

Business Continuity



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

Where the impacts occur:
The impacts can occur in the Company's industrial plants and facilities as well as in the nearby local communities.

By whom are the impacts caused:
The impacts may be caused by MYTILINEOS' Business Units, its subsidiaries and the strategic suppliers and contractors working with them.

The management of the topic by MYTILINEOS contributes to Sustainable Development:
The implementation and promotion of integrated policies and plans to effectively manage emergencies at all levels, so as to protect the natural environment and the well-being of society at local and national level.

Topic of increased significance to:

- **Employees**
- **Suppliers**
- **Shareholders / Investors / Financial Analysts**
- **NGOs**
- **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 inform MYTILINEOS' Stakeholders about how the Company responds to emergencies in its facilities and areas of activity, and about the ways in which it ensures its uninterrupted operation.

The Company's objective is to effectively respond to emergencies while protecting the environment, ensuring the Health & Safety of all those present within its facilities and areas of activity, and the well-being of neighboring local communities. [GRI 103-2b]

Key Challenges / Impacts

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

The development of an organization's capacity to ensure the uninterrupted provision of its products / services (without affecting their quality / availability) under abnormal operating conditions, such as natural disasters, epidemic / pandemic crises or other adverse events (and combinations thereof), as well as the continuation of the organization's internal operation and functioning, such as for example in cases involving loss of critical IT applications, failures of suppliers / subcontractors, shortages in human resources, etc.

Major risks

[GRI 102-15]

The low degree of preparedness and response to emergency incidents (fires, explosions, land subsidence, release of chemicals to the environment, transportation of products, waste, natural hazards such as climatic and seismic events, health and safety incidents and other hazards), with serious consequences for the employees, the local community and the natural environment but also for the smooth operation of the Company's activities and thereby for its reputation and its financial results.

Commitment

[GRI 103-2c]

Safeguarding business continuity, environmental protection and health and safety in emergencies, in accordance with the main priority areas of MYTILINEOS' [Occupational Health & Safety Policy](#) and [Environmental Policy](#).

Risk Management / Control Practices

[GRI 103-2a]

Managing emergencies and ensuring business continuity is of the highest priority for MYTILINEOS. Therefore, all Business Units of the Company have established appropriate Emergency Prevention and Response Plans (for fire, explosion, leakages, natural phenomena, extreme weather conditions etc.), in order to effectively deal with all incidents that result in deviations from their normal operation with serious consequences for the environment and for the health and safety of employees and the local communities.

- In the **Metallurgy Business Unit**, an Emergency Response System has been developed in the facilities of Ag. Nikolaos, Viotia, consisting in the following: (a) an integrated Internal Emergency Plan (IEP) which also includes special evacuation plans of the facilities, (b) regular training of personnel, and (c) planning and implementation of emergency preparedness exercises in accordance with the annual plan and their adaptation to the requirements of the IEP. Regarding in particular the risks related to the use of industrial substances, both the prevention measures and the response plans in place follow the provisions set out in the SEVESO III Directive and described in the relevant Plant Safety Study, which is registered in the National Registry established for such facilities. **ASI**
- In the **Power & Gas Business Unit**, a package of emergency response measures is applied in the Unit's Energy Centers, RES plants and offices, comprising the following: (a) Emergency Team or Emergency Manager, (b) documented Emergency Incident / Accident Response Procedures, (c) implementation of Emergency Management Plans, and (d) implementation of personnel exercises and trainings in accordance with the special Evacuation Plans and the Building Emergency Instructions.
- In the **Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit**, appropriate Emergency Prevention and Response Plans are in place to effectively address all emergencies identified as such by the system. In order to protect the workforce and the environment in the event of such an incident, Emergency Plans have been prepared and are applied. Each construction site has its own emergency plan, appropriate to the nature of its activities and to the risks identified

and assessed. The emergency plans are documented, accessible and clearly communicated to all personnel, who are trained -by means of regular emergency preparedness exercises- to understand these plans and to thoroughly familiarize themselves with their roles and responsibilities in the event of an emergency.

Results

[GRI 103-3a-ii]

- In 2021, there were no industrial accidents or environmental incidents with an impact on the natural environment or on public health.
- A total of 82 emergency preparedness exercises were carried out in all production units, construction sites and office buildings of the Company. In particular:
- In the **Metallurgy Business Unit**, a total of 26 exercises were carried out covering fire emergencies (in facilities, onboard ships, in fuel tanks) and rescue operations in enclosed areas and at heights, as well as the evacuation of offices and of the Chemical Laboratory facilities. The exercises were carried out in the context of the operation of the "Mobile Emergency Response Unit", which consists of Fire Protection Team employees. The staff is well-trained in fire safety and facility maintenance and this team is actively supported by approximately 100 volunteer firefighters from the Plant's other units, who receive proper training and are periodically retrained. In addition to conducting and analyzing emergency response exercises, the Fire Protection Team uses appropriate certified mobile equipment and the related means of assistance to help local authorities address incidents in the wider area, offering effective and prompt assistance as needed. The particular circumstances of the pandemic did not affect the preparedness of the Team, which responded promptly to all events inside and outside the Plant. In addition, evacuation / preparedness (alarm) exercises were carried out in the aluminothermic process, as well as exercises related to the explosion of natural gas and the treatment of polluted fire water, as well as exercises covering a rescue operation at height in the IPP II construction site and putting out a fire in a high-voltage transformer of the Plant's substation.
- In the **Sustainable Engineering Solutions (SES) Business Unit**, 14

emergency preparedness exercises were conducted, involving general evacuation exercises as well as exercises involving the evacuation of a building due to an explosives threat, fire and earthquake response exercises, and rescue at height / in an enclosed space exercises.

- In the **Renewables & Storage Development (RSD) Business Unit**, 27 preparedness exercises were conducted, involving fire, lightning strikes, earthquake and flood response exercises.
- In the **Power & Gas Business Unit**, 15 preparedness exercises were conducted, involving the evacuation of a building in case of earthquake and (forest) fire and evacuating a station due to severe weather phenomena and lightning strikes.

