

# Materiality process

## Identification of Material Topics

[GRI 102-46]

For the disclosure of **ESG** information, MYTILINEOS has established as its main criterion the identification of the topics related to its ability to create value and are therefore material for the Company itself, its Social Partners and Sustainable Development in general.

The Materiality process is a key tool of the responsible operation of MYTILINEOS, while it contributes to the enrichment and the development of its Sustainable Development strategy. It is a dynamic process that is constantly evolving. The evaluations of the Material ESG topics carried out at each Business Unit are used as a basis for their respective identification at central level and vice versa. At the same time, the open dialogue of the Company with its Social Partner groups contributes new data to this process annually. The evaluation cycle of the material topics is implemented every 2 years with an interim review.

During the implementation of the process in 2021, the Company updated the sustainable development topics based on the internal and external sources it uses, with particular emphasis on the topics proposed by the **SASB (Sustainability Accounting Standards Board)** standard for each Business Unit. Subsequently, the topics were prioritized from the 4 Business Units in terms of the extent to which they affect the Company's ability to meet its business objectives, as well as in terms of their impact on sustainable development. The findings of this internal exercise were combined with the corresponding findings of a relevant field research conducted on more than 1,500 individuals, institutions and organizations from all groups of the Company's Social Partners. In addition, the alignment of the material topics with the Global Sustainable Development Goals, strengthens the Company's ability to manage them in accordance with international best practices.

The following is a detailed presentation of the process stages to determine the Material Non-Financial topics for the year 2021:

### Identification Stage

**PRINCIPLE:** Stakeholder inclusiveness  
**PRINCIPLE:** Sustainability context  
**22** topics identified in total

### Sources used in the Sustainability Topics Identification exercise

- The MYTILINEOS Sustainable Development Strategy.
- Relevant laws, regulations, international agreements, or voluntary agreements of strategic importance to the Company (UNGC, SDGs).
- Significant risks for the Company.
- The SASB (Sustainability Accounting Standards Board) standard Materiality Map.
- 12 different international CSR and Sustainable Development standards and initiatives (e.g. GRI, ISO 26000, TI etc.).
- The feedback from the ESG ratings in which the Company participated.
- The results of the Social Partners annual Consultation.
- Study of material topics of peer companies.
- Media review (Study on the subject matter of publications related to the Company but also general publicity in this field during the reporting year).

### Prioritisation Stage

**PRINCIPLE:** Stakeholder inclusiveness  
**PRINCIPLE:** Materiality  
**16** topics prioritized as material

### Synthesis of findings from the prioritization of the identified topics within & outside the Company

#### Within the Company

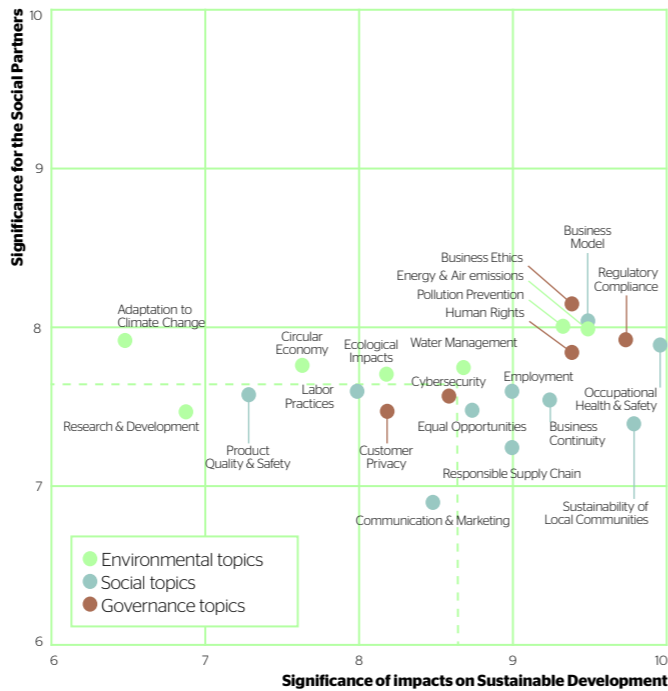
- Use of an online application for the prioritization of the identified topics, with reference to their relevance for MYTILINEOS, their impact on Sustainable Development at local and national level, and their correlation with the Sustainable Development Goals.
- ESG Team workshops at each of the Company's Business Units for prioritizing the identified topics - Confirmation and approval of the results by the General Management of the respective Business Units - Synthesis of the individual results and determination of the final value for each identified topic.

#### Outside the Company

Field research conducted in 2021 for the Social Partner groups of the Company (1,506 individuals, companies, institutions and organizations) through inviting them to respond to an electronic questionnaire for the evaluation of the 22 identified topics.

### Materiality table 2021

[GRI 102-47]



The 16 material topics (with a value of > 8.60/10 on the internal evaluation scale and a value of 7.60/10 on the external evaluation scale) include:  
a) the 3 most significant topics for the Social Partner groups,  
b) the 5 most significant topics in terms of their impact on Sustainable Development and  
c) the 8 topics that emerged as significant both for the Social Partners and for their impact on Sustainable Development.

In conclusion, the changes in the material topics are summarized in the following table:

<b>New material topics</b>	<ul style="list-style-type: none"> <li>• Responsible Supply Chain</li> <li>• Business model</li> <li>• Equal Opportunities</li> </ul>
<b>Material topics with updated titles</b>	<ul style="list-style-type: none"> <li>• Regulatory Compliance (Legal Compliance)</li> <li>• Business Ethics (Anti-Corruption &amp; Bribery)</li> <li>• Ecological Impacts</li> <li>• Business Continuity (Emergency Response Plans)</li> </ul>

### Validation Stage

**PRINCIPLE:** Stakeholder inclusiveness  
**PRINCIPLE:** Completeness  
**All Material topics were validated**

#### Sustainability Committee

The Validation of the Material Topics and the final approval for their publication in the Annual Report and the Sustainable Development Report of the Company was provided by the Sustainability Committee. The steps of the relevant methodology, its individual results, as well as the relevant Materiality table for 2021 were presented to the Sustainability Committee in a special meeting.

As part of the update of the Materiality process, continuous improvement and the best possible response to the modern requirements of the investment community and its Social

Partners, MYTILINEOS is already considering the implementation of the **"double materiality"** approach. By implementing this approach, the Company will include in the analysis of Material topics, in addition to the criterion of their impact on sustainable development, the criterion of their impact on the financial performance and position of the Company.

A supplementary table is provided below, presenting the grouping of Material Topics based on: a) the ESG pillar in which each identified topic is classified, b) the topics that emerged as Material from the Metallurgy Business Unit as a result of the prioritization process, within the context of the International Alumni Stewardship Initiative (ASI) in which the BU participates and c) the Global Sustainable Development Goals that the Company contributes to through the management of the respective Material topics.

ESG Pillar	Material topics 2021	Metallurgy Business Unit* ASI	Relevant SDGs
E	<b>Ecological Impacts</b>	●	<b>15</b>
	<b>Energy &amp; Air emissions</b>	●	<b>7, 13</b>
	<b>Water Management</b>	●	<b>6, 12</b>
	<b>Adaptation to Climate Change</b>		<b>13</b>
	<b>Circular Economy</b>	●	<b>6, 8, 12</b>
	<b>Pollution Prevention</b>	●	<b>12, 14, 15</b>
	Research & Development		
S	<b>Occupational Health &amp; Safety</b>	●	<b>3, 8</b>
	<b>Employment</b>	●	<b>8, 9</b>
	<b>Human Rights</b>	●	<b>5, 8, 10, 16</b>
	<b>Equal Opportunities</b>	●	<b>5, 8, 10, 16</b>
	<b>Sustainability of Local Communities</b>	●	<b>1, 2, 3, 4, 10, 11</b>
	<b>Business Continuity</b>	●	<b>11</b>
	<b>Responsible Supply Chain</b>	●	<b>8, 12</b>
	Labor Practices	●	
	Cybersecurity	●	
	Customer Privacy		
	Product Quality & Safety		
Communication & Marketing			
G	<b>Business model</b>		
	<b>Business Ethics</b>	●	<b>16</b>
	<b>Regulatory Compliance</b>	●	

**Material topics** - Other significant topics  
\* Metallurgy Business Unit Material Topics