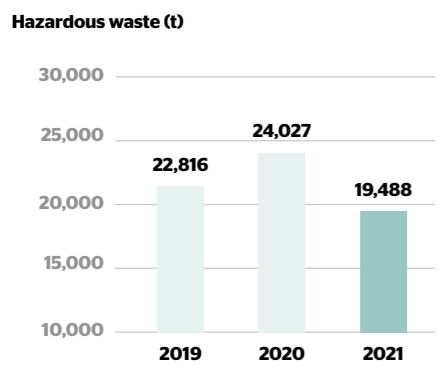
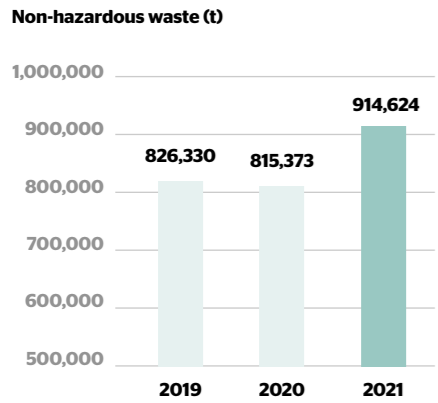




metal scrap (e.g., iron and steel), batteries of vehicles, tires, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, lamps and photocopier consumables. **ASI**



- The percentage of solid waste directed to controlled landfills, as a percentage of the total non-hazardous solid waste produced (excluding bauxite residues, which undergo special treatment), **was further reduced in 2021 and stood at 2.0%** (2020: 2.4%).
- Concerning **hazardous waste, their quantity was significantly reduced (by 18.9%)**, because the number of electrolysis basins that had reached their end of life and required reconstruction was reduced. Such a reconstruction process, when taking place, results in the generation of hazardous waste.
- The percentage of the total solid waste that was **reused, recycled and recovered** in various ways, either by the Company itself or through third parties, increased by 6 percentage units and **reached 25%** (2020: 18.6%) of the total waste produced (including bauxite residues). Of this quantity, **115,000 tons of bauxite residues and low grade bauxite residues** were made available to the cement industry and to other industrial uses. **ASI**

Non-Hazardous Waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2021
Recycling	9094	97,774.2	98,683.6
Reuse	0	26,395.2	26,395.2
Recovery by third parties	0	102,814.0	102,814.0
Controlled Landfill (Accumulation site for Bauxite Residues)	669,683.9	0	669,683.9
Controlled Landfills for Non-Hazardous Waste	3,154.5	1,629.2	4,783.7
Storage for recovery	12,165.2	0	12,165.2
Storage in third-party facilities	0	86.3	86.3
Recovery / Exchange	0	12.3	12.3
Incineration	0	0	0
Total	685,913.0	228,711.2	914,624.3

Hazardous Waste (t) [GRI 306-4] [GRI 306-5]	Onsite	Offsite	2021
Recycling	0	382.7	382.7
Reuse	0	24.9	24.9
Recovery by third parties	0	4,784.5	4,784.5
Controlled Landfills for Hazardous Waste	13,887.2	0	13,887.2
Storage for recovery	347.6	0	347.6
Storage in third-party facilities	0	1.1	1.1
Recovery / Exchange	0	45.5	45.5
Incineration	0	14.9	14.9
Total	14,234.8	5,253.6	19,488.4

Waste generation by waste category (t) ¹ [GRI 306-3] [GRI 306-4] [GRI 306-5]	Quantity diverted from disposal	Quantity directed to disposal	2021
Waste resulting from exploration, mining, quarrying and physical and chemical processing of minerals	115,005.3	674,091.7	789,097.0
Waste from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), sealants and printing inks	0.3	-	0.3
Waste from thermal processes	7,171.9	1,830.6	9,002.5
Waste from shaping and from chemical and mechanical surface treatment of metals and plastics	157.8	-	157.8
Oil waste and liquid fuels waste (except edible oils)	237.8	-	237.8
Waste packaging: absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	2,470.0	-	2,470.0
Waste not otherwise specified in the list	347.9	10,426.2	10,774.1
Construction and demolition waste (including excavation soil from contaminated sites)	118,851.0	-	118,851.0
Waste from waste treatment facilities, off-site wastewater treatment plants and water industry facilities for the preparation of water intended for human consumption and water for industrial use	1,189.2	377.1	1,566.3
Municipal waste (household waste and similar commercial, industrial and institutional waste), including separately collected fractions	326.5	1,629.2	1,955.7
Total	245,757.8	688,354.8	934,112.6

1. Waste types have been classified according to the categories of the European Waste Catalogue (EWC).

Pollution prevention



Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
The impacts occur in the areas of operation of MYTILINEOS' industrial plants, Business Units, subsidiaries and main suppliers.

By whom are the impacts caused:
Directly involved in these impacts are the Metallurgy and Power & Gas Business Units of MYTILINEOS and its subsidiaries DELPHI-DISTOMON and KORINTHOS Power, while key suppliers of the Company may be indirectly involved.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The prevention of all land and marine pollution.
- The environmentally sound management of all waste in accordance with internationally agreed frameworks and to the reduction of their emissions into the air, the water and the soil, in order to reduce its impact on human health and the environment.
- The reduction of waste production through prevention, recycling and reuse.

Topic of increased significance to:

- Employees
- Suppliers
- Customers
- Shareholders / Investors / Financial Analysts
- NGOs
- Press representatives
- Academic community
- Local Communities

in the context of their cooperation with MYTILINEOS.

Major risks [GRI 102-15]

- The possible deterioration of the air quality, of surface and ground waters and of the marine environment, as well as pollution of the soil from industrial accidents are permanent potential risks.
- Key production and transport activities of the Company involve the risk of spills, following unforeseen malfunctions or accidents, into the marine environment, since they are adjacent to it.
- Failure to prevent and manage the above risks could have a significant impact on the Company's economic and industrial capital, limiting its ability to create value either by increasing the financial costs for dealing with these incidents, or through possible administrative sanctions that may be imposed or the Company's potential inability to continue to smoothly conduct its activities.

Commitment [GRI 103-2c]

Prevention of all identified risks of pollution from the Company's activities, in accordance with the main priority areas of MYTILINEOS' [Environmental Policy](#).

Risk Management / Control Practices [GRI 103-2a]

Pollution risk management is directly linked to the safe, socially and environmentally responsible operation of all the Company facilities. The Company's annual target is to avoid any incidents and industrial accidents that could cause pollution to the natural environment, across all its business activities.

To address this risk, preventive and suppressive response measures are implemented in all MYTILINEOS Business Units. In particular:

In the **Metallurgy Business Unit**, a dedicated **Major Accident Prevention Policy** is in place for preventing and responding to large-scale industrial accidents. The policy addresses risks associated with the use of hazardous substances in the Business Unit's activities and, through a set of concrete measures, ensures their prevention and the avoidance of any incident involving a deterioration of the environment. **ASI**

The main pollution risk prevention measures implemented in the Business Unit consist in the following:

- Strict compliance with the approved Environmental Terms of the activity of Metallurgy.
- Continuous measurement and monitoring of air emissions and suspended particulates.
- Measurement and monitoring of water discharges from point sources.
- Compliance with the measures provided for in the Safety Study (SEVESO III - implementation of Joint Ministerial Decision 172058/2016).
- Conduct of industrial accident response exercises provided for in the Safety Study (SEVESO III - implementation of JMD 172058/2016), which in some cases are carried out in cooperation with external bodies (Fire Service, Civil Protection, etc.)
- Final disposal of non-hazardous waste in insulated areas with the construction of a geological barrier of low water

Management Approach [GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholder groups, so that they can understand how the Company is managing the risks of pollution and spills directly associated with its safe and socially and environmentally responsible operation. **[GRI 103-2b]**

Key Challenges / Impacts [GRI 103-1a] [GRI 102-15]

The key challenge for the Company is to effectively prevent any form of pollution of the natural environment from its production activity (air emissions, solid and liquid waste, use of chemicals) and from any major industrial accidents.

- permeability, as well as the corresponding disposal of hazardous waste in specially constructed and geomembrane- and geotextile-insulated cells (controlled landfill sites).
- Implementation of Best Available Techniques in the management of infrastructure and industrial waste (electric filters, bag filters, primary industrial waste treatment, biological wastewater treatment, oil basins and safety oil traps, sewer oil traps, tank level meters, waste quality meters, custom-designed waste disposal sites, etc.).
- Performing chemical analyses of wastewater at workshops and facilities, as well as specific analyses of wastewater discharged for various chemical parameters (e.g., Al, Cr, Cr+6, Fe, BODs, COD, etc.).
- Good knowledge of and training in Emergency Response Plans (EPs).
- Storage and use of chemicals by following the instructions of the Safety Data Sheets.
- Systematic visual inspections of facilities.
- Unloading of heavy fuel oil from tankers using as a precaution a floating anti-pollution dam.
- Constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against standard quality values. An example is the discharge of the seawater used in the cooling systems of the cogeneration (Combined Heat and Power - CHP) plant of the Metallurgy Business Unit, where in addition to the strict compliance with the relevant law provisions determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authoritative organization (Hellenic Centre for Marine Research - HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed. The studies carried out by the Company in accordance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change, and the Water Management Directorates of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of the recent studies, carried out in 2019 and 2020, show a stable ecological status, with improvement trends recorded at several observation stations. These studies will be continued for at least five more years.
- Operation of a fire protection department, which is equipped with 3 fire engines, staffed by a permanent fire-fighting team, and coordinates and trains a team of volunteer firefighters.

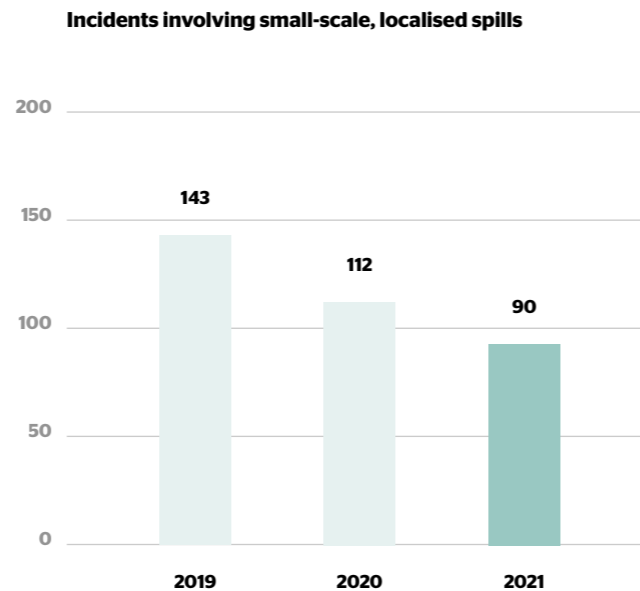
Moreover, in what concerns small-scale, localized incidents involving spills of lubricants in the context of mining activities in the tunnels of underground quarries, which are of a limited extent and affect surface soil only, mainly caused by wear and tear of lubricant pipes and by damages to machinery by falling stones or rocks, the **subsidiary DELPHI - DISTOMON** takes steps to prevent and reduce the annual number of such incidents by adopting the following practices: (1) Purchasing supplies with the best **quality** available in the market, to ensure their maximum possible durability, (2) implementing, on a regular basis, special **seminars** to raise awareness among personnel of the need to report and log such incidents, in line with the Company's policy on the protection of the environment, as well as of specific techniques to contain the extent of the spills in the soil, (3) **responding** immediately to such incidents, collecting the quantity of contaminated soil in the area of the spill and forwarding it to the hazardous waste disposal area for appropriate handling, and (4) regular and preventive **maintenance** of the equipment and its parts.

- In the Power & Gas, Sustainable Engineering Solutions (SES) and Renewables and Storage Development (RSD) Business Units**, intensive efforts are made in all production units (thermal plants, RES plants, composite construction plants and work sites), to identify potential risks, so that these are addressed in a timely manner and the consequences of unforeseen malfunctions and accidents are minimized. In particular, the following are implemented:
- All procedures provided for in the Environmental Management Systems and Emergency Response Plans, as well as the operating and maintenance instructions for installations.
 - Monitoring of air emissions.
 - The best available options for the reuse, recycling and disposal of the various types of generated waste.
 - Training of personnel and readiness exercises for handling spills.
 - Preventive maintenance programs.
 - Selection of state-of-the-art equipment.
 - Safety oil basins.
 - Systematic visual environmental facility inspections.
 - Annual audits by independent external organizations for the certification of the implemented Environmental Management Systems.

Results

[GRI 103-3a-ii]

- During 2021, **no incidents occurred involving the pollution of the natural environment from production activities or involving industrial accidents in all Company Business Units. Concerning air emissions, these remained below the statutory maximum limits for yet another year.**
- Regarding the incidents of small-scale, localized oil spills from machine failures in the context of the mining process, a total of 90 incidents occurred in 2021, 20% less than the corresponding number in 2020 (112 incidents), with the total spill volume amounting to 10,308lt¹, decreased by 20% compared to 2019 (12,869lt).



1. The quantity of 10,308 lt corresponds to 0,065 kbls.



Ecological Impacts



Materiality assessment process results
Scale: [0-10], where 0 "Not significant" and 10 "Very significant"

Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]

Where the impacts occur:
In the area where the mining activity of the company DELPHI-DISTOMON takes place, as well as in protected areas of the Natura network where the RES plants of MYTILINEOS' subsidiaries operate.

By whom are the impacts caused:
The impacts are caused by the Metallurgy Business Unit and in particular by the subsidiary company Delphi-DISTOMON, as well as by the wind energy subsidiaries of MYTILINEOS.

The management of the topic by MYTILINEOS contributes to Sustainable Development:

- The conservation of mountain ecosystems, including biodiversity.
- The restoration of the exploitable land affected by the business activity.
- The increase of forestry and reforestation at local and national level.

Topic of increased significance to:

- Employees
- Suppliers
- Shareholders / Investors / Financial Analysts
- NGOs
- Academic community
- Local Communities

in the context of their cooperation with MYTILINEOS.

Management Approach

[GRI 102-11] [GRI 103-2c]

The purpose of this disclosure is to provide specific information and data to all MYTILINEOS' Stakeholder groups, so that they can understand the Company's approach, which relies on a combination of elements to prevent, manage and restore the impacts of its activity on land areas, while minimizing any effects on biodiversity. [GRI 103-2b]

Key Challenges / Impacts

[GRI 103-1a] [GRI 102-15]

The protection of biodiversity and the restoration of the natural landscape of the land areas used in the Company's business activities, constitute a substantial challenge for MYTILINEOS in the context of the reduction of ecological impacts and its contribution to sustainable development.

Major risks

[GRI 102-15]

Ineffective prevention of any adverse impacts on the flora and fauna of the wider area of the Company's activities would lead to environmental degradation, raising issues of non-compliance with applicable legislation. In such a case, the consequences for the Company would include the disruption of its business development and growth plans, due to the impact on its reputation and financial position.

Commitment

[GRI 103-2c]

Protection of biodiversity and ecosystems during mining operations and development and operation of RES plants in protected Natura areas, in accordance with the main priority areas of MYTILINEOS' [Environmental Policy](#).

Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-160a.1]

In the **Metallurgy Business Unit**, the Aluminium of Greece (AoG) plant, in compliance with the applicable legislation (including the plant's Environmental Terms Approval Decisions), has established a series of prevention and control measures to contain emissions to the natural recipients, thus safeguarding their quality and, consequently, the conditions for the growth of the local flora and fauna. The prevention measures include investments in anti-pollution equipment such as state-of-the-art filters in chimneys and at the discharge points of wastewater treatment plants, installations for the treatment of process gases etc. The Aluminium of Greece plant also undertakes the restoration of the inactive surfaces of the Accumulation Sites for Bauxite Residues and the Inert Waste Disposal Areas, while it has assigned to a specialized external partner the maintenance of the new and old restored waste disposal sites (e.g., old and restored Controlled Landfill for Hazardous Waste, inactive slopes of the Inert Waste Disposal Area and of the limestone quarry). **ASI**

The control measures include:

- Taking regular groundwater and sea water samples, whose results are confirmed by samples and analyses made by independent bodies.
- Operation of the air quality measuring station located in the Holy Monastery of Hosios Luke of Steiris.
- Assessment and ecological evaluation of the wider area of AoG's plant, a study that was carried out in 2021 and also took account of the fact that the plant is developed only on land, which however is in direct contact with a sea area of the NATURA 2000 network (pSCI: GR2530007- CORINTHIAN GULF), which is a proposed Site of Community Importance (SCI).
- The evaluation of the ecological status of the Antikyra Bay, in collaboration with the Hellenic Centre for Marine Research (HCMR).
- The management of all types of hazardous and non-hazardous waste complies with the provisions of the applicable laws, while the disposal of this waste takes place either in the duly licensed sites of the Company or through duly authorized and certified systems / contractors.

Information on the level of operation of critical operating equipment (filters etc.) and measurement equipment (continuous