Other significant Social topics

Labor Practices

Employee training

The activity of MYTILINEOS in diverse sectors creates to differing training needs, while offering to employees a wide range of knowledge and giving them the opportunities to develop managerial and problem-solving skills, as they are confronted with new challenges each day. The Company's vocational training and development program for its personnel continued in 2021, aimed at improving the employees' professional skills and capabilities required to cope with the current and future business challenges for the Company as well as with the demands of their personal life.

In particular, within 2021, €414,741 were invested for the implementation of 41,879 training man-hours (2020: 38,476), an amount decreased by 8.8% compared to the respective number of hours in 2020.

The Company's training program, which was attended by 54% of its direct employees, focused primarily on the following key areas: [GRI 404-2]

- Induction program
- Foreign languages
- Development of skills and personal capabilities
- Development of technical skills
- Occupational Health & Safety
- Internal procedures & Management Systems
- Corporate compliance program
- Management & Leadership development
- Cybersecurity

Workforce data	Average training man-hours per employee [GRI 404-1]		
(direct employees)	2019	2020	2021
Analysis / gender			
Total	24.6	15.7	14.5
Men	26.1	16.2	14.5
Women	17.3	13.7	14.3
Analysis / age			
<30 years old	n/a	n/a	39.5
30 - 50 years old	n/a	n/a	12.4
>50 years old	n/a	n/a	6.4
Analysis / employee category ¹			
Executives ²	24.5	14.6	29.0
Management employees	16.7	12.8	12.8
Workers and technical staff	29.1	18.2	13.7

Employee performance evaluation

Moreover, the employee performance evaluation procedure was continued in 2021, in accordance with the Company's uniform evaluation system, with almost 80% of the employees from all categories of personnel who met the conditions for inclusion in the annual performance evaluation procedure, participating in it. In 2021, the revision of the Performance Management System was also completed, which involved optimizations and adaptations in a number of key points, as well as with the development

of a training plan for the Company's employees, scheduled for implementation in 2022. The objectives of the Performance Management System are the following:

- · To support the implementation of the strategy through individual, measurable goals.
- To enhance the employees' understanding of the Company's expectations (quantitative results) and the required skills.
- To provide the framework for productive discussions on performance and developmental feedback.
- · To empower Team Leaders to reward high performance, reinforce the people's engagement and contribute to the corporate results.

Workforce data (direct employees) ³	Percentage of employees who received a performance evaluation review ^{4.5} [GRI 404-3]		
	2019	2020	2021
Analysis / gender			
Total	55.9%	51.9%	50.2%
Men	59.2%	53.9%	51.8%
Women	40.8%	43.4%	43.4%
Analysis / employee category			
Executives	48.2%	61.1%	53.2%
Management employees	48.6%	47.9%	47.8%
Workers and technical staff	64.1%	54.0%	44.1%

At the same time, since 2021. Skills Development Centers are organized, in which Company Executives participate, in order to (a) identify and develop employees as candidates for succession in critical positions, (b) select the most suitable employees for promotion, and (c) identify and accelerate talent development.

Employee skills development programs [GRI 404-2]

Virtual Advance Negotiation Skills (strategic & selling)

The objective of this program was to introduce employees to negotiating skills and approaches, and to equip them with the means and tools to apply in their daily life the knowledge that they acquired. The program focused on training employees who specialize in complex or strategic negotiations, as well as employees who are active in sales and deal with customers on a daily basis. Among other situations, the program covered training in negotiation strategies and techniques, dealing successfully with refusals, dead ends, maneuvering and misleading tactics, and preventing dead ends and conflict situations. The percentage of employees who attended the programme reached 97%.

Communication and Collaboration

Because of the large size and dispersion of the MYTILINEOS activities and, therefore, of its people, in many countries, communication and collaboration are catalysts for the success of the organization, representing two key skills included in the Performance Dialogue system. In collaboration with Dynargie, targeted trainings were conducted to develop these two skills. Using the micro-site my-spark.gr, as well as the interactive gamification that rewards the effort, all participants had the opportunity to expand their knowledge, as well as the interactions and the collaboration between them. The program included, among other topics, training in understanding the value of effective communication, different types of communication, the value of collaboration and crossdepartmental teamwork. The percentage of employees who attended the programme reached 93%.

- Data for 2020 have been updated due to more accurate calculation. [GRI 102-48]
- The increase of the average hours is due to the implementation of specialized performance management training to all managers of MYTILINEOS. The above data do not include training in Personal Data Protection (GDPR). More information about this training can be found in the Legal Compliance section of this Report.
- Percentage of the total number of direct employees. The corresponding percentage for employees who met the conditions for inclusion in the annual performance evaluation procedure (i.e., those working in the Company for less than 6 months, as well as special categories of employees based on their role / scope of work) is almost 80%.
- 5. Refers to an evaluation carried out within the calendar year (1/1/2021 31/12/2021).

Product Quality & Safety

Environment

MYTILINEOS focuses on safeguarding the quality of its products, so that they are safe, over and above compliance with the applicable legal and regulatory safety requirements. Any deviation from the quality specifications of the Company's products and services affects its responsible operation, which in turn impacts its customers' satisfaction levels, its good reputation and credibility and, by extension, its financial results.

Because of the diverse nature of the Company's activities, each Business Unit is faced with different challenges:

- In the Metallurgy Business Unit, the impacts of the Company's primary products on health and safety specifications are related to the end use of the secondary products that result from the processing carried out by its clients. The Company is committed to ensuring the optimal quality of the products it offers (alumina and primary aluminium), in accordance with the expectations and requirements of its clients. ASI
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, in addition to taking into account the internationally applicable regulations on the **design of all manufacturing and RES projects,** the Company monitors their quality metrics and characteristics in detail, during the supply of materials and the construction of the final product, in order to ensure that the clients' stated requirements are met.
- · In the Power & Gas Business Unit, it is very important for MYTILINEOS to ensure the highest possible availability and reliability of its thermal plants for the generation of electric power, as well as the continuous improvement of the quality of the services accompanying it, while at the same time taking advantage of new developments in areas such as electromobility, energy efficiency and net metering.

All Business Units of the Company implement an ISO 9001:2015 certified Environmental Management System, which is supported by individual Quality policies specific to each Business Unit. In particular:

 In the Metallurgy Business Unit, the Company's laboratories, whose role in the quality program is pivotal, systematically control all production stages, from raw materials to finished products. In this respect, the officially issued Safety Data Sheets (SDS) describe the risks associated with the products, as well as all necessary precautions which must be taken to avoid / address these risks. The Company is committed and takes steps to ensure the best quality in its products, in response to the expectations and requirements of its clients, providing them with products (alumina and primary aluminium) and related services that fully meet their quality requirements. In this respect, for the purposes of monitoring performance in product safety, any customer complaints that may be related to product safety are regularly collected, analyzed and addressed by means of concrete corrective actions, with the aim to eliminate such complaints. Moreover, the sector's activities have been aligned with the requirements of the EU "REACH" **Regulation** on the effective management of the chemical substances used in industrial processes. In the framework of ISO 9001:2015, methodologies for the identification and analysis of operational risks as well as of opportunities for improvement, such as risk assessment, are applied, while independent quality audits covering product safety are also performed. The

Unit's quality control laboratory has been accredited by the Hellenic Accreditation System S.A. (ESYD) in accordance with the requirements of the ISO 17025:2017 International Standard, for the chemical analysis of bauxites, alumina and aluminium and its alloys. Finally, it is noted that the Unit's products do not contain harmful chemical substances. ASI

- In the Sustainable Engineering (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the strictest international quality criteria and the requirements of specialized international specifications and codes are applied, in order to ensure the quality of the heavy and/or composite metal structures which the BU produces. For every construction project undertaken by the Company and prior to the start of construction, a Hazard and Operability Study (HAZOP) or Risk Assessment Study is carried out. The purpose of the HAZOP study is to identify and resolve problems which may represent risks to personnel or equipment and which have not been identified at the project study and design stages.
- In the Power & Gas Business Unit, the target is to ensure the reliable supply of electricity to the Independent Power Transmission Operator (IPTO) and of natural gas to businesses, professionals and households, meeting the customers' needs for competitive prices through a range of specially configured, modern and reliable procedures, advice and energy conservation services. In addition, in order to enhance the efficiency of the Unit's Commercial Division and identify the potential for improvements, Customer Satisfaction Surveys are conducted on an annual basis, to measure the satisfaction of retail customers. In 2021, two such surveys were assigned to a consumer research company and were carried out via telephone calls, applying specific statistical criteria. The customer satisfaction rates obtained from the customers who responded to the two surveys were 80% and 76% respectively. It should be noted that the percentage of customers who are using the electronic services provided by the Company (e.g., online payments, mobile apps, internet services, etc.) stood at 55% in 2021.

Durina 2021:

- There were no cases of non-compliance with regulations and voluntary codes related to the impact on health and safety of the MYTILINEOS products and services. [GRI 416-2]
- In the Metallurgy Business Unit, where labelling requirements apply to the aluminium and alumina products for sale, a "Certificate of Conformity" was issued for each consignment, containing all necessary information. ASI
- In the Sustainable Engineering Solutions (SES) Business Unit and the Renewables & Storage Development (RSD) Business Unit, the Company's projects and services are in full agreement with the terms of the respective contracts and with the Company's contractual obligations to its customers, to whom all Health. Safety and Environment related information is delivered, such as: (a) Use, maintenance and disposal instructions for the entire equipment (Operation & Maintenance Manuals) and for all the materials supplied, (b) clearly visible labelling of all materials and equipment (trademarks, warnings and related instructions), and (c) instructions for use-recycling, in the form of Safety Data Sheets (SDS) for all hazardous materials.

Environment

Communication & Marketing

Due to the broad scope of its activities, MYTILINEOS is communicating on multiple levels and for a variety of purposes, which include, among others, the disclosure of stock market information, the announcement of new activities and projects, and the provision of information to consumers and of updates to its other Social Partners, such as for example local communities. At the same time, the Company's international activity in 30 countries in all 5 continents, increases the level of difficulty and the challenge of providing timely and accurate information, as each country of activity has different morals, culture, mentality and institutional framework, to all of which the Company must align itself. Consequently, the Company's many and varied audiences, in combination with its multiple activities, are an important challenge in the first place.

Recognizing these aspects, the Company designs and carries out its Communication and Marketing Strategy by **implementing an annual communication strategy plan** and individual sub-plans, depending on the business objectives. These plans are in turn evaluated, in order to examine whether corrective or updated actions are required. Communication and marketing plans are designed and implemented by the Communication and Marketing Strategy General Division, yet their scope is of relevance to all Company General Divisions and activities. For this reason, mechanisms have been developed for cooperation between all General Divisions and Committees of the Company, as well as with the Company's Management.

At the same time, MYTILINEOS **monitors developments** in the relevant legislation and voluntary codes of conduct, in order to ensure the lawfulness of its communication and promotions. In this respect, the Company's communication associates are bound by the Greek Code of Advertising-Communication Practice, compliance with which is established on an advisory, preventive and/or suppressive basis by the Communication Control Board, in line with Greek laws. The Code's principles require all promotions to be lawful, decent, honest and truthful, prepared with a due sense of social responsibility and in line with the principles of fair competition, as this is generally accepted in the market.

The Company also participates in institutional bodies such as the Greek Federation of Enterprises (SEV), the Hellenic Capital Market Commission (HCMC) and the Hellenic Advertisers Association, membership of which is conditional on the acceptance of obligations, commitments and rules which MYTILINEOS embraces and takes into account for its Communication and Marketing activities.

Finally, the CEO and the Executive Committee are kept informed and evaluate the progress and performance of the Communication and Marketing Strategy General Division at regular intervals.

Regarding the results for 2021:

- During the implementation of MYTILINEOS' communication strategy, there were no incidents of non-compliance with the regulations and voluntary codes on marketing communications, including product promotion and sponsorships. [GRI 417-3]
- The Company's products are not subject to any restrictions as regards their sale to specific markets and no significant issues of concern were raised by the Company's Stakeholder groups in connection with products and their marketing communication.
- Regarding the provision of verifiable and clear information on its products for the purposes of labelling, MYTILINEOS complies fully with the relevant requirements. In all cases, customers have at their disposal the tools allowing them to check all significant information provided and to proceed to the corresponding tests, if they so wish. In 2021, there were no incidents of non-compliance with the regulations regarding information and labelling of the Company's products. [GRI 417-2]



Type of information related to product labelling [GRI 417-1] ASI

Major categories of products subject to the following information requirements	Aluminium	Alumina	
Information on the origin of product elements or ingredients.			
Information on content, particularly regarding substances which may have an environmental or social impact.	100%	100%	
Information on the safe use of the product or service.			
Information on the product's disposal method and its potential environmental/social impacts.	Non-applicable requirements		

In the Metallurgy Business Unit, the above labelling requirements apply to all end products for sale (aluminium billets and slabs), as well as to calcined and hydrated alumina. For each aluminium or alumina cargo, a "Certificate of Conformity" is issued containing the necessary quality specifications for that cargo, and the Safety Data Sheet (SDS) of each product is also available.