MYTILINEOS Holdings S.A. - Water Security 2022

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Founded in Greece in 1990, MYTILINEOS has been listed on the Athens Stock Exchange since 1995 and is a leading international industrial and energy company. Its complex and wide-ranging business activity is a driving force for the Greek economy, while at the same time the Company has a dynamic pres-ence in all 5 continents. As a responsible industrial company, it seeks, through continuous reinvestment, to continuously develop and maximize business and economic synergies, to maintain leadership in each business activity sector and to apply the principles of Sustainable Development across the entire range of its core activities. At the end of 2021, the consolidated turnover of MYTILINEOS stood at nearly €2.66 billion. MYTILINEOS is active in the sectors of Metallurgy, Power and Gas, Sustainable Engineering Solutions, and Renewables & Storage Development

Business Activity Sectors

Metallurgy Business Unit: MYTILINEOS is a leader in the Metallurgy sector. Aluminium of Greece is the largest vertically integrated alumina and aluminium producer in the European Union and one of Greece's healthiest growing industrial companies. The company's international business activity, in cooperation with DELPHI-DISTOMON, is a driving force for the national economy as well as for the development of the Greek periphery. Through DELPHI DISTOMON, which is the second largest producer of bauxite in Greece and consequently in Europe, the annual production amounts to 630,000 tons of bauxite, from underground construction sites only. The company's focus on sustainability is strengthened by the subsidiary EPALME, which is the largest independent producer of recycled aluminum.

Power & Gas Business Unit: MYTILINEOS is firmly established in the Electric Power and Gas market. The Power & Gas Business Unit, where the Company is active through the brand name Protergia, brings under the same roof the management of all MYTILINEOS energy assets and activities. The Company is among the leaders of the private-sector initiative in the electric power market and is the largest independent electricity producer in Greece, with a portfolio of energy assets totaling more than 1,200 MWh of installed capacity, which accounts for over 13.5% of the licensed thermal plant production capacity operation in the country. As a private producer of electricity with investments in high-tech power plants, Protergia has an in-depth knowledge of the electricity market and is constantly engaged in carrying out environment-friendly investments, thus contributing to the Greek economy and to employment.

Sustainable Engineering Solutions Business Unit: MYTILINEOS strategically invested in the national and global goal of energy transition, putting all its forces at the service of Sustainable Development. The Company transformed the EPC BU - METKA into a new, modern, and innovative Business Unit; the Sustainable Engineering Solutions BU (SES BU) The BU now has a fresh direction and in addition to the construction of thermal power plants and selected infrastructure projects traditionally executed by the BU, is focusing on the dynamic development of Sustainability projects.

Renewables & Storage Development Business Unit: MYTILINEOS created a new Business Unit, identifying that its subsidiary METKA EGN is already being established as one of the largest Solar PV and energy storage developers worldwide. The Renewables and Storage Development (RSD) has become a strong pillar of growth while providing inherent synergies for the Company. The broader strategy of the RSD BU includes also the solar development business model Build-Operate-Transfer ("BOT") which leverages the expertise of METKA-EGN, having completed more than 2.5 GW of solar power plants and 400 MW of energy storage projects in all five continents.

Sustainable Development is an integral part of the MYTILINEOS long-term business strategy. It is the driving force through which the Company aspires to remain competitive in the long term, to meet contemporary challenges and, by developing appropriate partnerships, to contribute to a new and efficient model of socially inclusive growth, as this is reflected in the **UN Sustainable Development Goals**. The Company, after carefully examining the existing signifi-cant social, environmental and economic challenges affecting its activity, developed a new Sustainable Development strategy aiming at creating long-term and sustainable value for its shareholders and other stakeholder groups, through a holistic approach that combines economic stability with social and environmental sustainability. **The Company's 3-layer Sustainable Development strategy (Climate Change - ESG - Corporate Responsibility) is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) across all its activities.**

W-EU0.1a

(W-EU0.1a) Which activities in the electric utilities sector does your organization engage in?

Electricity generation

W-EU0.1b

(W-EU0.1b) For your electricity generation activities, provide details of your nameplate capacity and the generation for each technology.

	Nameplate capacity (MW)	% of total nameplate capacity	Gross electricity generation (GWh)
Coal – hard	0	0	0
Lignite	0	0	0
Oil	0	0	0
Gas	1215	85.5	5076
Biomass	0	0	0
Waste (non-biomass)	0	0	0
Nuclear	0	0	0
Fossil-fuel plants fitted with carbon capture and storage	0	0	0
Geothermal	0	0	0
Hydropower	0.8	0.1	0.8
Wind	194	13.6	525.2
Solar	11.5	0.8	18
Marine	0	0	0
Other renewable	0	0	0
Other non-renewable	0	0	0
Total	1421.3	100	5620

W-MM0.1a

(W-MM0.1a) Which activities in the metals and mining sector does your organization engage in?

Activity	Details of activity
Mining	Bauxite
Processing	Aluminium Alumina

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1 2021	December 31 2021

W0.3

(W0.3) Select the countries/areas in which you operate.

Greece

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

EUR

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups in which an equity share is held

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

No

W0.7

(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization.	Provide your unique identifier
Yes, an ISIN code	ISIN Code: GRS393503008

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Important	Water is vital for all MYTILINEOS' activities, and this dependency is likely to increase in the future in the company's specific business sectors. MYTILINEOS' Metallurgy and Power & Gas Business Units represent the 99% of the company's freshwater consumption (sea water, ground water and potable water) for the extraction of bauxite, and the production of alumina, aluminium and electrical energy (water intensity main operations: steam production and the cooling process). Direct use: For direct use, sufficient amounts of good quality freshwater available for use is considered vital, as the continuous production at our alumina & aluminium facility is dependent on our ability to maintain our water rights and the physical availability of the water supplies. Future quantity and quality dependency on this kind of water will likely remain the same. Indirect use: For indirect use, sufficient amounts of good quality freshwater available for use is considered important because the main downstream dependence of this type of water is that annually nearly 20% of our underground water withdrawals, after a minimun required treatment, is used to fulfill local communities' water needs. Future quantity and quality dependency on this kind of water will likely remain the same.
Sufficient amounts of recycled, brackish and/or produced water available for use	Important	Not very important	Direct use: In Metallurgy sector brackish water is used for the casting's cooling system. This amount of water is obtained from 2 drills, owned by MYTILINEOS, in the wider region around its plant, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. The use of brackish water for indirect use is considered unsignificant in our value chain, upstream or downstream. Future quantity and quality dependency on this kind of water will likely remain the same. Indirect use: There are no important dependencies concerning this type of water, and such (important) dependencies are not expected in our value chain in the future.

W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	MYTILINEOS considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals from all of its industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). Also we disclose water withdrawals at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water withdrawals – volumes by source	100%	MYTILINEOS considers this aspect as important. In this context measures and monitors the total volumes of water withdrawals by source from all of its industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant data at corporate level within our annual Sustainable Development Report under the new GRI 303 STANDARDS.
Entrained water associated with your metals & mining sector activities - total volumes [only metals and mining sector]	100%	The company measures and monitors the volumes of entrained water from all of its 3 facilities in Metallurgy Business Unit: bauxite mining plant, secondary aluminium production plant and alumina & aluminum production plant. These data are collected monthly from Metallurgy sector EHS department, through the environmental management system processes. Also we disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	We monitor water withdrawals quality in all of our of its 3 facilities in Metallurgy Business Unit: bauxite mining plant, secondary aluminium production plant and alumina & aluminum production plant. This refers to the quality of groundwater we drown into our boundary. These data are collected monthly from the Sector EHS department and reported annually to the local authorities (where it is recommended). Also we disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard. There is a breakdown of freshwater and other water withdrawals according to GRI 303-3 2018 Standard.
Water discharges – total volumes	100%	The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges from all of its industrial facilities across its business: 4 Industrial plants,3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water discharges – volumes by destination	100%	The company considers this aspect as important. In this context measures and monitors the total volumes of water discharges by destination from all of its industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes according to company's business sectors internal goals andreported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water discharges – volumes by treatment method	100%	The company monitors the quality of its water discharges to comply with local legislation and corporate environmental policy and procedures, from all of its industrial facilities across its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments, through the environmental management system processes f according to company's business sectors internal goals andreported annually to the local authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water discharge quality – by standard effluent parameters	100%	The company monitors the quality of its water discharges by standard effluent parameters according to its Environmental Approval Permits mainly in its 7 heavy industrial facilities which are covering the 100% of the company's total discharge volume: 2 Industrial plants of Metallurgy sector, 2 plants of EPC Project and 3 Gas-fired thermal plant of primary electricity production. These data are collected monthly from each Business sector EHS departments, through the environmentalmanagement system processes for review and management according to company's business sectors internal goals and reported annually to the local authorities(where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water discharge quality – temperature	100%	MYTILINEOS considers this aspect as important in all its facilities where discharge temperature (see water) is increased, such as the 3 Gas-fired thermal plant ofprimary electricity production where water is used for cooling processes. The company monitors the temperature of its water discharges by standard effluent parameters according to its Environmental Approval Permits. These data are collected monthly from each Business sector EHS departments, through theenvironmental management system processes for review and management according to company's business sectors internal goals and reported annually to thelocal authorities (where it is recommended). Also we disclose water discharges at corporate level within our annual Sustainable Development Report under the new GRI STANDARDS. For the rest facilities the issue is not relevant. As a consequence the percentage of coverage in the applicable cases is 100%.
Water consumption – total volume	100%	MYTILINEOS considers this aspect as important. In this context measures and monitors the total water consumption volumes from all of its industrial facilitiesacross its business: 4 Industrial plants, 3 Gas-fired thermal plant of primary electricity production and 18 facilities which are RES plants (14 Wind Farms, 3 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector EHS departments,through the environmental management system processes according to company's business sectors internal goals and reportedannually to the local authorities (where it is recommended). Also we disclose water consumption total volume, at corporate level, within our annual Sustainable Development Report under the new GRI:303 Water and Effluents Standard.
Water recycled/reused	100%	Reused water volume refers mainly to 3 company facilities (two Gas-fire thermal plant of primary electricity production and one plant of Metallurgy sector - miningprocess). The amount of water reused in Company plants, amounted to 7,484.3 ML, corresponding to 4.4% of total water withdrawals. In particular: (a) the reuse of 7,448.1 ML of discharged seawater from the cooling network of the Combined Heat and Power (CHP) plant, (b) the recycling of 29.2 ML of liquid waste from the Heat Recovery Boiler of the combined-cycle thermal power plant and (c) the use of 7 ML of rainwater, collected as a good practice in the bauxite mining activity. All data are collected monthly from each Business sector EHS departments, through the environmental management system processes according to company's business sectors internal goals. Also we disclose water reuse volume percentage within our annual Sustainable Development Report under the new GRI STANDARDS
The provision of fully-functioning, safely managed WASH services to all workers	100%	MYTILINEOS considers this aspect as important in all its facilities, so 100% of our Business sectors monitor this aspect as part of its labour relation policies and health and safety policies. All of our facilities (including RES sites) and corporate centers provide water installations and have access to fully-functioning WASH services.

W-EU1.2a

(W-EU1.2a) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

	% of sites/facilities/operations measured and monitored	Please explain
Fulfilment of downstream environmental flows	100%	Based on water use licenses and Environmental Terms Approval Decisions, there is no specific environmental flow that the Company must comply with. There is a limit on the annual amount of water we use for the total period of operation of the micro hydroelectric plant (April 1st to November 30th). The water supply is determined purely based on the technical characteristics of the equipment and does not appear to be related to environmental flow. There are no living organisms in the network, as we obtain water from a local irrigation canal.
Sediment loading	100%	There is a Scada system in the hydroelectric, which sends a notification when the water pressure in the water intake has dropped (ie the grill is blocked). In addition, the intake will be cleaned when the operator of the hydropower plant detects that garbage has been collected in the intake. This takes place 1-2 times a day up to 3 depending on the day and needs. The sediments which are mainly garbage, algae, branches, are collected are removed by mechanical means and end up in municipal waste bins
Other, please specify	Please select	

W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	169080.5	About the same	The company's total water withdrawal quantity presented a a slight decrease by 0.7%, comparing to 2020. The 95% of the total volume is related to seawater withdrawals. The decrease is mainly due to the decrease by 0.8% of the seawater volume used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy Business Unit. It is likely that total withdrawals will increase within the next 2 years as a result of a the operation of the new 826 MW combined cycle gas-fired power plant (CCGT). The new plant, the construction of which completed in the end of 2021, it is going to operate under commissioning for the first half of 2022, before its full operation in the second half of 2022. As a result, total water withrawal is expected to increase because of the need for more cooling sea water. The water withdrawal rate is annually determined by the Water Resources Management Directorate of the Sterea Regional Administration.
Total discharges	162130	About the same	The company's total water discharges presented a slight decrease by 0.3%, comparing to 2020. Given that the majority of the total discharge volume is related to seawater discharged back to its original source, it is likely that total discharges will increase within the next 2 years as a result of a the operation of the new 826 MW combined cycle gas-fired power plant (CCGT). The new plant, the construction of which complated in the end of 2021, it is going to operate under commissioning for the first half of 2022, before its full operation in the second half of 2022. As a result total water discharge is expected to increase in correspondence with the increased needs for cooling sea water.
Total consumption	6950.5	About the same	The total consumption volume remained about the same, compared to the respective one in 2020, and increased by nearly 5%. As the total water consumption is the difference between total water withdrawals and total water discharges, and both water withdrawals and discharges will increase correspondingly, total water consumption will likely remain at the same volumes or slighlty increase within the next 2 years.

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	Less than 1%	About the same	WRI Aqueduct	The water stress areas were identified using the WRI Aqueduct tool by WRI Aqueduct tool of World Resources Institute (Water Risk Atlas - https://www.wri.org/applications/aqueduct/water-risk-atlas/#/?advanced=false&basemap=hydro&indicator=bws_cat&lat=-14.445396942837744&lng=-142.85354599620152&mapMode=view&month=1&opacity=0.5&ponderation=DEF&predefined=false&projection=absolute&scenario=optimistic&scope=baseline&timeScale=annual&year=baseline&zoom=2). The areas in which MYTILINEOS operates including the construction sites all over the world, were classified based on their water stess risk level. As water stressed areas, were selected those who are characterized as extremely high stress. The water withdrawals are from areas with water stress correspond to only 0.3 ML.

W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	13.9	Much lower	This figure shows the volume of water withdrawn: a) From a nearby stream in the vicinity of MYTILINEOS subsidiary DELPHI-DISTOMON, and of rainwater which is collected directly in a special reservoir, with a capacity of 6-7 mega liters per year b) water withdrawn for the construction operations of MYTILINEOS' Renewables & Storage Development Business Unit. This water source is relevant to MYTILINEOS because it is used for the needs of bauxite mining process and the overall operation of DELPHI-DISTOMON subsidiary, as well as the ad hoc needs of water in construction sites. The measurement is conducted based on GRI:303 Water and Effluents Standards, The withdrawal of fresh surface water, including rainwater, water from wetlands, rivers, and lakes is much lower compared to the previous year, mainly because of the decreased need of water for the bauxite penetration tests conducted by DELPHI-DISTOMON.
Brackish surface water/Seawater	Relevant	159824.5	About the same	This figure shows the seawater intake for the cooling purposes of the High Efficiency Combined Heat and Power plant. The limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Regional Administration of thePrefecture of Sterea Hellas. This water source is relevant to MYTILINEOS because it is the main water source for some of our significant activities and is determined by legislation. Withdrawal of this kind of water has decreased (by 0.8%) with respect to last year. Withdrawal volumes vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant and no significant differences from year to year are observed.
Groundwater – renewable	Relevant	8599.2	About the same	This figure corresponds to volume of brackish, industrial service and drinking water, used primarily to meet the water supply needs of thecompany's facilities in all Metallurgy and 2 out of 3 Energy industrial plants and has remained the same by slightly increasing by 0.4% compared to 2020. This quantity of groundwater withrawed is obtained mainly by a network of 17 drills, owned by the company's Metallurgy sector, in strict compliance with the provisions of the Water Resources Management Directorate of the Sterea Regional Administration. This water source is relevant to MYTILINEOS as it is used for various industrial operations and covers the needs of industrial water in the AoG plant. Also the source is renewable because the volumes of the water withdrawn can be replenished relatively quickly and is located at shallow dept. The production of primary aluminum remained about the same compared to 2020 and that is why the groundwater withdrawal remained also about the same.
Groundwater – non-renewable	Not relevant	<Not Applicable>	<Not Applicable>	This water source is not relevant to MYTILINEOS because the groundwater used comes from by a network of 17 drills, owned by the company's Metallurgy sector, and the withdrawn volumes can be replenished relatively quickly (according to special study carried out and the company's monthly measurements) and they are located at shallow dept. As a consequence all the groundwater withdrawals come from renewable sources and the Company does not uses other non-renewable groundwater.
Produced/Entrained water	Relevant	216	Higher	It relates to the quantity of groundwater resulting from the bauxite mining process of the DELPHI-DISTOMON subsidiary of MYTILINEOS, and which is pumped and get the appropriate treatment before its final discharge. This water source is relevant to MYTILINEOS because it affects the bauxite mining process of the Company and it is essential for the smooth operation of the Metallurgy Business Unit. The measurement is based on GRI:303 Water and Effluents Standards. The quantity of produced/entrained water is higher compared to previous year, mainly because of the different nature of the parts of mining site, which could produce more or less water depending on the morphology of the bauxite reserves.
Third party sources	Relevant	426.8	About the same	The 53% of this volume concerns seawater returned by third party sources (Motor Oil company) and used in the desalination process for the production of industrial water in our thermal power station of the MYTILINEOS subsidiary Korinthos Power. The rest 47%, relates to water widrawal from public suppliers for various activities within the company. In total this source is relevant because a large number of facilities depend and use this kind of water in their operations. Withdrawals of this kind of water remained about the same in 2021 compared to 2020 due to the absence of significant changes on the operations of the Company through the reporting period of 2021 compared to the previous year.

W1.2i

(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Relevant	267.8	Higher	This figure relates to the discharge of the water produced by the bauxite mining unit, the irrigation of greenery that has been used for the restoration of the natural environment, and the amount of primary treated wastewater discharged in Asopos River due to the operation of secondary aluminum treatment plant. Water discharged in this destination is relevant to MYTILINEOS because the fresh water pumped from the bauxite mining unit is directly discharged to a nearby stream and without this operation the mining process could be at risk. This figure has increased compared to 2020 because of the increased quantities produced/entrained water from bauxite mining process. The quantities of produced water each year depend on various geological and other parameters of the mining sites and an accurate projection could not be acheived.
Brackish surface water/seawater	Relevant	161795.6	About the same	This figure shows the company's water discharge volume to the sea. The majority (99%) of this water volume is seawater discharge from the cooling process of the Combined Heat and Power (CHP) plant. The rest relate to casting's cooling system and wastewater and rainwater, measured at the point of exit from the primary treatment facilities of Metallurgy sector. Water discharged to this destination is relevant to MYTILINEOS as it is determined by legislation. The discharge of seawater have decreased by 1% and remains about the same compared to the previous year as it is directly connected with the respective withdrawal volumes which vary each year depending principally on the operation time of the High Efficiency Combined Heat and Power plant. Within the next 2 years as a result of the operation of the new 826 MW combined cycle gas-fired power plant (CCGT), total water discharges is expected to increase in correspondence with the increased needs for cooling sea water.
Groundwater	Relevant	23	Higher	It relates to the amount of water used for the drilling of the subsoil during the bauxite mining process of the company Delphi-Distomon. For the drilling of the subsoil, fresh under pressure water is used which ends up in groundwater reservoirs. This procedure is essential for the mining process and it is considered relevant to MYTILINEOS Metallurgy sector. The figure is increased compared to previous year and depends on the condition and the sharpness of the bauxite reserve which may vary.
Third-party destinations	Relevant	43.7	Higher	It relates to industrial service water in the power generation process (disposal to a Motor Oil company liquid waste treatment plant) and discharge to municipal wastewater treatment plants. Water discharged in this destination is relevant to MYTILINEOS as it is the appropriate way of treatment for both types of water sources described above. The discharge of this type of water is increased in comparison with the previous year due to the increased needs in industrial water and water from public suppliers and the corresponding increased withdrawals.

W1.2j

(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

	Relevance of treatment level to discharge	Volume (megaliters/year)	Comparison of treated volume with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	The amounts of water used for the operation of MYTILINEOS Business Units do not require tertiary treatment because the pollution burden is low. In any case, regarding the management of water discharges resulting from the activity of MYTILINEOS, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.
Secondary treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	The amounts of water used for the operation of MYTILINEOS Business Units do not require secondary treatment because the pollution burden is low. In any case, regarding the management of water discharges resulting from the activity of MYTILINEOS, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.
Primary treatment only	Relevant	473	About the same	100%	The 91% of the primary treated water relates to wastewater that is recycled within the production process of Metallurgy Business Unit. More specifically, the aluminium production plant uses an underground system of water or effluents collection pipes, which leads to a liquid industrial waste treatment plant featuring settling basins, an oil separator and a multi-layered activated carbon filter. The pH value, temperature and flow are constantly measured and monitored online. The other 9% relate to discharge of industrial wastewater to Motor Oil Company and primary-treated wastewater discharge to Asopos River. Primarily treated water remained about the same in 2021 compared to 2020 due to the absence of significant changes on the operations of the Company through the reporting period of 2021 compared to the previous year.
Discharge to the natural environment without treatment	Relevant	161795.6	Lower	100%	It relates to sea water discharge back to the sea, freshwater pumped for the bauxite mining site discharged to nearby streams, water used for the drilling of the subsoil during the bauxite mining process of the company Delphi-Distomon and brine water dicharges as a result of desalination process for the production of industrial water. Water with no need of any treatment before its discharge was lower in 2021 compared to 2020 mainly due to the decreased seawater withdrawal quantity.
Discharge to a third party without treatment	Relevant	23.6	Higher	100%	It relates to discharges to municipal wastewater treatment plants. It is relevant to MYTILINEOS because it is the appropriate way of treatment for this type of discharges. Discharge to a third party without treatment quantity is increased compared to the previous year mainly because of the increased use of water for the need of construction sites of MYTILINEOS 2 construction Business Units.
Other	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>	

W1.3

(W1.3) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue	Total water withdrawal volume (megaliters)	Total water withdrawal efficiency	Anticipated forward trend
Row 1	2664050000	169080.5	15756.1043408317	The water withdrawal intensity as reported in here is expected to increase because growth of the Company in the coming year is anticipated to reach much higher levels while various initiatives to mitigate water-related impacts and limit water withdrawal to the lower possible are already implemented and are planned to be implemented in the future.

W-EU1.3

(W-EU1.3) Do you calculate water intensity for your electricity generation activities?

Yes

W-EU1.3a

(W-EU1.3a) Provide the following intensity information associated with your electricity generation activities.

Water intensity value (m3)	Numerator: water aspect	Denominator	Comparison with previous reporting year	Please explain
0.95	Total water consumption	MWh	Higher	This intensity value refers to High Efficiency Combined Heat and Power Plant owned by MYTILINEOS, located in the Energy Complex of Ag. Nikolaos (Viotia). This indicator corresponds to water consumption per MWh. The value of the indicator is higher compared to the previous reporting year (0.96). The largest proportion of water consumption is linked to the evaporation of the water used for te cooling process of the CHP plant. The water evaporation depends on both operational and weather conditions and is not something we can fully control. Operating conditions include mainly the operating hours and the load of the unit, while in weather conditions the relative humidity and air temperature. For this reason, continuos monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on wtaer-use are conducted under the framework of ISO 14001.
0.06	Total water consumption	MWh	About the same	This intensity value refers to Gas-fired Combined Cycle Thermal Power Plant (CCGT) owned by KORINTHOS POWER SA, a subsidiary of MYTILINEOS located in Ag. Theodoroi (Korinthia). This indicator corresponds to water consumption per MWh. The value of the indicator remained about the same compared to the previous reporting year (0.06). In 2022 the Korinthos Power CCGT plant undertook a 3-month scheduled major inspection. Subsequently both the water consumption and power generation were decreased compared to 2020, but the intensity rate remained in the same levels. The largest proportion of water consumption is linked to the evaporation of the water used for te cooling process of the CHP plant. The water evaporation depends on both operational and weather conditions and is not something we can fully control. Operating conditions include mainly the operating hours and the load of the unit, while in weather conditions the relative humidity and air temperature. For this reason, continuos monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on wtaer-use are conducted under the framework of ISO 14001.

W-MM1.3

(W-MM1.3) Do you calculate water intensity information for your metals and mining activities?

Yes

W-MM1.3a

(W-MM1.3a) For your top 5 products by revenue, provide the following intensity information associated with your metals and mining activities.

Product	Numerator: Water aspect	Denominator	Comparison with previous reporting year	Please explain
Bauxite	Total water withdrawals	Ton of final product	Higher	2021: 0.00041 mega liters 2020: 0.00037 mega liters It refers to water withdrawals of the bauxite mining activities of MYTILINEOS subsidiary DELFI-DISTOMON. Compared to previous years, the water withdrawal per ton of bauxite produced has increased by 12% due to the increased quantities of produced/entrained water from bauxite mining process. The quantities of produced water each year depend on various geological and other parameters of the mining sites and an accurate projection could not be acheived.
Alumina	Total water consumption	Ton of final product	This is our first year of measurement	2021: 0.00337 mega liters per ton of Alumina This indicator corresponds to water consumption of the company's alumina production process. This is the first time of measurement under this scope. In 2021 a more accurate measurement of the water consumption in order to include only the operations related to alumina production has been carried out. It included the industrial and drinking water as well as the water consumed for the mentainance works inside the factory of AoG .
Aluminium	Total water consumption	Ton of final product	This is our first year of measurement	2021: 0.00129 mega liters per ton of primary aluminium This indicator corresponds to water consumption of the company's aluminum production process. This is the first time of measurement under this scope. In 2021 a more accurate measurement of the water consumption in order to include only the operations related to aluminum production has been carried out. It included the industrial and drinking water as well as the water consumed for the mentainance works inside the factory of AoG .

W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers

W1.4a

(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number

26-50

% of total procurement spend

76-100

Rationale for this coverage

The main objective of the company, by 2025, is to integrate specific sustainable development requirements into the process of selecting its key suppliers as well as to commit existing ones to responsible practices aiming to developing partnerships for better understanding of impacts and for mutual harmonization of goals and expectations. In this context in Q3 2021, MYTILINEOS initiated the 2nd official Sustainability/ESG self-assessment of its existing suppliers, as they were identified by each Business Unit. The group of suppliers selected for reporting about their environmental (including water use) impacts are key/strategic suppliers with purchase orders, that represented the 78% of total company's procurement spending. The collection of information is carried out through an on line Sustainability/ESG Assessment Questionnaire by the company's Central Sustainable Development Division. 53% of the company's key suppliers responded to this process. Moreover, MYTILINEOS has set a target of conduct assessments based on ESG criteria, including water management, on more than 60% of key suppliers in the next 1-3 years.

Impact of the engagement and measures of success

The survey asks about the water management and relative targets and reduction impacts mechanisms (if needed), among other environmental aspects, and is used by MYTILINEOS to: 1) to investigate whether the company's key suppliers have in place a process in terms of identification and management of the most significant current and potential environmental impacts stemming from their activity, 2) to report if they comply with the environmental and other sustainability standards as defined in our Supplier Code of Conduct and 3) to record these impacts for further suppliers assessment purposes on behalf of the company and to undertake any corrective actions, if needed. Finally, following the results of the study and the practices reported by suppliers, the company designed specific improvement actions (b' cycle of self-assessment with non-responding suppliers, training conferences, sending incentivizing letters etc). The evaluation process is still is still in progress. Till the end of 2021, 24 suppliers were assessed with no significant environmental impacts (including water impacts) from their activity.

Comment

• In 2021, almost 14% of all new Greek suppliers with which MYTILINEOS entered into a commercial relationship, were evaluated on the basis of environmental criteria, including water-related indicators.

W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement
Other

Details of engagement
Other, please specify (Training & Raising Awareness on Sustainability/ESG)

% of suppliers by number
1-25

% of total procurement spend
1-25

Rationale for the coverage of your engagement
The main objectives of the Company, until 2025, are the strengthening of the level of maturity and integration of Sustainable Development in its supply chain, the inclusion of ESG criteria in the process of selection of new suppliers as well as the commitment of the existing ones to the responsible partnerships, to better understand the impacts and harmonize goals and expectations. In this context, the Company in 2020 took the initiative and implemented a 1st round of specialized training webinars on the 10 Principles of the UN Global Compact enabling more than 40 Greek key suppliers to understand the multifaceted challenges facing the world today in relation to human rights, environment, and corruption and bribery. These challenges are becoming more prevalent than ever, due to the impact on business and economic activity because of the pandemic. In 2021, the Company completed the 2nd cycle of training of key suppliers on corporate responsibility issues, including water-related issues, increasing the number of suppliers already trained to 85, while 10 of them completed additional in-company training on sustainability.

Impact of the engagement and measures of success
Water management was one of the main thematic areas covered concerning environmental management challenges, responsibilities and environmental friendly technologies and suppliers gained a clear understanding concerning water-related impacts and they identified the chances of cooperation with one-another for the most efficient handling of those impacts.

Comment
During the training program, special focus was given on SDGs 6 & 14.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?
No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?
No

W3. Procedures

W-EU3.1

(W-EU3.1) How does your organization identify and classify potential water pollutants associated with your business activities in the electric utilities sector that could have a detrimental impact on water ecosystems or human health?

All the company’s Business Sectors apply an ISO 14001 -2015 certified Environmental Management System, supported by specific environmental policies. In parallel, the systematic application of Best Available Techniques (BATs) in the electricity generation process is a significant factor that contribute to the company’s business growth and drive its commitment to the protection of the environment and to ensuring the sustainable management of natural resources. The company has a specific standard-guide to manage the withdrawals and discharges in all process of Electric Power sector to guarantee the compliance with current legislation and avoiding any environmental impact. All the plants have technical instructions under this guide to determine the parameters/contaminants to be controlled, measurement points, frequency of measurement, limit values and who will carry out each measurement. There are no potential water-related impacts on ecosystem or human health. Moreover, all company's sectors follow the MYTILINEOS Measures & Principles for the protection of the natural environment, such as: a) Adherence to the agreements and commitments that the Company's Sector has undertaken over and above its statutory obligations, b) Organisation of regular internal and external inspections to assess the performance of the Environmental Management System, the achievement of the targets set and the application of regulations and principles, c) Prevention of all risks of pollution, including by accident, or of other large-scale accidents (development, testing and application of emergency response procedures), d) Assessment of the impacts of the company's activities on the environment, identification and assessment of potential risks, adoption of the necessary preventive measures, conduct of regular inspections and drills in order to confirm their implementation and evaluate their efficiency, e) Control and continuous reduction of liquid waste and f) Correction of all deviations identified, by introducing and implementing improvement / restoration plans and preventive action plans.

W-EU3.1a

(W-EU3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants associated with your activities in the electric utilities sector on water ecosystems or human health.

Potential water pollutant	Description of water pollutant and potential impacts	Management procedures	Please explain
Thermal pollution	One of the main pollution risk prevention measures implemented in the Business Unit is the constant monitoring of the quality of the natural recipients (aquifer, sea) and comparison against standard quality values. An example is the discharge of the seawater used in the cooling systems of the Combined Heat and Power (CHP) plant of the Metallurgy Business Unit. The seawater is not burdened with other water pollutants except for the thermal pollution due to the cooling process, which may affect the ecological status of Antikyra Gulf seabed.	Compliance with effluent quality standards	In addition to the strict compliance with the relevant provisions of the law determining the framework for preventing any environmental impact, the Company commissions, on an annual basis, an authoritative organization (Hellenic Centre for Marine Research – HCMR) to conduct a research study for monitoring the status of living organisms on the Antikyra Gulf seabed. The studies carried out by the Company in accord-ance with the applicable Environmental Terms and their results are communicated every year, in accordance with the applicable provisions, to the competent authorities (the Ministry of Environment, Energy and Climate Change, and the Water Management Directorates of the Decentralized Regional Administrations for Thessaly and Sterea). The findings of the recent studies, carried out in 2018, 2019 and 2020, show a stable ecological status, with improvement trends at several observation stations. These studies will be continued for at least five more years. During 2021, no incidents occurred involving any kind of pollution of the natural environment by production activities or involving industrial accidents in all Business Activity Sectors of the Company. For more information please refer to MYTILINEOS 2021 Sustainable Development Report, Pollution prevention section (p. 67).

W-MM3.2

(W-MM3.2) By river basin, what number of active and inactive tailings dams are within your control?

Country/Area & River basin
Please select

Number of tailings dams in operation
0

Number of inactive tailings dams
0

Comment
We do not use tailings dams.

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?
Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Value chain stage
Direct operations

Coverage
Full

Risk assessment procedure
Water risks are assessed as part of an established enterprise risk management framework

Frequency of assessment
Annually

How far into the future are risks considered?
3 to 6 years

Type of tools and methods used
Other

Tools and methods used
Internal company methods
External consultants
Materiality assessment
Nation specific databases, tools, or standards
Scenario analysis
Source Water Vulnerability Assessment
Other, please specify ((ISO 14001))

Contextual issues considered
Water availability at a basin/catchment level
Water quality at a basin/catchment level
Stakeholder conflicts concerning water resources at a basin/catchment level
Water regulatory frameworks
Status of ecosystems and habitats

Stakeholders considered
Employees

Local communities
NGOs
Regulators
Suppliers
Water utilities at a local level
Other water users at the basin/catchment level

Comment
This refers to company's direct operations, in Metallurgy sector. We measure the water consumption and monitor the natural sources situation in order to meet the permit's rules and criteria. The company has a specific water resources procedure within the environmental management standard. In case of a new product or any production change, we re-estimate the water needs and amend the permits if it would be accepted by the authorities. Our EHS team (in Metallurgy Sector) maintains a standing agenda item on environmental topics (including water) as part of its monthly meetings. Water risk assessment is taking place particularly in the alumina & aluminium production facilities including the High Efficiency Combined Heat And Power Plant which is used for the steam production. These facilities represent more than the 99% of the company's direct industrial operations water needs. Our facilities are certified under ISO14001 and evaluate water aspects in order to prevent, minimize and control potential impacts generated.

Value chain stage
Supply chain

Coverage
Partial

Risk assessment procedure
Other, please specify (Water issues are assessed as a part of ESG assessment and Materiality assessment)

Frequency of assessment
Every two years

How far into the future are risks considered?
1 to 3 years

Type of tools and methods used
Other

Tools and methods used
Internal company methods
Materiality assessment

Contextual issues considered
Stakeholder conflicts concerning water resources at a basin/catchment level
Status of ecosystems and habitats

Stakeholders considered
Customers
Employees
Investors
Local communities
NGOs
Regulators
Suppliers

Comment
The results of the Materiality assessment on water issues can be found in page 60 of MYTILINEOS 2021 Sustainable Development Report: https://www.mytilineos.gr/sustainability/reports/ Concerning the ESG assessment, water issues are emerged if they are significant in the context of the general environmental footprint of our key suppliers. A new ESG assessment took place in 2021 (Q4) and the relevant results will be available within 2022. The information submitted by the suppliers is reviewed in order to estimate whether action should be taken in cases of suppliers' non-compliance, so as to mitigate the risk in the Company's supply chain. In the Power & Gas Business Unit, 18 key suppliers have been evaluated, and in the Metallurgy Business Unit, 19 suppliers. The evaluation process will be completed in 2022 and actions will be taken as necessary. In addition, we completed the 2nd training cycle of key suppliers on sustainability topics, increasing the number of suppliers that have already being trained to 85, of which 10 completed an additional in-house training.

W3.3b

(W3.3b) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

Please refer to Disclosure Management Approach within MYTILINEOS 2021 Sustainable Development Report (p. 60) in the following address: https://www.mytilineos.gr/sustainability/reports/

Our aim is to avoid risks that pose a threat to MYTILINEOS operations continued existence and to make improved managerial decisions to create lasting value. We understand risk to be any event that can negatively impact the achievement of our short-term operational or long-term strategic goals. More specifically, in Metallurgy sector a substantive risks include: a) water availability and quality and extreme weather events, b) withdrawal and discharge authorisations and impact on supply chain, habitats and ecosystems. These could increased capital expenditure and operational maintenance costs associated with development of alternate water supplies. Many exposure variables and tools are used in the process to identify and assess these risks, such as: tools to monitor consumption and discharges and procedures for environmental management and the experience of the company's qualified personnel. Also, in order to effectively measure and manage identified opportunities and risks, we quantify these in terms of probability and economic impact in the event they occur. If a risk is identified that could have a significant impact on earnings, it must be immediately reported to the Executive Committee. Also, we measure the water consumption and monitor the natural sources situation in order to meet the permit's rules and criteria. In case of a new product or any production change, we re-estimate the water needs and amend the permits if it would be accepted by the authorities. Our stakeholder engagement process aims to promote open exchange between citizens and our site management with the goal of strengthening trust in our activities. In respect of water consumption, our facilities monitor their water use and implement risk minimization strategies if necessary. In addition, we specify stakeholders appropriately and use ISO26000 to ensure we have not missed any perspectives or matters that should be included in the due diligence process.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, only within our direct operations

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

MYTILINEOS S.A. has developed an Enterprise Risk Management (ERM) framework to manage the portfolio of risks and seize opportunities related to the achievement of strategic objectives. The ERM framework is based on best practices and focuses on the identification, analysis, and assessment of risk factors and controls as well as the determination of a suitable strategy for the management of the risks in line with organization's risk appetite.

The Board of Directors, the Management and the Enterprise Risk Management Office promote and support a culture that integrates the risk management into systems, processes, activities, and decision-making at all levels of the organization.

In order to enhance the Risk Management System, we follow the below actions:

- The risk assessment is performed under top-down and bottom-up approach

- Financial risk management is performed by a specialized function, which implements monitoring tools and using various derivatives instruments.

- The internal audit function conducts risk- based audit in accordance with the ERM framework. Additionally, the ERM office is taking into account the internal audit findings concerning the risk and control scores.

The risks are prioritized by the level of significance on a 5-scale rating related to the impact, the probability of occurrence and the control environment. The impact is assessed on three (3) dimensions: Financial, Health – Safety - Environment, and Reputational.

The highest rate for financial impact at the enterprise level (substantive financial impact) is equivalent to the 15% of our Earnings before interest, taxes, depreciation, and amortization (EBITDA).

The assessment of the risks impact in Health, Safety, Environment, and Reputation is strategic objective for our organization. We have defined substantive impact for all these dimensions. For example, substantive impact for Reputation is when the risk affects our relationship with multiple strategic stakeholders.

One of our main risk categories is Strategic Risks, which includes 7 risks under assessment (Health and Safety, Culture, Investment Decisions, Long-term Resources Availability, Technological, Investors, Sustainability).

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	2	1-25	As mentioned above, although water related risks are less material for our business we report two facilities that use the 99,8% of the total amount of the company's water withdrawal and could have potential substantive impact in the future: 1) High Efficiency Combined Heat and Power Plant, in Ag. Nikolaos (Viotia), exposed to seawater risks in terms of the limits of the water use permission issued by local authorities. This facility also used by Metallurgy sector for the steam production as a basic stage in alumina production process. 2) Alumina and Aluminium production Plant in Ag. Nikolaos (Viotia), which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities.

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

Greece	Other, please specify (Sea Gulf of Antikyra)

Number of facilities exposed to water risk
1

% company-wide facilities this represents
1-25

Production value for the metals & mining activities associated with these facilities
0

% company's annual electricity generation that could be affected by these facilities
Less than 1%

% company's global oil & gas production volume that could be affected by these facilities
<Not Applicable>

% company's total global revenue that could be affected
1-10

Comment
Sea water, which represents the 95% of the Company's water withdrawals, it is by its nature, not subject to scarcity. There are no clear financial water risks, deriving from the operation of the High Efficiency Combined Heat and Power Plant. Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for use in its cooling system. This facility is used by Metallurgy sector for the steam production as a basic stage in alumina production process. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume in the future may affect partially our operation increasing costs, forcing us to find alternative ways of water supply.

Country/Area & River basin

Greece	Other, please specify (Groundwater sources & Mornos River)

Number of facilities exposed to water risk
1

% company-wide facilities this represents
1-25

Production value for the metals & mining activities associated with these facilities
0

% company's annual electricity generation that could be affected by these facilities
Less than 1%

% company's global oil & gas production volume that could be affected by these facilities
<Not Applicable>

% company's total global revenue that could be affected
1-10

Comment
Alumina and Aluminium production Plant which uses industrial water for its operation, is exposed to groundwater and municipal supply sources risks concerning to the limits of the water use permission issued by local authorities. In case of the change of current limits of groundwater withdrawal, it has been estimated that if we have to meet all our the water needs of these specific facilities through the municipal supply (the Athens Water Supply and Sewerage Company - EYDAP) then it will affect less than 1% the price of aluminium products according to the current pricing policy of EYDAP.

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Greece	Other, please specify (Sea Golf of Antikira)

Type of risk & Primary risk driver

Regulatory	Statutory water withdrawal limits/changes to water allocation

Primary potential impact
Reduction or disruption in production capacity

Company-specific description
Our Combined Heat and Power (CHP) plant requires specific quantity of seawater for cooling purposes. Withdrawals/discharges are directly measured; consumption is calculated. The limit on the volume of seawater, withdrawn annually for this purpose, is determined by a Decision of the Water Resources Management Directorate of the Prefecture of Sterea Ellada. Any change on this volume may affect our operation increasing costs, forcing us to find alternative ways of water supply or forcing premature closures. In addition, the volume of the sea water which returns back to the sea after the cooling process may affect the status of living organisms (benthic biocoenoses, with emphasis on thermophile species) on the Antikira Gulf seabed in terms of its pH and temperature.

Timeframe
4-6 years

Magnitude of potential impact
Low

Likelihood
Exceptionally unlikely

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure - minimum (currency)
<Not Applicable>

Potential financial impact figure - maximum (currency)
<Not Applicable>

Explanation of financial impact
No substantive financial impacts are expected within the next 5 years.

Primary response to risk
Engage with regulators/policymakers

Description of response
Engagement with public policy makers - Strengthen links with local community - Cooperation with governmental research organisations. Our strategy is applied on an annual basis and consists of the following elements: 1) Compliance with the environmental legislation (including water management) is a core priority of MYTILINEOS. This view, which also serves as the foundation of the company's environmental policy, aims to drive the continuous improvement of its environmental footprint and is based, first and foremost, on the principle of adherence to the provisions of the law, as well as to the agreements concluded and the voluntary commitments. 2) Metallurgy Sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, which are responsible for controlling its activity and environmental performance. 3) Company's Stakeholder Engagement process expresses, in a systematic way, the long-standing principle to engage in a consistent and honest open dialogue with its Stakeholders. In this context, thematic consultations on Environmental issues take place giving the opportunity to our social partners to raise its concerns or expectations 4) Finally, the Metallurgy Sector appoints, on an annual basis, an authoritative organization Hellenic Centre for Marine Research - HCMR) to conduct of a research study to monitor the status of living organisms, on the he Antikyra Gulf seabed.

Cost of response
41130

Explanation of cost of response
There is no separated cost to managing the water risks. The cost of response is related with the research study to monitor the status of living organisms, on the he Antikyra Gulf seabed, as mentioned above. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of €8-10 million in annual basis.

Country/Area & River basin

Greece	Other, please specify (Groundwater sources & Mornos River)

Type of risk & Primary risk driver

Regulatory	Statutory water withdrawal limits/changes to water allocation

Primary potential impact
Increased operating costs

Company-specific description
Volume of industrial service, brackish and drinking water, used primarily to meet the manufacturing / processing, and water supply needs of the company's industrial facilities, in Metallurgy Sector. It is obtained from a network of 17 drills, owned by Metallurgy sector, in the broader region around its plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Regional Administration which has set specific limits on water withdrawal.

Any change on these limits may force us to municipal supply source affecting our operational costs, although a limited production disruption is not excluded.

Timeframe
4-6 years

Magnitude of potential impact
Low

Likelihood
Very unlikely

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure - minimum (currency)
<Not Applicable>

Potential financial impact figure - maximum (currency)
<Not Applicable>

Explanation of financial impact
We use groundwater from renewable resources based on a special study undertaken by the Metallurgy Business Unit, the supply capacity of the industrial well catchment is several times larger than the annual withrawal volume. Therefore the specific water risk is not material to our business, there is no need of calculation of its potential financial impact. No financial impacts are expected within the next 5 years.

Primary response to risk
Engage with regulators/policymakers

Description of response
The MYTILINEOS Metallurgy sector has close cooperation with the responsible services of the Ministry of the Environment and of the Region of Sterea Hellas, who are responsible for controlling its activity and environmental performance. Also the sector has an internal specific water target, not only to remain below the withdrawal limits but also to improve its performance as much as possible.

Cost of response
0

Explanation of cost of response
There is no distinct cost to managing the water risks. The total planned expenditures for the implementation of the company's environmental policy in Metallurgy Sector (which includes water issues) reaches the number of €8-10 million in annual basis.

W4.2c

(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?

	Primary reason	Please explain
Row 1	Risks exist, but no substantive impact anticipated	In Metallurgy sector, mining is at the base of the value chain and therefore we directly evaluate water use, risk and management as a core component of our own business. The suppliers' water use, risks and management are considered as an issue not related to our production because of the raw materials (bauxite, pet coke etc) nature. Also the company's power plants are located near the coast line and all internal water needs can be covered by sea water. Gas-fired Combined Cycle Thermal Power Plant (CCGT), in Agioi Theodoroi, uses sea water for its desalination plant. The sea water is provided by the Refinery plant that lies next to the plant and the quantity and quality is guaranteed with contracts. Moreover sea water is by its nature not subject to scarcity. We have reviewed public disclosures of our key suppliers and from that review we have not identified any water-related risks that could materially impact our business.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?
Yes, we have identified opportunities, and some/all are being realized

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

Type of opportunity
Other

Primary water-related opportunity
Other, please specify (Cost savings & community relations)

Company-specific description & strategy to realize opportunity
The power plants of MYTILINEOS are located near the coast line and use sea water. The Metallurgy Sector covers its local communities water needs. Also, it operates three wastewater treatment plants for the needs of the plant and local communities.The selected locations for the operation of MYTILINEOS facilities, in Metallurgy and Energy sectors, have a strategic importance. The use of seawater and groundwater provides cost savings for all plants. Also the Metallurgy Sector through its network of 17 drills covers the water needs of its local communities, maintaining good community relations and its social license to operate.

Estimated timeframe for realization
More than 6 years

Magnitude of potential financial impact
High

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact
There is no calculation of its potential financial impact.

W5. Facility-level water accounting

W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Facility reference number
Facility 1

Facility name (optional)
High Efficiency Combined Heat and Power Plant

Country/Area & River basin

Greece	Other, please specify (Sea Gulf of Antikyra)

Latitude
38.358016

Longitude
22.689508

Located in area with water stress
No

Primary power generation source for your electricity generation at this facility
Gas

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
159820

Comparison of total withdrawals with previous reporting year
About the same

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
159820

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
0

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
0

Total water discharges at this facility (megaliters/year)
157777.4

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
157777.4

Discharges to groundwater
0

Discharges to third party destinations
0

Total water consumption at this facility (megaliters/year)
2042.6

Comparison of total consumption with previous reporting year
Higher

Please explain
It relates to seawater used for the cooling process of the CHP facility. The withdrawal and discharge volumes are higher with respect to last year. Concerning the future projections, the limit on the volume of seawater withdrawn annually is determined by a Decision of the Water Resources Management Directorate of the Sterea Regional Administration, so it anticipated to be about the same with slight positive or negative deviations. The water consumption is determined by geological, hydrological and temperature parameters beyond the control of the Company.

Facility reference number
Facility 2

Facility name (optional)
Alumina and Aluminum production Plant

Country/Area & River basin

Greece	Other, please specify (Groundwater sources & Mornos River)

Latitude
38.360912

Longitude
22.688575

Located in area with water stress
No

Primary power generation source for your electricity generation at this facility
Gas

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
8721.5

Comparison of total withdrawals with previous reporting year
About the same

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
8578.3

Withdrawals from groundwater - non-renewable
0

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
143.2

Total water discharges at this facility (megaliters/year)
3883.2

Comparison of total discharges with previous reporting year

Lower

Discharges to fresh surface water
34

Discharges to brackish surface water/seawater
3849.2

Discharges to groundwater
0

Discharges to third party destinations
0

Total water consumption at this facility (megaliters/year)
4838.3

Comparison of total consumption with previous reporting year
About the same

Please explain
Withdrawals/discharges are directly measured; consumption is calculated. Virtually all withdrawals/discharges are due to alumina and aluminium production. Water consumption relates to water used for the production and potable water. The total water consumption remained about the same compared to the previous year. Water consumption is anticipated to remain the same in the next 2 year given that the alumina and aluminum production remains about the same.

W5.1a

(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water withdrawals – volume by source

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water withdrawals – quality by standard water quality parameters

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000AS v3 (2020).

Please explain
<Not Applicable>

Water discharges – total volumes

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water discharges – volume by destination

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water discharges – volume by final treatment level

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water discharges – quality by standard water quality parameters

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

Water consumption – total volume

% verified
76-100

Verification standard used
Audited by external independent third party organization. For more information please refer to Independent Assurance Statement section MYTILINEOS 2021 Sustainable Development Report (p. 128) and GRI Content Index – General Disclosures (external assurance option). The assurance engagement was designed in accordance with ISAE 30001 and the requirements for a Type 2 assurance engagement under AA1000APS.

Please explain
<Not Applicable>

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?
Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of business impact on water Commitment to align with public policy initiatives, such as the SDGs Commitments beyond regulatory compliance Acknowledgement of the human right to water and sanitation Other, please specify (Water issue is included in our Business Sectors environmental policies, in our Environmental Management & Climate Change Disclosure Management Approach under the management of raw materials as well as in our CSR policy under SDGs alignment.)	Following the results of the company's 20210 Materiality Process, we have included a separate statement concerning water management within our Environmental policy. https://www.mytilineos.gr/sustainability/our-main-policies/ More specifically: * Responsible use of water, beyond regulatory requirements, by reducing water withdrawals and discharges, and by minimizing water consumption. Acknowledgement of the human right to water and sanitation is included in our Human Rights policy. * The Company is committed to communicating and consulting with local communities, prior to and during its activities, so as to prevent, mitigate and eliminate potential adverse effects of its operation, by taking appropriate measures. Moreover, its is committed to respecting and supporting local community rights regarding the use of land, of natural resources and especially water, as well as the preservation of local cultural heritage, as key elements of the communities' sustainability. Mytilineos_annual_report_2021_eng.pdf MYTILINEOS_Environmental_policy.pdf

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual	Please explain
Board-level committee	The Board of Directors of MYTILINEOS has established a Board level Sustainability Committee in early 2021 with the main roles to: - assist the BoD in integrating Sustainable Development policies and procedures in the Company's basic decision-making processes and operations - assist the BoD in strengthening the Company's long-term commitment to creating value in all three pillars of Sustainable Development (economy, environment and society) and in overseeing the implementation of responsible and ethical business conduct The committee is composed of 6 members, including: - A former BoD member who led the development of MYTILINEOS' Corporate Affairs and Corporate Social Responsibility since 1990 (acts as Sustainability Committee Chairman) - The General Manager of Corporate Governance and Sustainable Development Division who is also an Executive BoD member - 4 independent non-executive BoD members (including the BoD Vice-Chairman) with extensive experience in Sustainability topics, risks and trends Water is one of the main environmental issues that the Sustainability Committee monitors closely alongside with the other environmental issues (including water risks if needed).
Director on board	General Manager of Corporate Governance and Sustainable Development Division (member of the BoD and member of the Executive and Sustainability committees. The GM is responsible for regularly communicating to members of the Board and the Executive & Sustainability Committees about key ESG issues (including water) and their potential (or realized) business impact, risk and opportunities.

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - all meetings	Monitoring implementation and performance Reviewing and guiding major plans of action Reviewing and guiding strategy Reviewing and guiding corporate responsibility strategy Setting performance objectives	The Sustainability Committee is appointed by and reports to the Board of Directors. The Board level - Sustainability Committee convenes in a fixed session occurring 3 times a year and whenever required extraordinarily. In all meetings the Sustainability material topics of MYTILINEOS are the main focus area of the Committee. The Sustainability Committee holds the following responsibilities: - It reviews annually the domestic and international trends in Sustainable Development that can have a significant impact on the Company's business activities and performance. - It examines and approve the process of determining the essential issues of Sustainable Development, validating its results annually, which shall constitute the structure of the Company's annual Sustainable Development Report. - It monitors the progress of achieving the objectives of reducing carbon dioxide (CO2) emissions and the Company's performance in the other essential Environmental, Social and Governance (ESG) issues, informing the Board in this respect and proposing corrective actions. - It forwards reports and makes recommendations to the Board for a better understanding of Environmental, Social and Governance (ESG) issues, highlighting areas that may require action or improvement. - It gets informed with regard to the Company's individual Sustainable Development policies (and the relevant Codes of Conduct) which fall within its remit and approves their content and any revision thereof or, as the case may be, shall recommend their approval to the Board. - It discusses and examine Sustainable Development issues and Environmental, Social and Governance (ESG) issues, in combination with the Company's priorities of communication and management of its reputation, proposing to the Board ways for the most effective communication of these issues both within and outside the Company. In addition, the BoD is also briefed (at least twice a year) on all core elements of the company's sustainability performance and progress. In short, the sustainability agenda that is raised to the BoD includes the following: - Overview and steering of the overall sustainability projects implementation (e.g., decarbonization initiatives, water/waste reduction initiatives) - Update on status of overall sustainability performance (in all ESG matters) and implementation with focus on high impact Business Units This agenda is escalated following specific processes of aggregating information regarding progress of projects, next steps of our efforts, issues and risks and generating standardized reports to efficiently convey the information required and align on actions on the basis of this information. The first BoD to take place that includes this agenda took place in June 2021.

W6.2d

(W6.2d) Does your organization have at least one board member with competence on water-related issues?

	Board member(s) have competence on water-related issues	Criteria used to assess competence of board member(s) on water-related issues	Primary reason for no board-level competence on water-related issues	Explain why your organization does not have at least one board member with competence on water-related issues and any plans to address board-level competence in the future
Row 1	No, and we do not plan to address this within the next two years	<Not Applicable>	Judged to be unimportant, explanation provided	The water-related impacts that are faced or caused by Company are characterized as not important or intense. The total water consumption is relatively low, while the majority of water withdrawals and discharges relates to sea water for the cooling process of gas-fired electricity production plants. Water withdrawal from groundwater sources are all renewable and they are monitored on a continuous basis based on the Environmental Approval Permits.

W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)
Other, please specify (Executive Committee)

Responsibility
Assessing future trends in water demand
Assessing water-related risks and opportunities
Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues
Quarterly

Please explain
Executive Committee The board receives the relevant environmental reports on progress, but not discussing these topics themselves. On the other hand the company's Executive Committee is discussing on ESG issues (including water topic), if there are specific risks to manage. According to the company's EHS structure a designated Team leading by a competent person is responsible for the Environmental issues by activity sector. In addition the head of corporate HSE, has taken over a coordinating role on the Environmental aspects (including water) of the MYTILINEOS Business Activity Sectors, composing the overall picture, designing the strategy, highlighting and promoting best practices, aiming at shaping the corporate image in the market. Every 3 months an overall presentation of environmental issues (including water) takes place at Executive Committee level (executed by the head of Corporate HSE) with intermediate relevant progress reports.

Name of the position(s) and/or committee(s)
Other, please specify (Capital Allocation Committee)

Responsibility
Assessing water-related risks and opportunities
Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues
Annually

Please explain
Capital Allocation Committee o Assessment of investment projects' potential material environmental and social risks and benefits o Alignment of prospective project investments with MYTILINEOS Sustainable Development and emissions reduction strategies o Contribution of the prospective project to the EU taxonomy environmental objectives o The Capital Allocation Committee convenes annually during the preparation of the strategic plan in the stage of Development of the project/investment pipeline and ad-hoc throughout the year whenever necessary. In preparation for these meetings BU Environmental teams and Sustainable Development Division examine the aforementioned agenda items and share pipeline's ESG assessment during the Committee through the GM of Sustainability

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Name of the position(s) and/or committee(s)
Other, please specify (BU Sustainability leaders)

Responsibility
Assessing future trends in water demand
Assessing water-related risks and opportunities
Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues
More frequently than quarterly

Please explain
BU Sustainability leaders o Submit BU and Central function approved sustainability action plans and related revisions to the Sustainable Development Division o Report summary progress of actions and roadblocks on a monthly basis to the Sustainable Development Division o Provide guidance to initiative owners and act as interface between initiative owners and the Sustainable Development Division for escalating issues and resolving bottlenecks o Develop proposals for increasing the sustainability aspiration and footprint o BU Sustainability leaders are already participating in BU Operational Committee to raise progress, next steps and issues with regards to the sustainability plans and performance. In parallel, we have instituted a monthly BU Sustainability meeting where progress on all initiatives is monitored and discussed, which acts as the first point of escalation for Sustainability initiatives

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W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	The water-related impacts that are faced or caused by Company are characterized as not important or intense. The total water consumption is relatively low, while the majority of water withdrawals and discharges relates to sea water for the cooling process of gas-fired electricity production plants. Water withdrawal from groundwater sources are all renewable and they are monitored on a continuous basis based on the Environmental Approval Permits.

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?
Yes, direct engagement with policy makers

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

MYTILINEOS has implemented a new environmental policy to ensure that all of its Business Units support its commitments related to water management, and are aligned with the Company's sustainability strategy. The environmental policy (including water-related issues) are applicable to all geographical areas in which the company operates. These policy is included in all the activities, operations and processes and is subject to review and improvement by management. In order to identify and assess the future likelihood of regulatory changes affecting water issues, the Company communicates regularly with the competent authorities and with the regulatory bodies involved. MYTILINEOS ensures that the activities and initiatives related to water are consistent with its strategy by involving the Sustainability/ESG BU teams. These teams are responsible for participating in the conferences and work groups of such activities depending on BU specific interest and MYTILINEOS environmental policy.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

Yes (you may attach the report - this is optional)

Please refer to "Water Management" chapter of the attached 2021 Annual Report (p. 84-86)

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	11-15	MYTILINEOS long term business objective is to become regional leader in each sector through continuous reinvestment while ensuring stable shareholder returns. In Metallurgy Sector the company focus on continuous cost cutting and product quality improvement as well as to invest in innovative technologies to enhance productivity and performance standards. In Electric Power Sector the company focuses on the increase of power production and to implement a new round of Renewables Investments. MYTILINEOS takes into account for its above mentioned business objectives by sector of activity several water issues such as water withdrawals, water reuse & recycling, water discharges quality and water cost. Water withdrawals and discharges are closely related to the power production as most of the water withdrawn and discharged relates to sea water used for the cooling of the CCGTs. Water reuse is integrated in Company's long-term business planning as already there are programs for reuse/recycle programs in the Company' plants, in order to prevent equivalent volumes of water withdrawals. Finally, cost of water is considered in the long-term business objectives because water scarcity due to climate change could lead to increased costs related to water supply and thus impact the financial capital of the Company.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	11-15	Our strategic lines to achieve our long-term business objectives include: In Metallurgy Sector a) Ongoing productivity and performance improvement to keep the company's place within the first quadrant of the global cost curve, b) Acquisition of know-how and expansion into the aluminium scrap recycling activity by acquiring the company EPALME SA. c) The basic technical study for the new Alumina plant with a production capacity of 1m. tons annually, is under completion. Water issues have been integrated in a time horizon beyond 5 years. We expect changes since we are going to operate a new alumina production plant increasing our water withdrawals mainly from public utilities sources. In Power & Gas sector a) Reduction of carbon footprint by means of further investment in the sector of RES b) Implementation of a new investment related to the establishment of a gas-fired, electric power generation plant of combined cycle, currently in the process of licensing to replace the lignite plants. Water issues have been integrated expecting minor changes mainly in seawater withdrawals regarding the upcoming operation of the new CCGT due to the reuse water process we are implementing between our energy plants for cooling purposes.
Financial planning	Yes, water-related issues are integrated	11-15	The financial aspects affected by the water related initiatives, concern mainly the Metallurgy sector. Above of that, the future outcomes (2023) of the implementation of the new double materiality process concerning ESG issues (including water management) will show the actual strategic relevance of the issue within company's financial results and overall strategy.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

0

Anticipated forward trend for CAPEX (+/- % change)

0

Water-related OPEX (+/- % change)

18.8

Anticipated forward trend for OPEX (+/- % change)

0

Please explain

In 2021 CAPEX has not changed because no significant water investments have taken place. The investments remained close to zero. Regarding anticipated forward trend for water-related CAPEX, an amount of money is anticipated to be invested in 2022. On the other hand, in the reporting year, OPEX has increased by 18.8%, compared to 2020 mainly due to increased energy costs for industrial, potable and brackish water. OPEX expediture include labor, water utilities, energy and maintenance costs for brakish, industrial, potable, deionized and fire extinguishing water. Regarding OPEX anticipated forward trend, it is anticipated to remain at the same level in the upcoming year based on the above-mentioned parameters.

W7.3

(W7.3) Does your organization use scenario analysis to inform its business strategy?

	Use of scenario analysis	Comment
Row 1	Yes	Our strategy on emission reduction targets for each of our 4 Business Units was developed in Dec 2020, following a IEA scenario of below 2 degrees. We developed targets following a three pillars approach: - Assessment of the relevant regulations on climate change (Paris Agreement, EU targets, country targets) - Benchmarking of best-in-class peers in the peer group of each of our Bus - Identification of emission reduction levers for each of the Business Units and selections of feasible solutions in terms of technology availability and cost Following this approach we set targets for each BU by 2030 and 2050 that are in line with a scenario of 2 degrees. Our targets for each of the BUs are the following: - Net zero emissions in our 2 constructions/EPC BUs by 2030. - 65% reduction in absolute CO2e emissions in Scope 1 & 2 in our Metallurgy BU. - 50% reduction in relative emissions (CO2e/MWh) in Scope 1 & 2 through the enhanced strategy of new RES developments for our Power and Gas BU.

W7.3a

(W7.3a) Provide details of the scenario analysis, what water-related outcomes were identified, and how they have influenced your organization's business strategy.

	Type of scenario analysis used	Parameters, assumptions, analytical choices	Description of possible water-related outcomes	Influence on business strategy
Row 1	Climate-related	In line with the TCFD recommendations, MYTILINEOS relies on Climate-related "scenarios" to understand the strategic implications of climate risks and opportunities. In the context of the MYTILINEOS analysis, 3 scenarios (Representative Concentration Pathway - RCP) were selected, which present possible pathways regarding the concentration of greenhouse gases under different socio-economic assumptions and climate policies, based on the 5th Evaluation Report of the IPCC (AR5). RCP 8.5 Lack of implementation of climate policies RCP 4.5 Moderate scenario with implementation of certain climate policies RCP 2.6 Ambitious climate policy scenario	The analysis of selected social and economic parameters (e.g. coal, energy and fuel prices) as well as climate (e.g. temperature, drought, sea level rise) for each of the selected scenarios is currently in progress. After the completion of the analysis (within 2022) will be able to describe possible water related outcomes.	The analysis of the Climate-related "scenarios" to understand the strategic implications of climate risks and opportunities including possible water related issues is currently in progress.

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

Please explain

As the costs associated with water use do not reflect a significant economic impact to the company in monetary terms, we currently do not use an internal price on water. Above of that, the future outcomes (2023) of the implementation of the new double materiality process concerning ESG issues (including water management) will show the actual need for the implementation of internal price on water.

W7.5

(W7.5) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Definition used to classify low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
Row 1	No, but we plan to address this within the next two years	<Not Applicable>	Important but not an immediate business priority	

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals Business level specific targets and/or goals Site/facility specific targets and/or goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Company wide our approach to setting water-related targets and goals derives mainly from our environmental policy and our commitment to support the Sustainable Development Goals 6 and 14 in conjunction with our relations with local communities in terms of environmental issues and initiatives. Moreover we have site/facility policy to set water targets for responsible water use and in order to decrease water cost and to comply with specific regulations. These targets and goals are monitored annually (through the analysis of the established KPIs) at all production sites. Business level and site/facility specific targets concern the Metallurgy Business Unit of the Company and the Aluminium & Alumina production plant. Those targets refer to the reduction of water withdrawal for industrial and drinking water, and the mitigation of the corresponding impacts, as a result of the operation of this specific Business Unit of MYTILINEOS. The targets are set in an annual basis and are closely monitored on an ongoing basis throughout the year.

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number
Target 1

Category of target
Water pollution reduction

Level
Company-wide

Primary motivation
Commitment to the UN Sustainable Development Goals

Description of target
Zero water pollution incidents. This is an important and company-wide target as it responds to more than one of the MYTILINEOS Measures and Principles for the Environmental Protection: 1) Prevention of any identified pollution risk and 2) Assessment of the impacts of the company's activities on the environment, identification and assessment of potential risks, adoption of the necessary preventive measures, conduct of regular inspections and drills in order to confirm their implementation and evaluate their efficiency. This target, is a company-wide target and is broken down into annual objectives in all Business activity sectors, which, in addition, is again broken down at facility level.

Quantitative metric
Other, please specify (Zero number of pollution incidents)

Baseline year
2016

Start year
2016

Target year
2030

% of target achieved
100

Please explain
This is an annual target. Target achieved: No water pollution incidents occurred during 2021. In general no incidents occurred involving any kind of pollution of the natural environment by production activities or involving industrial accidents in all Business Activity Sectors of the Company. For 2022, the target of no water pollution incidents though the year, remains.

Target reference number
Target 2

Category of target
Water withdrawals

Level
Business activity

Primary motivation
Commitment to the UN Sustainable Development Goals

Description of target
Total water withdrawal (industrial use & drinking) <13 megaliters /day. This is a specific annual target of the Metallurgy sector that contributes to the conservation of natural resources.

Quantitative metric
Absolute reduction in total water withdrawals

Baseline year
2019

Start year
2019

Target year
2025

% of target achieved
90

Please explain
The target set was fullfiled by 90% in 2021, (14.4 ML/day) due to the unexpected increase in the total water withdrawals in the settlements, due to the increase of the population (visitors, contractors for projects implemented at the plant).During the year there were, also, unpredictable leaks of drinking water which were detected in the aged water networks of the settlements.

Target reference number
Target 3

Category of target
Water consumption

Level
Site/facility

Primary motivation
Water stewardship

Description of target
Drinking water consumption by local settlements (Winter season, OCT to APR) <2.8 megaliters /day. This target is a new one and is aiming to sensitize the local community about the responsible use of water.

Quantitative metric
Other, please specify (Absolute reduction in drinking water consumption)

Baseline year
2019

Start year
2019

Target year
2021

% of target achieved
90

Please explain
The target set was fullfiled by 90% in 2021 (3.0 ML/day) due to the unexpected increase in the total water consumption in the settlements, due to the increase of the population (visitors, contractors for projects implemented at the plant).During the year there were, also, unpredictable leaks of drinking water which were detected in the aged water networks of the settlements.

Target reference number
Target 4

Category of target
Water consumption

Level
Site/facility

Primary motivation
Water stewardship

Description of target
Drinking water consumption by local settlements ((Summer season, MAY to SEP) <3.5 ML/day. This target is a new one and is aiming to sensitize the local community about the responsible use of water.

Quantitative metric
Other, please specify (Absolute reduction in drinking water consumption)

Baseline year
2019

Start year
2019

Target year
2021

% of target achieved
94

Please explain
The target set was fullfiled by 94%, in 2021 (3.7 ML/day) due to the unexpected increase in the total water consumption in the settlements, due to the increase of the population (visitors, contractors for projects implemented at the plant).During the year there were, also, unpredictable leaks of drinking water which were detected in the aged water networks of the settlements.

Target reference number
Target 5

Category of target
Water withdrawals

Level
Business activity

Primary motivation
Water stewardship

Description of target
Total water withdrawal from the drills for the needs of the aluminium plant (industrial use & drinking) <=10.55 ML/day. This is a specific target of the Metallurgy sector that contributes to the conservation of natural resources.

Quantitative metric
Other, please specify (Absolute reduction in total water withdrawals)

Baseline year
2019

Start year
2019

Target year
2021

% of target achieved
100

Please explain
The target was achieved in 2021 (9,8 ML/day). This is a key annual target under the Aluminum Stewardship Initiative (ASI), a global industry-led initiative to drive sustainability across the entire aluminum value chain, in which MYTILINEOS became a certified member in 2021.

W8.1b

(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.

Goal
Other, please specify (Compliance with regulations)

Level
Company-wide

Motivation
Brand value protection

Description of goal
The water withdrawals and discharges limits are are determined by the applicable legislation (including every plant's Environmental Terms Approval Decisions). Our goal is to ensure full and ongoing compliance with laws and legislations. This very important for the avoidance of fines, the continuation of the smooth operation of the industrial facilities and plants, and in order to secure good relationship with the local communities. We set this goal pursuant to our policy commitment to prevent pollution, be compliant and continually improve. The indicators used to assess progress against the target are the incidents of non-compliance with the applicable laws and legislations.

Baseline year
2021

Start year
2021

End year
2021

Progress
This is an annual target. In 2021, no incidents arose that resulted any legal action and the target set has been achieved.

Goal
Engagement with suppliers to help them improve water stewardship

Level
Company-wide

Motivation
Brand value protection

Description of goal
One of the MYTILINEOS ESG strategic objectives is to mitigate environmental risks in its the supply chain and create a white list of its key/strategic suppliers until 2025. This goal is of particular relevance and applies to the whole company (and is broken down in its business sectors). The company is implementing this goal trough suppliers training and self assessments regarding ESG/Sustainability issues (including water aspects).

Baseline year
2017

Start year
2017

End year
2025

Progress
Regarding MYTILINEOS sustainability targets up to 2025, one strategic objective is the development of a responsible supply chain (key/strategic suppliers). This includes: a) to inform key suppliers about MYTILINEOS Code of Conduct for Suppliers and Business Partners, b) the assessment of the environmental (including water) impacts of the activity of the Company's key suppliers and c) the inclusion of social and environmental criteria in the purchasing process. We have completed the training of 80 (~18%) of our key suppliers who are based in Greece, in the 10 Principles of the UN Global Compact and in Sustainable Development. The Company's Corporate Governance & Sustainable Development Division is implementing this goal through training courses in cooperation with the national networks CSR Hellas & Global Compact Hellas to encourage suppliers signatory to UNGC as a proof of their responsible behavior in environmental issues (including water aspects). Finally, we have launched the formal ESG assessment of key suppliers and, at the same time, we have introduced the sustainable development assessment process for new and existing suppliers, to all purchasing and procurement departments/divisions of all our Business Units.

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?
Yes

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	1) W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year. 2) (W1.2h) Provide total water withdrawal data by source. 3) (W1.2i) Provide total water discharge data by destination	Other, please specify (AA1000AS & ISAE3000 (revised))	Audited by external independent third party organization. For more information please visit MYTILINEOS 2021 Sustainable Development Report on pages 128-131 Independent Assurance Statement and on pages 138: GRI Content Index – General Disclosures (external assurance option). https://www.mytilineos.gr/media/ovtdu5dq/sustainable_development_report_2021_eng.pdf

W10. Sign off

W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

No additional information

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	General Manager Corporate Governance & Sustainable Development | Executive BoD Member and Member of the Board Sustainability Committee	Director on board

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

The European Climate Pact Submission

Please indicate your consent for CDP to showcase your disclosed environmental actions on the European Climate Pact website as pledges to the Pact.

Yes, we wish to pledge to the European Climate Pact through our CDP disclosure

Please confirm below

I have read and accept the applicable Terms