

# Human Rights



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

<b>Boundaries of the Material Topic [GRI 102-46] [GRI 103-1b]</b>
<b>Where the impacts occur:</b> In all work areas of the Business Units and subsidiaries of the Company and of its contractors and suppliers.
<b>By whom are the impacts caused:</b> The Business Units of MYTILINEOS and its subsidiaries are directly involved in these impacts, while its contractors/suppliers may also be indirectly involved.
<b>The management of the topic by MYTILINEOS contributes to Sustainable Development:</b> <ul style="list-style-type: none"> <li>The protection of labor rights.</li> <li>Strengthening social and economic integration for all, irrespective of age, gender, disability, race, nationality, origin, religion, economic situation or other characteristic.</li> <li>The elimination of any form of child or forced labor (modern slavery).</li> </ul>
<b>Topic of increased significance to:</b> <ul style="list-style-type: none"> <li>Employees</li> <li>Suppliers</li> <li>Shareholders / Investors / Financial Analysts</li> <li>NGOs</li> <li>Local Communities</li> </ul> in the context of their cooperation with MYTILINEOS.

## Management Approach

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

The purpose of this disclosure is to provide information and data to MYTILINEOS' Stakeholders, so that they can understand how the Company is managing its Human Capital in the context of its operation. [GRI 103-2b]

MYTILINEOS aims to safeguard labor relations that promote mutual trust, constructive collaboration, two-way communication and recognition, as stated in the Company's Human Rights Policy. At the same time, it aims to promote the fundamental principles of the International Labour Organisation's (ILO) Declaration on the Protection of Fundamental Labour Rights including: (a) respect for the freedom of association and the effective recognition of the right to collective bargaining, (b) elimination of all forms of forced or compulsory labor; (c) effective abolition of child labor, and (d) the elimination of all discriminations at work.

### Key Challenges / Impacts

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

The key challenge for the Company is to maintain its strong focus on the protection of Human Rights and especially of the labor and social rights related to its activity. The protection of labor rights helps further strengthen a working environment that promotes the

development of employees and also ensures that the Company is not involved in circumstances of violation of these rights, which may be caused by another company or by State bodies, natural persons or other groups with which the Company cooperates in the countries where it operates.

### Major risks

[GRI 102-15]

MYTILINEOS, due to its activity in developing countries abroad, primarily mainly through the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, identifies risks related to human rights, both within its working environment and in the business environment of its main suppliers and business partners. Such potential risks include activities that may affect or involve children, a culture of corruption, inequalities in the workplace, limitation of human rights at the level of local communities etc. These risks may affect the Company's financial, human and social capital, through their likely impact on its reputation and its "social license to operate", and may also lead to legal sanctions as well as to emergency measures beyond those imposed by normal business conditions.

### Commitment

[GRI 103-2c]

Zero tolerance of violations of Human Rights, in accordance with the main priority areas of the MYTILINEOS' [Human Rights Policy](#), [Code of Business Conduct](#) and [Suppliers / Business Partners Code of Conduct](#).

### Risk Management / Control Practices

[GRI 103-2a] [SASB EM-MM-210a.3]

- MYTILINEOS is committed to the first six Principles of the UN Global Compact, 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 (UDHR). The Company's commitment to monitoring and disclosing the impacts of its activity in this area, together with the MYTILINEOS Code of Business Conduct and the Suppliers / Business Partners Code of Conduct, which are 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 work environment.
- MYTILINEOS monitors the relevant labor legislation (national, European, ILO), including reports on child labor, respect for human rights and work conditions, and is fully aligned with the collective bargaining agreements and the relevant international conventions. The Company's employees may without any restriction whatsoever participate in trade unions and professional associations.
- Labour rights are an issue of major significance for all employees. The Company's direct employees are covered by business or collective bargaining agreements, where applicable, and participate through their representatives in health and safety committees, presenting to the Management their proposals regarding continuous improvement. Furthermore, Employees' Unions are established in the Metallurgy Business Unit and in the Sustainable Engineering Solutions (SES) Business Unit. In the latter, a first-degree trade union body is established and functions at business-unit level (Volos plant), whose members are elected by the general assembly of the plant's employees, with

representatives also elected to the second-degree trade union organization (Volos Labour Centre) and to the Panhellenic Metal Workers' Federation (POEM).

- The Company, through the main grievance mechanism provided for in its Code of Business Conduct and in the Suppliers / Business Partners Code of Conduct for reporting Code violations (anonymous or named reports by phone, fax, post, as well as by e-mail to the Regulatory Compliance Division), enables its employees and its suppliers / business partners to raise any concerns, as well as to report incidents of Human Rights violations. Moreover, the Company warrants that no action shall be taken against any person reporting in good faith any actual or alleged inappropriate conduct. This mechanism is being enriched to reflect the provisions of Directive 1937/2019 of the European Parliament and of the Council and, following the enactment of the relevant local legislation, its revised version will enter into effect.
- Regarding its activity in developing countries, MYTILINEOS takes all requisite measures to comply with the applicable laws. Safe work management is governed by a series of actions that must be followed by all, to ensure that the Health & Safety system for employees is properly implemented and the appropriate measures are taken. At the same time, the contracts signed with contractors and suppliers include an explicit provision about the Company's Code of Business Conduct, to safeguard the respect of Human Rights and to prevent conditions of corruption and bribery.
- Finally, the Company is committed to conducting regular risk assessments of its main production plants and its Business Units, to identify potential impacts on key Human Rights protection areas, in accordance with the methodology proposed by the Global Compact (Global Compact Self-Assessment Tool - Human Rights section), and to publish the relevant findings. This process is supported by both daily communication and employee management procedures and systems implemented by the Human Resources General Division.

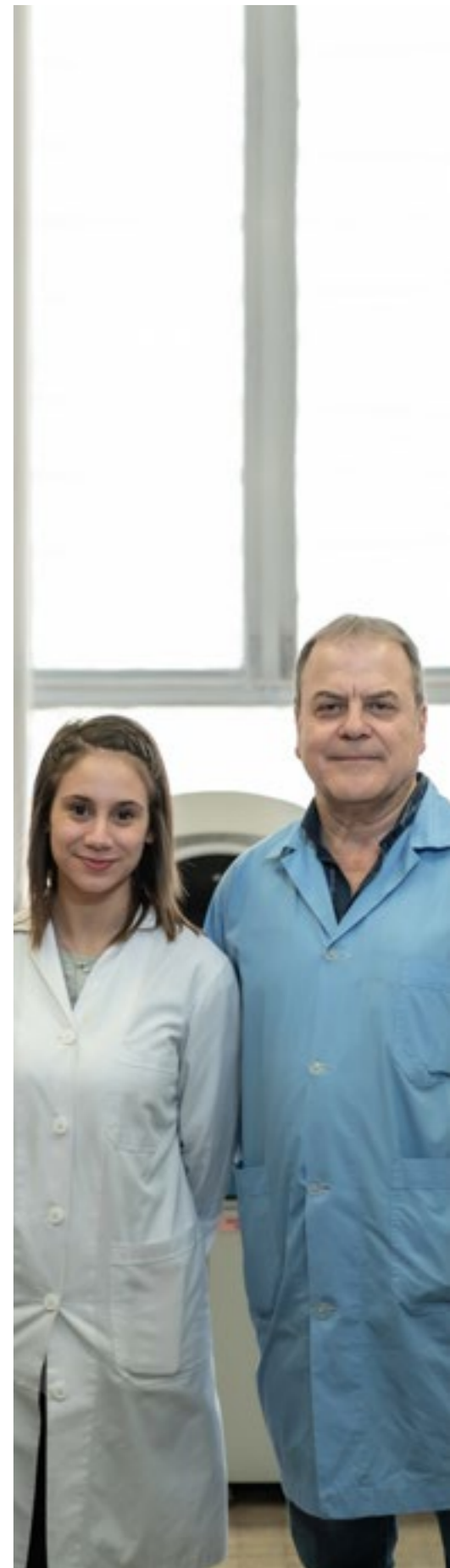
## Results

[GRI 103-3a-ii]

- In 2021, as part of employee training on the Code of Business Conduct, the Company provided to its Executives a

special e-learning training programme which also covered Human Rights topics, during which 730 employees were informed about the respect for the freedom of association, the elimination of all forms of forced or compulsory labor, the identification and elimination of child labor, and the elimination of any discrimination related to the workplace and to employment.

- During 2021, no incident of Human Rights violation was reported to the Human Resources General Division or to the Regulatory Compliance Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. **Thus, the Company's permanent target of zero tolerance of Human Rights violations was achieved.**
- In 2021, the Company implemented for the 5<sup>th</sup> consecutive year the self-assessment process regarding the protection of Human Rights, in all its Business Units and in all countries of operation referred to in section "Countries of Activity 2021". **According to the results of the self-assessment process, no areas were identified in which the deficiencies observed could jeopardize the protection of Human Rights in the Company's activities.** The main areas investigated according to the above procedure are presented in the following table. [GRI 412-1]



Assessment areas	Results
<b>Occupational Health &amp; Safety</b>	<p><b>During the self-assessment exercise, no deficiencies were observed in terms of procedures or policies regarding the Health and Safety of employees.</b></p> <ul style="list-style-type: none"> <li>The Company guarantees that its employees are provided with safe and healthy work facilities.</li> <li>It also ensures that its employees are supplied with the necessary protective equipment and training to perform their tasks safely.</li> <li>The Company promotes the active participation of its employees in the Health and Safety procedures at the workplace.</li> <li>In 2021, the Company highlighted the importance of promoting and strengthening the mental health of employees and their families by providing a 24-hour Psychological Support Hotline.</li> <li>In 2021, the Company organized experiential lectures on psychosocial risks, employee resilience, health and well-being. The program of lectures, which consisted of 11 modules, was attended by 151 employees. Further information is available in the "Occupational Health &amp; Safety" section of this Report.</li> <li>Overall, the policy, the planned actions for the achievement of the targets set and the initiatives adopted voluntarily by the Company to ensure the Health and Safety of employees, are rigorously applied, as presented in the relevant section of this report.</li> </ul>
<b>Employee Work Hours, Wages and Leave</b>	<p>For MYTILINEOS, a fundamental and non-negotiable principle is that its business activity is carried out in complete alignment, conformance to and compliance with the legislation on labor applicable in every geographical region or country where it operates.</p> <ul style="list-style-type: none"> <li>The Company confirms that all employees have a formal employment status.</li> <li>It also ensures that weekly work is limited to 40 hours; however, due to the workload in various activities, groups of employees may be called upon to work beyond 40 hours.</li> <li>The Company has procedures in place for planning, recording and monitoring each employee's work hours to check any overtime, while also providing employees with a reasonable break time during work (as laid down by the law and the industrial standards).</li> <li>The Company ensures the wages of its employees in all cases of sick or parental leave and vacation leave, in accordance with the international standards.</li> <li><b>No incident of a violation of these rights was reported to the Human Resources General Division</b> through the formal procedure in place for reporting violations of the Company's Code of Business Conduct.</li> </ul>
<b>Fair Treatment of Employees</b>	<p>In accordance with the Code of Business Conduct and the Internal Regulation Code, the Company:</p> <ul style="list-style-type: none"> <li>Protects its employees from harassment at the workplace, as well as from physical, verbal, sexual or psychological harassment or threats of any kind.</li> <li>Respects the privacy of its employees' personal data whenever it collects personal information or checks work areas.</li> </ul> <p><b>No incident of discrimination was reported to the Human Resources General Division</b> through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. A study has been carried out on the formulation of a Policy for Preventing and Combating Violence and Harassment at Work, which is still in progress. In the Metallurgy Business Unit, an employee survey was carried out in order to further investigate issues concerning the respect for human rights and women's rights in the workplace. At the same time, with assistance from an external business partner, 35 Executives attended seminars on Discrimination and Violence &amp; Harassment in the workplace.</p>

Assessment areas	Results
<b>Freedom of Association</b>	<p>The legal framework on labor includes provisions on the identification and safeguarding of the employees' right to freedom of association and collective bargaining, which MYTILINEOS fully respects. The employees' right to freedom of association is recognized in all its Business Units. During 2021, no areas were identified and no incidents were reported in connection with a threat to or violation of this right. This has been the result of the implementation of a specific social negotiation process, whose fundamental prerequisite is the commitment of the Company's Management and of its employees to detailed arrangements on social and labor issues, taking into consideration the rights and interests of both sides.</p> <p><b>No incident of a violation of this right was reported to the Human Resources General Division</b> through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. <b>[GRI 407-1]</b></p>
<b>Impact on Local Communities</b>	<p>The Company, through the mechanisms for formal and informal interactions with local communities which it maintains in each one of its Business Units, except in the case of industrial units located in demarcated Industrial Areas, ensures that the concerns of local communities regarding any general impact of its activity are recorded and takes, where necessary, appropriate measures.</p> <p>It also takes the necessary measures to ensure that the security system of its premises or such arrangements in place are consistent with the international law enforcement principles and the use of power.</p> <p>In this respect, in 2021 no circumstances were identified to justify the likelihood of incidents of human rights violations at community level. The Company's activity does not restrict but, on the contrary, ensures access by the citizens to resources or various other methods of living. At the same time, the consultation process and the cooperation with the local Municipalities during the development and operation of RES projects is systematic, with the Company investing significant funds in the development and improvement of local infrastructure with mutual benefits.</p>
<b>Child Labour</b>	<p>MYTILINEOS does not employ persons under the age of 15 or 18 for work.</p> <p>As a result, no Company activity in Greece presents any risk (significant or non-significant) of child labor incidents or of conditions likely to drive young employees to hazardous work. <b>[GRI 408-1]</b></p>
<b>Forced Labour</b>	<p>In compliance with the Constitution of Greece (art. 22 par. 4), which protects the freedom of work, MYTILINEOS prohibits, via its Code of Business Conduct and its Suppliers / Business partners Code of Conduct, all forms of forced or compulsory in its work areas and in the work areas of its suppliers / business partners. As a result, no Company activity in Greece presents any significant risk of conditions that may lead to incidents of forced labor.</p> <p><b>In 2021, no complaint or incident of forced or compulsory labor was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 409-1]</b></p>
<b>Discrimination</b>	<p>MYTILINEOS follows the internationally accepted practices in all the regions and countries where it operates, ensuring that decisions on matters such as recruitment, compensations, promotions, vocational training, retirement and the termination of employment contracts, are based exclusively on impartial criteria and are not connected to any form of discrimination.</p> <p><b>No incident of discrimination was reported to the Human Resources General Division through the formal procedure in place for reporting violations of the Company's Code of Business Conduct. [GRI 406-1]</b></p>