

Equal Opportunities



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 all work areas of the Company's Business Units, subsidiaries and contractors / suppliers.

By whom are the impacts caused:
The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors / suppliers may also be indirectly involved.

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

- Strengthening employability in the industrial sector and enhancing corporate culture with the elements of diversity and equality.
- Ensuring meritocracy and equal treatment in the selection of personnel.
- Promoting equality regardless of particular characteristics such as age, gender, etc.

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 provision of an environment of equal opportunities, where all employees enjoy the same rights and are treated fairly and according to their ability to respond to their assigned roles, is a core practice of MYTILINEOS, as stipulated in the Company's Human Rights Policy. The Human Rights Policy was formally issued in 2021 and lays down a number of commitments on Equal Opportunities, such as the following:

- MYTILINEOS is committed to offering equal opportunities and prohibits discrimination and harassment. The corporate procedures for attracting and recruiting workforce, for access to education and training, rewards, performance appraisal and termination of cooperation, are free from discriminations based on race, gender, color, national or social origin, religion, age, disability, sexual orientation and political beliefs.
- The Company does not tolerate any kind of offensive or inappropriate behavior, unfair treatment or retaliation. According to its Code of Business Conduct, physical or verbal harassment of a sexual, racist or defamatory nature is prohibited in the workplace as well as in all work-related situations outside the workplace.
- In the context of gender equality at work, the Company is committed to taking appropriate measures in order to eliminate all kinds of discrimination against women in the areas of employment,

equal pay for equal work, vocational education and training, as well as in decision-making processes.

- The Company respects the privacy of its workforce personal data (GDPR) when collecting personal information or inspecting work areas.

In addition, the Company, faithful to its commitment to apply best practices of Corporate Governance, intends to apply the Diversity principle (the basic parameters being, inter alia, gender, age, experience, skills and knowledge) in the composition of its Board of Directors, in its senior executives and in all direct employees across its activities, where feasible.

Key Challenges / Impacts

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

With the main part of the Company's activity involving a heavy industry, the participation of women and young employees in employment (proportionally and in accordance with the requirements of each Business Unit) are the two main issues in promoting equal opportunities and diversity at the workplace.

In this respect, the key challenge for the Company is to ensure equal opportunities, by eliminating discriminatory policies and practices (on the grounds of wage, age, gender, disability, race, nationality, origin, religion, sexual identification or other status) and by promoting actions to provide a working environment where every employee has exactly the same rights and is treated fairly and in accordance with their abilities to fulfil their respective roles.

Commitment

[GRI 103-2c]

Provision of equal opportunities without discrimination, in accordance with the main priority areas of MYTILINEOS' [Human Rights Policy](#).

Major risks

[GRI 102-15]

Risks include inequalities primarily in terms of pay, education and training, as well as in terms of the opportunities for the advancement and development of human resources. Such risks may impact the morale and productivity of employees, while inequalities in terms of pay may be an obstacle to the retention of qualified employees and may jeopardize the Company's reputation as a responsible employer.

Risk Management / Control Practices

[GRI 103-2a]

In 2021, priority was given to gathering and analyzing data and information on education, salary grades etc. from the Company's individual Business Units, in order to gain a deeper understanding of these issues and formulate an action plan. The following are some initial studies and ongoing actions:

- Apart from the Code of Business Conduct and the Human Rights Policy, in which explicit provisions are made for the prohibition of discrimination at the workplace, MYTILINEOS evaluates the human resources policies in place and will formulate new ones, in order to reinforce, among other things, equality at work.
- An **evaluation is under way for the revision of the Human Resources Policies**, such as the Human Resources Sourcing,

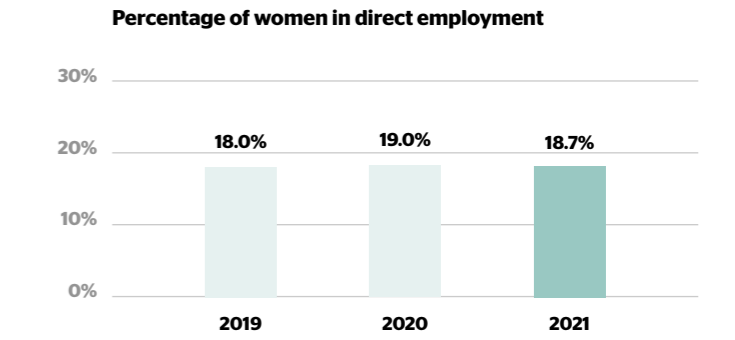
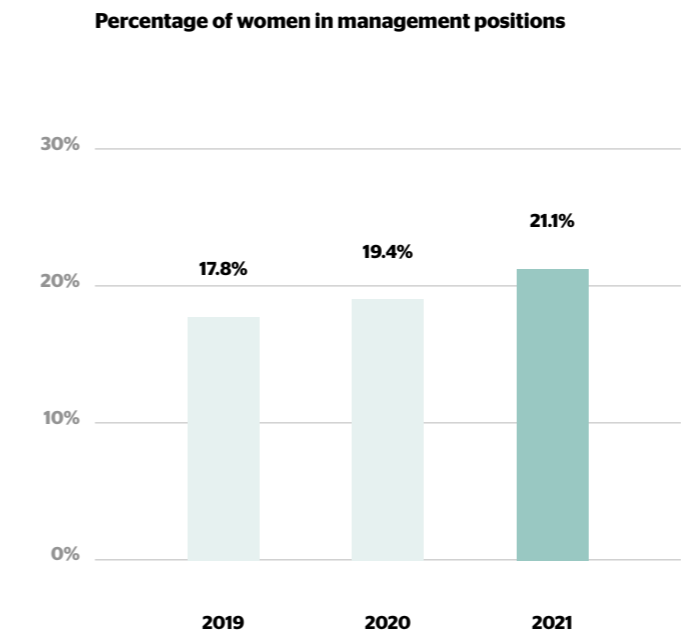
Selection and Recruitment Policy and the Training and Development Policy, to ensure that the topic of Equal Opportunities is included in them.

- In 2021, the scope of application and the framework for the formulation of the Policy on Diversity, Equal Opportunities & Inclusivity, was explored. This policy is currently under development.
- Following the training in the identification of psychosocial risks at work, as part of the actions to promote mental health, the training of MYTILINEOS' Management Executives in issues of unconscious bias at work, by specialized business partners, is also planned.
- MYTILINEOS reviews and adopts the **United Nations Women's Empowerment Principles** (UN WEPs) and plans to join the WEPs community as a signatory.
- An analysis and evaluation of salary grades is carried out on an annual basis, in order to identify areas in need of corrective actions in the short term and eliminate the gender pay gap over the long term. The objective of this study is to establish an action plan by the end of 2023.

Results

[GRI 103-3a-ii]

- In 2020, work had already begun on the formulation of a data collection and analysis methodology that will allow a better understanding of the **gender pay gap indicator**. The average deviation was calculated 2021 and according to the preliminary analyses, the difference between men's and women's earnings in the category of Executives appears to be less than 10%. Because of the geographic dispersion and complexity of MYTILINEOS' operations and the diverse nature of its activities, the Company's priority, before disclosing specific indicators, is to identify the various reasons that cause these deviations in each personnel category, namely Executives, Management employees and Workers and technical staff. **[GRI 405-2]**
- In 2021, no employees with disabilities were employed at MYTILINEOS. **[GRI 405-1]**
- In the revenue generating Divisions, the **percentage of women** participating in the Company's team of Executives stood at 18.3%. **[GRI 405-1]**



Diversity of MYTILINEOS' Governance bodies and executive / management personnel [GRI 405-1]

	2019	2020	2021
Board of Directors			
Men	80.0%	86.3%	72.7%
Women	20.0%	13.7%	27.3%
<30 years old	0.0%	0.0%	0.0%
30-50 years old	20.0%	31.5%	18.2%
>50 years old	80.0%	68.5%	81.8%
Executive Committee			
Men	83.3%	86.7%	92.9%
Women	16.7%	13.3%	7.1%
<30 years old	0.0%	0.0%	0.0%
30-50 years old	33.3%	26.7%	14.3%
>50 years old	66.7%	73.3%	85.7%
Executives			
Men	82.2%	80.6%	78.9%
Women	17.8%	19.4%	21.1%
<30 years old	0.0%	1.7%	6.1%
30-50 years old	70.6%	60.6%	59.6%
>50 years old	29.4%	37.7%	34.3%
Employees of nationalities other than Greek	2.5%	0.0%	0.0%
Management employees			
Men	65.8%	62.7%	63.1%
Women	34.2%	37.3%	36.9%
<30 years old	15.9%	13.0%	14.8%
30-50 years old	65.4%	65.6%	63.4%
>50 years old	18.7%	21.4%	21.8%
Employees of nationalities other than Greek	2.7%	0.0%	0.0%
Workers & technical staff			
Men	98.4%	96.7%	96.1%
Women	1.6%	3.3%	3.9%
<30 years old	10.3%	9.5%	11.8%
30-50 years old	73.8%	71.6%	68.9%
>50 years old	15.9%	18.0%	19.3%
Employees of nationalities other than Greek	4.0%	0.7%	0.0%