



## **CENTRAL FUNCTION HUMAN RESOURCES**

### **Diversity, Equity and Inclusion (DE&I) Policy**

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<b>Management Approval</b>	Internal Consultation Process
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<b>Approved by</b>	Board of Directors

April 2025

<b>REVISION HISTORY</b>		
<b>Revision Number</b>	<b>Approval Date</b>	<b>Amendments' Description</b>
1.0	23/04/2025	Policy establishment

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## **1. Introduction**

Diversity, Equity and Inclusion are core values integral to the mission, vision, and activities of Metlen Energy & Metals plc and its direct and indirect subsidiaries, including Metlen Energy & Metals S.A. (hereinafter referred to as "METLEN"). At METLEN, we believe that by embracing diversity, we can unlock innovation, enhance employee engagement, and increase our adaptability to market changes.

The Diversity, Equity and Inclusion Policy (Policy), approved by a decision of the Board of Directors, defines the concepts of Diversity, Equity and Inclusion (DE&I), outlines the basic principles and requirements for its application in METLEN's business activities, while also contributing to its full compliance with the applicable laws and regulations.

The Policy complements, reinforces and is in line with the following Policies: Corporate Social Responsibility (CSR) Policy, Human Rights Policy, Policy against Violence and Harassment in the Workplace, Policy for the Internal Reporting Channel-Whistleblowing, Talent Recruitment and Selection Policy, Executive Leadership Team Selection and Appointment Policy, Training and Development Policy, Remote Work Policy, Responsible Supply Chain Policy, Employment Rules and Regulations, as well as the Code of Business Conduct and the Suppliers-Business Partners Code of Conduct.

## **2. Purpose & Scope**

The Policy underpins METLEN's mission to foster a work environment where every employee feels valued, heard, and empowered to contribute to our collective success by fostering equal opportunities, embracing diversity, and creating a sense of inclusion and belonging regardless of race, colour, sex, sexual orientation, gender identity, ethnicity, indigeneity, religious or other beliefs, disability or chronic illness, neurodiversity, marital or socioeconomic status, age, political opinion and any other characteristic that can categorize an individual into a specific minority or vulnerable group, defined by particular attributes.

Moreover, the Policy seeks to enhance METLEN's ability to attract and retain talent with diverse skills, views, and perspectives, who are encouraged to meet their full potential, contributing to higher levels of innovation, the achievement of corporate goals and ultimately, optimal business performance.

The Policy applies across all METLEN business sectors, subsidiaries, and operations, regardless of geographical location. To ensure the Policy's effectiveness across our global footprint, we adapt our DE&I initiatives to respect local cultures and comply with regional laws. Any additional country-specific requirements are covered by local Policy supplements.

## **3. Basic Principles**

### **DIVERSITY:**

At METLEN, we embrace and encourage the unique differences of every individual, promoting a workforce rich in varied skills, knowledge, experiences, and perspectives. Our commitment extends beyond recognizing differences in race, colour, sex, sexual orientation, gender identity, ethnicity, indigeneity, religious or other beliefs, disability or chronic illness, marital or socioeconomic status, age, political opinion, and other characteristics, to leveraging these diverse perspectives in enhancing innovation, problem-solving, and decision-making processes.

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**EQUITY:**

Equity at METLEN means more than implementing the principle of equal opportunities; it involves actively addressing and dismantling systemic inequalities to ensure fair treatment and advancement for all employees. This commitment is manifested in our continuous efforts to review, adjust, and improve our policies, practices, and procedures, ensuring they promote both personal and professional development equitably.

**INCLUSION:**

Inclusion is at the heart of the corporate culture at METLEN. It signifies our dedication to creating a workplace where every individual's differences are valued, and where every voice is heard and considered in shaping our policies and practices. We are committed to fostering an environment that encourages participation, respects diverse viewpoints, and implements feedback into actionable change.

**BELONGING:**

While the terms Diversity, Equity and Inclusion are most commonly used to describe METLEN's commitment to creating a fair and supportive work environment, we also recognize and highlight the notion of Belonging as a key element of our culture. At METLEN we cultivate a sense of connection, acceptance and appreciation for all our employees, fostering a workplace community of trust, engagement and enhanced wellbeing, beyond mere tolerance or compliance.

**4. Standards & Guidelines**

To draft the Policy, internationally recognized standards and guidelines have been taken into consideration, including:

- The Fundamental Conventions of the International Labour Organization (ILO).
- The UN Guiding Principles on Business and Human Rights.
- The International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.
- The ILO's Declaration on Fundamental Rights and Principles at Work.
- The 10 Principles of the UN Global Compact (particularly Principle 6).
- The 2030 Agenda and the 17 Sustainable Development Goals (particularly SDGs 5, 8 and 10).
- The UN Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment).
- The UN Declaration on the Rights of Indigenous Peoples.
- The ILO's Indigenous and Tribal Peoples Convention (No. 169).
- The UN Convention on People with Disabilities.
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Businesses.

**5. Roles & Responsibilities**

All METLEN employees share the responsibility for creating and maintaining a work environment with DE&I values and practices at its core, in accordance with the

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Policy, respecting the dignity and diversity of others, focusing on conscious inclusion, and enhancing their own awareness.

Leadership at all levels and People Managers bear the additional responsibility to actively champion diversity initiatives, incorporate inclusive practices into their teams, and be accountable for fostering an inclusive and safe work environment where everyone can thrive.

The Human Resources Central Function defines and oversees the DE&I Strategy, policy adherence, and implementation of initiatives. This includes guiding leaders to meet diversity objectives and actively enhance workplace culture, periodically monitoring relevant targets and KPIs in a specialized DE&I dashboard as well as evaluating the effectiveness of actions to ensure they contribute positively to achieving the Policy's stated goals.

## **6. Vision & Commitments**

METLEN envisions an inclusive workplace that focuses on wellbeing, allowing employees to feel a sense of safety, belonging, and authenticity, where everyone accepts diversity, seeks equality, and works towards inclusion.

To this end, the DE&I vision of METLEN encompasses:

- The fair treatment of all employees, promoting personal and professional advancement in areas covering the full employee lifecycle, including attraction and selection, onboarding, learning and development, performance management, rewards and compensation, and culture and communication.
- Equality irrespective of non-work-related personal characteristics, in accordance with the applicable law in each country of operation and in line with international best practices, as well as the Sustainable Development Goals, particularly with regards to access to employment, vocational training and development.
- The establishment of a work environment that encourages open and respectful expression, where all employees feel valued, safe, respected, and supported, free from any behaviours that could lead to discrimination.
- Compliance with national legislation, regulations and directives relating to diverse representation, non-discrimination, the elimination of violence and harassment in the workplace, and others.

For the achievement of the above vision, METLEN recognizes the need to integrate DE&I considerations and goals into a wide range of processes, procedures and policies that govern its broader business activities and to make relevant commitments, contributing, at the same time, to its overall Sustainable Development Strategy. METLEN strives to:

- Implement fair and unbiased recruitment and selection processes.
- Use and promote inclusive language in all communications internally and externally, free from content that reinforces harmful social stereotypes or discriminates based on non-work-related characteristics.
- Attract a diverse pool of candidates through the implementation of dedicated strategies.
- Provide an inclusive and welcoming onboarding experience for all new employees.
- Implement ongoing awareness-raising and educational initiatives on unconscious bias and other DE&I-related issues with an emphasis on HR and Senior Executives, but also for employees at different hierarchical

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levels.

- Ensure equal opportunities for career growth, mentorship, and professional learning and development based on transparent criteria, to enable everyone to learn, grow and thrive at work.
- Offer equal pay for work of equal value, conducting annual pay equity reviews to identify and address any disparities in salary and bonus structures between different groups.
- Be transparent regarding the Gender Pay Gap Index through regular reporting, such as the annual Sustainable Development Report.
- Enhance collaboration between METLEN teams across different countries and continents to encourage cross-national exchange and establish multicultural relations.

An area of particular importance for METLEN is the enhancement of gender equality across all hierarchical levels and therefore, specific targets for gender representation have been set. Specifically, METLEN aims to reach the representation level of women as follows by 2030:

- 30% of Chiefs & Executive Directors
- 20% of Senior Directors & Directors
- 30% of Admin, Technical, Other
- 30% of Total Workforce

## **7. Transparency & Communication**

Respecting the Principle of Transparency, METLEN is committed to evaluating and publishing its progress in the context of the implementation of the Policy for all its activities.

The Policy, through internal communication tools, is communicated to all METLEN employees in Greece and abroad and is publicly accessible on its website.

A copy of the Policy is published on METLEN's internal website (intranet), always making it available for all employees.

Furthermore, METLEN is committed to promoting continuous dialogue and maintaining transparency regarding DE&I efforts through multiple channels of communication, including company newsletters, intranet updates, and internal events, highlighting stories and initiatives across our global footprint. Through this communication strategy, METLEN keeps DE&I at the forefront of its culture.

## **8. Reporting of Policy Violations**

The Company has a zero-tolerance stance against all forms of harassment and discrimination. METLEN gives its employees the opportunity to express any concerns, as well as to report incidents of violations in relation to this Policy, through the main mechanism for reporting violations of the Code of Business Conduct (named or anonymous reports) via:

1. the Electronic Reporting Platform: <https://metlen.ethics.help/web/en>
2. email to: metlen[at]ethics.email (anonymously linked to the abovementioned Electronic Reporting Platform, without revealing the email address of the reporter).

Reports can be submitted by employees linked to the Company by any type of current, former or candidate employment relationship, as well as any person working under the supervision and direction of contractors, subcontractors and

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suppliers of METLEN Energy & Metals S.A.”) through the corporate METLEN Energy & Metals S.A. reporting channels.

The Company is committed to investigating and addressing the concerns of employees, as well as to resolving complaints by taking corrective action, while abstaining from any action against any employee who reports, in good faith, any real or alleged inappropriate behaviour believed to violate the Policy, will not be tolerated.

## **9. Continuous Improvement & Feedback**

Our DE&I Policy is dynamic, designed to adapt and evolve through continuous learning and growth. As such, at METLEN, we are dedicated to the ongoing evaluation and enhancement of our DE&I Policy and initiatives, employing a data-driven approach to monitor success and identify opportunities for improvement.

Indicatively, the metrics that we monitor in our DE&I Dashboard include, but are not limited to, the following areas:

- **Recruitment Metrics:** Tracking diversity in applicant pools, candidate satisfaction scores on DE&I, and the proportion of diverse hires, to ensure our recruitment practices are equitable and inclusive.
- **Turnover Metrics:** Identifying patterns in turnover rates, among diverse and underrepresented groups, to better understand and address potential disparities.
- **Employee Engagement and DE&I Index:** Using employee feedback to measure the impact of our DE&I initiatives on overall engagement, satisfaction, and sense of belonging.
- **DE&I-focused Learning Programs Participation:** Tracking completion rates in DE&I learning to ensure widespread understanding and commitment to DE&I principles.
- **Gender Gap Index:** A critical measure of our commitment to equity, this index assesses pay disparities between genders across the organization. By analysing and addressing any identified gaps, we aim to ensure that pay equity is not just a goal but a reality for our employees.

Employee input is invaluable to our DE&I strategy. Through annual Engagement Surveys and Pulse Surveys, we invite all METLEN employees to share their experiences and suggestions on DE&I practices. This feedback is essential for tailoring our initiatives to meet the diverse needs of our workforce effectively.

This structured, data-driven approach underscores METLEN’s commitment to diversity, equity and inclusion. It ensures these values are integrated into every facet of our organizational culture, preparing us to meet future challenges and opportunities.

## **10. Review & Approval**

The People Experience & Intelligence Director is responsible for developing the Policy, as well as reviewing it annually to determine if there is a need for revision.

The Policy is updated by the People Experience & Intelligence Director in response to any significant internal changes and/or external changes (e.g., changes in the regulatory framework).

The Policy and any revised version are approved by the Board of Directors.