. Major Accident Prevention Policy (Metallurgy Sector)
- vii. Occupational Health & Safety Policy
- viii. Human Rights Policy
- ix. Employee Training and Development Policy
- x. Human Resources Selection and Recruitment Policy
- xi. Policy for the Prevention and Combating of Violence & Harassment at Work
- xii. Policy for the Employee Data Protection
- xiii. Relations with the Social Partners groups (stakeholders)
- xiv. Code of Conduct Breach Reporting Process
- xv. Internal formal procedures supporting the Company's Sustainable Development management system

In addition, the integrated management of key issues of Sustainable Development of the Company is carried out, among others, through the Management Systems it implements:

- i. Environmental Management System, according to ISO 14001:2015 standard.
- ii. Occupational Health and Safety Management System, according to ISO 45001:2018 standard.
- iii. Quality Management System, according to ISO 9001: 2015 standard, applied in selected production units.
- iv. Energy Management System, according to ISO 50001:2018 standard.
- v. Also, the laboratory of the AoG aluminum plant is certified according to the requirements of the standard ELOT EN ISO / IEC 17025: 2005 by the ESYD (National Accreditation Council) with the scope of accreditation the analysis of bauxites, aluminum (hydrate, anhydrous), aluminum and its alloys.

3.7. Commitments to Sustainable Development initiatives

MYTILINEOS voluntarily participates in, cooperates, and supports the following Responsible Entrepreneurship & Sustainable Development initiatives.

i. UN Global Compact: MYTILINEOS, since 2008, has consistently declared its commitment to upholding the Ten Principles of the Global Compact by publishing on an annual basis the relevant Communication on Progress report (COP), which examines compliance with these principles.

ii. Task Force on Climate Related Financial Disclosures (TCFD): MYTILINEOS belongs to the official list of supporters of the TCFD, world's most important initiative, which aims with its recommendations to create a more resilient financial system and adapt to climate change. The Company has already started from 2021 to implement the recommendations of the initiative and aims to fully integrate them at the end of 2023.

iii. Global Reporting Initiative (GRI): Since 2011, the Company has been disclosing sustainability information referred to in the GRI Standards of the non-governmental organization GRI, which aims at the transparency and comparability of corporate sustainability reporting.

iv. Aluminium Stewardship Initiative (ASI): The Metallurgy Business Unit of MYTILINEOS, since November 2019, participates in the global Aluminium Sustainability Initiative (ASI). The Company was certified in 2022 with the ASI Performance Standard, covering responsible environmental and social standards, as well as governance criteria for responsible production and rational use of aluminum, highlighting its strong commitment to a carbon-neutral production process in the Metallurgy Sector.

v. Greek Sustainability Code: MYTILINEOS has been an ambassador of the Greek Sustainability Code since 2015, while it actively participated in its co-formation, submitting its views and initiatives through the open consultation process in the context of the relevant dialogue, while also participating in the relevant working groups.

3.8 Results of the policies

Below are the key results of the implementation of the aforementioned policies and management systems for the year 2022 per material issue of Sustainable Development of the Company:

i. Material issue: Climate Change (control and adaptation)

Absolute direct and indirect CO₂ emissions recorded a further decrease of ~15.5% compared to base year 2019. The implementation of all initiatives to reduce CO₂ emissions in all Business Sectors continued, as well as the Company's Renewable Energy Sources investment plan. Specific electricity saving measures were taken, while the study of analysis and management of risks and opportunities from climate change based on the recommendations of the TCFD initiative continued.

ii. Material issue: Pollution prevention

There were no incidents of pollution of the natural environment from the production activity, nor industrial accidents in the overall activity of the Company.

iii. Material issue: Water resources management

Water withdrawals and discharges from the Company's activities in 2022, were within the limits indicated by the relevant environmental permits for each basic facility and no issues were identified that could materially affect or threaten the adequacy of the available water in the aquifer, nor any water source that is of high value for the preservation of biodiversity or is important for local communities. As regards wastewater discharges, the best possible management continued both for the protection of the natural environment and for the benefit of human health.

iv. Material issue: Occupational Health & Safety

The implementation of employee awareness and training procedures continued, as well as measures to identify and mitigate occupational Health and Safety risks. In 2022, no accidents, injuries with serious consequences on the lives of employees, nor occupational diseases were recorded in the direct and indirect employees of the Company. The frequency indicators of accidents with interruption of work and total accidents of direct workers improved significantly, while the values of the corresponding indicators of indirect workers remained almost stable, compared to 2021. The effort to strengthen the culture of health and safety at work and in the company's key suppliers and contractors continues.

v. Material issue: Employment

As an industrial company, we increased the percentage of total employment (direct & indirect) by 12.3% while keeping the percentages of part-time employees at very low levels. We continued to invest in the development of technical and personal skills, covering almost 47% of our human resources with general and targeted vocational education and training programs. Also, the gradual implementation of the unified Performance Management Program, designed in 2021, which is linked to corporate goals, as well as corporate results, continued. In 2022, more than 4 out of 10 workers were covered by corporate collective labour agreements.

vi. Material issue: Human Rights

No areas were recorded where there were deficiencies such that they could endanger the protection of Human Rights in the Company's activities. However, it is considered important to put in place due diligence mechanisms, policy development is expected to start in 2023, as well as training and awareness-raising on the issue of human rights risk assessment in projects and investments, as well as in the supply chain.

vii. Material issue: Equal Opportunities

The employment rates of women at work as well as of women in positions of responsibility have improved. Actions continued to be developed to ensure a favorable working environment that promotes equal opportunities, non-discrimination, enhances diversity and inclusion, thus adopting a people-management model committed both to professional excellence and to the adoption of policies and actions to promote work-life balance and reduce the pay gap.

viii. Material issue: Supply Chain

The evaluation of the Company's key and critical suppliers continues with the application of environmental, social and governance (ESG)

criteria. At the same time, for the 3rd consecutive year, the educational program for Sustainable Development, implemented by the Company to its Greek suppliers, continued. Future actions that will enhance the creation of a responsible supply chain include the establishment of a dedicated policy, as well as the implementation of due diligence mechanisms to ensure compliance. Efforts must also be made to determine the carbon footprint of suppliers.

ix. Material issue: Sustainability of local communities

The Company manages any negative impact of its activity on its local communities, starting from the appropriate communication and collaboration with them. In 2022, the institution of consultation with local Social Partner groups (stakeholders) in the Metallurgy Sector continued to be consistently implemented, the high rates of local employment were maintained for another year, while 16 key social programs and specific social actions were implemented respectively at central and local level with almost 80,000 benefiting citizens, contributing to the entire social spectrum of the Global Sustainable Development Goals.

x. Material issue: Business Ethics

MYTILINEOS has implemented all the necessary internal procedures to safeguard its policy. Through the control mechanisms applied in the Purchasing – Procurement Departments of the Company's Sectors of Activity, where both the selection of partners and any kind of transaction were examined, there were no confirmed incidents of corruption, incidents that led to the removal or disciplinary prosecution of employees for reasons of corruption, confirmed incidents related to corruption and which led to the termination or non-renewal of cooperation with partners, nor public court cases related to corruption against the Company or its employees.

xi. Material issue: Regulatory compliance

Compliance with the applicable legislation, as well as the implementation of compliance controls with the rules related to the activity of MYTILINEOS, resulted in the absence of incidents of non-compliance with the legislation and the related impact on an environmental, social, and economic level.

xii. Material issue: Cyber Security

Based on the results of the comprehensive evaluation of the actions of the MYTILINEOS Information Security Program for the year 2022, the degree of achievement of the goals set for maintaining an adequate level of cybersecurity, proper functional operation, protection of corporate and personal data and compliance with applicable regulatory requirements, is considered very satisfactory, contributing to the Company's broader strategy for Sustainable Development and safeguarding the rights of the subjects.

xiii. Environmental compliance

No incidents of non-compliance with environmental legislation and relevant regulations were recorded,

thus avoiding any direct financial impact (e.g. fines) as well as effects related to the image and reputation of the Company.

xiv. Ecological impacts

There were no incidents of biodiversity degradation from the Company's activities. Mining activity continued in a responsible and sustainable manner, while increasing the rehabilitation rate of the entire exploitable area to almost 85% without reserving new land. At the same time, there were no incidents of killing birds.

3.9 Risk Management

The Business Risk Management system is a key component of MYTILINEOS' operations and is achieved through a multidimensional approach based on three fundamental elements: Risk Governance, Risk Culture, and the Enterprise Risk Management (ERM) framework. Through these elements, MYTILINEOS achieves an integrated approach to managing the risks that affect its strategy, operations, and business objectives, in order to reduce their potential impact and maximize the benefit of the opportunities presented. Regarding the risks and opportunities related to climate change, MYTILINEOS plans to integrate the most substantial ones into the Enterprise Risk Management Process (e.g. the risk register), which is managed by the Enterprise Risk Management Division.

More information is available in the "Enterprise Risk Management" section of this Financial Report.

3.10 Sustainable Development Governance

The governance structure of MYTILINEOS in relation to Sustainable Development consists of the following:

i. The Sustainable Development Committee assists the Board of Directors in strengthening the Company's long-term commitment to value creation in all three pillars of Sustainable Development (economy, environment, and society) and overseeing the implementation of responsible and ethical business conduct, which is regularly evaluated based on its results and performance on environmental, social and governance issues (ESG).

ii. The General Division of Corporate Governance and Sustainable Development, through its key and coordinating role, determines the short-term strategic priorities and the long-term overall Sustainable Development strategy of the Company. It informs the Executive Committee of the Company and provides information to the Board of Directors, through the Sustainable Development Committee, on sustainability issues, including the progress of climate goals. It cooperates directly with the Central Services on sustainability issues and is responsible for supporting all newly established Sustainability/ESG teams per Business Unit regarding MYTILINEOS' Sustainable Development standards and goals. In addition, it coordinates, monitors, gathers, and synthesizes the Sustainable Development actions carried out throughout the Company, ensuring that, collectively, they produce the best possible results based on ESG criteria and relevant evaluations, maintaining the Company's ESG performance at the highest possible level and meeting the increased demands of the investment community in this field.

iii. The Enterprise Risk Management System of MYTILINEOS operates in order to limit the chances and impact of risks, and to maximize the benefit of the opportunities presented and concerning, among others, the Company's Material Sustainability Issues. In this context, an Enterprise Risk Assessment methodology has been adopted, which is based on best international practices and is adapted to the needs of MYTILINEOS, promoting a unified culture that integrates risk management into processes, activities and decision-making at all levels.

iv. The General Divisions of the Business Units define the guidelines for the respective Sustainability/ESG teams of their sector, in cooperation with the General Directorate of Corporate Governance and Sustainable Development, ensuring that the Key Performance Indicators (KPIs) are in line with the strategic objectives of MYTILINEOS. In addition, the new Sustainability/ESG teams, with the creation of special roles of "BU Sustainability Leaders" and "BU Sustainability/ESG initiative owners", are responsible for the organization and implementation of Sustainable Development initiatives per Business Area of the Company.

v. The institution of the Consultation with the Stakeholders is a timeless principle of the responsible operation of MYTILINEOS, which contributes to the enhancement of transparency, social acceptance of the Company's operation and the further improvement of the Company's responsible entrepreneurship and Sustainable Development initiatives.

4. ESG Criteria

Developments in the regulatory framework related to sustainability disclosure and thus their integration into traditional investment strategies, as well as credit ratings, have significantly changed the way companies treat and disclose relevant information. Corporate non-financial disclosure and ESG transparency are constantly evolving as companies strive to meet the increased demand for relevant information. MYTILINEOS, aware that environmental, social and governance (ESG) factors affect its medium and long-term results and sustainability, continues to integrate ESG criteria into its business strategy.

The Company responds to specific ESG Criteria related requests, including the following:

i) the ever-increasing demand for requests from investors and credit institutions for information on environmental, social and governance issues.

ii) the provision of specialized information in the context of ESG assessments received from international organizations, and

iii) the increasing requirements in the context of sustainability reporting .

During 2022, MYTILINEOS held more than 20 meetings with analysts and investors. Most of the meetings had on their agenda topics such as the management of sustainability issues and the ESG performance of the Company in general, but also issues related to the Company's commitments such as tackling climate change, human rights and the protection of biodiversity.

4.1 ESG Assessments

International ESG rating agencies systematically monitor the performance of MYTILINEOS and, through the application of different methodologies, evaluate its practices for managing ESG risks and opportunities.

MYTILINEOS receives 13 ESG assessments, regarding the integration of ESG criteria in its operation on an annual basis, from popular, internationally recognized, independent organizations, achieving, in recent years, significant progress, with the result that many of the Company's performance can be compared with those of leading companies internationally.

In 2022, MYTILINEOS managed to further improve its ESG performance, and to be placed in the top 10% performers, in its activity sector, in 10 out of 13 ESG Raters it participates in. Below are presented the results of the most key ESG ratings of MYTILINEOS,

as they were formed until 31/12/2022, as well as the relevant distinctions achieved by the Company.

Key ESG Raters					Distinctions obtained in 2022	Presence in new indexes
Raters						
	Scale (high to low)	2021	2022	Year on Year	 	Member of Dow Jones Sustainability Indices Powered by the S&P Global CSA
	100 - 0	48	60	+12 pts (percentile 91%)		
	AAA - CC	-	A	1st year of assessment		
	>=10 - 100	22,4	22,4	Stable (percentile 98%)		
	A - D ⁺	C	B	Upgraded by 2 levels		
	1 - 10	1.3	1.3	Stable (percentile 99%)		
	5 - 0	3.9	4,2	+0.3 pts (percentile 93%)		
	100 - 0	58	67	+9 pts (percentile 93%)		

1st participation of MYTILINEOS in the DJSI Emerging Markets sustainability index

MYTILINEOS (as of December 19, 2022) participates for the first time in the Dow Jones Sustainability Indices, which are internationally characterized as the benchmark for the performance of companies in sustainability issues, as a member company of the DJSI Emerging Markets Index. This recognition for the company comes as a continuation of the significant improvement recorded in its performance this year, after a relevant evaluation received by the organization S&P Global. Specifically, MYTILINEOS managed to obtain the maximum score (100/100) in almost 1/3 of the indices evaluated and thus managed to be among the top 10% of the companies in the conglomerate sector, while sharing this distinction with global giants, such as Enel or Hindalco operating in emerging markets. MYTILINEOS is the only Greek company, out of a total of 111 companies worldwide, that participates in the DJSI Emerging Markets Index. At the same time, it is one of the most important milestones in the course of its business development since it certifies the substantial integration of ESG criteria in various aspects of its strategy and operations, an effort that began with small but steady steps almost 10 years ago with the aim of creating sustainable value.

5. Climate related issues

MYTILINEOS' climate change strategy is characterized by:

- i) The strong commitments it has made and the corresponding targets it has set to tackle climate change, which are directly linked to its business strategy.
- ii) Compliance with the recommendations of its international initiatives (TCFD), as well as the measures to enhance the resilience of its production units, in the context of its adaptation to climate change.
- iii) The alignment of its basic administrative functions with the issues of climate change.

In addition, in 2022 the Company published their new central Environmental policy with special reference to climate change, in order to promote its commitments and strengthen the effort to understand and manage the risks, opportunities and impacts of climate-related nature in the context of its activities.


5.1 Tackling climate change

Tackling climate change is a key pillar of the Company's Sustainable Development strategy, in combination with the latter's alignment with the UN Sustainable Development Goals (7: Clean and affordable energy & 13: Climate Action) and the corresponding national priorities. MYTILINEOS, at the end of 2020, took the strategic decision of the energy transition, which was based on:

- a) the Company's desire to contribute to tackling climate change, to the extent that it deserves, as one of the greatest challenges that humanity must face in the 21st century and which requires the participation of all in the transition process towards a carbon-neutral economy based on renewable energy sources, and
- b) the finding, after the relevant analysis and recognizing the different needs arising from its expanded activities, that the Company, in order to remain resilient and competitive in modern challenges, should integrate sustainability into the core of its activity, developing ambitious targets for reducing CO₂ emissions and achieving a carbon neutral footprint, for each Business Unit.

To this end, MYTILINEOS committed to achieving ambitious targets for reducing its carbon footprint by 2030 and net-zero emissions for 2050, which are directly linked to its business strategy.

MYTILINEOS Climate metrics & targets

Emission categories	Climate scenario	Basic targets*	Sub-Targets* and key CO ₂ reduction initiatives
CO ₂ e emissions Scope 1 & Scope 2	 Well below 2°C	By 2030: -30%	<p>Metallurgy Sector Sub-targets: 1) Overall CO₂ emissions (Scope 1&2): -65% 2) Specific emissions (tCO₂/tAl): -75%</p> <p>Electric P&G Sector Sub-target**: 1) Specific emissions (kgCO₂/MWh): -50%</p> <p>Renewables, Energy Storage & Sustainable Development Sectors Sub-target: 1) Overall CO₂ emissions (Scope 1&2): Net Zero</p> <p>Key initiatives</p> <ul style="list-style-type: none"> • Production of 7.600 GWh from RES. • Electricity supply exclusively from renewable sources. • Use of low carbon emission fuels. • Application of state-of-the-art technologies and digitization of the production process. • Increase of production of secondary - cast aluminium and increased use of scrap in the production of primary - cast aluminium. • Use of electric vehicles. • Use of electric heat pumps in offices and buildings. • Use of batteries for energy storage at work sites
		By 2050: Net Zero	<p>Long-term Net - Zero initiatives</p> <ul style="list-style-type: none"> • Production and use of green hydrogen • Production and use of low carbon emission fuels. • Use of carbon capture and storage technologies. • Use of the inert anode technology in the production of aluminium. • Further increase of secondary cast aluminium production.

*Compared to 2019 levels.

**Currently, this specific sub-target is not aligned with the “Well Below 2o C” scenario

At the same time, the Company has developed and implements specialized action plans, per Sector of Activity, for each key initiative that contributes to the achievement of its climate goals. These plans focus on the utilization of existing technology, innovation, and the development of pioneering solutions, taking into account the specific characteristics of each activity and the existing composition of the country's energy mix, while they are renewed on an annual basis according to developments. More specifically, the individual categories of actions of the main initiatives include, but are not limited to:

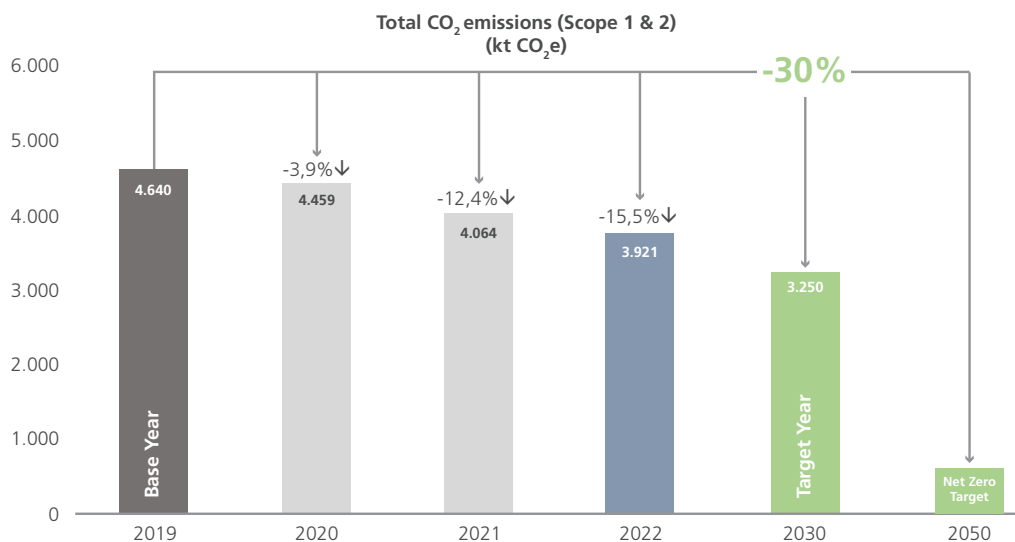
- i. the implementation of strategic partnerships in the field of RES (e.g., development of offshore wind farms),
- ii. the implementation of best practices and energy saving initiatives,
- iii. the implementation of pilot projects and specific technical actions in production processes,
- iv. the optimization of existing processes by introducing technological upgrades where feasible,
- v. the participation in European programs in the context of the Company's R&D activities,
- vi. the monitoring of new technologies for future application.

The evolution of the main climate target³

Regarding the evolution of the reduction of total CO₂ emissions (Scope 1 & 2) compared to the base year 2019, the Company, despite the significant decrease recorded in 2022, estimates that, in the next 3 years, its total emissions will fluctuate at higher levels, since an increase in direct CO₂ emissions is expected, mainly due to the operation of the new gas-fired thermal power plant and the undertaking of new conventional electricity generation projects. energy and infrastructure projects. At the same time, in 2025, the 1st official review of the climate objectives of MYTILINEOS is planned with main axes: i) the inclusion of new activities, ii) the study of the specificities of the new business structure and their impact on the objectives, iii) the overall assessment of the evolution of key CO₂ reduction initiatives, iv) the assessment of the degree of utilization of available technologies, as well as the development of new ones. From 2025 onwards, it is expected to deliver the Company's significant RES investment plan that will substantially support the drastic reduction of indirect emissions by 2030, in combination with the implementation of special actions to reduce direct emissions, which will be at an advanced stage, to achieve the target.

³ KPI according to the «European Commission Guidelines on reporting climate-related information

Our Main CO₂ reduction Target evolution



5.2 Adaptation to climate change

MYTILINEOS has initiated a thorough analysis and prioritization of the risks and opportunities associated with climate change that may affect its activities. Through this process, the Company will be able to appropriately adapt its operations, in order to address the risks and take advantage of the opportunities presented. The analysis focuses on existing industrial facilities in Greece and projects owned by MYTILINEOS, with the aim of identifying climate-related risks and opportunities that are essential. It is carried out using an integrated and horizontal approach, which includes specialized departments and business activities. In particular, climate change is analyzed, evaluated and, by extension, addressed, considering aspects of energy transition (market scenarios, regulatory and technological development, reputation issues) and the natural phenomena (natural changes, which are assessed as important for the operation of the Company's industrial units, such as e.g., impact on the company's production units due to increased temperatures and other extreme weather events, etc.).

In order to adapt to climate change and reduce the impact of the relevant potential risks, the Company takes the following actions:

A. In each Business Unit and after having examined climate projections on a local scale to identify immediate potential risks, the Company implements specific measures:

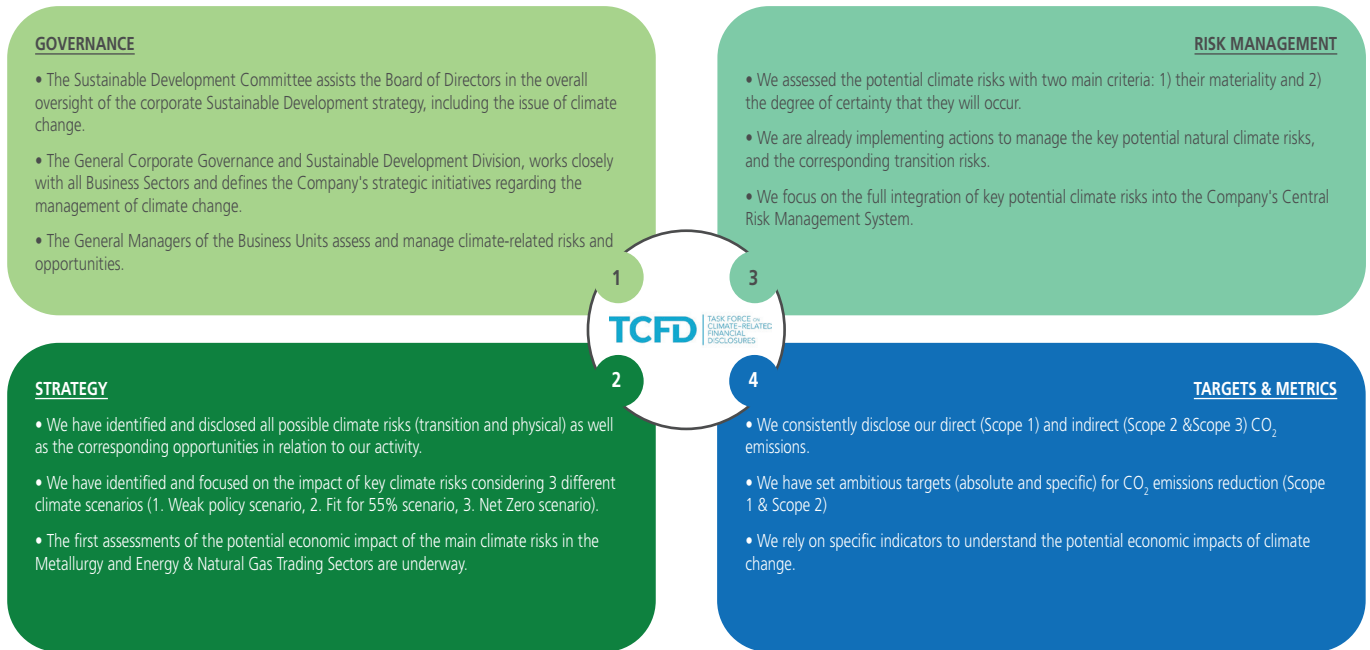
i. Emergency Plans have been drawn up at the thermal stations in cases of extreme natural events (heatwave, frost, storm, flood, etc.), as well as special flood studies, where there are streams near the stations. Regarding the operation of RES units, the wind turbines are equipped with safety systems that in case of very strong winds they stop the operation of the generators and drive their blades to a safe position, while the surfaces (panels) of the solar panels are by construction resistant to hail.

ii. In the Metallurgy Sector, studies have been carried out on accident-related risks from natural disasters and floods, while infrastructure has been built or improved to deal with the most extreme events and the relevant emergency plans have been created. A risk assessment study for water has also been carried out.

iii. Regarding the Company's activity abroad, through the Renewables & Energy Storage Development and Sustainable Development Projects Business Units, appropriate protection measures are taken and implemented, within the boundaries of the facilities and construction sites.

B. Following the disclosure of its climate objectives, MYTILINEOS is also focusing on its alignment with the recommendations of the Financial Stability Board's "Task Force on Climate-related Financial Disclosures" (TCFD) initiative, with the aim of better integrating climate change into the Company's governance, strategy and risk management processes and assessing the impact of potential climate risks (natural and transition), its financial position and the corresponding opportunities related to its business model and activities. The Company has already begun its adaptation to each of the four specific thematic sections of the TCFD's recommendations: Governance, Strategy, Risk Management, Indicators and Objectives.

MYTILINEOS' response to TCFD recommendations



The Sustainable Development Report 2022 presents in more detail the results of the analysis of climate risks and opportunities, as well as the overall progress of the Company in incorporating the recommendations of the TCFD.

5.3 Energy & air emissions

The activities of electricity generation from thermal power plants and aluminum production are the main sources of energy consumption and carbon dioxide (CO₂) emissions of the Company, which affect the phenomenon of climate change, while also constituting a significant operating cost. Reducing the carbon footprint and achieving a carbon neutral footprint are the most important challenges of the Company in the context of its new strategy for Sustainable Development.

Company policies and commitments

- Responsible use of energy and other natural resources, in accordance with the Environmental Policy of MYTILINEOS.
- Achieving the ambitious 30% CO₂ emissions reduction targets and achieving a carbon neutral footprint for 2030 and 2050 respectively.
- The voluntary participation of MYTILINEOS in the global Sustainable Development Initiative CDP (Carbon Disclosure Project) – Climate Change, expressing its commitment to responsible management of the potential risks related to climate change in its activity

Main Risks

The main long-term potential risks relate primarily to the Company's core production units and are the following:

- Any deviations from the current legislation may cause an additional burden on the atmosphere and cause an additional financial burden due to the need to purchase additional CO₂ emission allowances with implications for the financial results, but also in general for the maintenance of existing and the attraction of new customers, investors or business partners of MYTILINEOS.
- A further increase in the price of allowances (€/t) of CO₂ emissions, as it may be shaped by future EU energy and climate policies, will affect future compliance costs.

Actions to address and mitigate risks

i. MYTILINEOS has adopted specific initiatives to reduce its carbon footprint, which are mentioned in the section "Tackling Climate Change" of this report. The Company's overall CO₂ emissions target (Scope 1 and 2) is consistent with the emission reductions needed to keep global warming below 2°C by 2030, while being aligned with the vision of the European Green Deal to achieve climate neutrality by 2050, as well as the Global Sustainable Development Goals. By 2026, MYTILINEOS aspires to complete a large part of its investment program of 1.5 GW in renewable energy sources in Greece, to have proceeded to a large extent in the electrification of the Metallurgy Business Unit from RES, to have increased the production of second-cast aluminum to 26% of the total aluminum production and to have integrated key digital industrial methods in the production stages. At the same time, the implementation of relevant initiatives such as the use of electric vehicles in the Sustainable Development Projects and Renewable Energy Sources & -Storage Sectors is in progress.

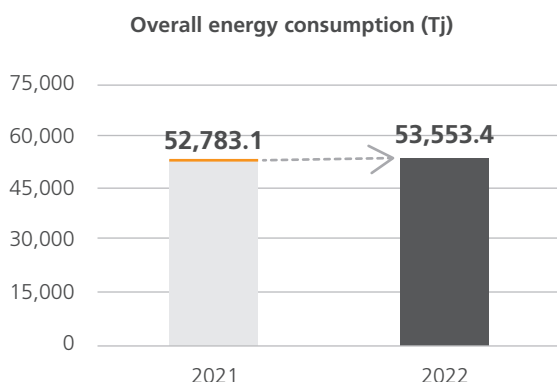
ii. MYTILINEOS implements systematic procedures for monitoring and complying with the legislation, obtaining the greenhouse gas emission permits provided by law and submitting the relevant reports, while participating through the Metallurgy and Electricity Business Units and in the Emissions Trading System (EU ETS) since 2013. At the same time, MYTILINEOS has installed all the necessary systems for the regular monitoring of CO₂, Fluorine and PFCs emissions, as well as other air pollutants (NOx, SOx and particulate matter) with continuous measurements. It systematically applies Best Available Techniques (BATs) to its production processes and ensures the proper maintenance and modernization of the equipment.

iii. Finally, in the Metallurgy Business Unit, the study for the installation of carbon dioxide emission containment systems in the facilities of the Aluminium of Greece plant continues, in collaboration with a leading company in this field, at a global level. In 2022, the first stage of the study was completed, and the relevant opportunities were identified, while the implementation study of the prevailing implementation scenario is in progress. The aim is to complete the second design stage in 2023 and to decide whether or not to continue the initiative.

Results of actions

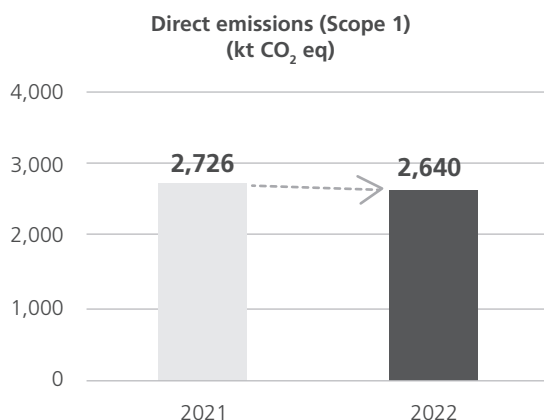
Overall energy consumption⁴

Energy consumption within MYTILINEOS is systematically monitored in all production units, office buildings and construction sites of the Company. In 2022, total energy consumption amounted to 53,553 Tj showing a small increase of ~1.5% from 2021. 70% concerns the consumption of primary energy from fuels (with 91% being natural gas) and 30% the consumption of electricity.



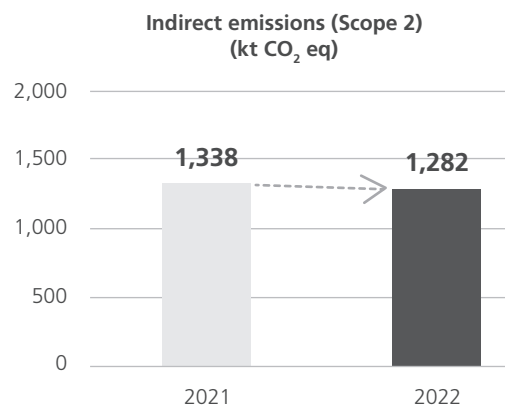
Direct CO₂ emissions (Scope 1)⁵

Direct gaseous emissions (Scope 1) come from sources (physical units or processes that release greenhouse gas emissions into the atmosphere) owned or controlled by the Company. In this regard, these emissions result in >95% from the alumina and aluminium production process (fuel consumption and chemical treatments as part of the production process), as well as from the power generation process (through natural gas consumption). Direct emissions in 2022 amounted to 2,640 ktCO₂-eq and were reduced by 3.15% compared to 2021.



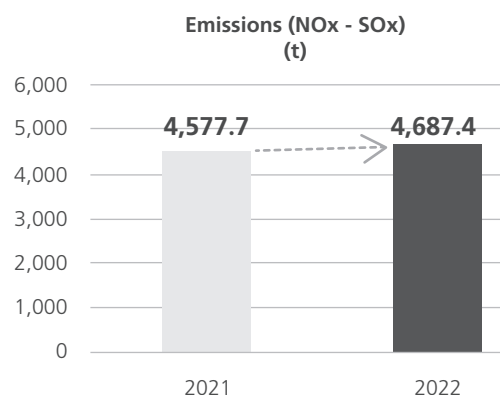
Indirect CO₂ emissions (Scope 2)⁶

The indirect energy emissions (Scope 2) come from the production of the electricity purchased by the Company, for its own consumption. In total, indirect emissions (Scope 2) amounted in 2022 to 1,282 ktCO₂-eq, showing a decrease of 4,18% from 2021, while annual electricity consumption recorded a small increase compared to 2021 by 0,8% and amounted to 10,565 Tj (2021: 10,483 Tj).



Other significant emissions

For the remaining significant gaseous emissions, these were stabilizing levels compared to 2021. The total amount of nitrogen oxide (NOx) and sulphur dioxide (SOx) emissions recorded a small increase of 2.4%. The amount of fluoride also recorded a small increase of 2.1%, while a further decrease of ~7% in the amount of particulate matter (PM) was achieved.



⁴ Overall energy consumption = energy consumption from non-renewable sources + energy purchased for consumption + energy generated – energy sold.

⁵ KPI according to the “European Commission Guidelines on reporting climate-related information”; Calculating direct greenhouse gas emissions (Scope 1) is possible using coefficients to convert energy from fuel consumption (in Tj) to equivalent carbon dioxide (CO₂eq). The values used are those that apply in the end of the reference period (year 2022). The NIR 2022 method has been used to determine NIR 2022 conversion factor values.

⁶ KPI according to the “European Commission Guidelines on reporting climate-related information”; Calculating indirect greenhouse gas emissions (Scope 2) is possible using coefficients to convert energy from the consumption of electric power, heat, cooling and steam (in Tj) to equivalent carbon dioxide (CO₂eq). The values used are those that apply in the end of the reference period (year 2022). The “RES MANAGER & ORIGIN GUARANTEE” method has been used to determine conversion factor values.

Performance evaluation and continuous improvement

i. In the context of the Environmental Management Systems implemented by the Company, the Company receives inspections from independent third parties, while internal audits are also implemented.

ii. The Company's progress is assessed, on an annual basis, by the international organization CDP – Climate Change. The Company's performance in 2022 certifies that it undertakes coordinated actions on climate change issues.

MYTILINEOS Performance in the CDP Climate Change index	2021 B/A	2022 B/A
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iii. Key performance indicators on energy management and emission reduction are externally ensured in the context of ensuring the Sustainable Development Report.

The Sustainable Development Report 2022 presents in detail the data on energy and gaseous emissions.

5.4 European Classification of sustainable investments

The EU Taxonomy is the European Union classification system of activities that can under certain conditions be considered as environmentally sustainable or as activities that enable the transition to environmental sustainability. Under the Taxonomy regulation, companies and organizations can attract funds to develop their sustainable activities as well as expand them further, provided they meet certain criteria.

The criteria that determine the level of sustainability of certain economic activities are set by the Taxonomy Regulation (2020/852/EU). In order to achieve sustainability of its economic development, the European Union has stipulated 6 environmental goals, the achievement of which will advance sustainable development within the Union. Specifically, the environmental goals at the center of the Taxonomy framework are the following:

1. Climate change mitigation;
2. Climate change adaptation;
3. The sustainable use and protection of water and marine resources;
4. The transition to a circular economy;
5. Pollution prevention and control;
6. The protection and restoration of biodiversity and ecosystems.

The achievement of one or several of the above-mentioned goals provides an economic activity with the status of sustainable, transitional or enabling according to their alignment to the Taxonomy framework. Specifically, depending on whether the activity has the potential to be conducted in a fully sustainable way at present, whether it can help the economy transition to a more sustainable model or whether it can allow other activities to be conducted sustainably, the economic activities have been designated into different subgroups. In order to be considered aligned to the EU Taxonomy, an economic activity must fulfil all of the following criteria:

- I. Contributes substantially to one or more of the environmental objectives set out in the Regulation
- II. Does not significantly harm any of the environmental objectives set out in the Regulation
- III. Is carried out in compliance with the minimum safeguards laid down in the Regulation

IV. Complies with technical screening criteria stipulated by the Commission for each economic activity towards the achievement of the environmental goals of the Taxonomy.

At the moment of publication of the present report, the Taxonomy framework contains specific technical screening criteria solely for the first two goals (Climate change mitigation & Climate change adaptation). The technical screening criteria relating to the achievement of these goals have been adopted via the Climate Delegated Act (2021/2139/EU) as well as the Complementary Climate act (2022/1214/EU). The first year of Taxonomy alignment reporting will be conducted based on the criteria set out by these legislative acts.

The compliance with said criteria is monitored continuously and reported on an annual basis, included in the non-financial section of the respective annual financial statements. As part of the Taxonomy reporting process, we disclose in the following section the key performance indicators relating to our economic activities for the FY2022.

MYTILINEOS activities

The Group since the first period of Taxonomy reporting for FY2021, examined its activities through the prism of EU Taxonomy in order to identify the proportion of its eligible activities. This procedure forms the basis of its disclosures for Taxonomy purposes in the annual financial statements and was also carried out in the current period, where the following eligible activities were recognized:

- 3.8. Manufacture of aluminium
 - 4.1. Electricity generation using solar photovoltaic technology
 - 4.3. Electricity generation from wind power
 - 4.5. Electricity generation from hydropower
 - 4.9. Transmission and distribution of electricity
 - 4.10. Storage of electricity
 - 6.15. Infrastructure for rail transport
 - 6.14. Infrastructure enabling road transport and public transport
 - 4.29. Electricity generation from fossil gaseous fuels
 - 4.30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels

The second step following the eligibility examination based on the descriptions provided by the Climate Delegated Act (2021/2139/EU), was to evaluate alignment with EU Taxonomy according to the relevant technical screening criteria. The result of this evaluation is presented in the following section of the report.

Declaration of activities related to nuclear energy and fossil gaseous fuels

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Assessment of compliance with Taxonomy Regulation (2020/852/EU) and technical screening criteria (2021/2139/EU)

Manufacture of aluminium

Taxonomy activity description:

This activity consists of the manufacture of aluminium through primary alumina (bauxite) process or secondary aluminium recycling.

Eligible MYTILINEOS activity description:

The Group operates the only vertically integrated alumina and aluminium production and marketing unit in the EU as well as a secondary aluminium production unit. The production process includes the manufacture of primary aluminium through the processing of alumina (aluminium oxide) by electrolytic method and the recycling of secondary aluminium. The Group's production capacity reaches 250,000 tonnes of aluminium (primary and secondary cast). Its industrial complex in Ag. Nikolaos, Boeotia, which operates for over 50 years, has achieved continuous growth by the adoption of production and commercial practices comparable to those of the leading metallurgical industries worldwide, and by over €600 million of investments in the technological modernization of the plant's facilities and the increase of its production and productivity – one of the largest private investments to be carried out in Greece in recent years.

Alignment to EU Taxonomy Criteria re Climate Change Mitigation

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all secondary aluminium plants to said measures. Specifically, the Group's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative Task Force on Climate Related Financial Disclosures (TCFD), also includes the recognition of natural climate risks up to a time horizon of ~30 years (long-term risks). The information regarding this process is described in detail in the TCFD data table included in the Group's 2022

Sustainable Development Report as well as in the designated place on the MYTILINEOS website <https://scorecard.mytilineos.gr/index-en.html>.

Regarding emissions (other than GHG emissions) during the production processes, the economic activity within its continuous regulatory compliance, constantly monitors emissions' levels, confirming that they do not exceed the levels associated with the best available techniques (BAT-AEL) ranges for the non-ferrous metals industries. The said production processes regularly comply to the Directives outlined in Appendix C of the Climate Delegated Act regarding the use/manufacture of dangerous chemicals.

Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-scale construction projects, MYTILINEOS produces EIAs for all of its facilities including the aluminium production sites. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, the Metallurgy B.U. supported by external specialists has conducted a Technogeological-Hydrogeological survey where all identified risks to the subterranean waters of the surrounding area are described and thoroughly analysed to ensure the flawless operation of the sites and the protection of the local environment. Lastly, as certain sites of the economic activity border areas included in the Natura 2000 network of protected areas, the Group has undertaken a Special Ecological Assessment (SEA) as part of the licensing process of the said sites.

Electricity generation using solar photovoltaic technology

Taxonomy activity description:

This activity consists of the construction or operation of electricity generation facilities that produce electricity using solar photovoltaic (PV) technology.

Eligible MYTILINEOS activity description:

The Group, through its subsidiary METKA EGN is one of the leading manufacturers of photovoltaic and energy storage projects worldwide. This positions the Group as global manufacturer and contractor for solar energy projects, offering reliable solutions across the entire range of the activities involved in developing such projects, from autonomous solar parks and energy storage projects to complex hybrid projects. The broader strategy of the Renewables & Storage Development Business Unit apart from the construction of external projects includes the use of the Build-Own-Transfer ("BOT") business model for the development of photovoltaic projects, utilizing construction technology proprietary to the Group and currently working on (including completed) about 2.5 GW of solar power plants and 400 MW of energy storage projects on all five continents. Moreover, the Group has completed the construction and connection to the grid of three PV projects with a capacity of 118 MW in Australia. The construction of the solar parks is part of the total investment portfolio, which was acquired by the RSD BU, in 2019, through its subsidiary METKA EGN in the Australian continent with a total capacity of 250 MW. Utilizing the portfolio of permits for Photovoltaic Power Plants in Cyprus with a total capacity of 26 MW the Group moved forward with the gradual construction and connection to the grid of two PV projects with a maximum capacity up to 3.4 MW in 2021. The RSD B.U. has solidified its place in S. Korea with the development of a solar PV project with a total capacity of 36MW in the Gonam-Myeon area of Taean prefecture. The project has already received a power generation permit and has applied for a construction permit. Furthermore, MYTILINEOS through the RSD B.U. signed Power Purchase Agreements (PPAs) with Vofafone UK (110 MW) as well as Enel Generación Chile S.A. (588 MWp). Lastly, the Group through the P&G B.U. operates solar PV parks in Greece of a total capacity at 11.5MW.

Alignment to EU Taxonomy Criteria re Climate Change Mitigation

The said activity covers 2 separate parts of MYTILINEOS activities: the RSD B.U. involving the construction of solar PV facilities for clients and the P&G B.U. responsible for the operation of the Group's own solar PV facilities. Thus, alignment was examined from both scopes with clear distinction between them, due to the fact that certain technical screening criteria may not be applicable to both aspects of the activity. Specifically, the Group's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative Task Force on Climate Related Financial Disclosures (TCFD), also includes the recognition of natural climate risks up to a time horizon of ~30 years (long-term risks). The information regarding this process is described in detail in the TCFD data table included in the Group's 2022 Sustainable Development Report as well as in the designated place on its website <https://scorecard.mytilineos.gr/index-en.html>. The said assessment was conducted thoroughly for the Group's own facilities operated by the P&G B.U. However, since no reliable projections can be made for the construction activity, this aspect (RSD B.U.) of the climate risk assessment is naturally limited.

Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of the solar PV facilities with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely.

The materials required for the construction of the solar PV facilities consist mainly of metal devices, photovoltaic panels, aluminum and copper cables, electrical equipment and concrete, most of which are recyclable, as well as packaging materials (e.g. wood, plastic and paper-cardboard) which are waste produced during construction. All the above-mentioned materials are recyclable and are properly recycled through licensed waste management companies so as not to cause negative effects on the environment.

Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-scale

construction projects, MYTILINEOS produces EIAs for all of its facilities including the solar PV facilities operated by the P&G B.U. The same regulatory framework is applicable for the construction activities of the RSD B.U. within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Group follows the environmental commitments set by its Environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

Electricity generation from wind power

Taxonomy activity description:

Construction or operation of electricity generation facilities that produce electricity from wind power.

Eligible MYTILINEOS activity description:

The Group owns and operates wind farms of combined capacity up to 222.2MW in Serres, Euboea, Fokida, Boeotia and Aitolokarnania. In 2020, the construction of a new Wind Park with a maximum capacity up to 43 MW was also initiated. Moreover, the construction of a new wind farm of a total capacity at 43.2 MW was completed and operational in Q4, 2022. Lastly, MYTILINEOS announced a cooperation with Copenhagen Infrastructure Partners towards the joint development and construction of offshore wind farms, which however is not yet feasible due to lack of proper legislative framework.

Alignment to EU Taxonomy Criteria re Climate Change Mitigation

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all wind farms to said measures. Specifically, the Group's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative Task Force on Climate Related Financial Disclosures (TCFD), also includes the recognition of natural climate risks up to a time horizon of ~30 years (long-term risks). The information regarding this process is described in detail in the TCFD data table included in the Group's 2022 Sustainable Development Report as well as in the designated place on its website <https://scorecard.mytilineos.gr/index-en.html>.

Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of wind farms with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely.

Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-

scale construction projects, MYTILINEOS produces EIAs for all of its facilities including wind farms operated by the P&G B.U. Lastly, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

Electricity generation from hydropower

Taxonomy activity description:

Construction or operation of electricity generation facilities that produce electricity from hydropower.

Eligible MYTILINEOS activity description:

The Group owns and operates four small hydropower plants in Aitoloa-karnania and Fthiotida of a combined capacity up to 6.06 MW.

Transmission and distribution of electricity

Taxonomy activity description:

Construction and operation of transmission systems that transport the electricity on the extra high-voltage and high-voltage interconnected system as well as on high-voltage, medium-voltage and low-voltage distribution systems.

Eligible MYTILINEOS activity description:

The Group has signed a contract with the Greek Independent Power Transmission Operator (IPTO) for the construction of an Electricity Transmission Line 400kV to facilitate the Greece-Bulgaria electrical interconnection.

Storage of electricity

Taxonomy activity description:

Construction and operation of facilities that store electricity and return it at a later time in the form of electricity. The activity includes pumped hydropower storage.

Eligible MYTILINEOS activity description:

In 2021, the Group was awarded a total sum of 26 MW for battery energy storage systems (BESS) to provide Fast Reserve grid services for Terna, the Italian Transmission System Operator. The commissioning of the projects is expected to take place during Q4 of 2022, when both systems are expected to start providing Fast Reserve services to the Italian grid from 2023 until 2027. Finally, the Group has undertaken the construction of electricity storage units as part of a broader PV plant construction project in England.

Alignment to EU Taxonomy Criteria re Climate Change Mitigation

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all wind farms to said measures. Specifically, the Group's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative Task Force on Climate Related Financial Disclosures (TCFD), also includes the recognition of natural climate risks up to a time horizon of ~30 years (long-term risks). The information regarding this process is described in detail in the TCFD data table included in the Group's 2022 Sustainable Development Report as well as in the designated place on its website <https://scorecard.mytilineos.gr/index-en.html>.

The Group is not involved in the construction of pumped hydropower storage units. Moreover, since the economic activity of the RSD B.U. is limited to the construction of electricity storage units, the owners/clients are responsible for any waste management plans. As such, this criterion is considered not applicable in this case.

Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-scale construction projects, MYTILINEOS produces EIAs for all of the construction activities of the RSD B.U. within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Group follows the environmental commitments set by its Environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, in case of sites of the economic.

Infrastructure enabling road transport and public transport

Taxonomy activity description:

Construction, modernisation, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems including the provision of architectural services, engineering services, drafting services, building inspection services and surveying and mapping services and the like as well as the performance of physical, chemical and other analytical testing of all types of materials and products.

Eligible MYTILINEOS activity description:

The Group has undertaken 2 Railway Projects in the area of Peloponnese namely the electrification of the part Kiato-Rododafni as well as the expansion of the railway infrastructure, electrification and construction of stops and stations in the part Rododafni-Rio.

Infrastructure for rail transport

Taxonomy activity description:

Construction, modernisation, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems including the provision of architectural services, engineering services, drafting services, building inspection services and surveying and mapping services and the like as well as the performance of physical, chemical and other analytical testing of all types of materials and products.

Eligible MYTILINEOS activity description:

The Group has undertaken 2 Railway Projects in the area of Peloponnese namely the electrification of the part Kiato-Rododafni as well as the expansion of the railway infrastructure, electrification and construction of stops and stations in the part Rododafni-Rio.

Turnover KPI Table

Economic activities (1)	Code(s) (2)	Absolute turnover (3)	Proportion of turnover (4)	Substantial contribution criteria							Climate change mitigation (11)
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)		
				%	%	%	%	%	%	Y/N	
		€000	%	%	%	%	%	%	%	Y/N	
A. TAXONOMY-ELIGIBLE ACTIVITIES											
A.1 Environmentally sustainable activities (Taxonomy-aligned)											
Manufacture of aluminium	3.8	121,423	2%	100%							
Electricity generation using solar photovoltaic technology	4.1	502,820	8%	100%							
Electricity generation from wind power	4.3	47,234	1%	100%							
Storage of electricity	4.10	132,234	2%	100%							
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		803,711	13%	100%							
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)											
Manufacture of aluminium	3.8	461,214	7%								
Electricity generation from hydropower	4.5	120	0%								
Transmission and distribution of electricity	4.9	2,450	0%								
Infrastructure for rail transport	6.14	40,090	1%								
Infrastructure enabling road transport and public transport	6.15	14,680	0%								
Turnover of Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.1 + A.2)		518,554	8%								
Total (A.1 + A.2)		1,322,265	21%								
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES											
Turnover of Taxonomy-non-eligible activities (B)		4,984,207	79%								
Total (A + B)		6,306,472	100%								

* Activity 1 is Taxonomy-eligible in its entirety. However, only a proportion of it is Taxonomy-aligned. Therefore, Activity 1 may be reported under both A1 and A2. However, only the proportion reported under A1 may be counted as Taxonomy-aligned in the Turnover KPI of the non-financial undertaking.

DNSH criteria
 ("Does Not Significantly Harm")

Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Taxonomy-aligned proportion of turnover, year N (18)	Taxonomy-aligned proportion of turnover, year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percent	Percent	E	T
Y	Y	-	Y	Y	Y	2			T
Y	-	Y	-	Y	Y	8			
Y	N/A	Y	-	Y	Y	1			
Y	N/A	N/A	-	Y	Y	2		E	
						13			

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CapEx KPI Table

Economic activities (1)	Code(s) (2)	Absolute CapEx (3)	Proportion of CapEx (4)	Substantial contribution criteria						
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	
				%	%	%	%	%	%	
		€000	%	%	%	%	%	%	%	
A. TAXONOMY-ELIGIBLE ACTIVITIES										
A.1 Environmentally sustainable activities (Taxonomy-aligned)										
Manufacture of aluminium	3.8	11,972	2%	100%						
Electricity generation using solar photovoltaic technology	4.1	433,391	61%	100%						
Electricity generation from wind power	4.3	14,350	2%	100%						
Storage of electricity	4.10	96,194	13%	100%						
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		555,907	78%	100%						
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)										
Manufacture of aluminium	3.8	32,344	5%							
Electricity generation from hydro-power	4.5	9	0%							
Transmission and distribution of electricity	4.9	16	0%							
Infrastructure for rail transport	6.14	259	0%							
Infrastructure enabling road transport and public transport	6.15	95	0%							
CapEx of Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.1 + A.2)		32,722	5%							
Total (A.1 + A.2)		588,629	82%							
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES										
CapEx of Taxonomy-non-eligible activities (B)		127,079	18%							
Total (A + B)		715,708	100%							

* Activity 1 is Taxonomy-eligible in its entirety. However, only a proportion of it is Taxonomy-aligned. Therefore, Activity 1 may be reported under both A1 and A2. However, only the proportion reported under A1 may be counted as Taxonomy-aligned in the CapEx KPI of the non-financial undertaking.

**DNSH criteria
("Does Not Significantly Harm")**

Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Taxonomy-aligned portion of CapEx, year N (18)	Taxonomy-aligned proportion of CapEx, year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percent	Percent	E	T
	Y	Y	-	Y	Y	Y	2			T
	Y	-	Y	-	Y	Y	61			
	Y	N/A	Y	-	Y	Y	2			
	Y	N/A	N/A	-	Y	Y	13		E	
							78			

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OPEX KPI Table

Economic activities (1)	Code(s) (2)	Absolute OpEx (3) €000	Proportion of OpEx (4) %	Substantial contribution criteria							Climate change mitigation (11) Y/N
				Climate change mitigation (5) %	Climate change adaptation (6) %	Water and marine resources (7) %	Circular economy (8) %	Pollution (9) %	Biodiversity and ecosystems (10) %		
A. TAXONOMY-ELIGIBLE ACTIVITIES											
A.1 Environmentally sustainable activities (Taxonomy-aligned)											
Manufacture of aluminium	3.8	131,832	2%	100%							
Electricity generation using solar photovoltaic technology	4.1	419,297	8%	100%							
Electricity generation from wind power	4.3	10,299	0%	100%							
Storage of electricity	4.10	110,940	2%	100%							
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		672,368	13%	100%							
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)											
Manufacture of aluminium	3.8	249,751	5%								
Electricity generation from hydropower	4.5	86	0%								
Transmission and distribution of electricity	4.9	2,273	0%								
Infrastructure for rail transport	6.14	37,189	1%								
Infrastructure enabling road transport and public transport	6.15	13,618	0%								
OpEx of Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.1 + A.2)		302,917	6%								
Total (A.1 + A.2)		975,285	18%								
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES											
OpEx of Taxonomy-non-eligible activities (B)		4,343,838	82%								
Total (A + B)		5,319,123	100%								

* Activity 1 is Taxonomy-eligible in its entirety. However, only a proportion of it is Taxonomy-aligned. Therefore, Activity 1 may be reported under both A1 and A2. However, only the proportion reported under A1 may be counted as Taxonomy-aligned in the OpEx KPI of the non-financial undertaking.

DNSH criteria
 (“Does Not Significantly Harm”)

Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Taxonomy-aligned proportion of OpEx, year N (18)	Taxonomy-aligned proportion of OpEx, year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percent	Percent	E	T

Y	Y	-	Y	Y	Y	2			T
Y	-	Y	-	Y	Y	8			
Y	N/A	Y	-	Y	Y	0			
Y	N/A	N/A	-	Y	Y	2		E	
						13			

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Fossil Gaseous Fuel Activities

Electricity generation from fossil gaseous fuels

Taxonomy activity description:

Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels.

Eligible MYTILINEOS activity description:

The Group, through Protergia, brings together under the same roof the management of all MYTILINEOS energy-related fixed assets and activities. The Company today ranks as one of the leading private sector actors in the electric power market and is the largest independent electric power producer and supplier in Greece. The portfolio of energy assets totaling more than 1,200 MWh of installed capacity, accounts for over 13.5% of the licensed thermal plant production capacity in place in the country and includes the thermal plants in Ag. Nikolaos, Boeotia (444.48 MW) and Ag. Theodoroi, Corinth (436.6 MW). At the same time, the Group through the SES BU has individually undertaken the "Engineering, Procurement & Construction" (EPC) of three open circle (OCGT) power production stations in the UK, and as part of a joint venture, the construction of combined circle (CCGT) power production station in Poland which is also its inaugural project in the country.

High-efficiency co-generation of heat/cool and power from fossil gaseous fuels

Taxonomy activity description:

Construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. This activity does not include high-efficiency co-generation of heat/cool and power from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels.

Eligible MYTILINEOS activity description:

The Group, continued in 2022 the construction of a new dual-fuel Combined Heat and Power Plant (CHP) with maximum capacity up to 110 MW in Ljubljana, Slovenia. The project involves the Engineering, Procurement & Construction (EPC) of a novel double fuel, co-generation power-heat facility (CHP) of 110MW total power, largely replacing the coal power production with natural gas and decreasing the total carbon consumption by up to 70%.

Turnover KPI

Taxonomy-aligned economic activities (denominator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	803,711	13%	803,711	13%	0	0%
8.	Total applicable KPI	6,306,472		6,306,472		0	

Taxonomy-aligned economic activities (numerator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	803,711	13%	803,711	13%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	803,711	13%	803,711	13%	0	0%

Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,154,533	18%	1,154,533	18%	0	0%
5.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	18	0%	18	0%	0	0%
6.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	518,554	8%	518,554	8%	0	0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	1,673,105	26%	1,673,105	26%	0	0%

Taxonomy non-eligible economic activities

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	3,751,180	59%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	3,751,180	59%

CapEx KPI

Taxonomy-aligned economic activities (denominator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	555,907	78%	555,907	78%	0	0%
8.	Total applicable KPI	715,708		715,708		0	

Taxonomy-aligned economic activities (numerator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	555,907	78%	555,907	78%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	555,907	78%	555,907	78%	0	0%

Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	95,470	13%	95,470	13%	0	0%
5.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	32,722	5%	32,722	5%	0	0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	128,192	18%	128,192	18%	0	0%

Taxonomy non-eligible economic activities

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	31,609	4%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	31,609	4%

OpEx KPI

Taxonomy-aligned economic activities (denominator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	672,368	13%	672,368	13%	0	0%
8.	Total applicable KPI	5,319,123		5,319,123		0	

Taxonomy-aligned economic activities (numerator)

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	672,368	13%	672,368	13%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	672,368	13%	672,368	13%	0	0%

Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	452,050	8%	452,050	8%	0	0%
5.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	302,917	6%	302,917	6%	0	0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	754,967	14%	754,967	14%	0	0%

Taxonomy non-eligible economic activities

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	3,891,788	73%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	3,891,788	73%

Minimum Safeguards

MYTILINEOS creates value for its Social Partners through its business activities, making a substantial contribution to the economy, to employment and to the development of its local communities.

The responsible operation of MYTILINEOS, has been systematically cultivated over the last 12 years through the implementation of its Corporate Social Responsibility (CSR) policy and the Company's commitment to the 10 Principles of the UN Global Compact. For MYTILINEOS, CSR is an ongoing self-improvement and incessant learning process, while also serves as a key mechanism for renewing its "social license to operate" and, at the same time, improves its competitiveness at national and international level.

Sustainable Development is an integral part of the "corporate DNA" of MYTILINEOS and, therefore, of its long-term business strategy. It is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the Sustainable Development Goals.

The Company's business model is at the center of its operation. We utilize our available resources in accordance with our vision, mission and business values, to produce and market our products and services, while also contributing to the Global Sustainable Development Goals (UN 2030 Agenda) and creating value for our Social Partners. The relevant key performance indicators, together with descriptions of the interrelationships between the resources utilized in the context of our Business Model, is available at: <https://scorecard.MYTILINEOS.gr/index-en.html>

The aim of the Integrated Value Creation Scorecard (scorecard.MYTILINEOS.gr/index-en.html) is the presentation to all MYTILINEOS Social Partners of the basic resources (economic, industrial, natural, human and social) that it utilizes during its activity, through its business model, the corresponding results and the value generated in combination with the 17 UN Sustainable Development Goals.

The Sustainability Actions Map (sdactionsmap.MYTILINEOS.gr/en) is an innovative tool that provides in a concise and centralized way, the information on Sustainable Development issues to all Stakeholders. Immediate access to the desired information and easy operation of the microsite are key features for the effective provision of information to the Company's stakeholders, focusing either on the desired Global Sustainable Development Goal or on the desired region / country for each of the Business Units.

OECD Guidelines for Multinational Enterprises

Our Code of Conduct has been developed taking into account the OECD Guidelines for Multinational Enterprises. We have implemented a custom training program in the Company's Code of Business Conduct for our employees. We applied our "Zero Tolerance" approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally. We successfully continued the dialogue with our Stakeholders, implementing a special thematic Consultation focused on the creation of our corporate Human Rights Policy, gaining the almost universal acceptance and support of all our Stakeholder groups for this initiative of the Company.

Respect of Human and Labour Rights

Since 2008, MYTILINEOS has committed itself to complying with the Compact's 10 Principles, annually publishing its relevant performance, both in terms of its overall operation and its broader transactions. MYTILINEOS is committed to the first six Principles of the UN Global Com-

pact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights. The Company's commitment to monitoring and publishing the impacts of its activity in this area, together with the Code of Business Conduct, which is addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's working environment. Furthermore, during 2020 we have proceeded with the elaboration of a specialized Human Rights Policy, in dialogue with our Social Partners, during which MYTILINEOS listened to the views of all its Social Partners on the key points of the policy and integrated them into its final corporate policy document. The Human Rights Policy expresses the Company's zero tolerance of any violation of Human Rights. We fully protected labour rights as well as the other categories of Human Rights related to our activity.

Responsible Risk Management

MYTILINEOS' has developed a systematic approach to the recording, optimal management and disclosure of information about the ESG risks and opportunities that affect its performance, as well as about its efforts to implement its strategy. Through the ESG approach, MYTILINEOS strengthens its ability to create long-term value and manage significant changes in the environment in which it operates. In this way, it responds to the modern-day sustainability requirements of investors, capital markets and financial institutions, as well as to society's expectations of commitment and transparency regarding these issues, whose number keeps increasing.

Climate Change risks and opportunities

Furthermore, the Company has already incorporated in its strategic priorities the implementation of a study to identify the risks and opportunities from the impacts of climate change on its activity. In 2021, MYTILINEOS will join the CDP Climate Change international initiative, while according to its current planning, by the end of 2022 the Company intends to fully adopt the climate-related financial risk disclosures framework regarding the analysis of the risks and impacts of climate change, by following the relevant recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD).

For more information about the ESG and Sustainability strategic plan and in addition how the Company is managing the TCFD recommendations, please review the "TCFD Content Index" section of the Corporate Responsibility and Sustainability Report.

The MYTILINEOS Sustainable Development Report is published annually and refers to the review of the Company's non-financial performance, supplementing its Annual Financial Report. It is also available online at the official website of MYTILINEOS <https://www.MYTILINEOS.gr/sustainability/reports/sustainable-development-reporting/>.

Qualitative information

Accounting Policy

The figures presented in this report have been calculated and are presented in accordance with the International Financial Reporting Standards (IFRS) that have been issued by the International Accounting Standards Board (IASB) and their interpretations that have been issued by the International Financial Reporting Interpretations Committee (IFRIC) of the IASB. Their preparation requires estimations during the application of the Group's accounting principles. Important admissions are presented wherever it has been judged appropriate.

In the present report we present the proportion of the total turnover from the sale of goods or provisions of services, as well as the total CapEx and OpEx of the Group's economic activities that correspond to activities determined to be non-eligible, eligible or aligned for EU Taxonomy purposes according to the description of these activities and taking into account the respective NACE activity codes, as well as the relevant technical screening criteria as presented in Delegated Acts 2021/2139/EU and 2022/1214/EU. Since we are currently in the first period of implementation of the Taxonomy framework (1/1 – 31/12/2022), the Group's economic activities were reviewed and ultimately included/excluded both in terms of eligibility as well as in terms of alignment with the technical screening criteria provided in the related Delegated Acts. The said examination is thoroughly presented for each aligned activity, whereas any activities that did not fulfill one or several of the technical criteria are included only as eligible.

Taking into consideration the above, the calculation of the KPIs was based on the following elements of the Group's financial reporting:

Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions.

Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria.

Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

6. Environmental issues

Compliance with applicable environmental legislation and environmental standards is a key element of MYTILINEOS' business activity and a matter of equal importance to issues it manages in the context of its continuous and responsible development. This position, which is a key component of the central Company's Environmental policy, is based primarily on the principle of compliance with the legal requirements, as well as the agreements and commitments it has voluntarily undertaken through its Business Units. In addition, the monitoring of compliance with the approved environmental permits of the business units of the Company (DAECs – Decision on the Approval of Environmental Conditions) is a process that is carried out internally, on a regular basis in each Business Area, by specialized personnel, but also annually by a recognized independent third-party assurance agency that undertakes the audit and certification of the environmental management system.

A list of the Company's DAET is available at the following web address:
http://www.mytilineos.gr/Uploads/Adeies_Egkrishs_Perivallontikon_Oron.pdf

The Company is committed to reducing its carbon and environmental footprint, both by applying new technologies and appropriate sustainable investments and by implementing an integrated environmental management system certified ac-

ording to the international standard ISO 14001: 2015. The system is supported by individual environmental policies, by investments for the upgrading of production units, taking advantage of new technological developments, as well as by the application of Best Available Techniques per Business Sector.

6.1 Water Management

Water is an essential and irreplaceable natural resource for the core activities of MYTILINEOS. More than 97% of the total water withdrawal is used for the production of aluminium and power generation (cooling processes) at MYTILINEOS plants. The remaining water corresponds to the rest of the production activities, to assistive services of the production units, as well as consumption in the buildings of the Company's offices. All water withdrawals are strictly regulated by government authorities, which issue permits and set the maximum allowable withdrawal volumes in order to avoid significant negative impacts.

Company policies and commitments

- i. Responsible management of water withdrawal, use and discharge, in accordance with the central Environmental Policy of MYTILINEOS.
- ii. Voluntary participation of MYTILINEOS in the global Sustainable Development Initiative CDP – Water Security, through which it expresses its commitment to responsible management of potential risks related to the management of water resources from its activity.

Main Risks

The main long-term potential risks relate primarily to the Company's core production units and are the following:

- i. The possible reduction of the water reserves of the aquifer (groundwater) that the Company utilizes both in its production activities and in meeting the needs of the settlements of its local communities, concerns a potential risk that may lead to a reduction or interruption of production, complaints from local communities, increased operating costs through the use of water from public services as an alternative source.
- ii. Possible future changes in the water withdrawal limits and water discharge parameters in the DAECs (Decision on the Approval of Environmental Conditions) of the Company's Industrial Units, in particular in the Metallurgy and Energy Sectors. It refers to potential risk that may result in increased capital and maintenance operating costs associated with the development of alternative water reserves.

Actions to address and mitigate risks

In order to achieve more efficient water management, the Company implements practices and programs of continuous improvement in all its basic production units. In particular :

i. The Company implements an Environmental Management System certified according to ISO 14001 through which the management and treatment of possible incidents is carried out, with the preparation of plans to minimize the risks of leakage, with the implementation of predictive, preventive, and corrective measures that ensure the good condition of the water.

ii. In the Metallurgy Business Unit, the pumping of water from groundwater is done by a controlled network of shallow deep boreholes, which allows the water to be renewed in a short time, after its pumping, in a natural way through rainfall, snowfall, etc. (renewable sources).

iii. Implementation of water recycling and reuse programs in production processes or secondary uses to the maximum extent possible.

iv. Risk & Impact Assessment on the underground aquifer of the aluminum plant area as well as hydrogeological studies.

v. In the energy complex of Agios Nikolaos, Viotia, for the cooling of the towers of the thermoelectric production unit, the method of utilizing discarded seawater from another unit is systematically applied, thus avoiding the pumping of a significant amount of seawater.

vi. On an annual basis, internal targets are set for critical water consumption in the Sectors of Activity with the greatest impact, while rainwater collection and reuse is carried out.

vii. Water resources management includes the monitoring of water discharge in all production units and subsidiaries to ensure the quality of the discharged water. Water discharges are completely controlled and are made through monitoring of parameters determined by the

environmental regulations and conditions, according to which the environmental permits of the facilities have been obtained.

viii. In order to control the quality of disposal of treated wastewater from industrial waste, measurements are carried out on a continuous basis of specific parameters as defined in the applicable EPO and Water Use Permits.

Results of Actions

i. The water withdrawals and discharges from the Company's activities in 2022, were within the limits indicated by the relevant environmental permits for each basic facility and no issues were identified that could materially affect or threaten the adequacy of the available water in the aquifer, nor in any water source that is of high value for the preservation of biodiversity or is important for local communities.

ii. A total of 165.8 mm was pumped. ML of water⁷ to be used, 3,281 ML less than in 2021, while the amount of used water returned to the water receivers after quality treatment and in accordance with the approved environmental conditions per Sector of Activity, was 159.3 mm. ML. As a result, the total water consumption amounted to almost 6.5 mm. ML, recording a decrease of 6.4%, while freshwater consumption remained at stable levels (with a small increase of 0.2%) compared to 2021.

Index: Total water consumption	Unit of measurement	2021	2022	YoY
Total water withdrawals ⁸	ML	169,080.5	165,808.0	-1.9%
Total water discharges	ML	162,130.0	159,298.1	-1.7%
Total water consumption	ML	6,950.5	6,509.9	-6.3%

iii. The amount of water that was reused in other Company's plants, preventing an additional volume of water withdrawal, amounted to almost 5.6 mm. ML corresponding to 3.4% of the total water withdrawals.

iv. In 2022, no incidents of non-compliance regarding permits, standards and regulations on water quantity or quality were reported.

Performance evaluation and continuous improvement

i. Conduct regular internal audits to improve water management.

ii. The Company's progress is evaluated, on an annual basis, by the international organization CDP – Water Security. The Company's performance in 2022, certifies that it undertakes coordinated actions for the management of water resources.

MYTILINEOS Performance in CDP Water Security index	2016 B-/A	2017 A-/A	2018 B-/A	2019 B-/A	2020 B/A	2021 B/A	2022 B/A

iii. The key performance indicators (KPIs) on water are externally verified in the context of assurance of the Sustainable Development Report.

⁷ Overall water withdrawals is the sum of individual sources and is obtained through direct measurement (flow meters) or by estimating the output of extracting water pumps.

6.2 Pollution prevention

A key challenge for the Company is the effective prevention of any form of pollution of the natural environment from the production activity (gaseous emissions, solid and liquid waste, use of chemicals), as well as any large-scale industrial accidents.

Company policies and commitments

Prevention of any identified risk of pollution from the Company's activities, in accordance with the central Environmental Policy of MYTILINEOS.

Main Risks

- i. The potential degradation of air, groundwater and surface water quality, the marine environment, as well as soil pollution from industrial accidents are permanent potential risks.
- ii. The Company's core activities, both those relating to production or transportation, carry the risk of leaks, after unforeseen malfunctions or accidents, in the marine environment since they are adjacent to it.
- iii. The inability to prevent and manage the above risks could have a significant impact on the Company's financial and industrial capital, reducing the value generated, either through the increase of financial costs to deal with these incidents, or through possible administrative sanctions and possible inability to carry out its activities.

Actions to address and mitigate risks

- i. In the Metallurgy Sector, in order to prevent and deal with risks from large-scale industrial accidents, a special Major Accident Prevention policy is applied concerning the treatment of risks related to the use of dangerous substances in the activities of the sector. Through a series of prevention measures, it is achieved the avoidance of any incident of environmental degradation. These measures include, among others: the strict observance of the Environmental Conditions of the Metallurgy Activity, the observance of the measures provided for in the Safety Study (SEVESO III – implementation of JMD 172058/2016), the application of Best Available Techniques in the management of infrastructure and industrial waste, the good knowledge and practice on Emergency Plans, the operation of a fire protection department and the systematic monitoring of water and soil quality.
- ii. The subsidiary company DELPHI – DISTOMON, in the context of preventing and reducing small and local incidents of lubricant leaks in the context of mining activity within underground quarries, on an annual basis applies the following practices: 1) supply of materials to the best possible quality of the market, ensuring their greatest possible durability, 2) implementation, on an annual basis, of special seminars to raise awareness among staff, 3) immediate response to incidents, collecting the amount of soil in the area of the leak and forwarding it to the hazardous waste site for its appropriate management, and 4) regular and preventive maintenance of the equipment and its components.
- iii. In the Business Units of Energy & Natural Gas, Sustainable Development Projects and Development of Renewable Sources and Energy Storage, in all production units (thermal Power Plants, RES, complex construction plants and construction sites), the potential risks are identified, in order to be addressed in a timely manner and to minimize the consequences of unforeseen malfunctions and accidents. More specifically, the following are applied: a) all the procedures provided for in the Environmental Management Systems and the Emergency Plans, as well as the instructions for the operation and maintenance of facilities, b) monitoring of air pollutant emissions, c) preventive maintenance programs, d) systematic environmental visual inspections of installations, e) annual inspections by an external body for certification of Environmental Management Systems.

Results of Actions

- i. During 2022, there were no incidents of pollution of the natural environment from the production activity, nor industrial accidents in the overall activity of the Company. Regarding air emissions, in the Metallurgy Sector, they were kept for another year at levels below the legally imposed.

- ii. The Company's annual goal is to avoid any incidents and industrial accidents that could cause pollution to the natural environment, to its entire activity.

Performance evaluation and continuous improvement

- i. Continuous measurements shall be made to monitor gaseous emissions, floating particles and water discharges, as well as chemical analyses of the wastewater. Systematic visual inspections of the facilities are also carried out.
- ii. Within the framework of the Environmental Management Systems applied, inspections are carried out by independent third parties as well as internal inspections.
- iii. The key performance indicators on pollution prevention are externally verified as part of the assurance of the Sustainable Development Report.

6.3 Circular Economy (Waste management)

The management of all hazardous and non-hazardous waste and especially bauxite residues, the reduction of the amount of waste to be landfilled and the reuse of water and the proper management and reduction of water discharges are continuous challenges for the Company.

Main Risks

A key environmental risk for the Company is the gradual reduction of available bauxite repository sites, which may have social and economic negative effects on the Company.

Company policies and commitments

The reduction of the generated hazardous waste from its activities and their utilization to the maximum extent. Also, the continuous reduction and proper management of solid and liquid waste with recovery, reuse, and recycling techniques, where feasible. The reference point is the application of Best Available Techniques in the production process, in accordance with the central Environmental Policy of MYTILINEOS.

Actions to address and mitigate risks

In the Metallurgy Sector, MYTILINEOS :

- i. Operates (through its subsidiary company EPALME) an aluminum recycling unit where the circular economy approach is fully implemented. Long-term know-how in optimal processing of recycled aluminum produces new raw materials, consuming significantly less energy, while contributing to the reduction of operating costs and environmental impact. The main waste of the plant, which is ash, ends up entirely in the cement industry as an alternative raw material, while consumes 20 times less energy per ton of recycled aluminum produced, than is required for the production of primary cast aluminum.
- ii. Has set ambitious targets for the production of second-cast aluminium (65,000 t) and the use of aluminium scrap by 2030.

iii. Implements Life Cycle Assessment (LCA) studies to assess the potential environmental impacts of bauxite mining and alumina and aluminum production, in accordance with ISO 14040 and 14044 standards.

iv. Maintains and operates specially designed landfills for waste (Hazardous and inert), while the deposition of bauxite residues (non-hazardous waste that constitutes almost 72% of the Company's total waste) is carried out in a special way, based on geotechnical studies, following the natural terrain of the area.

v. Invests in the installation of pilot plants for the development of research in the utilization of bauxite residues, participating in European programs of efficient green technologies for the production of useful products and materials, as well as in the development of technology for the extraction of rare earths.

vi. Promotes for recycling the largest percentage of liquid waste within the production process itself, while at the same time three Biological Stations for the treatment of urban wastewater operate.

In addition, in 2022, the Company's Metallurgy Business Sector established a new innovation division at the Agios Nikolaos plant, which consists of 3 new departments, Research and Sustainable Development (RSD), Digital Transformation and Continuous Progress. In 2022, the RSD department participated in 23 research projects co-funded by the EU or the Greek state through the funding bodies H2020/Horizon Europe, EIT Raw Materials, EIT Manufacturing, ERA-MIN 2 and GSRT. These programs carry out research in areas such as:

i. Utilization of bauxite residues for the production of scandium, iron, alumina, cement additives and construction products.

ii. Alumina production from alternative (secondary) sources.

iii. Utilization of carbonated alumina electrolysis by-products.

iv. Heat recovery - use of RES in aluminum production.

v. New tools/training courses for engineers and technicians working in the raw materials and metallurgy industry.

<u>Index: Total Waste Produced</u>	Unit of measurement	2021	2022	YoY
Non - hazardous waste	t	914,624	1,118,463	22.3%
Hazardous waste	t	19,488	21,136	8.4%
Total	t	934,112	1,139,599	22.0%

ii. The percentage of solid waste that was reused, recycled, and utilized in various ways either by the Company itself or through third parties increased by ~12 percentage points and amounted to 36.9% (2021: 25%) of the total waste (including bauxite residues).

iii. The amount of solid waste sent to landfill, as a percentage of the total non-hazardous solid waste generated (excluding bauxite residues that undergo special treatment), was further limited in 2022 to 1.3% (2021: 2.0%).

Performance evaluation and continuous improvement

The key indicators regarding the quantities and management of waste are externally ensured in the context of ensuring the Sustainable Development Report.

The Sustainable Development Report 2022 presents detailed data on methods of disposal of Company's waste.

vi. New aluminum recycling technologies & process digitization in alumina production.

The total funding of the programs, in the period 2017-2026, exceeds € 120 million Euro, of which 9.5 million Euro concerns financing of the Metallurgy Business Sector of MYTILINEOS. MYTILINEOS, through the RSD activity of the Metallurgy Business Unit, is among the leading companies in the aluminum sector worldwide in the field of research for the exploitation of bauxite residues and the recovery of rare earths.

In all Business Units and production plants of MYTILINEOS:

i. Waste is separated at source and waste collection networks are in operation for reuse and recycling.

ii. In cases where recycling cannot be completed internally, partnerships are developed with alternative management system operators, as well as with licensed (per waste category), waste collection, transport, disposal / recovery companies in Greece and abroad.

iii. The management of water discharges is completely controlled and is done through parameters determined by the environmental regulations and conditions, according to which the relevant environmental permits have been obtained.

Results of Actions

i. In 2022, an increase in the total amount of solid waste of the Company by 22% was recorded, which came mainly from the increase in the production of Excavation, Construction and Demolition Waste (ECDW), almost 160,000 tons, as a result of the increased construction activity in 2022. It is noted that the entire specific category of waste was recycled.

7. Social Issues

MYTILINEOS is committed to remain steadfast in its goal of ensuring a healthy and safe working environment without accidents, making prevention its norm. At the same time, it continues to operate with a sense of responsibility and consistency towards its people by investing in education and the development of their skills, and constantly seeking to create a working environment without inequalities, discrimination, and exclusions. In addition, the consistent support of the sustainability of local communities, as well as the promotion of responsible entrepreneurship in the supply chain are key strategic priorities for the Company, which help meeting the modern challenges of Sustainable Development.

7.1 Occupational Health & Safety

The Business Units of the Company are inherently prone to risks relating to Health & Safety risks (minor accidents, accidents with loss of working time, occupational diseases and accidents), which can cause significant or less significant social impacts addressed not only to the employees themselves and their families, but also to third parties such as: employees of independent contractors, associates, trainee students and employees, but also any kind of visitor. In addition, these issues may have consequences related to the decrease in the level of satisfaction and morale of employees, the increased cost of accidents and/or absences and the negative impact on the image and reputation of MYTILINEOS.

Main Risks

- i. Indirect or Direct Accident Hazards: Indirect hazards create the conditions that lead to an accident (configuration, functionality, access - evacuation, lighting, temperature environment of workplaces). Direct hazards lead to an accident or an occupational disease (physical, chemical, and biological agents).
- ii. Non-Accident Risks, which concern organizational, psychological, and ergonomic factors, which do not lead to an accident but affect in the short or long term the mental and physical health of employees.

Company policies and commitments

MYTILINEOS continues to work tirelessly, in all areas of its Business Activity, to achieve the goal "NO ACCIDENTS AND NO OCCUPATIONAL DISEASES AT WORK", which is one of the dominant challenges in the field of industry. The Health and Safety of employees is a fundamental and primary business objective of MYTILINEOS' activity. It is a line of responsibility that starts from the Management and the General Directorates and reaches the production areas of all the Business Areas of the Company.

Operating responsibly, MYTILINEOS recognizes both its responsibility for the continuous improvement of Health & Safety conditions in its workplaces, as well as the right of its employees, but also of the employees of independent partners and contractors who perform work on its premises, to work without being exposed to risks that could cause an accident, injury or occupational disease, as explicitly stated in the Company's central Occupational Health and Safety Policy.

Actions to address and mitigate risks

The achievement of continuous progress and improvement, in this regard, depends both on the preventive actions it undertakes, as well as on the wider experiences gained by the Company from each incident and near-accident it examines, while the education and training of the staff is crucial for the maintenance and further development of the accident prevention mentality.

In all its Business Units, the Company implements an integrated management system for Occupational Health and Safety that aims to minimize risks, continuously take measures to prevent accidents and occupational diseases, continuously train employees, as well as strengthen the occupational culture. The system has been based on and is certified according to the International Standard ISO 45001: 2018, covering, at the end of 2022, >90% of all industrial and RES units of the Company that are in normal operation, and all direct and indirect employees in the Business Units and subsidiary companies applied. Analytically:

- i. Strict systems and measurements are applied, assessing their impact on employees, but also identifying the needs of interventions in offices and industrial units.
- ii. Preventive and structural actions are implemented, analyzing each incident and near-miss.
- iii. Continuous education and training actions for personnel are carried out as a priority of crucial importance for maintaining and further developing the culture of accident prevention. In this way, the systematic effort to promote and form a single corporate H&S Culture continues, which encourages all employees (directly and indirectly) to behave responsibly for themselves and their colleagues.
- iv. Systematic investments are made in Health and Hygiene issues, monitoring, and evaluating all relevant factors of the working environment, aiming at the continuous improvement of good health and healthy living of employees.
- v. Health and Safety issues are integrated into the central Corporate Risk Management System (ERM), in order to further ensure their prioritization, as well as the required allocation of relevant resources for their improvement.

In order to keep workplaces safe for employees and contractors working for MYTILINEOS, the issue of Health and Safety is linked to all decisions and actions of the Company.

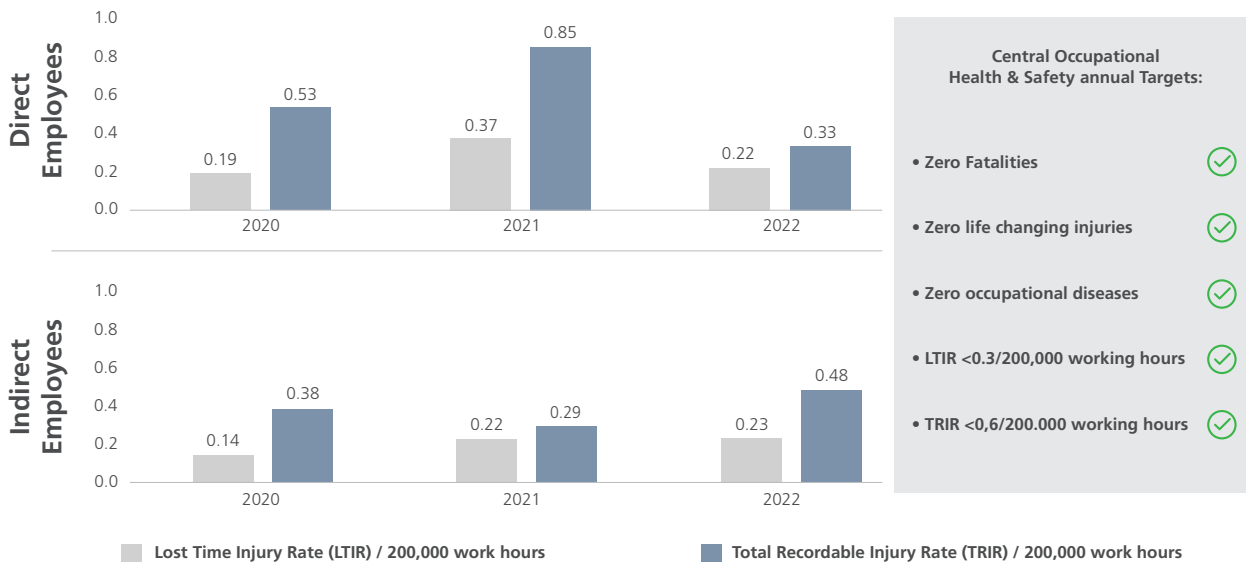
Results of Actions

The central Occupational Health & Safety policy of MYTILINEOS applies to all Business Units, subsidiaries, and Central Services of the Company. Individual action plans, which are reviewed annually, aim to improve Health and Safety performance, especially in the Company's main production units. In addition, the central Health and Safety business' objectives support the strategy on issues that have been assessed as important for the Company as a whole, including the number of accidents and serious accidents, the frequency of total recorded accidents and the frequency of accidents causing loss of working time. These core corporate goals are scaled across the enterprise and monitored locally, along with any additional goals that may be related to the specifics of each production unit.

Regarding 2022:

- i. No accidents, injuries with serious consequences on the lives of employees, nor occupational diseases were recorded for the direct and indirect employees of the Company.
- ii. The frequency indicators of accidents with interruption of work and total accidents of direct workers improved significantly, while the values of the corresponding indicators of indirect workers remained almost stable, compared to 2021.
- iii. Particular emphasis was placed this year on the prevention of serious accidents through innovative training methodologies using new technology.

Occupational Health & Safety Performance



TRIR: This includes accidents, serious accidents and all accidents that resulted in days of absence from work, limited work or transfer to another job, medical care other than first aid or loss of consciousness or significant injury or ill health diagnosed by a physician or other authorized health professional. This includes all cases of accidents and accidents that occurred during the employee's movement from the place of their private activity (e.g., residence) and a place of work or workplace and only when such movement has been organized by the Company.

LTIR: Accidents with loss of working time ≥ 3 days.

Performance evaluation and continuous improvement

i. MYTILINEOS Business Units of and its subsidiaries, in addition to the regular internal audits they carry out, are also subject to frequent external audits by customers, government bodies and independent auditors to evaluate and improve occupational Health and Safety management systems.

ii. The key Health and Safety performance indicators are externally verified in the context of the assurance of the Sustainable Development Report.

The Sustainable Development Report 2022 presents more detailed information on the Company's management and performance in matters of Health and Safety at work.

7.2 Human Rights

A key challenge for the Company is the protection and respect of Human Rights, especially labor and social rights, related to its activity, as well as ensuring its non-indirect participation in conditions of violation of these rights that may be caused either by another cooperating company, state bodies, natural persons, or other groups that it cooperates in the countries where it operates.

Company policies and commitments

MYTILINEOS operates on the basis of its long-standing commitment to zero tolerance of human rights violations, which is implemented both

by the non-participation (direct, passive or silent) of the Company in relevant violations, as well as by the avoidance of any transaction and contact with third parties, in the countries in which it operates, that may have caused or are reasonably suspected that they may participate in the creation of conditions that may cause violations of Human Rights, in accordance with the main axes of the Human Rights Policy, the "Code of Business Conduct" and the "Suppliers & Business partners Code of Conduct" of MYTILINEOS. In addition, MYTILINEOS is committed to the first six (6) Principles of the UN Global Compact, which are based, inter alia, on the internationally recognized Principles of Human Rights Protection, as set out in The UN Guiding Principles on Business and Human Rights.

Main Risks

MYTILINEOS, due to its activity in developing countries, mainly through the Sustainable Engineering Solutions Business Unit and the Renewable Energy Sources and Storage Development Business Unit, recognizes risks related to human rights, both within its working environment and in the operating environment of its key suppliers and partners. These risks (e.g., activities that may affect or involve children, culture of corruption, inequalities in the workplace, restriction of human rights at the level of local communities, etc.) can affect both the financial, human, and social capital of the Company, through possible effects on its reputation and social license to operate, while they may also lead to legal sanctions and the adoption of extraordinary measures beyond those imposed by the normal business conditions.

Actions to address and mitigate risks

i. MYTILINEOS monitors the relevant labor legislation (national, European), as well as the recommendations of the International Labour Organization (ILO), while it is in full compliance with collective and rel-

evant international conventions, both at national and European level and in the context of operating in developing countries.

ii. The Company carries out self-assessments for the protection and respect of Human Rights in all its Business Areas.

iii. The Company has a mechanism for reporting violations of the Code of Conduct that is under the responsibility of the Directorate of Regulatory Compliance, enabling its employees to raise any concerns they may have, as well as incidents of Human Rights violations. At the same time, it undertakes that it does not take any action against any employee who reports, in good faith, any actual or alleged inappropriate behavior.

iv. Regarding its activity in developing countries, MYTILINEOS takes all necessary measures to comply with the law. The management of safe work is governed by a series of actions that everyone has a duty to implement, for the proper implementation of the system of occupational Health & Safety of employees taking appropriate measures. At the same time, in the contracts signed with contractors and suppliers there is an explicit provision regarding the Code of Conduct to ensure the protection of Human Rights and the avoidance of conditions of corruption and bribery.

v. The Company also conducts training of its executives on Human Rights with emphasis on respect for the freedom of association, the elimination of any form of forced or compulsory labor, the recognition and elimination of child labor and the elimination of any discrimination related to the workplace and employment.

Results of Actions

i. Through the formal process of reporting violations of the Company's Code of Conduct, no incidents of Human Rights violations were reported to the General Directorate of Human Resources or the Directorate of Regulatory Compliance during 2022.

ii. Also, in the context of educating employees on the Code of Business Ethics, the Company continued in 2022 the special training for its executives and employees, through the e-learning process, in the theme of Human Rights, where 211 employees were informed about the respect of the freedom of association, the elimination of any form of forced or compulsory labor, the recognition and elimination of child labour and the elimination of any discrimination related to the workplace and occupation, bringing the total number of workers trained to 941.

Performance evaluation and continuous improvement

Company's performance in the matter of Human Rights is externally verified in the context of assurance the Sustainable Development Report.

The Sustainable Development Report 2022 presents in detail the areas explored during the self-assessment process, as well as the results of the evaluation of key suppliers on Human Rights issues.

7.3 Employment

Employment is characterized as an extremely important issue for MYTILINEOS, due to its high locality and large number of employees. The creation of opportunities for long-term employment of workforce also contributes to the sustainability of the local communities in which the Company operates. Focusing on issues such as: the working environment, remuneration, benefits, working time, rest periods, leave, disciplinary and dismissal practices, maternity protection, mental health, and other welfare issues is a critical factor for the satisfaction and retention of MYTILINEOS employees.

Company policies and commitments

Development, management, and retention of human resources, through the implementation of practices that promote an inclusive working environment, with

equal opportunities and respect for Human Rights, in accordance with the main axes of the Policy and Recruitment process, the Human Rights Policy and the Corporate Social Responsibility Policy of MYTILINEOS.

Main Risks

Increasing competitiveness in the labour market and labour mobility can lead to the loss of valuable knowledge and experience gained through the employment of workers, as well as the loss of financial investment and time spent to employee induction training. Also, the Company can bear increased costs due to mobility and the need to replace qualified personnel.

Actions to address and mitigate risks

In order to address the aforementioned risks, the Company has implemented retention systems and practices relating to:

i. the development of programs for the formation of a unified corporate culture, based on the common values and behaviors of employees,

ii. the implementation of employee training and development programs, which aim to strengthen personal and technical skills and abilities required to address the current and future challenges of the Company's business activity, while aiming at the personal development of employees,

iii. the provision of incentives, both in terms of remuneration and benefits as well as development and growth, aimed at increasing engagement and employee retention,

iv. the timely and continuous information of employees about changes in structures and procedures, which are associated with the development of its activities and the adoption of best practices in its operating model.

Basic areas of employment management by the Company

i. The attraction and retention of competent executives and the continuous improvement of relations with employees, as well as the implementation of modern performance evaluation systems.

ii. The promotion and understanding of the Code of Business Conduct to all staff, as well as the avoidance of discrimination, either directly or indirectly, in any work practices.

iii. The recognition of the importance and continuous improvement of healthy and safe employment for all staff and associates with emphasis on mental health.

iv. The focus on locality, giving priority to the recruitment of workers from its local communities and the strengthening of local employment at domestic and international level based on its activity.

v. To ensure the flow of information and timely communication on organizational changes through the

available communication channels: intranet, e-mail, SharePoint application and ways of communication not related to electronic means such as special events for management, written announcements in production areas and generally open communication with human resources through the role of the HR-Business Partner per Business Sector.

vi. The protection of employees' personal data by allowing their use only to authorized persons and only where required by law and for purposes related to the operation of labor relations and the business activity of the Company.

vii. To ensure through the individual Labor Regulations and the Code of Professional Ethics the elimination of any arbitrary or discriminatory practice of termination of cooperation with employees.

The Human Resources Division of MYTILINEOS is responsible for the creation and implementation of the management & development framework of the relevant policies and practices, as well as for the provision of professional support to the Business Units in dealing with human resources issues.

Results of Actions

In 2022:

i. Direct employment showed a significant increase of 10.7%. The total number of direct employees of the Company amounted to 3,210 people (2021: 2,899), with about 79% of them employed in Greece.

ii. The total number of indirect employees (permanent independent contractors, partners with long-term or project contracts) amounted to 2,232 (2021: 1,934), bringing the number of direct and indirect employees of the Company to 5,442 people, increasing total employment by 12,8% compared to 2021.

iii. Regarding staff mobility: i) The voluntary departures ratio stood at 8.75% increased by 2.6 percentage points (2021: 6.1%).

iv. Total new hires reached 820.

v. MYTILINEOS has created 76 quality internships and vocational training positions, with the aim of developing skills and converting many of these positions into permanent jobs.

vi. The percentage of full-time employee retention stood at 88.3% (2021: 90.6%).

vii. The high percentage (82.6%) of employees employed under an employment contract of indefinite duration was retained (2021: 83%)

viii. Part-time employment was maintained for another year at very low rates (0.7%) (2021: 0.6%).

ix. A total of 476 new jobs were created, covering needs in all areas of business activity of the Company.

Performance evaluation and continuous improvement

The Company's key employment performance indicators are externally verified in the context of assurance of the Sustainable Development Report.

7.4 Equal Opportunities

To ensure equal opportunities by abolishing discriminatory policies and practices (wages, age, gender, disability, race, nationality, origin, religion, sexual orientation or other status) and by promoting actions to provide a working environment where each employee has exactly the

same rights and is treated fairly and according to the abilities, he / she has to meet under his / her role.

Company policies and commitments

i. Provision of equal opportunities without discrimination, in accordance with the main guidelines of the Human Rights Policy of MYTILINEOS.

ii. Commitment to promoting the reduction of Inequalities in the context of the Company's contribution to the Global Sustainable Development Goals (5 &10)

iii. Priority to practices that promote an inclusive working environment, with the promotion of equal opportunities and respect for Human Rights, as stated in the Corporate Social Responsibility Policy of MYTILINEOS.

iv. Commitment of the Company to the 6th Principle of the UN Global Compact for the limitation of all forms of discrimination at work.

Main Risks

Risks include inequalities mainly related to wages pay provision, education and training, as well as opportunities for human resource development and career opportunities. Such risks may have an impact on the morale and productivity of employees, while inequalities in the provision of remuneration may impede the retention of talented and skilled employees, burdening the Company with increased costs for their replacement, while at the same time they can jeopardize the Company's reputation as a responsible employer.

Actions to address and mitigate risks

i. The Code of Business Conduct and Human Rights Policy have explicit references to non-discrimination at work.

ii. The Policy for the Search, Selection and Recruitment of Human Resources, as well as the Training and Development Policy, were revised with the aim of ensuring the integration of Equal Opportunities into them.

iii. The design and the approval process of the Policy of the prevention of Violence and Harassment in the Workplace has been completed. The aim of the policy is to create a working environment free of Violence and Harassment, which respects and safeguards human dignity. The policy concerns employees, associates, apprentices, interns, former employees, and job seekers, etc. and is fully in line with labour law.

iv. The study of the analysis and evaluation of wage tiers is ongoing, in order to identify areas that may require corrective actions in the short and long term to eliminate the pay gap between men and women. The aim of this study is to create an action plan by the end of 2023.

Results of Actions

In 2022:

- i. 180 new hires of female workers were made, further increasing the percentage of women in direct employment to 20.1% (2021: 18.7%).
- ii. The percentage of women in executive positions also increased, reaching 23.5% (2021: 21.1%).
- iii. In addition, 303 new employees were hired <30 years old, increasing their participation in direct employment to 14.3% (2021:13%).

Performance evaluation and continuous improvement

The Company's key performance indicators regarding the provision of equal employment opportunities are externally verified in the context of assurance of the Sustainable Development Report.

In the 2022 Sustainable Development Report, more information is provided on equal opportunity management and diversity in the Company.

7.5 Sustainability of local communities

MYTILINEOS, as an active member of the local communities in the areas where its main industrial units are located, seeks the long-term acceptance of its business activity by the local communities, having as a key priority to play an active role in their economic, social, and cultural activities, supporting their Sustainable Development. The Company's social policy focuses on the implementation of actions related to the Global Sustainable Development Goals, as stated in the section "Aligning our strategy with the Global Sustainable Development Goals" of this report.

Company policies and commitments

- i. Respect to the rights of citizens of local communities neighboring to the Company's industrial plants, according to the main directions of the Human Rights Policy and the Corporate Social Responsibility Policy of MYTILINEOS.
- ii. The consistent implementation of its social policy with actions and initiatives that enhance the harmony of coexistence of MYTILINEOS with its local communities, but also with the wider society.
- iii. The consistency in the implementation of the institution of consultation at local level (Metallurgy Sector) on Sustainable Development issues.

Main Risks

The Company's inability to identify and manage the often changing social, economic, and cultural peculiarities of its local communities in a timely manner may negate the existing assumption that the Company is an integral member of them. This may have an impact on the maintenance of social acceptance of the Company's operation, its reputation, and its strategy, placing possible restrictions on its future growth with effects on its financial results.

Actions to address and mitigate risks

The contribution of MYTILINEOS to the Sustainable Development of its local communities is determined by the following main axes:

- i) strengthening local employment, recognizing its role in developing and maintaining the well-being of the local communities in which it operates.
- ii) development of the local economy, choosing to cooperate with domestic and consequently local suppliers as a priority,

iii) substantial social contribution through the annual social investment program, implementing selected actions in areas directly linked to basic social needs and national priorities in the context of the social Global Sustainable Development Goals.

iv) development and provision of innovative products and services that serve the sustainable management of local communities.

More analytically:

i. MYTILINEOS has been implementing with absolute consistency over the last 13 years the institution of Consultation with its Stakeholder groups at local community level. The Company is among the pioneers in this field in Greece, creating the conditions for the formation of new perceptions and practices in its relations with Social Partner groups, having as a springboard the particularities of its Business Units.

ii. The social initiatives undertaken by the Company at local level, and mainly in the category of strengthening local infrastructure, are linked to the needs of each community and its wider area and are shaped through open dialogue with local Social Partner groups. The Company communicates with its local communities in a clear and transparent way through the "open door" policy that is applied mainly in the areas where its industrial units are located.

iii. At the same time, strengthening the constructive relationship it has built over time with its Stakeholders, MYTILINEOS implements a system for the management and evaluation of social requests, which enhances transparency and ensures the sustainability of its social investments.

iv. The General Division of each Business Unit of MYTILINEOS are responsible for the management of the relations with the local communities that operate, while special executives of the Company, members of the individual Sustainability/ESG teams of the Business Unit, manage the implementation of social policy at local level and support the General Directories in the management of relations with local communities.

Results of Actions

i. During 2022, and in accordance with the existing complaint mechanisms of the industrial units, there were no significant negative impacts, from the company's activity, on local communities both on a social, environmental, and economic level.

ii. The Company maintained for yet another year the very high rates of local employment, where more than 9 out of 10 of its direct and indirect employees come from the communities directly adjacent to its industrial units and the wider region.

iii. A total of >€2m was invested in the implementation of social programs at central and local level with a total of 80,000 (2021: 52,899) benefiting citizens.

iv. The 8th consecutive thematic consultation with the Social Partner groups (stakeholders) was imple-

mented, in the Metallurgy Sector of the Company, titled "Innovation and Digital Transformation".

v. MYTILINEOS, in the context of its transformation into an integrated energy provider, created and presented the new MYTILINEOS Smart Cities platform that aims, through the use of digital technologies, at the direct involvement of citizens of local communities in improving their quality of life and optimizing the exploitation of natural resources.

vi. In order to determine the social value created by its investments in key social programs, MYTILINEOS applies the SROI (Social Return on Investment) methodology. It concerns a holistic approach through which the Company calculates the impact it creates and makes informed decisions, with the aim of maximizing the value returned by the investment it implements for each social program. In 2022, the results of four of the Company's main social programs were analyzed, whose SROI ratios ranged at high levels, namely from 3.24:1 to 4.88:1. This means that for every 1 euro invested in each programme, between 3.24 and 4.88 euros of social value were produced respectively.

Performance evaluation and continuous improvement

The Company's key performance indicators (KPIs) regarding the sustainability of local communities are externally verified in the context of assurance of the Sustainable Development Report.

The Sustainable Development Report 2022 details the social programs implemented by the Company with their relative effects and the corresponding targets for 2023, as well as the relevant results based on the SROI methodology in the programs implemented.

8. Governance Issues

In this section, elements of Corporate Governance that are extensively analyzed in the corresponding section "Corporate Governance Statement" of this report are not commented on.

8.1 Business Ethics

MYTILINEOS recognizes that the phenomena of corruption, bribery, fraud, violation of healthy competition and money laundering undermine the ethical environment of any business and the consequences they may cause include the violation of Human Rights, adverse effects on the environment, as well as the obstruction of the distribution of wealth and the economic development of countries. These phenomena are a major obstacle to Sustainable Development, with a disproportionate impact on poor communities, eroding the structure of society.

Company policies and commitments

MYTILINEOS demonstrates Zero tolerance for situations of corruption and bribery, in accordance with its main corporate culture which is ensured through the Corporate Social Responsibility Policy, the Code of Business Conduct and the "Suppliers & Business partners Code of Conduct".

Main Risks

MYTILINEOS, through its activity in developing countries with high energy needs which, according to the annual survey of the Organization Transparency International (Corruption Perceptions Index) are located in the area of high risk of corruption, may be exposed to facilitation payments or other benefits to local partners, in order to continue the smooth operation of the projects. Any deviation from the principles and ethical practices of the Company endangers the good reputation,

reliability, trust of the Social Partners groups and consequently its financial results and its ability to undertake new projects.

Actions to address and mitigate risks

Tackling corruption and bribery is a key element of the Code of Professional Ethics, as well as the Code of Conduct for Suppliers & Partners of MYTILINEOS. For the Company, the benchmark in tackling corruption and bribery is the principle of integrity, which is linked to its long-standing commitment to zero tolerance in these matters. The Company takes a number of measures to implement this commitment and specifically:

i. Officially bound to the 10th principle of the UN Global Compact, according to which it "is opposed to all forms of corruption, including extortion, bribery and facilitation payments", and which acts as a catalyst in the development of the relevant ethical culture throughout the Company.

ii. It implements thorough audits and practices third-party due diligence before entering into an agreement or paying them, with the aim of tackling corruption and bribery.

iii. Any transaction and contact with third parties who have participated in the creation of conditions for the development of incidents of corruption, extortion or bribery is avoided.

iv. A risk study on the potential corruption and bribery in its business activities is carried out on an annual basis and risk minimization measures are prescribed in the context of Enterprise Risk Management.

v. Systems and controls are applied at a preventive and detective level to ensure the correct selection of suppliers, the avoidance of disputed payments, the correctness of payments, as well as their correct and transparent recognition in the Company's accounting records.

vi. It establishes a grievance mechanism in countries at high risk of corruption, protecting whistleblowers, while operating a complaints mechanism at central level by reporting breaches to the Director of Regulatory Compliance.

vii. Exceptional supplier audits are carried out in order to ensure the implementation of the Code of Conduct for Suppliers and Partners.

viii. The Company ensures the systematic training of staff on issues of the code of conduct per category of exposure to regulatory risk.

Results of Actions

In 2022, MYTILINEOS implemented all the necessary internal procedures to safeguard its policy. Through the control mechanisms applied in the Purchasing – Procurement Departments of the Company's Activity Sectors, where both the selection of partners and any kind of transaction were examined, there were no confirmed incidents of corruption, incidents that led

to the removal or disciplinary prosecution of employees for reasons of corruption, confirmed incidents related to corruption and which led to the termination or non-renewal of cooperation with associates or public court cases related to corruption against the Company or its employees. In this way, MYTILINEOS achieved its annual target for zero incidents of corruption and bribery.

Performance evaluation and continuous improvement

Key performance indicators on business ethics are externally verified in the context of assurance of the Sustainable Development Report.

8.2 Cybersecurity

Maintaining and continuously enhancing the level of Cybersecurity are of major importance for MYTILINEOS, both in the context of compliance with international and domestic regulatory standards of information security, as well as in the broader effort to ensure the services provided against the constantly evolving cyber threats. Given the complexity of the relevant regulatory framework and the significant dependence of business activities on the resilience and smooth operation of infrastructure, MYTILINEOS has put in place technical and organizational safeguards that focus on ensuring the key security pillars, such as confidentiality, integrity, and availability.

Company's policies and commitments

MYTILINEOS has developed and is committed to the implementation of a holistic Information Security Management System, which consists of policies, procedures, and instructions, through which the effective and efficient protection of the Company's information systems and data is achieved. The Information Security Management System is designed to support the business objectives of MYTILINEOS, to reduce the risk of breach of confidentiality, integrity and availability of corporate information and information systems, and to instill the Company's strategy and ethical values, as well as information security principles, on the Company's staff. In addition, MYTILINEOS, being fully aware of the criticality of the cyber threats it faces and the associated potential impacts, has decided to demonstrate zero tolerance towards information security risks, which is achieved through the existing Information Security Management System. The objectives, responsibilities, and commitments of MYTILINEOS are communicated through the Information Security Management System to all employees, partners and third parties involved.

Main risks

A decisive factor for the effective maintenance of an adequate level of cybersecurity is the successful identification of the most critical information security risks that lurk and are directly related to the size of MYTILINEOS, the nature and scope of its business activities and services offered, as well as its active partnerships with third parties. MYTILINEOS recognizes as most important the risks stemming from targeted cyberattacks, which aim to disrupt the proper functioning of the Company. Indicative examples of such attacks are "Distributed Denial of Service" attacks, as well as attacks with encryption malware or ransomware. At the same time, in the context of safeguarding human rights, MYTILINEOS recognizes as equally important the risk of data leakage to unauthorized entities, which may occur intentionally or even unintentionally, due to human error.

Risk mitigation and mitigation actions

i. With the aim of timely, effectively, and efficiently addressing the identified risks and avoiding or mitigating any potential impacts, MYTILINEOS has put in place a holistic Information Security Program, which consists of the appropriate organizational and technical safeguards. The ultimate goal of the Program is to maintain and continuously enhance the level of cybersecurity, thus contributing to the achievement of the Company's business goals regarding Sustainable Development and the provision of safe services, while protecting the rights of its employees, customers, and partners. Part of the Information Security Program is the aforementioned Information Security Management System, which defines all the organizational safeguards required for the proper functioning of the Program.

MYTILINEOS, through its cooperation with independent organizations and consultants, periodically reviews the adequacy and effectiveness of information and IT security policies, procedures and instructions and makes any necessary update of the Information Security Management System, in accordance with the needs of the Company. This update shall also take place in the wake of any technological developments, new information security risks and information security breach incidents, with a view to ensuring that the Information Security Programme and the achievement of operational objectives are adequately supported.

An integral part of the Program is the periodic identification, evaluation, and prioritization of information security risks, identifying the relevant information resources, their exposure to cyber threats, the potential impact on the Company, as well as the existing security safeguards. Through this assessment, the level of maturity of the safeguards in place can be determined, as well as the degree to which the risks identified are mitigated, thus contributing to the continuous improvement of the Information Security Program.

ii. Parallel actions that are implemented and contribute to the continuous identification of risks are the vulnerability checks of information systems. Such technical audits are carried out periodically by external organisations and consultants, as well as through information security systems put in place by MYTILINEOS, in order to identify in a timely manner systemic vulnerabilities exposed to cyber threats that can have a significant impact.

iii. Paying particular attention to the human factor, MYTILINEOS has developed a regular and structured awareness and training program on information security and information technology issues, which is implemented on an ongoing basis. The aim of the program is to ensure that all employees, contractors and related third parties with access to information and information systems of the Company, understand the need for information security, accept the responsibilities assigned to them under the Information Security Management System and perform their duties demonstrating a high level of professional ethics. That programme shall be evaluated and reviewed if appropriate, at regular intervals through examinations as well as exercises that simulate actual cybersecurity attacks.

At the same time, given the size of MYTILINEOS, the continuous training and awareness of the Company's staff and associates on information security issues contributes to the enhancement of the relevant level of knowledge in the wider society, to the promotion of the information security culture and ultimately to the protection of data from cyber threats.

iv. Recognizing the potential negative effects resulting from a targeted information security attack, MYTILINEOS has implemented technical safeguards aimed at the early detection of information security incidents. At the same time, there are organisational safeguards, such as roles, responsibilities, and procedures, that make it possible to confirm incidents as

information security incidents, as well as to investigate, assess, mitigate and respond to them within strict timeframes, with the aim of mitigating the related impacts and implementing measures to avoid similar incidents in the future.

v. Finally, recognizing the increased likelihood of information security incidents, MYTILINEOS has designed and implemented a business continuity and disaster recovery plan, which is tested and updated on a regular basis, with the aim of ensuring business continuity, minimizing, and restoring the negative impact following a cybersecurity breach or natural disaster.

At regular intervals, or if issues arise in the wider cybersecurity environment in which the Company operates, relevant presentations are made at the level of Senior Management or Audit Committee. Senior Management is responsible for taking appropriate measures that will guarantee business continuity, according to the needs of the Company.

Results of actions

In order to evaluate the adequacy and effectiveness of the Information Security Program, MYTILINEOS has established and systematically monitors a set of performance metrics (KPIs), while conducting periodic and continuous compliance audits, aiming to ensure compliance with regulatory requirements and the adequate achievement of the goals set, as well as to continuously enhance the Company's level of cybersecurity. The results of the performance evaluation as well as the internal and external audits / inspections are periodically reported to the Senior Management of the Company, so that, based on them, the appropriate plan of actions for correction and improvement of the Program is determined and implemented.

Paying particular attention to the continuous awareness of employees on information security issues, MYTILINEOS diligently monitors this action and has put in place appropriate controls and quantitative performance indicators. Indicatively, it is mentioned that:

- i. 2,216 users of the Company's information systems participated in the training activities that were conducted and which focused on 8 different security topics.
- ii. 63% of employees completed these trainings.
- iii. 21% are in the process of completing these trainings.
- iv. 59% of employees successfully completed their information security assessments.

Evaluation of performance & continuous improvement

Based on the results of the comprehensive evaluation of the actions of the MYTILINEOS Information Security Program for the year 2022, the degree of achievement of the goals set for maintaining an adequate level of cybersecurity, proper operational operation, protection of corporate and personal data and compliance with applicable regulatory requirements, is considered very satisfactory, contributing to the Company's broader strategy for Sustainable Development and safeguarding the rights of the subjects.

8.3 Regulatory Compliance

Maintaining regulatory compliance at environmental, social and product level, in order to ensure that the overall corporate activity is legal and corresponds to high levels of responsible entrepreneurship, enhancing the climate of trust between MYTILINEOS and its Social Partners.

Company policies and commitments

Operation in full harmony, compliance with the applicable legislation and the principles of operation in each region or country of activity, in accordance with the basic axes of the "Code of Business Conduct" and the "Suppliers & Business partners Code of Conduct".

Main Risks

- i. Financial risks, from possible negative outcomes of litigation related to non-compliance with the legislative context in general.
- ii. Possible non-compliance of the Company with its obligations arising from environmental legislation and more specifically with the terms of the environmental permits of its industrial facilities. In the event of a breach of the applicable regulations, the competent authorities may impose fines or sanctions, as well as withdraw or refuse to renew licenses and authorizations.
- iii. MYTILINEOS operates in countries with emerging economies, where its operations may be affected by political conditions and changes therein. This could adversely affect the Company's activities.

The above potential risks could have a significant impact on profitability, financial position and cash flow and, consequently, on MYTILINEOS' ability to meet its obligations.

Actions to address and mitigate risks

- i. In order to prevent any risks, MYTILINEOS ensures compliance with the legal and regulatory requirements of the areas in which it operates and that its relations and activities comply with the applicable legislation and the applicable institutional framework.
- ii. Measures are taken to keep abreast of the legal obligations in force over time while monitoring procedures for legislative developments.
- iii. Compliance with applicable laws and regulations, including approved environmental permits, is reviewed and assessed on a regular basis.
- iv. The Company ensures that its business practices are in line with the Principles of the UN Global Compact.
- v. During bidding for a project, policies, and procedures (management system or due diligence procedures) are applied to prevent bribery and corruption, as well as anti-competitive behavior.
- vi. At the same time, trainings on issues related to regulatory compliance are developed and carried out, such as trainings on personal data protection (GDPR) and trainings on the application of the Code of Conduct. In addition, relevant training material has been developed and thematic trainings are carried out to specific employees whose topics concern:

- a. Initial Regulatory Compliance Training for New Employees.
- b. Laws on fair competition.
- c. Thorough third-party screening using the intercompany integrity checking platform.
- d. Financial sanctions and control of counterparties.
- e. Management of a platform for complaints and relevant investigation of them.

Results of Actions

- i. In 2022, the Compliance Division continued the implementation of the training for the protection of personal data (GDPR) and the training in the Code of Conduct of MYTILINEOS (CoC) focusing on new entrants.
- ii. In 2022, there were also no incidents of litigation or financial sanctions for anti-competitive conduct, antitrust or monopolistic practices, corruption, bribery, cartel, or price-fixing activities.

Performance evaluation and continuous improvement

Key performance indicators on regulatory compliance are externally verified as part of the Sustainable Development Report assurance.

9. Supply Chain issues

The Company's approach to sustainable supply chain management integrates environmental, social and governance aspects. MYTILINEOS monitors sustainability risks to avoid any adverse impacts arising from the supply chain. In addition, key suppliers are encouraged not only to comply with legal requirements, but also to exceed them. Consequently, the Company understands the sustainability performance of its suppliers as an important aspect in creating added value and positive impact.

Main Risks

The lack of responsible practices in the Company's supply chain can be a source of different risks, such as: problems in the supply of raw materials, materials, and services, increased environmental impacts, Health and Safety risks, risks of human rights violations, risks related to ethical and compliance issues, with financial consequences for the Company, but also consequences for its reputation and reliability.

Company policies and commitments

Creation of a responsible supply chain based on ESG criteria and in accordance with the Suppliers & Business Partners Code of Conduct.

Actions to address and mitigate risks

In order to develop a responsible and sustainable supply chain, MYTILINEOS has adopted the following:

"Suppliers & Business partners Code of Conduct"

The Company has created a specific "Suppliers & Business partners Code of Conduct" that includes the description of the Company's minimum conditions / expectations from its suppliers, in matters related to responsible entrepreneurship and Sustainable Development, while it is a basic condition of the commercial cooperation of both parties. The Code is structured according to ESG criteria and aligned with the Global Sustainable Development Goals. It has been posted on the corporate website and is accessible to suppliers. Acceptance of the Code is a prerequisite when signing a contract or other agreement with a supplier (its observance is a contractual obligation).

Supplier training

At the level of training, the Company consistently promotes knowledge in the implementation of standards and procedures to ensure sustainability as a key factor in the business operations of its key suppliers, as it recognizes the positive connection between sustainability, resilience, and economic performance. The training program implemented by MYTILINEOS aims to train and raise awareness of its key suppliers on the main pillars of sustainable development and has been systematically carried out over the last 3 years, in collaboration with the Hellenic Network for Corporate Social Responsibility "CSR HELLAS".

Supplier assessment according to ESG criteria

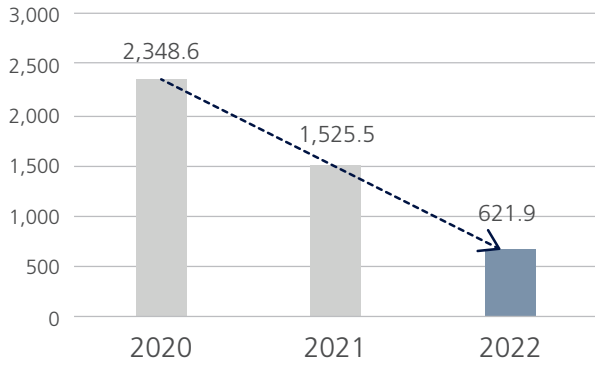
At the level of evaluation, the aim is to identify critical issues, provide support, as well as continuously improve the Company's key suppliers. In 2022, MYTILINEOS began the systematic promotion and integration of the principles of Sustainable Development in its supply chain. Specifically, by 2025, MYTILINEOS aims to create a register of key suppliers, who meet the ESG criteria set by the Company, through a special evaluation methodology, harmonized with the requirements of its Code of Conduct for Suppliers and Partners. The process of evaluating key suppliers is gradually integrated into all purchasing and procurement departments of all its Business Areas and focuses on material issues directly related to the Sustainable Development Goals and including the assessment of, inter alia, compliance with environmental requirements, health and safety management, protection of human rights, as well as ethical and integrity issues. At the same time, MYTILINEOS cooperates with its suppliers that are lagging behind in sustainable development issues, in order to support them in improving their performance in managing the essential ESG issues that concern them.

Results of Actions

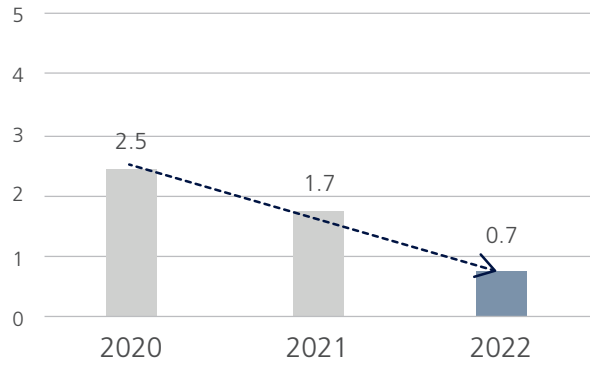
- i. In 2022, the new process of evaluating existing key suppliers with ESG criteria began. 62 key suppliers from various activities of the Company participated in the evaluation process. The first results showed that 82% of them are at the level of low and negligible risk, while for the rest, the possibility of designing specific adaptation actions to improve them is being considered. The evaluation continues with individual communications with suppliers to send additional information.
- ii. The Company completed the 3rd cycle of training of its domestic suppliers on Sustainable Development issues, increasing the number of suppliers already trained to 126, while 14 of them completed additional in-house training following an expression of interest on their part, with the relevant costs being covered exclusively by MYTILINEOS.

10. Key intensity metrics

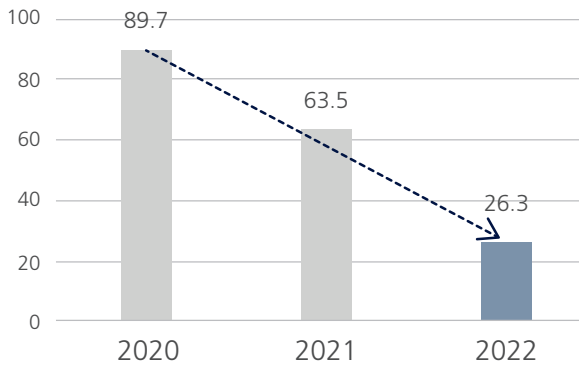
Overall CO₂ emissions (Scope 1 & 2) (t_{eq})
/ mil. Income, Euro



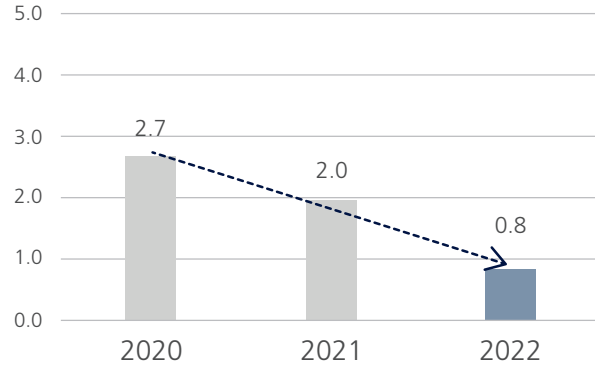
Overall NOx - SOx emissions (t)
/ mil. Income, Euro



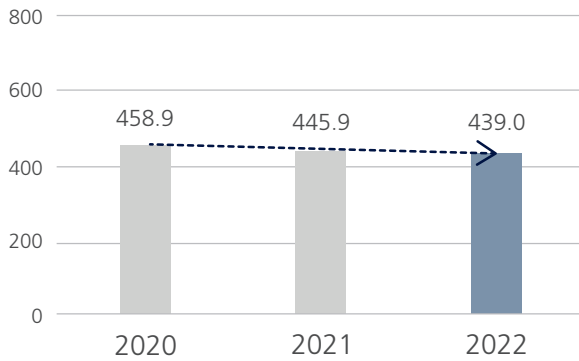
Overall water pumping (MI)
/ mil. Income, Euro



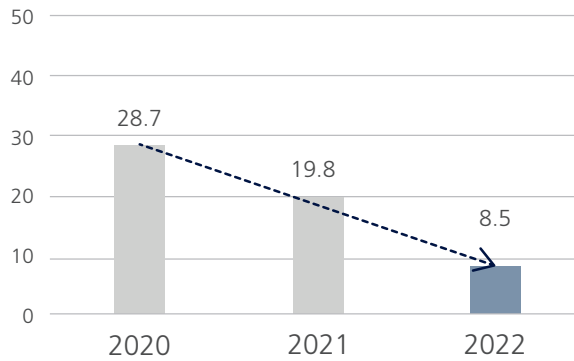
Overall fresh water consumption (MI)
/ mil. Income, Euro

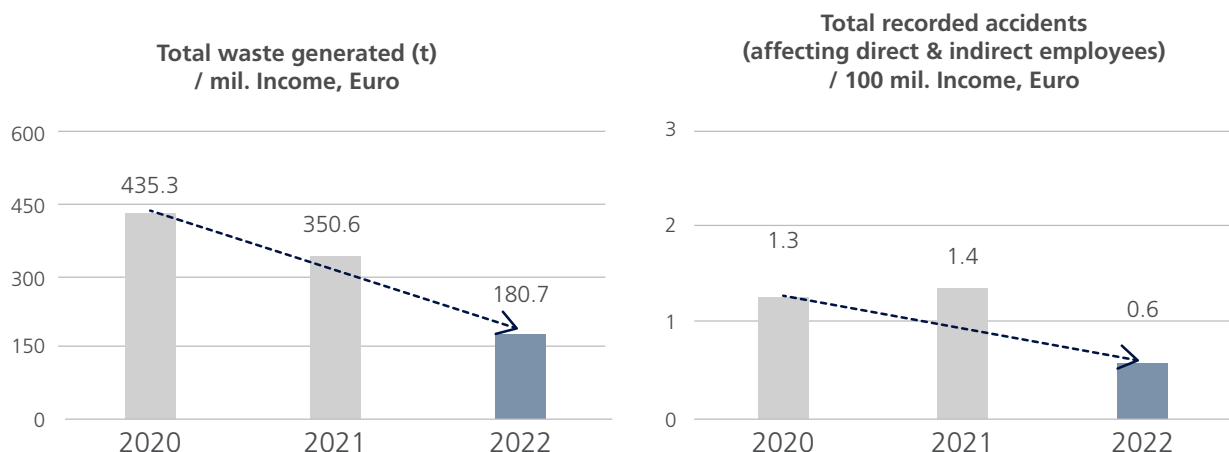


Overall energy consumption (MWh)
/ Overall energy produced (Tj)



Overall energy consumption (Tj)
/ mil. Income, Euro





11. ESG Scorecard

Demonstration of selected ESG performance indices that complement the Essential subject matter information are presented in this Report.

ESG Pillar	ESG KPIs indices	ESG ATHEX indices	2020	2021	2022
E	Overall CO ₂ emissions (Scope 1&2 - t CO ₂ e)	C-E1 C-E2	4,459,424	4,063,959	3,921,899
	Metallurgy Sector: CO ₂ emissions (Scope 1&2- t CO ₂ e)		2,840,274	2,619,917	2,586,076
	Metallurgy Sector: Specific CO ₂ emissions (t CO ₂ e Scope 1 & 2 / t of primary cast aluminium produced) ¹		6.98	6.53	6.30
	Electric Power and Natural Gas Sector: Specific CO ₂ emissions (kg CO ₂ e Scope 1 & 2 / MWh of electric powered generation)		324	322	317
	Income from products and services having environmental gain (% of total income) ²	A-S5	-	-	13.0%
	Overall CO ₂ emissions avoided (t CO ₂ e) ³		287,088	250,113	235,592
	Electric power production from renewable sources (% of total electric power produced)		8.6%	9.7%	9.9%
	Total NOX & SOX emissions (t)	SS-E2	4,670	4,577	4,687
	Solid waste reused, recycled or utilized (% of total solid waste produced)	SS-E5	18.6%	24.9%	36.9%
	Solid waste sanitary landfill (% of total non - hazardous solid waste produced)	SS-E5	2.4%	2.0%	1.3%
	Fresh water consumption (ML) ⁴	SS-E3	5,245	5,301	5,309
	Percentage of useful land restoration during the mining process		83.3%	84.3%	84.9%

1. The specific emissions of primary cast Aluminium are calculated in the context of the participation of the Metallurgy Business Unit of MYTILINEOS in the international Aluminium Stewardship Initiative (ASI) and in accordance with what is stated in the Aluminium Carbon Footprint Technical Support Document (WA, Feb-2018), of the International Aluminium Institute, for the LEVEL 1 approach. This includes the activities of aluminium electrolysis, foundry aluminium and anode generation.

2. It includes revenues derived from activities that qualify (alignment criteria) to be included in the list of activities as defined by the EU Taxonomy. The EU Taxonomy is a classification system that creates a list of environmentally sustainable economic activities to increase sustainable investment and implement the European Green Deal.

3. It concerns the emissions that would have arisen in the absence of MYTILINEOS' Renewable Energy Sources projects. It is calculated through the multiplication of the energy produced (MWh) from RES (photovoltaic, wind, small hydroelectric (<10MW)) in operation and the coefficient of conversion of electricity to CO₂e based on the country's energy mix in the reference year.

4. The difference between the total amount of fresh water pumped and the total amount of fresh water discharged. Fresh is considered to be water with a concentration of total dissolved solids equal to or less than 1,000 mg / l. Methodology for calculating this indicator is according to GRI 303-5 (2018).

ESG Pillar	ESG KPIs indices	ESG ATHEX indices	2020	2021	2022
S	Total employment (direct & indirect employees)		3,856	4,823	5,442
	Percentage of part-time employees (direct employees)		0.5%	0.6%	0.7%
	Employee mobility index (%) ⁵	C-S3	6.0%	6.1%	8.8%
	Total accidents (direct & indirect employees)	SS-S6	1	1	0
	Total accident frequency index per 200.000 employment hours (direct employees) ⁶	SS-S6	0.53	0.85	0.33
	Total accident frequency index per 200.000 employment hours (indirect employees) ⁶	SS-S6	0.38	0.29	0.48
	Percentage of women at work (%)	C-S1	19.0%	18.7%	20.1%
	Percentage of women at executive positions (%) ⁷	C-S2	19.4%	21.1%	23.5%
	Average of training days per employee (days / year)	C-S4	2.0	1.8	1.6
	Number of citizens that benefit from corporate social programs/initiatives		31,602	52,899	89,601
	Number of suppliers trained in the UN Global Compact principles		50	35	41
G	Rate of conformance with the UK Corporate Governance Code (%)		70%	75%	80%
	Number of members of the Board of Directors		11	11	11
	Rate of independent members of the Board of Directors		64%	64%	64%
	Diversity in the Board of Directors (% of women in the Board of Directors)		20%	27%	27%
	Rate of independent members of the Monitoring Committee		100%	100%	100%
	Rate of independent members of the Wages Committee		100%	100%	100%
	Sustainable Development Committee	C-G1	Yes	Yes	Yes
	Linking variable wages of executive staff to Sustainability indices		Yes	Yes	Yes
	Confirmed cases of corruption and bribery		0	0	0
	Financial surcharges from cases of violating the Business Conduct Code (€)	SS-G1	0	0	0
	Financial surcharges due to non-conformance with regulations and legislation (regarding financial, environmental, labour and social matters) (€)		0	0	0

5. Number of voluntary departures as a percentage of the average number of direct employees of the Company in the same year. Cases of termination of fixed-term contracts are not considered voluntary departures.

6. The methodology for measuring accidents has been carried out in accordance with GRI 403-9 (2018). It includes all accidents as well as accidents leading to days off, limited work or transfer to other work, medical care other than first aid or loss of consciousness or serious injury or ill health diagnosed by a physician or other authorized health professional. It includes all accidents and incidents that occurred during the transportation of the employee from the place of his private activity (eg residence) and from a workplace and only when this transfer has been organized by the Company.

7. Percentage of the Company's executive staff.