METLEN ENERGY & METALS S.A.

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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01/16/2026, 09:01 am

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:
☑ English

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

Select from:
☑ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:
☑ Publicly traded organization

(1.3.3) Description of organization

Metlen Energy & Metals (former MYTILINEOS – Energy & Metals) is a global industrial and energy company, distinguished by its strategic positioning in the energy transition and green metallurgy sectors. Listed on the Athens Stock Exchange, Metlen reported a consolidated turnover of €5,683 million in 2024 and employs 7,627 individuals directly and indirectly, engaging over 16,636 suppliers globally. The company underwent a significant organizational transformation in 2023, establishing two primary business segments: the Energy Sector and the Metallurgy Sector, aimed at enhancing competitiveness and fostering synergies across its operations. Energy Sector Metlen stands as Greece's largest private energy utility, encompassing the development, construction, and operation of thermal and renewable energy projects, as well as electricity and natural gas supply. METLEN is the largest private integrated energy utility in Greece, with operations across the full energy spectrum. Its activities include thermal and RES power generation, electricity infrastructure construction, retail electricity and natural gas supply, gas procurement and trading, and advanced energy services. The Energy Sector is structured into five core areas: -M Renewables: Develops RES and energy storage projects globally (11.1 GW portfolio). -M Energy Generation & Management: Manages thermal and renewable energy assets, energy trading, and PPAs. -M Energy Customer Solutions: Supplies electricity and gas to households and businesses, offering modern energy products. -M Integrated Supply & Trading: Handles procurement and management of natural gas and energy products for B2B clients. -M Power Projects: Designs and constructs large-scale energy infrastructure and energy transition projects (e.g., hydrogen, smart grids). Through Protergia, METLEN leads in retail supply and energy efficiency services. As the largest independent power producer in

Greece with over 2 GW in thermal capacity, it also plays a major role in energy management and innovation. Internationally, it delivers high-value energy projects, including digital, smart city, and IoT solutions. METALS SECTOR METLEN Energy & Metals holds a leading position in the European metals industry, operating the EU's only vertically integrated unit for bauxite, alumina, and primary aluminium production, along with its own port and the largest cogeneration power plant. It has also expanded into the recycled aluminium market. Key facilities include: -Delphoi-Distomo (bauxite production) -Aluminium of Greece (primary aluminium & alumina) -EPALME (largest independent producer of recycled aluminium) -Volos plant (complex metal constructions) -Sometra (zinc and lead metallurgy) In 2023, the acquisition of IMERYS BAUXITES GREECE (now European Bauxites) made METLEN the largest bauxite producer in Europe. The flagship Aluminium of Greece plant has over €600 million in modernization investments and annual capacities of 180,000 tons of primary aluminium and 865,000 tons of alumina. The company also produces 65,000 tons of recycled aluminium annually, reducing energy use and emissions. A major new investment announced for 2025 includes expansion of bauxite and alumina capacity and a new gallium production unit, boosting EU autonomy in critical raw materials. METLEN procures bauxite and caustic soda for alumina production and markets anhydrous and hydrated alumina, as well as aluminium columns and plates. Its customer base is primarily manufacturers, with many long-term relationships exceeding 10 years. INFRASTRUCTURE & CONCESSIONS Beyond its core sectors, METLEN Energy & Metals has expanded into Infrastructure and Concessions through two specialized subsidiaries, leveraging its construction expertise and aiming to capture a significant share of upcoming projects in Greece and abroad. METKA ATE focuses on infrastructure and construction, holding a 7th-class contractor license. It undertakes major projects such as roads, railways, ports, buildings, and waste management. With strong financials, technical know-how, and experienced staff, METKA ATE is well-positioned for leadership in the sector. As part of its growth, it acquired M.T. ATE, a company specialized in environmental projects. M CONCESSIONS is dedicated to financing, designing, building, operating, and maintaining infrastructure, environmental, and energy projects—mainly through PPPs and concession schemes. Working in tandem with METKA ATE, it aims to become a key player in co-financed projects, promoting sustainable development and improved quality of life. Overall, Metlen Energy & Metals continues to drive growth and innovation in the energy and metallurgy sectors, aligning with global trends in energy transition and digital transformation. The company's commitment to sustainable development and the circular economy underscores its strategic direction and operational excellence. [Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/30/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:
☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:
☑ 5 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 5 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 3 years
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

5682956000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from:

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	☑ Yes

[Fixed row]

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

	Does your organization use this unique identifier?	Provide your unique identifier
ISIN code - bond	*Select from:* ☑ Yes	*GRS393503008*
LEI number	*Select from:* ☑ Yes	*213800KT8MEUJEJ2KW41*
D-U-N-S number	*Select from:* ☑ Yes	*72-844-1382*

[Add row]

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

Select all that apply

☑ Greece

(1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain

☑ Electricity generation

☑ Electricity purchasing

Other divisions

☑ Battery storage

☑ Gas storage, transmission and distribution

☑ Smart grids/demand response

(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

Coal - Hard

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Lignite

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Oil

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Gas

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

2041.08

(1.16.1.3) Gross electricity generation (GWh)

9015.63

(1.16.1.4) Net electricity generation (GWh)

8740.36

Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Geothermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Hydropower

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

0.83

(1.16.1.3) Gross electricity generation (GWh)

2

(1.16.1.4) Net electricity generation (GWh)

2

Wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

200

(1.16.1.3) Gross electricity generation (GWh)

576

(1.16.1.4) Net electricity generation (GWh)

576

Solar

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

1200

(1.16.1.3) Gross electricity generation (GWh)

976

(1.16.1.4) Net electricity generation (GWh)

976

Marine

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Total

(1.16.1.2) Nameplate capacity (MW)

3441.91

(1.16.1.3) Gross electricity generation (GWh)

10569.63

(1.16.1.4) Net electricity generation (GWh)

10294.36
[Fixed row]

(1.18) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.

Row 1

(1.18.1) Mining project ID

Select from:
☑ Project 1

(1.18.2) Name

DELPHI-DISTOMON

(1.18.3) Share (%)

100

(1.18.4) Country/Area

Select from:

☑ Greece

(1.18.5) Latitude

38.552844

(1.18.6) Longitude

22.411641

(1.18.7) Project stage

Select from:

☑ Production

(1.18.8) Mining method

Select from:

☑ Underground

(1.18.9) Raw material(s)

Select all that apply

☑ Bauxite

(1.18.10) Year extraction started/is planned to start

1975

(1.18.11) Year of closure

2040

(1.18.12) Description of project

DELPHI-DISTOMON supplies bauxite to Metlen Group's primary aluminium production plant (Aluminium of Greece).
[Add row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:
☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply
☑ Upstream value chain

(1.24.3) Highest supplier tier mapped

Select from:
☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:
☑ Tier 2 suppliers

(1.24.7) Description of mapping process and coverage

In 2023, METLEN introduced its Responsible Supply Chain Policy alongside the Suppliers' and Business Partners' Code of Conduct, aiming to ensure that all suppliers, partners, and subcontractors operate ethically, responsibly, and sustainably. The company emphasizes alignment with ESG (Environmental, Social, and Governance) principles and enforces high standards of integrity, corporate responsibility, and anti-corruption across its supply chain. Before engaging any supplier, METLEN conducts integrity assessments to evaluate ethical practices and operational standards. Contracts include audit rights, enabling METLEN to monitor compliance with its Code of Conduct and recommend corrective actions when needed. Supplier evaluations also include ESG criteria, such as requiring suppliers to ensure their own partners act responsibly and lawfully, especially in areas related to anti-corruption and responsible sourcing. To safeguard the integrity of transactions on behalf of the company and its stakeholders, METLEN applies strict supplier selection and monitoring processes through its Procurement and Project Management teams. All transactions are subject to annual audits to identify and eliminate potential fraud or corruption. The company also enforces systems to detect questionable payments and ensure transparent financial reporting. METLEN operates a centralized whistleblowing mechanism for reporting actual or suspected policy violations. The company ensures protection from retaliation for all reporters, including supplier employees. Verified violations may result in consequences ranging from formal warnings to employment or contract termination, depending on severity. Suppliers must comply with all applicable laws and standards in the following areas: Fair Compensation: Wages and benefits must meet or exceed legal thresholds. Non-Discrimination: Equal treatment regardless of personal characteristics. Prohibition of Child/Forced Labor: Full labor rights and freedom of association. Anti-Corruption & Fair Competition: Zero tolerance for bribery and unfair practices. Data Protection: Confidentiality and respect for intellectual property. Suppliers must avoid materials from illegal mining or Conflict-Affected and High-Risk Areas (CAHRAs) and, when requested, disclose the origin of materials. They must comply with trade control laws, particularly when working with restricted entities or regions. Breaches may result in severe legal or contractual penalties.
[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☑ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

The company's use of plastic is in very small quantities and relates mainly to quantities through goods purchased. The disposal of the company's products (aluminium, electricity etc.) is plastic free.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

1

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The Company is focused on immediately identifying and addressing environmental risks that can affect current operations and annual planning. This is directly linked to the Sectors' five-year business plans, as it allows the company to maintain stability and timely respond to short-term changes.

Medium-term

(2.1.1) From (years)

4

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The Company prepares for potential changes in the climate and regulatory environment by adapting its corporate strategy and developing products and services that meet future needs. This horizon is critical to achieving the business plan's medium-term objectives and enhances the Company's sustainability in this environment.

Long-term

(2.1.1) From (years)

11

(2.1.2) Is your long-term time horizon open ended?

Select from:
☑ No

(2.1.3) To (years)

30

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The long-term horizon allows the Company to fully integrate climate risks and opportunities into its long-term planning and corporate strategy. In this case, the focus is on innovation and creating resilient solutions that will help ensure the Company's long-term success and sustainability, beyond the five-year business horizon. [Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process	Biodiversity impacts evaluated before the mining project development stage
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts	*Select from:* ☑ Yes, in all cases

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term
☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:
☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply
☑ Site-specific
☑ Local
☑ Sub-national
☑ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management
☑ Enterprise Risk Management

International methodologies and standards
☑ IPCC Climate Change Projections
☑ ISO 14001 Environmental Management Standard
☑ Life Cycle Assessment

Databases
☑ Nation-specific databases, tools, or standards
☑ Regional government databases

Other
☑ External consultants

☑ Materiality assessment
☑ Partner and stakeholder consultation/analysis
☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical
☑ Drought
☑ Avalanche
☑ Wildfires
☑ Heat waves
☑ Cold wave/frost
☑ Cyclones, hurricanes, typhoons
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

(2.2.2.14) Partners and stakeholders considered

Select all that apply
☑ Customers
☑ Employees
☑ Investors
☑ Local communities
☑ Regulators

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:
☑ No

(2.2.2.16) Further details of process

Metlen conducted an in-depth analysis to identify climate-related risks and opportunities within its Business Sectors as part of the TCFD implementation project. This process involved a comprehensive review of Metlen's activities, data analysis, and stakeholder consultations. As a result, risks and opportunities related to climate change were identified, impacting various aspects of Metlen's operations. The identified risks and opportunities were assessed based on two main criteria: • Materiality of consequences: Evaluated over short-term (2022-2025), medium-term (until 2030), and long-term (until 2050) horizons, considering financial impact. • Level of certainty: Analyzed through confidence (availability of reliable data), sensitivity (variations in parameters), and outcome likelihood (direction and rate of change). Based on these criteria, risks and opportunities were categorized into four groups for each Metlen Business Sector: 1. High importance and high certainty: These are quantitatively analyzed using climate scenarios and Metlen's future data. Proactive measures are planned to integrate these into future policies. 2. High importance and low certainty: Monitored systematically, and management plans will be developed if they become significant. Immediate action is not required. 3. Low importance and high certainty: These are observed without needing detailed management plans. 4. Low importance and low certainty: Considered non-material. Climate-related risks are integrated into Metlen's Risk Registry. The Risk Department, in collaboration with Business Units and the Sustainable Development Division, identifies and assesses these risks annually using a risk management approach. The severity and likelihood of each risk/opportunity are analyzed to prioritize them. These are then presented to the Executive Committee alongside other types of risks, and major climate-related risks/opportunities are included in Metlen's Sustainable Development Report, outlining the management approach. Climate risks and opportunities play a vital role in Metlen's strategy, investment decisions, and operations management. As an industrial company involved in Metallurgy, EPC, Electric Power, and Gas Trading, Metlen faces various climate-related risks that could significantly impact its financial position, operations, earnings, reputation, and access to capital. Acute physical risks, like extreme weather events and high temperatures, are relevant across Metlen's activities, affecting plants, facilities, and construction sites. For instance, in the Metallurgy Sector, risks such as reduced water resources due to low rainfall, loss of working days from extreme temperatures, and the need to adapt mining activities to climate change are of high priority. Metlen ensures that appropriate measures are in place to address these risks. The transition to a low-carbon future presents additional regulatory challenges, especially for industries like primary aluminium and natural gas-based power production that are hard to decarbonize. Climate and energy regulations may have significant financial and non-financial impacts. These could include stricter emissions reporting requirements, the use of low-emission energy sources, increased CO2 prices, and reduced exposure to fossil fuels. Metlen closely monitors legal compliance and actively participates in regulatory consultation groups to ensure all relevant risks are included in its risk management system.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks
☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply
☑ Direct operations

(2.2.2.4) Coverage

Select from:
☑ Full

(2.2.2.7) Type of assessment

Select from:
☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:
☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply
☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ Sub-national

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ WRI Aqueduct

Other

☑ Desk-based research

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Groundwater depletion

☑ Increased levels of environmental pollutants in freshwater bodies

☑ Saline intrusion

☑ Water availability at a basin/catchment level

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ Regulators

☑ Water utilities at a local level

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ Yes

(2.2.2.16) Further details of process

Our organization employs a systematic process to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities. In 2024, Metlen conducted a Double Materiality assessment so as to identify material impacts, risks and opportunities. We evaluate various risk types, including groundwater depletion, saline intrusion, water availability at the basin level, and increased pollutant levels in freshwater bodies. This assessment involves data collection and analysis, stakeholder engagement, and regular monitoring. We integrate these findings into our decision-making processes to mitigate risks and capitalize on opportunities, ensuring long-term sustainability in our operations. All company Business Sectors apply an ISO 14001-2015 certified Environmental Management System. The company has a specific standard-guide to manage withdrawals and discharges to ensure compliance with legislation and avoid environmental impact. All plants have technical instructions under this guide to determine parameters to be controlled, measurement points, frequency, and limits. For example, the company monitors thermal pollution from its CHP plant in the Metallurgy Business Unit by commissioning annual studies by the Hellenic Centre for Marine Research (HCMR) to monitor the status of the Antikyra Gulf seabed, with results communicated to competent authorities.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.6) Mining projects covered

Select all that apply

☑ All disclosed mining projects

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ As important matters arise

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ A specific environmental risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ Sub-national

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Internal company methods

International methodologies and standards

☑ Environmental Impact Assessment

Databases

☑ Nation-specific databases, tools, or standards

Other

☑ External consultants

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Declining ecosystem services

☑ Increased ecosystem vulnerability

☑ Operations in or adjacent to areas important for biodiversity

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Local communities

☑ NGOs

☑ Regulators

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ Yes

(2.2.2.16) Further details of process

Our organization employs a comprehensive process to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities related to biodiversity. In 2024, Metlen conducted a Double Materiality assessment so as to identify material impacts, risks and opportunities. We consider various risk types, including declining ecosystem services, increased ecosystem vulnerability, and operations adjacent to areas critical for biodiversity. This involves gathering and analyzing data, engaging with stakeholders, and conducting regular impact assessments. The insights gained are integrated into our strategic planning and operational decisions, allowing us to mitigate risks and enhance our positive contributions to biodiversity conservation.
[Add row]

(2.2.3) Provide mining-specific details of your organization’s process for identifying, assessing, and managing biodiversity impacts.

Row 1

(2.2.3.1) Mining project ID

Select from:

☑ Project 1

(2.2.3.2) Extent of assessment

Select from:

☑ Full-scale environmental and social impact assessment

(2.2.3.3) Impacts considered

Select all that apply

☑ Direct impacts

☑ Indirect impacts

☑ Cumulative impacts

(2.2.3.4) Scope defined by

Select all that apply

☑ Governmental agency requirements

☑ Company own standards and/or policies

(2.2.3.5) Aspects considered

Select all that apply

☑ Threatened species

☑ Protected habitats

☑ Natural habitats

☑ Ecosystem services

(2.2.3.6) Baseline biodiversity data available

Select from:

☑ Yes

(2.2.3.7) Environmental Impact Statement publicly available

Select from:

☑ Yes

(2.2.3.8) Please explain

At Metlen, our mining operations focus on bauxite extraction to support our primary aluminum production. We follow a comprehensive approach to identifying, assessing, and managing biodiversity impacts in line with both regulatory requirements and our internal sustainability standards. METLEN implements procedures appropriate for the overall consideration of biodiversity-related issues, assessing potential risks, in terms of their likelihood and time of occurrence. These procedures are aligned with the requirements of national and European laws and standards. At the same time, in the context of consultations with social partners and the permitting procedures of installations, the views of stakeholders are taken into account. Until the end of 2024, no significant negative impacts have been identified in terms of soil degradation. 1. Extent of Assessment: We conduct a full-scale Environmental and Social Impact Assessment (ESIA) for our mining activities. This extensive assessment ensures that we capture all potential biodiversity impacts across different phases of our operations, from exploration to extraction and rehabilitation. 2. Impacts Considered: Our assessment covers direct, indirect, and cumulative impacts. Direct impacts include changes to land use and habitat alteration, while indirect impacts consider effects on surrounding ecosystems, such as water bodies or air quality. Cumulative impacts involve long-term effects that may arise from combined mining activities over time. 3. Scope Defined By: The scope of our biodiversity impact assessment is defined by governmental agency requirements, ensuring compliance with national regulations, as well as our company's own standards, which often exceed regulatory requirements. This dual approach ensures that we address all biodiversity-related risks comprehensively. 4. Aspects Considered: We pay close attention to ecosystem services, recognizing the critical role they play in maintaining biodiversity. We evaluate how our mining operations might affect ecosystem services like water purification, soil stabilization, pollination, and natural habitat provision and threatened species ensuring that these aspects are protected or restored throughout our activities. By integrating these elements into our biodiversity management process, we aim to minimize our environmental footprint, mitigate potential risks, and contribute positively to the ecosystems surrounding our mining operations.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:
☑ Yes

(2.2.7.2) Description of how interconnections are assessed

At Metlen, we recognize the interconnected nature of environmental dependencies, impacts, risks, and opportunities, especially from our mining activities and sites of RES systems. We adopt an integrated approach to assess these interconnections for sustainable operations. 1. Environmental Dependencies: Our operations depend on natural resources like water, energy, and bauxite. Through a detailed resource management plan, we monitor resource availability and identify vulnerabilities. For instance, water is essential for mining processes, so we regularly monitor sources to detect potential shortages affecting operations. 2. Environmental Impacts: We conduct Environmental and Social Impact Assessments (ESIAs) to evaluate our activities' effects on ecosystems, biodiversity, air, and water resources. These assessments identify direct, indirect, and cumulative impacts. For example, we mitigate land disturbance impacts by implementing habitat

restoration and rehabilitation practices. 3. Risk Assessment: We use a structured risk management process to identify, evaluate, and prioritize environmental risks based on severity and likelihood, including climate change risks such as emissions regulations, water scarcity, and extreme weather. This helps us develop strategies to reduce vulnerability, like implementing water-saving technologies or using renewable energy sources. 4. Opportunities Assessment: We identify opportunities by monitoring environmental trends and regulations, such as investing in energy-efficient technologies, waste material utilization, or expanding renewable energy use. Transitioning to low-carbon energy sources, for example, can reduce operational costs and improve market competitiveness. Interconnections Assessment Process: Metlen employs an integrated management system to evaluate how dependencies, impacts, risks, and opportunities are interconnected. Cross-functional teams from sustainability, risk management, operations, and procurement ensure a holistic view. We use scenario analysis and data modeling to understand how changes in one aspect (e.g., water availability) affect others (e.g., production efficiency, regulatory compliance). Outcome: This approach allows us to: • Mitigate risks by adapting strategies to reduce critical resource dependency. • Identify opportunities, such as energy efficiency improvements and circular economy practices. • Build a resilient, sustainable business model aligned with environmental goals. By continuously assessing these interconnections, we ensure strategic decisions that contribute to long-term sustainability and reduce our environmental footprint.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

☑ Areas of high ecosystem integrity

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

At Metlen, we have developed a structured approach to identify and manage biodiversity priority areas, particularly because our operations—such as bauxite mining for our aluminum production and the development of wind and photovoltaic parks—are often situated near or within Natura-designated zones. This process enables us to assess, recognize, and mitigate biodiversity impacts, ensuring minimal disruption to the environment. Our efforts begin with a comprehensive Environmental and Social Impact Assessment (ESIA), which includes detailed mapping of the areas surrounding our operations. Through this assessment, we identify sensitive habitats, threatened species, and critical ecosystems. We use Geographic Information System tools in conjunction with biodiversity experts to overlay our operational sites with protected areas like Natura 2000, helping us pinpoint high-priority biodiversity locations. We strictly follow national and international biodiversity regulations and Natura 2000 guidelines. We also actively engage with government agencies, environmental NGOs, local communities, and subject-matter experts to identify areas of critical biodiversity that may be impacted by our activities.This collaborative approach ensures compliance with legal requirements and alignment with local conservation priorities. Before any development begins, we conduct thorough field surveys to collect data on local flora and fauna. These surveys help us detect the presence of rare, endangered, or protected species, and allow us to monitor biodiversity throughout the lifecycle of our operations.This enables us to identify and manage priority locations effectively. We evaluate both direct and indirect impacts on biodiversity, such as habitat loss, species displacement, and disruptions to ecosystem services. When a site is identified as a biodiversity priority, we implement targeted mitigation measures—including habitat restoration, buffer zones, and conservation offsets—to reduce potential harm.For example, we may reposition wind turbines or photovoltaic panels to avoid disturbing critical habitats or wildlife migration routes. Metlen maintains an ongoing biodiversity monitoring program in and around these priority areas. This monitoring allows us to detect changes early and apply adaptive management strategies to safeguard biodiversity. Our operations are continuously adjusted based on monitoring data to address emerging risks to species and ecosystems. We are committed to transparent communication about our biodiversity performance. We regularly publish reports detailing our impacts and mitigation actions, and we actively engage in broader conservation initiatives to encourage sustainable practices across the industry.By following this structured and proactive process, Metlen ensures that biodiversity priority locations are effectively identified, protected, and managed in accordance with leading standards and regulatory expectations. Priority areas: p. 598 IAR 2024

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ Yes, we will be disclosing the list/geospatial map of priority locations

(2.3.6) Provide a list and/or spatial map of priority locations

iar_2024_metlen_gr.pdf
[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ Absolute decrease

(2.4.5) Absolute increase/ decrease figure

0

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

The Business Risk Management Division conducts an annual or as-needed risk identification process to strengthen and update the company's Risk Register. Information is gathered from various sources, including proposals from Risk Owners, reports on emerging risks, and assessments of the company's impact on sustainable development (impact materiality). This information is reviewed to improve existing risk descriptions or add new risks, ensuring the Risk Register remains current and aligned with sustainability impact assessments. The Risk Register is structured into four levels: a) Risk Category (Level I) b) Risk Sub-Category (Level II) c) Risk Occurrence Factors (Level III) d) Key Internal Control System elements (Level IV) that support risk management. After risk identification, the division

coordinates with Risk Owners to assess risks at Level II, using detailed Risk Register data to evaluate each risk's materiality. Risks are assessed considering impact, likelihood of occurrence, and internal control system design to calculate intrinsic and residual risk. Inherent risk is measured as the product of potential impact (financial, operational, reputational, and sustainable development) and the likelihood of occurrence. The division then analyzes risk assessment data to identify key risks that could affect the Company's business objectives and operations. Both positive and negative impacts resulting from dual materiality are analyzed to identify risks and opportunities. Heads of Business Activities, Central Human Resources, and Compliance Services actively contribute to identifying and assessing risks and opportunities. The focus is on those with the greatest potential negative or positive impact on the Company. Risks and opportunities are also evaluated based on the time horizon within which they may influence the Company's strategy and operations. These are then prioritized, emphasizing those with the most significant potential impacts or benefits, to develop appropriate management and exploitation strategies. Further information available on page 105 of the Integrated Annual Report 2024.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ Absolute increase

(2.4.5) Absolute increase/ decrease figure

0

(2.4.6) Metrics considered in definition

Select all that apply

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

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(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

METLEN implements an integrated, continuous improvement approach to water resource management across all major production sites, focusing on regulatory compliance, operational monitoring, and environmental protection. Regulatory Compliance & Engagement a) Full compliance with Approved Environmental Terms

(AEPO) and Water Use Licenses is maintained across all industrial units. b) METLEN regularly engages with regulatory authorities to track and prepare for potential changes in water-related legislation. Operational Oversight & Monitoring c) Designated Environmental Officers monitor water targets and manage resources responsibly across Business Units. d) All production sites apply an ISO 14001-certified Environmental Management System, with measures to prevent and respond to incidents such as leakage. Water Discharge & Quality Monitoring e) Discharges are controlled through parameters defined by environmental permits. f) Continuous monitoring includes pH and temperature, with monthly sampling of key indicators such as suspended solids, dissolved solids, COD, BOD_5, sulphides, fluorides, and pH. The marine recipient is also tested for compliance with Environmental Quality Standards (EQS). g) Discharge limits are set for priority substances based on site-specific AEPOs. No violations occurred in 2024. Best Practices & Risk Management All Business Sectors follow an ISO 14001:2015 EMS, supported by environmental policies and consistent application of Best Available Techniques (BATs), which contribute to both environmental performance and business growth. A standardized internal guide governs water withdrawals and discharges, ensuring compliance and reducing environmental impact. Each site follows technical protocols detailing substances to monitor, measurement points, frequency, thresholds, and responsible staff. No water-related risks to ecosystems or human health have been identified. All sectors follow the METLEN Measures & Principles for environmental protection, including: Voluntary commitments beyond legal obligations Regular internal/external EMS audits Pollution prevention Environmental impact assessments Reduction and control of liquid waste Timely correction of non-conformities [Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Other, please specify :Thermal pollution

(2.5.1.2) Description of water pollutant and potential impacts

One of the main pollution risk prevention measures implemented in the Business Sector 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.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Other, please specify :Compliance with effluent quality standards

(2.5.1.5) Please explain

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 accordance 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 studies carried out in 2019 and 2020, and of the more recent ones from 2021, 2022, 2023 and 2024 show a stable ecological status, with improving trends recorded at several observation stations. These studies will continue over the next five years. During 2024, 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 Metlen 2024 Integrated Annual Report, POLLUTION [ESRS: E2] section (p. 150-154).
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We evaluated climate change risks, also through double materiality assessment, only within our direct operations, because the upstream/downstream value chain climate change risks have not the potential to have a substantive effect on Metlen's activities.

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We evaluated water risks, also through double materiality assessment, only within our direct operations, because the upstream/downstream value chain water risks have not the potential to have a substantive effect on Metlen's activities.

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Not an immediate strategic priority

(3.1.3) Please explain

Risks related to plastics have zero effect on Metlen's activities.

Biodiversity

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Biodiversity risks have not the potential to have a substantive effect on Metlen's activities.
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Under the EU's climate change framework, METLEN is regulated by the EU Emissions Trading Scheme (EU-ETS), which aligns with the Paris Agreement. As carbon prices increase, the company incurs higher expenses for purchasing greenhouse gas (GHG) emission allowances. Our power generation operations fall under EU Directive 2003/87/EC, which requires thermal power plants to obtain CO2 emission permits, known as EU Allowances (EUAs). Since its launch in January 2005, the EU ETS is now in its fourth phase (2021-2030), mandating all power producers to acquire CO2 allowances to cover their emissions. In the Metals sector, METLEN benefits from a partial free allocation of allowances under updated EU regulations. Moreover, Greece implemented a compensation scheme during the third phase to cover indirect emission costs related to electricity prices. The Greek Government is currently preparing to notify the European Commission about a state-aid program compatible with the fourth phase of the EU ETS, aiming to maximize compensation for costs that cannot be passed on through aluminium pricing.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The implementation of the EU-ETS, especially in its fourth phase (2021-2030), may significantly impact Metlen Group's financial position, performance, and cash flows in the reporting year. The increase in carbon prices and the requirement to purchase additional greenhouse gas (GHG) emission allowances could lead to higher operational costs, particularly for our thermal power plants, which must acquire and surrender CO2 emission rights under the EU-ETS. For our Metals Sector, although partial free allocation of allowances has been granted, the remaining costs not covered by this allocation may still impact profitability by reducing operating margins and overall financial performance. Increases in carbon prices would further raise expenses, negatively affecting cash flows. However, the Greek government has recently obtained approval from the European Commission for a state aid scheme designed to compensate energy-intensive companies for indirect emission costs, such as those embedded in electricity prices. This scheme, effective through 2030, aims to partially offset these financial burdens by reimbursing a significant portion of indirect costs, provided companies meet certain energy efficiency or renewable energy criteria. Once implemented, this compensation could help mitigate some of the negative effects on our financial position and support continued operational resilience. In summary, while the EU-ETS represents a financial risk due to increased costs, the compensation measures expected by the Greek government could help alleviate this impact to some extent. Nonetheless, continuous monitoring and strategic planning will be essential to manage these risks effectively.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

550000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

1050000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased carbon prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy & Energy sectors of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the

Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The sum of difference between projected allocated and reported CO2 emissions in our currently participating ETS schemes of each sector activity multiplied by the projected carbon value resulting from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased prices of CO2 emission allowances constitute a high potential risk for the Metallurgy and Energy sectors as they may lead to a further increase in the cost of purchasing allowances. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). Increased prices of emission allowances continue to be a potential risk, high for the Energy sector and very high risk for the Metallurgy sector. In this scenario, the cost increase based on each sector's projected CO2 emissions appears to be significantly higher than the existing policies scenario.

(3.1.1.26) Primary response to risk

Pricing and credits

☑ Other pricing or credit, please specify :we employ hedging strategies to minimize the impact from the price volatility of CO2 emissions rights.

(3.1.1.27) Cost of response to risk

3000000000

(3.1.1.28) Explanation of cost calculation

The figure we report as a cost of response to risk equals to the annual environmental investments in 2023 related to climate change and our overall estimation to response to this risk is primarily the monitoring of CO2 emissions reduction initiatives implementation, with specific projects and investments in each sector and an ambitious RES investments plan by 2030.

(3.1.1.29) Description of response

Since 2013, we have not been allocated free CO2 emission rights and as our thermal power plants currently emit approximately 0.35 tonnes of CO2 per MWh generated, increased prices of CO2 emission rights will affect our operating costs. Although we employ hedging strategies to minimize the impact from the price volatility of CO2 emissions rights, and despite our recently announced ESG-related initiatives which are expected to significantly reduce our CO2 footprint by 2030, we must still acquire sufficient amounts of CO2 emission rights per year, and, accordingly, there can be no assurance on the price level that such CO2 emission rights will be obtained in any future year.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to national legislation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Sea Golf of Antikira

(3.1.1.9) Organization-specific description of risk

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.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Exceptionally unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk related to the seawater usage of our Combined Heat and Power (CHP) plant could have substantial implications for Metlen's financial position, performance, and cash flows. Any regulatory changes that restrict the allowable volume of seawater withdrawals could significantly impact our operational efficiency. This may lead to increased costs as the company seeks alternative water supply sources, potentially requiring investment in new infrastructure such as desalination plants or water recycling systems. Such capital expenditures would affect our cash flows and may reduce available funds for other strategic projects or investments. If restrictions on seawater usage force operational limitations or premature closures, the company's electricity and heat production capacity could be reduced, directly impacting revenue streams. Lower production levels would translate into decreased sales, negatively affecting profitability and the overall financial performance of the CHP plant. This scenario may also increase fixed costs per unit of production, further eroding profit margins. Additionally, environmental concerns related to the temperature and pH changes of discharged seawater could result in regulatory fines, legal liabilities, or the requirement to implement costly mitigation measures to minimize ecological impacts. This could increase operating expenses and potentially affect Metlen's reputation, leading to challenges in maintaining licenses or permits for continued operation. If stricter regulations are enforced, there could also be an impact on Metlen's ability to attract financing, as lenders and investors are increasingly focused on environmental compliance and sustainability. This may result in higher borrowing costs or restricted access to capital, further affecting the company's financial flexibility and cash flow. In summary, this risk poses a significant challenge to Metlen's financial position in the

medium term by potentially increasing operational costs, reducing production capacity, and exposing the company to regulatory compliance expenses. Proactive risk management and investment in alternative water solutions or technologies will be essential to mitigate the financial impact and maintain long-term financial stability.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Other engagement, please specify :Engage with regulators/policymakers

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

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.

(3.1.1.29) Description of response

Engagement with public policy makers - Strengthen links with local community - Cooperation with governmental research organizations. 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 Metlen. 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.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Other market risk, please specify :Increased power and gas sales prices due to climate change mitigation policies

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Metlen Company operates in a dynamic energy landscape, where climate change mitigation policies are increasingly shaping the market. As governments and regulatory bodies implement measures to reduce greenhouse gas emissions, the risk of increased power and gas sales prices poses a significant challenge to Metlen. Higher electricity and gas sales prices due to climate change policies may impact Metlen's competitiveness in the market. Consumers may seek more affordable options, potentially leading to a decline in demand for the company's products and services.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Decreased revenues due to reduced demand for products and services

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk could impact Metlen's financial position, performance, and cash flows. As climate change mitigation policies intensify, we anticipate a steady increase in power and gas prices, leading to higher operational costs. This increase could erode profit margins, particularly if we face challenges in passing these costs on to customers due to competitive market pressures. The rising energy expenses may reduce Metlen's EBITDA, affecting profitability and potentially resulting in lower earnings before interest and taxes (EBIT). As a result, the company might experience reduced free cash flows, limiting our ability to invest in growth initiatives, sustainability projects, or technological advancements necessary to maintain competitiveness. Moreover, Metlen's credit ratings could be negatively affected if profitability continues to decline, which might increase the cost of borrowing or reduce access to external financing. This would place additional pressure on cash flows, making it more challenging to fund day-to-day operations, repay debt, or support capital expenditures. A prolonged increase in energy costs could also make our products less competitive, leading to a potential reduction in sales volumes and revenue. The combined effect of reduced sales, higher costs, and increased borrowing expenses may weaken the company's overall financial health, potentially affecting shareholder returns and long-term financial resilience. In summary, this risk poses a significant challenge to Metlen's financial stability over the medium term, necessitating strategic cost management, efficiency improvements, and the adoption of energy-efficient technologies to mitigate the impact on financial performance and cash flows.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

20000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

95000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased power and fossil fuel (NG) prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The projected electricity and gas consumption of Metallurgy sector multiplied by the projected electricity and gas values derived from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased power and fossil fuel (NG) prices are a very high potential risk of increased operating costs for the Metallurgy Sector, based on the Sector's projected power and gas consumption. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). In this scenario, these prices are even higher, therefore continue to be a very high potential risk of increased operating costs in the Metallurgy sector.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

1000000

(3.1.1.28) Explanation of cost calculation

Since the cost of the Company's sub-sector M Renewables (RES systems) planned investments is already included in the Risk 1 response cost above, we have assigned a value of 1,000,000 as an estimation cost which related to Engagement activities of the Company.

(3.1.1.29) Description of response

Metlen is investing in a diversified energy portfolio that includes both conventional and renewable energy sources. This approach can help mitigate the impact of rising costs in a transitioning energy market. Also engaging in constructive dialogues with policymakers and regulatory authorities can help Metlen advocate for supportive policies that strike a balance between environmental goals and economic sustainability.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Other policy risk, please specify :Emerging regulation: Increased power and fossil fuel (NG) prices)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

Metlen, as a prominent aluminum production company, heavily relies on stable and affordable electricity and natural gas (NG) prices to sustain its operations and competitiveness. However, the risk of rising electricity and fossil fuel prices poses a significant challenge to the company's aluminum production processes. As an aluminum production company, Metlen operates energy-intensive smelting and refining processes. These processes require substantial amounts of electricity and NG

to power the furnaces and other equipment necessary for aluminum production. The risk is related with the escalation of production costs. Competing against companies in regions with more favorable energy prices could put Metlen at a disadvantage.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the risk of rising electricity and natural gas (NG) prices could significantly affect Metlen's financial position, performance, and cash flows. As a highly energy-intensive aluminum production company, any increase in energy costs will directly lead to higher production expenses, reducing profit margins. Given that energy accounts for a significant portion of total production costs, even moderate price increases could result in substantial cost escalations. This risk is likely to reduce Metlen's EBITDA and overall profitability, as passing on these increased costs to customers may not be feasible in a competitive market. As a result, the company could experience a decline in gross margins, affecting earnings before interest and taxes (EBIT). This impact may be further amplified if competitors in regions with more favorable energy prices are able to maintain lower production costs, resulting in potential market share loss for Metlen. Reduced profitability in the medium term may also influence Metlen's credit ratings, which could increase borrowing costs or limit access to external financing. This would place additional strain on cash flows, potentially affecting the company's ability to fund essential investments, such as technological upgrades or sustainability projects aimed at improving energy efficiency. Furthermore, higher energy prices could increase working capital requirements as operating expenses rise, resulting in tighter cash flow

management. This situation may impact Metlen's liquidity and limit its capacity to meet short-term financial obligations, pay dividends, or pursue growth opportunities. In summary, the risk of escalating electricity and NG prices presents a substantial threat to Metlen's financial stability in the medium term, with the potential to diminish profitability, strain cash flows, and challenge the company's ability to maintain its competitive position in the aluminum market.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

300000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

400000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of increased power and fossil fuel (NG) prices through a study, conducted for the direct operations in Greece, concerning the Metallurgy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 2.6, RCP 4.5 and RCP 8.5. Calculation methodology: The projected electricity and gas consumption of Metallurgy sector multiplied by the projected electricity and gas values derived from the respective NGFS scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, increased power and fossil fuel (NG) prices are a very high potential risk of increased operating costs for the Metallurgy Sector, based on the Sector's projected power and gas consumption. - The RCP 8.5 Strong Policies Scenario (Net-Zero) (maximum). In this scenario, these prices are even higher, therefore continue to be a very high potential risk of increased operating costs in the Metallurgy Unit.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase investment in R&D

(3.1.1.27) Cost of response to risk

8000000

(3.1.1.28) Explanation of cost calculation

Since the cost of the Company's sub-sector M Renewables planned investments is already included in the Risk 1 response cost above, we have assigned a value of 8,000,000 as an estimation cost which related to R&D initiatives and specific energy efficiency initiatives of the Metallurgy sector.

(3.1.1.29) Description of response

Metlen is investing in energy-efficient technologies and practices to reduce electricity and NG consumption during the aluminum production processes. Also, integrating renewable energy sources, such as solar or wind power, into the Company's energy mix can help offset the reliance on fossil fuels and stabilize electricity costs in the long term.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Other acute physical risk, please specify :Rising air temperatures and reduced efficiency of natural gas-fired power plants.

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.9) Organization-specific description of risk

With global temperatures on the rise due to climate change, the ambient air temperatures surrounding the power plants are increasing. This elevation in temperature can have several adverse effects on the efficiency and overall operation of natural gas-fired power plants, including: Reduced Power Output: Higher air temperatures decrease the density of air, leading to a lower mass flow rate of air entering the combustion chamber. This results in reduced power output from the turbines, directly impacting electricity generation capacity. Reduced Turbine Efficiency: Gas turbines' efficiency is closely related to the temperature difference between the inlet air and the exhaust gases. As the temperature differential decreases due to rising ambient temperatures, the efficiency of the turbines declines, leading to higher fuel consumption for the same electricity output. Increased Cooling Demand: Gas-fired power plants rely on cooling systems to maintain operational temperatures. As ambient temperatures rise, the demand for cooling systems escalates, putting additional stress on water resources and increasing operational costs. Increased in mean air temperatures can lead to reduced production (and revenues) due to lower efficiency.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the long-term, the risk of rising ambient air temperatures due to climate change could significantly impact Metlen's financial position, performance, and cash flows, particularly in its natural gas-fired power plants. As temperatures increase, the efficiency of these power plants is expected to decline, resulting in reduced electricity generation capacity and lower overall power output. This reduction in output may lead to decreased revenue over time, especially if Metlen is unable to meet electricity demand or contractual obligations. The decline in turbine efficiency due to reduced temperature differentials will result in higher fuel consumption for the same level of electricity generation, directly raising operational costs. This increase in fuel costs will likely erode profit margins, negatively affecting the company's EBITDA and overall profitability. Over time, the cumulative effect of these inefficiencies could make Metlen's power generation activities less competitive compared to those of more energy-efficient or renewable energy-based companies. Increased cooling demands due to higher ambient temperatures will also escalate operational expenses, particularly if water resources become scarcer or more expensive. This could further strain Metlen's cash flows, as the company may need to invest in more advanced or alternative cooling technologies to maintain operational efficiency. These additional capital expenditures may limit Metlen's ability to invest in other growth or sustainability projects, potentially affecting long-term financial health. Furthermore, the reduced efficiency and increased operational costs may make it challenging for Metlen to maintain its profit margins, affecting net income and shareholder returns. Persistent inefficiencies and elevated expenses could also lead to potential asset impairments, especially if certain power plants become unprofitable in the long run. Overall, this risk could significantly weaken Metlen's financial stability, resulting in reduced cash flow generation, increased operational costs, and lower competitiveness in the energy market. To maintain long-term viability, Metlen may need to explore investments in energy efficiency improvements, alternative energy sources, or more resilient technologies to mitigate these financial impacts.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

7000000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

14000000

(3.1.1.25) Explanation of financial effect figure

Metlen assessed the potential financial impacts of the rising air temperatures through a study, conducted for the direct operations in Greece, concerning the Energy sector of the Company considering three alternative climate scenarios. These scenarios are based on the scenarios of the Network for Greening the Financial System (NGFS) and their key assumptions, incorporating both transition and physical risk variables, specifically on the RCP scenarios (Representative Concentration Pathway) developed in the context of the 5th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC): RCP 8.5, RCP 4.5, and RCP 2.6, Calculation methodology: The reduction in efficiency of thermal plants in a future climate, which characterized by higher temperatures (WPS and CPS scenarios), is calculated through a semi-empirical equation where it takes into account future climate data in the area of interest (Greece). Given electricity generation will require larger quantities of fuel, and this cost is calculated by multiplying the additional quantities by the corresponding values contained in the RCP scenarios. More specifically, the stated potential financial impact figures (for the year 2030), focus on: - The RCP 4.5 Current/Existing Policies Scenario (minimum). Under this scenario, the risk exists, but to a lesser extent, since the cost is lower than in the weak policies scenario due to climate change limitation and therefore lower impact on the efficiency of thermal plants. - The RCP 2.6 Week Policies Scenario (Net-Zero) (maximum). In this scenario, it is a moderate to high risk for Power sector since it can lead to reduced production (and revenues) due to lower efficiency and increased transmission losses of the power stations.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

We put 0 on the corresponding cost, because the cost of the Company's RES planed investments is incorporated in the Risk 1 cost of response above.

(3.1.1.29) Description of response

The company focus on diversification of its energy generation sources, expanding its energy portfolio to include renewable energy sources which can reduce dependency on gas-fired power plants and provide more flexibility during extreme temperature events.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to national legislation

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Greece

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Groundwater sources & Mornos River

(3.1.1.9) Organization-specific description of risk

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.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very unlikely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In the medium-term, the identified risk regarding water withdrawal limits in the Metallurgy sector could significantly impact Metlen's financial position, performance, and cash flows. If regulatory authorities impose stricter water withdrawal limits, the company may be forced to rely on municipal water supply sources, which are typically more expensive than self-extracted water. This shift would lead to increased operational costs, directly affecting profit margins and reducing overall profitability. Increased reliance on municipal water could result in a considerable rise in the cost of production, especially for water-intensive processes within the Metallurgy sector. This would diminish Metlen's competitiveness, as higher production costs might not be fully passed on to customers, potentially leading to reduced sales volumes and a decline in revenue. Additionally, any disruptions in water availability could result in temporary production halts or inefficiencies, further impacting financial performance. Such disruptions may lead to lower output, affecting the company's ability to meet customer demand and resulting in lost sales opportunities. This could have a direct impact on cash flows, making it more challenging to cover operational expenses, service debt, or fund future investments. Furthermore, increased water costs and potential disruptions may also affect the company's credit ratings, potentially raising borrowing costs or limiting access to external financing. This could reduce financial flexibility, making it more difficult for Metlen to invest in capital projects, technological upgrades, or sustainability initiatives in the medium term. In summary, this risk poses a significant threat to Metlen's financial stability in the medium term by potentially increasing operational costs, reducing production efficiency, and impacting revenue generation. Proactive measures, such as investing in water-efficient technologies or exploring alternative water sources, will be essential to mitigate the financial impact and maintain the company's financial health.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ No

(3.1.1.26) Primary response to risk

Engagement

☑ Other engagement, please specify :Engage with regulators/policymakers

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

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.

(3.1.1.29) Description of response

Metlen's Metals 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.
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

2774409000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:
☑ 41-50%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

1019309000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:
☑ 11-20%

(3.1.2.7) Explanation of financial figures

The most vulnerable activities regarding transition risk from climate change are those that do not align with the EU Taxonomy. These activities may face increased scrutiny from regulators, shifting market demands, and potential liabilities as climate policies evolve. Companies engaged in non-eligible activities are likely to experience higher operational costs and reduced competitiveness, making them more susceptible to financial impacts as stakeholders prioritize sustainability and climate-resilient investments. Thus, focusing on taxonomy-aligned activities is essential for mitigating transition risks. Thus, we put the turnover of taxonomy-non-eligible activities. Regarding the financial metric vulnerable to physical risks, we put the turnover of the M Energy Generation & Management sub-sector which is the responsible sub-sector for the operation of natural gas thermal power plants.

Water

(3.1.2.1) Financial metric

Select from:

☑ Other, please specify :No financial metric

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ 21-30%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ 21-30%

(3.1.2.7) Explanation of financial figures

In relation to water management, METLEN does not experience any financial consequences affecting its financial position, financial performance or cash flow. Recognizing that water is the most important natural resource, the Company has adopted effective measures to manage it and prevent the associated risks. The Company complies with regulations and legislation on responsible water pumping, while informing on an annual basis and in the interim, when required, the competent control authorities. It also closely monitors the water availability level and implements responsible pumping with the main concern of avoiding salinization, in order to ensure that the Company's production rate is not affected, ensuring stable performance and workflow. In conclusion, the resilience of the Company's business model in dealing with financial risks related to water resources management is based on: a) the implementation of a strong central environmental Policy that allows it to effectively manage, anticipate and maintain low levels and, as far as possible, reduce the likelihood of incidents with a negative impact on water; ensuring its uninterrupted operation, b) the continuous assessment and monitoring of pumping and discharge levels, adapting its practices to face new risks or emerging threats, c) the flexibility it has for its immediate adaptation, through its specialized environmental administrative units, to new conditions or stricter regulations,

minimizing the financial impact, d) the continuous awareness of its staff, e) its commitment to upgrading its infrastructure and processes, incorporating innovative technologies and best practices and f) investing in insurance coverage.
[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

Greece
☑ Other, please specify :Sea Gulf of Antikyra

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply
☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:
☑ 1-25%

(3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:
☑ Less than 1%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

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.

Row 2

(3.2.1) Country/Area & River basin

Greece

☑ Other, please specify :Groundwater & Mornos River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.8) % organization’s annual electricity generation that could be affected by these facilities

Select from:

☑ Less than 1%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

Alumina and Aluminum 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 aluminum products according to the current pricing policy of EYDAP.
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

(3.3.1) Water-related regulatory violations

Select from:

☑ No

(3.3.3) Comment

In 2024, there were no reported incidents of non-compliance with permits, standards, and regulations regarding water. The company's discharged water quality readings are consistently lower than legally required limits.
[Fixed row]

(3.4) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation?

	Any penalties for violation of biodiversity-related regulation?	Comment
	Select from: ☑ No	*In 2024, there were no reported incidents of non-compliance with biodiversity-related regulation.*

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:
☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply
☑ EU ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

EU ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

62.4

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

12/31/2023

(3.5.2.4) Period end date

12/30/2024

(3.5.2.5) Allowances allocated

602053

(3.5.2.6) Allowances purchased

1188252

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

2472168

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

(3.5.2.10) Comment

62.4% refers to the percentage of Metlen Group's total Scope 1 emissions which are regulated by EU ETS.
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Metlen's strategy for complying with the EU Emissions Trading System (ETS) is multi-faceted, focusing on proactive decarbonization, risk management, and strategic investment. The company views the "cap and trade" mechanism as the most effective method for reducing emissions in industrialized economies, as it sets a clear environmental target while allowing the market to determine the price, ensuring economic efficiency. To address the significant price volatility of emission allowances, Metlen has established the following strategic pillars: 1. Financial Risk Management: The company employs hedging strategies to minimize the financial impact from the price volatility of CO_2 emissions rights. This is a crucial short-term measure to manage the operational costs associated with purchasing allowances, particularly for its thermal power plants, which have not received free allocations since 2013. 2. Decarbonization and Investment: Metlen is committed to a comprehensive decarbonization strategy across all business activities. This includes significant investments in emissions reduction initiatives such as: • The development of a large portfolio of Renewable Energy Sources (RES) to support the energy transition. • The application of advanced technologies and digital methods in aluminum production. • The electrification of the Metals Sectors, powered exclusively by RES. • The use of low-carbon fuels. • An increase in the production of secondary (recycled) aluminum. • Studying the application of carbon capture technologies. 3. Emissions Reduction Targets: The company has set ambitious targets to reduce its CO_2 emissions by 2030 and achieve climate neutrality by 2050. These targets guide its long-term strategy and investment decisions, ensuring alignment with the goals of the Paris Agreement. 4. Sustainable Business Development: Metlen is actively developing new business activities in sustainable projects, further integrating its environmental commitments into its core business model. This comprehensive strategy allows Metlen to not only comply with current regulations but also to anticipate future requirements and mitigate risks while capitalizing on opportunities in the low-carbon economy. In 2023, the emission allowances' price trend in the market has significantly been volatile, starting the year at 86.28 /ton CO2 and approaching the high price of 100.34 /ton CO2 towards the end of February and trading around 70 /ton by the end of the year

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☑ Yes, we have identified opportunities, and some/all are being realized

Water

(3.6.1) Environmental opportunities identified

Select from:

☑ Yes, we have identified opportunities, and some/all are being realized

Biodiversity

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Not an immediate strategic priority

(3.6.3) Please explain

The assessment of environmental opportunities regarding biodiversity will be highlighted through the TNFD study that Metlen plans to complete in the next few years. [Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Other products and services opportunity, please specify :Development and/or expansion of low emission goods and services.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.8) Organization specific description

As the world embraces the green transition and seeks sustainable solutions, Metlen, a diversified energy company, stands at the forefront of an exciting opportunity. By focusing on low-carbon products and offerings essential to the green transition, Metlen can significantly increase its sales share while contributing to global efforts to combat climate change. Metlen can expand its portfolio of renewable energy solutions, including solar power plants, wind farms, and energy storage systems. As the demand for clean energy grows, these offerings can gain traction and drive significant sales growth.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify :Increased sales share of low-carbon products or products necessary for the green transition.

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:
☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

Metlen has created new sub-sectors geared towards the dynamic development of international sustainable projects (M Renewables, M Power Projects). In the next decade, which will be crucial, the Company is expected to play a major role in energy transition and the reduction of greenhouse gas emissions worldwide, escalating its positive impact to become a global market leader in this field. Growing presence in recycled aluminium, aiming to increase output to c.65ktpa and achieving c.250ktpa total production aluminium capacity by the end of 2025. 25% reduction in electricity consumption per tonne. Long-term relationships with major European customers. Also, the ambition of Energy sector of Metlen is to become the catalyst for a low emissions electric power sector in Greece. In this context an ambitious and Energy sector specific target to reduce its relative emissions by approximately 50% per MWh generated by 2030 was set. To fulfil this target, the Company aims to install n additional 2.5GW of RES projects in Greece and abroad by 2030. Following the increasing demand in renewable energy, there is an opportunity in increasing the Company's revenues through this activity.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Other resource efficiency opportunity, please specify :Cost savings & community relations.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify :Sea Golf of Antikira

(3.6.1.8) Organization specific description

The power plants of Metlen 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 Metlen 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.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

No, we do not have this figure.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

No strategy available at the time being. We aim to develop it within 2 years.

Climate change

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets
☑ Other markets opportunity, please specify :Increased demand for aluminium as the main energy transition ingredient.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:
☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply
☑ Greece

(3.6.1.8) Organization specific description

Aluminum's lightweight properties make it a preferred material in electric vehicles (EVs) and aircraft, enhancing energy efficiency and reducing carbon emissions in the transportation sector. Aluminum is widely used in the construction of wind turbines and solar panels due to its corrosion resistance and durability, supporting the expansion of renewable energy generation. Aluminum plays a crucial role in advanced energy storage technologies, such as lithium-ion batteries and redox flow batteries, contributing to grid stability and the integration of intermittent renewable energy sources. Aluminum is utilized in energy-efficient building systems, including window frames and facades, enhancing insulation and reducing energy consumption in buildings.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

With the increasing demand for aluminum across multiple energy transition applications, Metlen is expanding its aluminum production capacity and supply the growing market. In 2019, we acquired the Greek recycling company, EP.AL.ME S.A. (“EPALME”), which enabled us to expand our recycled aluminium production and add incremental production capacity, which we are currently further expanding to reach our annual production capacity target of 250,000 tonnes by the end of 2021, of which approximately 26.0% will come from aluminium with a lower environmental footprint (at both our Aluminium of Greece and EPALME production facilities). Our expansion into recycled aluminium production, or “sustainable aluminium”, enables us to increase our capacity, better catering for our customers’ needs while reducing our overall energy consumption per tonne of aluminium produced by approximately 25.0% compared to the electrolysis process required to produce primary aluminium.

Climate change

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets
☑ Other markets opportunity, please specify :Major increase in electricity demand.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Greece

(3.6.1.8) Organization specific description

Metlen, a prominent energy company, finds itself presented with a significant opportunity - a major increase in electricity demand. The driving factors behind this surge in demand could be various, such as economic growth, industrial expansion, or a shift towards electrification in various sectors. As economies expand and industries flourish, the demand for electricity rises in tandem, providing Metlen with an ideal opportunity to meet the increasing energy requirements. A major increase in electricity demand can drive a higher adoption of renewable energy sources, providing Metlen an opportunity to expand its renewable energy portfolio.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not possible for now to estimate the anticipated effect of this opportunity as it is already encompassed within our overall business growth strategy budget.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No, we do not have this figure.

(3.6.1.26) Strategy to realize opportunity

Diversification of Energy Sources: Metlen is leveraging this opportunity to diversify its energy mix, incorporating both conventional and renewable energy sources to ensure a stable and sustainable supply. Capacity Expansion: To capitalize on the increased electricity demand, Metlen is investing in expanding its power generation capacity, ensuring it can meet the growing needs of customers and industries.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☑ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

1175926000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:
☑ 100%

(3.6.2.4) Explanation of financial figures

The financial figures are based on the EU Taxonomy Regulation as detailed in the 2024 Integrated Annual Report. The reported amount represents 21% of total turnover from products and services associated with economic activities that meet the Taxonomy's technical screening criteria for substantial contribution to climate change mitigation, ensuring compliance with minimum social safeguards.

Water

(3.6.2.1) Financial metric

Select from:
☑ Other, please specify :Metlen is currently in the process of estimation of the potential financial impact figure of the identified climate opportunities, under the CSRD implementation project.

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

No additional explanation.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The policy aims to apply diversity based on gender, age, experience, skills, and knowledge across the Board of Directors, executive management, and all employees. It mandates that the selection process for board members and senior executives must use merit-based and objective criteria, ensuring equal opportunities for all genders. The policy's scope covers the selection of board members and is considered when hiring senior executives and personnel at all other levels. The company aims to facilitate the broader participation of women and young people in its workforce and invests in developing managerial skills to handle a multicultural work

environment effectively. In 2024, the gender representation in the Board of the Directors stands at 31% women and 69% men, while among non-executive members, it is 44% women and 56% men.

(4.1.6) Attach the policy (optional)

diversity_policy_eng.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board chair

☑ Director on board

☑ Chief Executive Officer (CEO)

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board Terms of Reference

☑ Other policy applicable to the board, please specify :Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing and guiding the development of a business strategy
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Committee, supported by the Director of Sustainable Development, reviewed progress on key actions for aligning the Company with the Corporate Sustainability Reporting Directive (CSRD). This directive enhances transparency in sustainability disclosures. Completed actions include: • Training on ESRS standards • Consultation with Social Partners • Value Chain mapping for key sectors • Data collection and GAP analysis Ongoing work includes the Financial Materiality assessment (via ERM) and development of the Due Diligence Policy. The Committee also discussed the preparation of the Integrated Report, with Deloitte as external consultant, and reviewed ESG performance across the three pillars (Environmental, Social, Governance). The Committee held an in-depth discussion on the 2024 Stakeholder Consultation process and outcomes, and reviewed the Socioeconomic Impact Study, which evaluates the Company's contributions to GDP, employment, and tax revenue. The Director presented four digital platforms launched in 2024: Metlen-EnGage – ESG data collection and consolidation platform supporting CSRD compliance and LSE requirements Supplier Evaluation Platform – Developed with Procurement teams to assess ESG performance of Key Suppliers (2024 target: >68% coverage). While not mandatory, this supports supply chain ESG transparency. With support from the General Director of Corporate Governance & Sustainable Development, the Committee discussed 2024 ESG trends, including: a) Enhanced disclosure requirements from CSRD and IFRS standards b) Impacts from Directive (EU) 2024/1760 (CSDDD), which introduces corporate responsibility for supply chains. The Company is developing a central Due Diligence Policy in response. The Committee also reviewed the development of a Responsible Supply Chain, emphasizing integration of ESG criteria into procurement processes in collaboration with relevant departments and stakeholders. Guided by the Chief Officer for Corporate Governance & Sustainable Development, the Committee reviewed the Company's Sustainable Development Strategy. The strategy aims to create long-term value while advancing the UN Sustainable Development Goals. Core pillars—Climate Change, ESG Approach, and Corporate Responsibility—were evaluated for 2023, and key 2024 objectives were outlined. Further, the Committee discussed progress on climate targets, focusing on: • Scope 1 & 2 CO_2 reduction goals • Development of carbon reduction initiatives • Climate target review process, essential due to the Company's growth trajectory A detailed discussion was held on the draft 2023 Sustainable Development Report, covering: • The Business Model and Sustainability Strategy • Material ESG topics aligned with GRI Standards • Sustainability alignment tables The Committee approved the report. Finally, the Committee reviewed deviations between LSE requirements and TCFD, FCA LR 9.8, and LSE ESG indicators. It also reviewed and approved the results of the 2024 Impact Materiality.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply
☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding public policy engagement

☑ Monitoring compliance with corporate policies and/or commitments

☑ Reviewing and guiding innovation/R&D priorities

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

☑ Overseeing and guiding the development of a business strategy

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Committee, supported by the Director of Sustainable Development, reviewed progress on key actions for aligning the Company with the Corporate Sustainability Reporting Directive (CSRD). This directive enhances transparency in sustainability disclosures. Ongoing work includes the Financial Materiality assessment (via ERM) and development of the Due Diligence Policy. The Committee also discussed the preparation of the Integrated Report, with Deloitte as external consultant, and reviewed ESG performance across the three pillars (Environmental, Social, Governance). The Committee held an in-depth discussion on the 2024 Stakeholder Consultation process and outcomes, and reviewed the Socioeconomic Impact Study, which evaluates the Company's contributions to GDP, employment, and tax

revenue. The Director presented four digital platforms launched in 2024: Metlen-EnGage – ESG data collection and consolidation platform supporting CSRD compliance and LSE requirements Supplier Evaluation Platform – Developed with Procurement teams to assess ESG performance of Key Suppliers (2024 target: >68% coverage). While not mandatory, this supports supply chain ESG transparency. With support from the General Director of Corporate Governance & Sustainable Development, the Committee discussed 2024 ESG trends, including: a) Enhanced disclosure requirements from CSRD and IFRS standards b) Impacts from Directive (EU) 2024/1760 (CSDDD), which introduces corporate responsibility for supply chains. The Company is developing a central Due Diligence Policy in response. The Committee also reviewed the development of a Responsible Supply Chain, emphasizing integration of ESG criteria into procurement processes in collaboration with relevant departments and stakeholders. Guided by the Chief Officer for Corporate Governance & Sustainable Development, the Committee reviewed the Company's Sustainable Development Strategy. The strategy aims to create long-term value while advancing the UN Sustainable Development Goals. Core pillars—Climate Change, ESG Approach, and Corporate Responsibility—were evaluated for 2023, and key 2024 objectives were outlined. Further, the Committee discussed progress on climate targets, focusing on: • Scope 1 & 2 CO_2 reduction goals • Development of carbon reduction initiatives • Climate target review process, essential due to the Company's growth trajectory • Water management and targeting A detailed discussion was held on the draft 2023 Sustainable Development Report, covering: • The Business Model and Sustainability Strategy • Material ESG topics aligned with GRI Standards • Sustainability alignment tables The Committee approved the report. Finally, the Committee reviewed deviations between LSE requirements and TCFD, FCA LR 9.8, and LSE ESG indicators. It also reviewed and approved the results of the 2024 Impact Materiality.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Terms of Reference of the Sustainability Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding public policy engagement

☑ Overseeing and guiding the development of a business strategy

☑ Reviewing and guiding innovation/R&D priorities

(4.1.2.7) Please explain

The Committee, supported by the Director of Sustainable Development, reviewed progress on key actions for aligning the Company with the Corporate Sustainability Reporting Directive (CSRD). This directive enhances transparency in sustainability disclosures. Ongoing work includes the Financial Materiality assessment (via ERM) and development of the Due Diligence Policy. The Committee also discussed the preparation of the Integrated Report, with Deloitte as external consultant, and reviewed ESG performance across the three pillars (Environmental, Social, Governance). The Committee held an in-depth discussion on the 2024 Stakeholder Consultation process and outcomes, and reviewed the Socioeconomic Impact Study, which evaluates the Company's contributions to GDP, employment, and tax revenue. The Director presented four digital platforms launched in 2024: Metlen-EnGage – ESG data collection and consolidation platform supporting CSRD compliance and LSE requirements Supplier Evaluation Platform – Developed with Procurement teams to assess ESG performance of Key Suppliers (2024 target: >68% coverage). While not mandatory, this supports supply chain ESG transparency. With support from the General Director of Corporate Governance & Sustainable Development, the Committee discussed 2024 ESG trends, including: a) Enhanced disclosure requirements from CSRD and IFRS standards b) Impacts from Directive (EU) 2024/1760 (CSDDD), which introduces corporate responsibility for supply chains. The Company is developing a central Due Diligence Policy in response. The Committee also reviewed the development of a Responsible Supply Chain, emphasizing integration of ESG criteria into procurement processes in collaboration with relevant departments and stakeholders. Guided by the Chief Officer for Corporate Governance & Sustainable Development, the Committee reviewed the Company's Sustainable Development Strategy. The strategy aims to create long-term value while advancing the UN Sustainable Development Goals. Core pillars—Climate Change, ESG Approach, and Corporate Responsibility—were evaluated for 2023, and key 2024 objectives were outlined. Further, the Committee discussed progress on climate targets, focusing on: • Scope 1 & 2 CO_2 reduction goals • Development of carbon reduction initiatives • Climate target review process, essential due to the Company's growth trajectory • Water management and targeting A detailed discussion was held on the draft 2023 Sustainable Development Report, covering: • The Business Model and Sustainability Strategy • Material ESG topics aligned with GRI Standards • Sustainability alignment tables The Committee approved the report. Finally, the Committee reviewed deviations between LSE requirements and TCFD, FCA LR 9.8, and LSE ESG indicators. It also reviewed and approved the results of the 2024 Impact Materiality.
[Fixed row]

(4.2) Does your organization’s board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

☑ Active member of an environmental committee or organization

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

☑ Active member of an environmental committee or organization

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes

	Management-level responsibility for this environmental issue
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning
☑ Developing a business strategy which considers environmental issues
☑ Developing a climate transition plan
☑ Managing environmental reporting, audit, and verification processes
☑ Managing major capital and/or operational expenditures relating to environmental issues

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:
☑ More frequently than quarterly

(4.3.1.6) Please explain

Metlen has an integrated governance structure for environmental issues. The highest management level with responsibility is the Chairman & CEO. The CEO and Executive Management are accountable for the identification, assessment, and management of all enterprise risks, including environmental ones. They are supported by the Corporate Governance and Sustainable Development General Division, which coordinates the strategy and initiatives across all business sectors. This division reports to the Sustainability Committee of the Board of Directors. The Sustainability Committee, which, in 2024, conducted five meetings, oversees the implementation of the sustainable development strategy, monitors progress against targets, and reports to the full Board of Directors at least annually. The purpose of the Committee is to assist the Board 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, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG). The Audit Committee also has an oversight role concerning risk management and the integrity of sustainability reporting.

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Managing annual budgets related to environmental issues

☑ Managing environmental reporting, audit, and verification processes

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

Metlen has an integrated governance structure for environmental issues. The highest management level with responsibility is the Chairman & CEO. The CEO and Executive Management are accountable for the identification, assessment, and management of all enterprise risks, including environmental ones. They are supported by the Corporate Governance and Sustainable Development General Division, which coordinates the strategy and initiatives across all business sectors. This division reports to the Sustainability Committee of the Board of Directors. The Sustainability Committee, which, in 2024, conducted five meetings, oversees the implementation of the sustainable development strategy, monitors progress against targets, and reports to the full Board of Directors at least annually. The purpose of the Committee is to assist the Board 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, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG). The Audit Committee also has an oversight role concerning risk management and the integrity of sustainability reporting.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

Metlen has an integrated governance structure for environmental issues. The highest management level with responsibility is the Chairman & CEO. The CEO and Executive Management are accountable for the identification, assessment, and management of all enterprise risks, including environmental ones. They are supported by the Corporate Governance and Sustainable Development General Division, which coordinates the strategy and initiatives across all business sectors. This division reports to the Sustainability Committee of the Board of Directors. The Sustainability Committee, which, in 2024, conducted five meetings, oversees the implementation of the sustainable development strategy, monitors progress against targets, and reports to the full Board of Directors at least annually. The purpose of the Committee is to assist the Board 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, evaluated regularly on the basis of its results and its performance in Environmental, Social and Governance (ESG). The Audit Committee also has an oversight role concerning risk management and the integrity of sustainability reporting.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

2.64

(4.5.3) Please explain

The remuneration of the executive members of the Board of Directors is indirectly linked to the company's climate targets. A specific climate parameter, CO2 Emissions (scopes 1 & 2) / € million net profit, is used to calculate the variable remuneration for executive Board members. This parameter is part of the ESG KPIs that also apply to Senior Executive Management and aims to ensure that remuneration is linked to environmental performance.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

While water is a material topic for the company, there are currently no specific water-related performance indicators linked to the monetary incentive schemes for C-suite and board-level management.

Biodiversity

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

There are currently no specific biodiversity-related performance indicators linked to the monetary incentive schemes for C-suite and board-level management. [Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Board/Executive board

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Emission reduction

☑ Reduction in emissions intensity

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

At Metlen, the remuneration of the executive members of the Board of Directors is indirectly linked to the company's climate targets. A specific climate parameter, CO_2 Emissions (scopes 1 & 2) / € million net profit, is used to calculate the variable remuneration for executive Board members. This parameter is part of the ESG KPIs that also apply to Senior Executive Management. For the reporting year, the percentage of remuneration related to climate parameters is 2.64% of the total variable remuneration of the company's executive Board members.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The performance metric directly links executive remuneration to the company's efficiency in reducing CO_2 emissions in relation to its financial performance. This incentivizes management to prioritize and implement the company's decarbonization strategy, emissions reduction initiatives, and investments in low-carbon technologies, thereby driving progress towards the company's climate targets and transition plan.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:
☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(4.6.1.4) Explain the coverage

The Central Environmental Policy applies to all METLEN Sectors and Subsidiaries. Its main principles are also extended to suppliers and business partners through the "Suppliers and Business Partners Code of Conduct," ensuring comprehensive coverage across the value chain. The main points covered in the policy: - Compliance and Commitment - Environmental Management Systems - Climate Change - Sustainable Management of Natural Resources - Innovation and Training - Stakeholder Engagement - Policy Governance The policy emphasizes the company's commitment to environmental protection, sustainable management of natural resources, and continuous improvement of environmental performance

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to respect legally designated protected areas

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to avoidance of negative impacts on threatened and protected species

☑ Commitment to stakeholder engagement and capacity building on environmental issues

☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems

Climate-specific commitments

☑ Commitment to net-zero emissions

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution

☑ Commitment to reduce water consumption volumes

☑ Commitment to reduce water withdrawal volumes

Social commitments

☑ Commitment to respect internationally recognized human rights

Additional references/Descriptions

☑ Recognition of environmental linkages and trade-offs

☑ Description of environmental requirements for procurement

☑ Description of impacts on natural resources and ecosystems

☑ Acknowledgement of the human right to water and sanitation

☑ Reference to timebound environmental milestones and targets

☑ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with the Paris Agreement

☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

☑ Yes, in line with another global environmental treaty or policy goal, please specify :1) The Principles of the UN Global Compact, which include environmental practices and environmental protection. 2) The Sustainable Development Goals. 3) Carbon Reporting Initiative (CDP) 4) Standard ISO 14001

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

environmental-policy.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ Aluminum Stewardship Initiative (ASI)

☑ Task Force on Climate-related Financial Disclosures (TCFD)

☑ UN Global Compact

☑ Other, please specify :Eurometaux, European Aluminium, Hydrogen Europe, COGEN Europe, CSR HELLAS Network,SEV (Hellenic Federation of Enterprises), BusinessEurope, Hellenic Association of Independent Power Producers (HAIPP), Athens Stock Exchange (ATHEX) ESG Reporting Guide

(4.10.3) Describe your organization’s role within each framework or initiative

UN Global Compact: Metlen has been a signatory since 2008, committed to the ten principles and disclosing its performance annually. The Chair of the Board's Sustainability Committee was elected Chair of the Board of Directors of the UN Global Compact Network Greece in 2024, supporting the promotion of corporate sustainability and the 10 Principles at a national level. Aluminum Stewardship Initiative (ASI) [M-B only]: Metlen has been a Production & Manufacturing member since 2019. Its Metals Sector is certified against the ASI Performance Standard and the Chain of Custody Standard, demonstrating its commitment to responsible production, sourcing, and stewardship of aluminium. Task Force on Climate-related Financial Disclosures (TCFD): Metlen aligns its reporting with TCFD recommendations. The Board's Sustainability Committee oversees the alignment process, ensuring that climate-related risks and opportunities are integrated into the company's governance, strategy, and risk management. Moreover: • Eurometaux: Metlen plays a leadership role, with its Chairman and CEO serving as the President of this pan-European association. It represents the non-ferrous metals industry at the European level, advocating for resilient and ethical supply chains. • European Aluminium: As a participant, Metlen focuses on promoting the role of aluminium as an essential material for the green transition, vital for renewable energy, electric vehicles, and other sustainable technologies. • Hydrogen Europe: Metlen participates in this initiative to support the development and use of hydrogen as a key technology for decarbonizing the economy, with a particular focus on heavy industry. • COGEN Europe: As a participant, Metlen supports the initiative's goal of promoting high-efficiency cogeneration for the production of low-carbon electricity and heat in a sustainable manner. • CSR HELLAS Network: Metlen is a principal member since 2006, actively participating in and supporting the network's initiatives to promote and disseminate Corporate Social Responsibility principles and practices in Greece. • SEV (Hellenic Federation of Enterprises): As a founding member of the SEV Council for Sustainable Development, Metlen is fully committed to its Code of Principles and actively participates in initiatives to advance sustainable development. • BusinessEurope: Through its membership in SEV, Metlen is part of this initiative, which works to promote growth and competitiveness for European companies. • Hellenic Association of Independent Power Producers (HAIPP): Metlen has been a member since 2010, contributing to the promotion and management of issues related to the generation of reliable, cost-effective, and environmentally

friendly electricity. • Athens Stock Exchange (ATHEX) ESG Reporting Guide: Metlen participates in the ATHEX initiative for ESG disclosure and reports against its ESG Reporting Guide, aiming to improve transparency and promote sustainable entrepreneurship.
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

☑ Another global environmental treaty or policy goal, please specify :UN Global Compact, Sustainable Development Goals (7, 12, 13, 14, 15 & 17), Carbon Reporting Initiative (CDP), Standard ISO 14001

(4.11.4) Attach commitment or position statement

iar_2024_metlen_en.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☑ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

Metlen participates in European Aluminium - As a founding member of the Council of the Greek Federation of Enterprises (SEV) since 2008, Metlen is fully committed to the relevant Code of Principles and actively participates in its initiatives to promote and disseminate the principles of Sustainable Development. - Metlen participates in the Hydrogen Europe initiative. - In 2024, Metlen President and CEO Evangelos Mytilineos was re-elected President of the Pan-European Association Eurometaux.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Metlen ensures its external engagement activities are consistent with its environmental commitments through a structured governance process. The company's Regulatory Affairs Division, in close cooperation with the business Sectors, manages interactions with policymakers and participation in trade associations. This division's activities are guided by the company's Central Environmental Policy, which is approved by the Board's Sustainability Committee and explicitly aligns with the Paris Agreement and other global goals. The Corporate Governance and Sustainable Development General Division oversees the design and implementation of this policy. This integrated approach ensures that the positions advocated by Metlen are consistent with its board-approved sustainable development strategy, climate targets, and transition plan. Following the public announcement of our climate targets, our company has also committed to updating shareholders each year (at the General Assembly) about our progress towards achieving them. Our company's positions are based on decisions taken in the internal Committees (where the upper management participates), and all of our engagement activities must be consistent with the company's positions and targets, including the climate targets. All of our company's responses to European Commission consultations are publicly available on the Commission's portal for each consultation.
[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

European Union Emissions Trading System (EU ETS)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Emissions trading schemes

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Greece

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The effectiveness of the EU Emissions Trading Scheme (EU ETS) is limited by the fact that it applies only to production within European installations—specifically energy-intensive industries facing global competition. European companies must compete with counterparts in other regions that often use cheaper and far more polluting technologies without incurring carbon costs at the production level. This situation has contributed to carbon leakage, a significant issue in the aluminium sector. Carbon leakage occurs when production shifts from Europe to countries with less stringent climate policies, leading to higher global emissions. For example, the carbon footprint of producing primary aluminium in Europe is approximately three times lower than producing aluminium in China. Despite this, since 2008, the EU has lost over 50% of its primary aluminium production capacity, which has been replaced by more carbon-intensive production in countries like China, Indonesia, and India. This shift results in a substantial net increase in global emissions, undermining the climate objectives of the EU ETS. Therefore, any increase in the ambition of the EU ETS must be paired with truly effective measures to prevent carbon leakage, such as establishing a level playing field at the production cost level. Relying on import duties or border adjustments alone (e.g., the Carbon Border Adjustment Mechanism) is insufficient. Without such measures, tightening the EU ETS could inadvertently lead to increased global emissions, negating the scheme's climate rationale. Metlen supports the overall EU ETS framework but expresses concerns about the significant price volatility of emission allowances and the financial strain placed on energy-intensive industries. To maintain competitiveness, the company actively advocates for and benefits from state aid schemes that compensate for indirect emission costs which cannot be passed on to customers. Additionally, through its engagement with policymakers, Metlen promotes legislative improvements aimed at creating a stable and predictable regulatory environment that encourages long-term investments in decarbonization.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Our participation in the EU Emissions Trading System (EU ETS) is fundamental to achieving our environmental commitments, particularly our targets to reduce CO2 emissions by 30% by 2030 and reach net-zero by 2050. The EU ETS creates a financial incentive to minimize greenhouse gas emissions, driving investments in renewable energy, energy efficiency, and low-carbon technologies that form the core of our climate transition plan. Through active engagement with policymakers and industry stakeholders, we advocate for a regulatory framework that supports these investments, addresses financial risks such as carbon price volatility, and promotes mechanisms like state aid schemes to compensate for indirect emission costs. This engagement also ensures that emissions reductions align with local ecological priorities, including biodiversity conservation in key river basins, fostering stronger collaboration with communities and organizations. Success is measured by tracking emissions intensity reductions, securing emissions allowances, influencing legislation to include our positions, and establishing stable policy environments that enable sustainable growth and competitiveness. By integrating strategic climate action with local environmental goals, we aim to lead a responsible and resilient transition toward a low-carbon future.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Carbon Border Adjustment Mechanism (CBAM)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Carbon taxes

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Oppose

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The CBAM will increase the cost of producing aluminium in Europe by around 50%, and the CBAM tries to offset this cost increase by introducing a new duty at the border. Unfortunately no duty at the border will ever be able to offset such a large production cost increase, due to various inherent weaknesses (including the ample possibilities for circumvention, the lack of protection for European exports, and the inherent issue of cost absorption by third-country producers). The CBAM will therefore not result in the desired climate effect, a fact which is acknowledged also by the European Commission in its own impact assessment of the measure (as regards aluminium). In order to drive decarbonisation, we believe that Europe should do precisely the opposite, i.e. reducing the cost of low-carbon technologies by supporting investments to bring these technologies to the market, which will reduce their cost via economies of scale and learning.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Carbon Border Adjustment Mechanism (CBAM) is relevant to our environmental commitments as it significantly impacts the cost structure of aluminum production in Europe. We anticipate that the CBAM will increase production costs by approximately 50%, which poses a considerable challenge to our operations and undermines our transition plan. We believe that the inherent weaknesses of the CBAM, including circumvention opportunities and lack of protection for European exports, will prevent it from achieving its intended climate benefits. Our engagement focuses on advocating for policy reforms that promote investment in low-carbon technologies rather than imposing punitive measures. To gauge the success of our engagement, we will monitor changes in policy proposals and assess the inclusion of provisions that support low-carbon technology investments. Metrics will include tracking our advocacy outcomes, such as shifts in legislative support and collaborations with industry stakeholders to promote sustainable practices. Ultimately, we aim to foster a regulatory environment that encourages decarbonization through economic support rather than additional burdens.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Electricity market design

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Electricity grid access for renewables

☑ Green electricity tariffs/renewable energy PPAs

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Our company broadly supports the Commission’s proposals for the reform of the electricity market design, although some improvements can still be made. Regulatory certainty and stability with regard to the market design are necessary in order to stimulate the required new investments in renewables and other forms of generation capacity. More can be done to facilitate RES PPAs for electro-intensive consumers, especially by introducing tools to deal with shaping and firming risks.

Our company has developed a pioneering scheme (the Green Pool) which is endorsed by significant EU industrial associations and has been submitted to the EC (DG COMP) for approval; the aim is to facilitate (through mitigation of the shaping risk/cost) corporate RES PPAs for the decarbonization of the electricity supply of electro-intensive industries while contributing to the massive deployment of new RES in Europe.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The reform of the electricity market design is crucial to our environmental commitments and transition plan, as it aims to create a stable and predictable regulatory environment that fosters investment in renewable energy sources (RES) and diversified generation capacity. We believe that these reforms will enable us to reduce our carbon footprint and enhance our operational efficiency. While we support the Commission's proposals, we recognize that improvements are needed, particularly in facilitating corporate RES Power Purchase Agreements (PPAs) for energy-intensive industries. Our engagement focuses on advocating for regulatory mechanisms that address shaping and firming risks, which are barriers to the adoption of RES PPAs. Through our pioneering initiative, the Green Pool, we aim to mitigate these risks and facilitate corporate partnerships in RES. This initiative is supported by significant EU industrial associations and has been submitted for approval to the European Commission (DG COMP). By engaging with policymakers, we intend to influence the final design of electricity market reforms to better accommodate the needs of electro-intensive consumers. To measure the success of our engagement, we will track the approval and implementation of our Green Pool initiative, monitor the adoption rate of corporate RES PPAs among our peers, and evaluate the regulatory changes that support these arrangements. Metrics for success will include the number of partnerships established through the Green Pool, the volume of renewable energy procured, and the overall increase in renewable energy capacity deployed in Europe. By achieving these outcomes, we aim to contribute significantly to decarbonization efforts while enhancing the resilience and sustainability of the electricity market.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 4

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Critical Raw Materials Act

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other

☑ Other, please specify :Low-carbon products and services

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Critical Raw Materials Act (CRMA) is integral to our environmental commitments and transition plan, particularly following the addition of aluminum to the list of critical raw materials in July 2023. This inclusion underscores the importance of aluminum in the transition to a green economy and positions our company to capitalize on new opportunities while ensuring sustainable practices in sourcing and production. We anticipate that the CRMA will positively impact our organization by facilitating access to essential materials needed for the production of low-carbon technologies. This policy also drives innovation in recycling and circular economy initiatives, aligning with our commitment to sustainability. However, we remain cautious about potential regulatory burdens and market fluctuations resulting from heightened demand. Our engagement with stakeholders, including policymakers and industry groups, focuses on advocating for balanced regulatory frameworks that support sustainable sourcing and recycling of aluminum. By participating in consultations and contributing to discussions on implementation strategies, we aim to influence the CRMA's execution in ways that enhance resource efficiency and minimize environmental impacts. Success metrics for our engagement will include tracking our compliance with CRMA requirements, monitoring the development of new sustainable sourcing partnerships, and assessing progress in increasing the recycling rates of aluminum. Additionally, we will evaluate the growth of the market for secondary aluminum and measure our contribution to reducing the carbon footprint of aluminum production. By achieving these outcomes, we strive to ensure that our operations align with the goals of the CRMA while reinforcing our commitment to environmental stewardship.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply
☑ Another global environmental treaty or policy goal, please specify :Critical Raw Materials Act (CRMA)

Row 5

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Energy Efficiency Directive

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply
☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other
☑ Other, please specify :Energy efficiency requirements

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:
☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Our company fully supports the need for ambitious energy efficiency targets, which can play an important role in achieving our climate targets while also reducing costs (energy efficiency reduces the need to purchase input fuels/electricity). However, energy efficiency cannot be mistaken (as is the case in EU law) with demand reduction, but must truly aim at improving the energy intensity of all processes at all levels. This way, energy efficiency becomes the right metric for combining growth and climate ambition, whereas in the alternative (as applied today in the EU) the targets can be met (and often are) through demand destruction. High-efficiency cogeneration (the most efficient method for producing electricity and heat) should be supported. Primary energy savings are typically overlooked.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Energy Efficiency Directive (EED) is crucial for achieving our environmental commitments and transition plan, as it sets ambitious energy efficiency targets that directly contribute to our climate goals. By reducing energy consumption, we can lower costs associated with input fuels and electricity, aligning with our commitment

to sustainability and operational efficiency. We anticipate that the EED will positively impact our organization by incentivizing improvements in energy intensity across all processes, thereby enhancing our competitive advantage. However, we caution against conflating energy efficiency with mere demand reduction, as achieving targets through demand destruction does not foster genuine sustainability or growth. Our engagement strategy involves collaborating with policymakers, industry stakeholders, and regulatory bodies to advocate for clear definitions and metrics that differentiate true energy efficiency improvements from simple demand reduction. By participating in discussions around the EED, we aim to influence the development of standards that prioritize high-efficiency cogeneration and recognize the significance of primary energy savings. To measure the success of our engagement, we will track our compliance with EED targets, monitor our energy intensity metrics, and assess the implementation of high-efficiency cogeneration technologies in our operations. Additionally, we will evaluate the financial savings generated through enhanced energy efficiency and the overall reduction in our carbon footprint. By achieving these outcomes, we aim to demonstrate that energy efficiency is a vital component of sustainable growth, reinforcing our commitment to climate action while ensuring long-term operational resilience.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 6

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Renewable Energy Directive

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Renewable energy generation

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Our company fully supports the need to invest in more renewables as a key way to achieve our climate targets. However the introduction of over-increasing volumes of renewables into our electricity system needs to be managed in a way that does not jeopardize our security of supply, it is done in the most balanced/technology neutral and cost-effective way.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Renewable Energy Directive (RED) is integral to our environmental commitments and transition plan, as it outlines the framework for increasing the share of renewable energy in our energy mix. Our company fully supports investing in renewables to meet our climate targets, recognizing their critical role in decarbonizing our operations and the broader economy. However, we are concerned that excessive volumes of renewables must be integrated into the electricity system without compromising supply security. Therefore, our engagement strategy emphasizes the need for a balanced, technology-neutral approach to renewable energy deployment that prioritizes cost-effectiveness and stability. This involves advocating for policies that support diverse energy sources, including traditional generation methods, to ensure a reliable and resilient energy supply. To measure the success of our engagement with RED, we will monitor key performance indicators, including the proportion of renewable energy sources in our operational energy mix, compliance with RED targets, and the reliability of our energy supply. We will also track the implementation of technology-neutral policies that facilitate the sustainable integration of renewables without jeopardizing security. Our engagement is particularly vital in regions where renewable energy deployment may strain existing infrastructure or create supply challenges. By focusing on these priority locations, we aim to ensure that our commitments to renewable energy contribute positively to both environmental sustainability and energy reliability. Achieving these outcomes will reinforce our leadership in promoting a balanced approach to renewable energy and further our long-term climate goals.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 7

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Temporary Crisis and Transition Framework (TCTF)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Carbon taxes

☑ Subsidies for low-carbon, non-renewable energy projects

☑ Subsidies for renewable energy projects

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Subsidies are -unfortunately still- a crucial enabler for more RES in the system. However, subsidies should be well-targeted and should be kept to the minimum level required, in order to avoid excessive costs for consumers. Finally, RES support schemes should be adjusted in order to place a greater emphasis on the cost-competitive consumption of renewable energy (currently, support schemes are focused exclusively on the generation side, without helping end users to consume this

energy). Finally, the conditions under which energy-intensive consumers can access aid under the TCTF must be improved, as the current rules are unjustifiably restrictive.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Temporary Crisis and Transition Framework (TCTF) plays a vital role in aligning our environmental commitments and transition plan with the broader EU strategy for enhancing renewable energy systems (RES). Given our commitment to decarbonization, we recognize that well-targeted subsidies are crucial for facilitating the integration of more RES into the energy landscape. However, we advocate for these subsidies to be kept to a minimum level necessary to avoid imposing excessive costs on consumers. Our engagement with TCTF is focused on promoting policies that emphasize not only the generation of renewable energy but also the cost-competitive consumption of that energy by end users. Current support schemes predominantly target production; hence, we believe that adjustments should be made to encourage the uptake of renewable energy consumption, ensuring that consumers can benefit from the transition without incurring additional financial burdens. Moreover, it is imperative to improve the conditions under which energy-intensive consumers can access aid under the TCTF. The existing rules are overly restrictive and do not adequately support sectors heavily reliant on energy inputs. By advocating for more flexible access to financial support, we aim to enhance the competitiveness of our operations while promoting sustainable practices. To measure the success of our engagement with the TCTF, we will track several metrics, including the proportion of subsidies allocated to cost-competitive consumption initiatives, the reduction in energy costs for end users, and the accessibility of aid for energy-intensive industries. Additionally, we will assess the impact of these changes on our operational costs and overall energy consumption patterns. Our engagement is particularly crucial in regions with high energy demand and significant renewable energy potential, where we can drive meaningful change. By achieving our desired outcomes, we aim to reinforce our leadership in promoting a sustainable energy transition while ensuring that consumers benefit from this transformation.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 8

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Sustainable Finance Taxonomy

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply
☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)
☑ Sustainable finance

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:
☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

The Taxonomy can play an important role in channelling finance towards sustainable investments. However, the current Taxonomy provisions (for both industry and energy) are far too restrictive, and effectively discriminate against investments that can play a crucial role in reducing carbon emissions. Certain thresholds are completely out of touch with technology availability in specific sectors and exclusively driven by political ambition. Such exercise should absolutely rely on scientifically verified data, including as regards the TRL of decarbonization solutions.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Regular meetings

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Sustainable Finance Taxonomy is integral to achieving our environmental commitments and transition plan by directing capital towards sustainable investments. We acknowledge its potential to mobilize finance for projects that reduce carbon emissions. However, the current provisions are overly restrictive and, in some cases, discriminatory against certain investments that are essential for meaningful decarbonization. Our engagement with the Taxonomy aims to influence the criteria to ensure they are aligned with technological realities and scientific data rather than solely political ambitions. We advocate for thresholds that accurately reflect the available technology readiness levels (TRL) for decarbonization solutions, which would promote more inclusive investment opportunities across various sectors. The anticipated positive impacts of a more flexible Taxonomy would enable greater access to financing for projects that contribute significantly to carbon reduction,

facilitating the transition to a low-carbon economy. Conversely, maintaining the current restrictive framework may hinder our ability to invest in innovative technologies necessary for achieving our sustainability goals. We prioritize engagement in regions and sectors where sustainable finance can drive substantial improvements in environmental outcomes. By collaborating with stakeholders, we aim to refine the Taxonomy's criteria to better reflect the capabilities of emerging technologies and provide a more robust framework for sustainable investments. To measure the success of our engagement, we will track the number of investments made under the revised Taxonomy provisions, the amount of capital directed towards projects meeting the updated criteria, and the overall impact of these investments on carbon emissions reduction. Additionally, we will monitor the alignment of the Taxonomy with scientific data and TRL benchmarks. By achieving these outcomes, we can enhance our sustainability profile while contributing to the broader goals of climate mitigation and responsible investment.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Eurometaux

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

☑ Water

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Eurometaux notes that the climate transition will require large volumes of metals in order to produce the low-carbon technologies needed to reduce emissions (RES units, batteries, electric vehicles etc). European production of non-ferrous metals is the most sustainable in the world, with a carbon footprint that is already 50% lower than the global average, and should therefore be supported during the transition. Eurometaux calls for strong carbon leakage protection in order to preserve a level playing field with competitors operating in regions with lower climate ambitions. They have raised concerns about the Carbon Border Adjustment Mechanism's effectiveness for the metals sector.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

60000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 2

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe
☑ Other trade association in Europe, please specify :European Aluminium

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

European Aluminium supports the EU's target to reach net zero by 2050 and highlights the essential role of aluminium in the low-carbon transition, as a raw material that is necessary to produce clean technologies while also being infinitely recyclable. European Aluminium is a member of Eurometaux, and therefore there are similarities between their positions, with European Aluminium focusing specifically on aluminium (as opposed to all non-ferrous metals). European Aluminium calls for strong carbon leakage protection in order to preserve a level playing field for European aluminium producers during the transition. They also call for measures to help aluminium smelters switch to renewable electricity.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

50000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding from our membership in European Aluminium is dedicated to advancing sustainable practices and policies within the aluminum sector. This financial commitment enables us to participate in initiatives that promote innovation, energy efficiency, and circular economy principles. By collaborating with industry stakeholders, we aim to influence key policies, laws, and regulations that govern environmental standards and practices. Our involvement helps to advocate for supportive regulatory frameworks that encourage low-carbon technologies and responsible sourcing, while addressing challenges related to resource management and emissions reduction. This engagement not only aligns with our environmental commitments but also fosters a more sustainable and competitive aluminum industry in Europe.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Hydrogen Europe

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Hydrogen Europe advocates for hydrogen as a central enabler of a zero-emission society and EU climate neutrality by 2050. They stress that hydrogen can play an important role in decarbonising our economy, especially for the decarbonization of heavy industry. Our company agrees that renewable and/or low-carbon hydrogen will likely be necessary in order to reach net zero, but highlights the challenging economics of hydrogen investments and the fact that there are often more efficient alternatives. Our company is less active in Hydrogen Europe than in other associations (less participation in internal meetings etc).

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

18000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 4

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe
☑ BusinessEurope

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply
☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

BusinessEurope supports the need for European business to transition in line with the European/global climate targets. This transition will require large investments in low carbon technologies, and therefore the climate transition must be designed in a way that supports European businesses to make these investments and preserves the competitiveness of the European economy (otherwise, the transition will not be possible; in terms of climate impact, it will actually produce the opposite effect through investment and carbon leakage).

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

30000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 5

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :COGEN Europe

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

COGEN Europe highlights the crucial importance of energy efficiency in order to minimize the energy needed to power our society, thereby also minimizing emissions. COGEN emphasizes that cogeneration is the most efficient way to produce electricity and heat and advocates for measures that support the deployment and use of cogeneration technologies.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

9000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 6

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :Eurogas

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Eurogas supports the EU's climate neutrality objective by 2050 and the Paris Agreement. Eurogas notes that it is not possible to electrify every end-use of energy and therefore gases will also be necessary in order to reach net zero. Eurogas promotes policies that support the production and deployment of low-carbon gases, as well

as the use of natural gas where this is needed as a transition fuel. They also highlight security of supply, affordability, and competitiveness as equally important pillars of the energy transition.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

10000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 7

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ SolarPower Europe

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

SolarPower Europe advocates for a climate-neutral EU energy system, ideally 100% renewable well before 2050, with solar at the core. Their work emphasises rapid electrification supported by system flexibility (notably batteries and demand-side response) and calls for EU-level planning and targets for flexibility and storage.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

35000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 8

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify: RE-Source Platform

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The RE-Source Platform is a platform for connecting buyers and sellers of renewable energy. It organizes a large event in Amsterdam every year in order to discuss the latest trends in renewable energy procurement. RE-Source is also active in EU policy advocacy, promoting policies that help energy consumers switch to a renewable energy supply, with a big focus on Renewable Power Purchase Agreements (RES PPAs) as a key tool for achieving this.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

60000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The role of our funding is to allow us to participate in the internal discussions and to contribute to the development of the association's positions with our input

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement
[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:
☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:
☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply
☑ ESRS
☑ GRI
☑ Other, please specify :SASB

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Water pollution indicators

☑ Content of environmental policies

☑ Value chain engagement

☑ Dependencies & Impacts

☑ Biodiversity indicators

☑ Public policy engagement

☑ Water accounting figures

(4.12.1.6) Page/section reference

Kindly review the Environmental section of the attached Integrated Annual Report, pages118-172.

(4.12.1.7) Attach the relevant publication

iar_2024_metlen_en.pdf

(4.12.1.8) Comment

For more info see the attached file.

Row 2

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Governance

☑ Risks & Opportunities

☑ Strategy

☑ Emissions figures

☑ Emission targets

(4.12.1.6) Page/section reference

Kindly review the TCFD report as analyzed below: - Introduction: p. 3 - Governance: p. 4 - Strategy: p. 6 - Risk Management: p. 17 - Metrics and Targets: p. 22

(4.12.1.7) Attach the relevant publication

tcfd_report_en.pdf

(4.12.1.8) Comment

https://www.metlengroup.com/media/kxlhgvol/tcfd_report_en.pdf
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:

☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☑ No, but we plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

The company proactively identifies and manages water-related risks, including groundwater salinization, through its established risk assessment procedures and environmental management systems. However, it has not yet prioritized a formal, dedicated scenario analysis focused exclusively on water-related outcomes. This is

because the company's primary emphasis for scenario analysis remains on climate-related transition and physical risks, which are currently deemed to have a more significant financial impact.
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios
☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:
☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:
☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply
☑ Policy
☑ Market
☑ Reputation
☑ Technology
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Net Zero Emissions by 2050 Scenario (NZE) is a normative IEA scenario that shows a pathway for the global energy sector to achieve net zero CO2 emissions by 2050, with advanced economies reaching net zero emissions in advance of others. This scenario also meets key energy-related United Nations Sustainable Development Goals (SDGs), in particular by achieving universal energy access by 2030 and major improvements in air quality. It is consistent with limiting the global temperature rise to 1.5 °C with no or limited temperature overshoot.

(5.1.1.11) Rationale for choice of scenario

Our company chose the IEA NZE 2050 scenario because it aligns with global climate goals, providing a clear pathway to limit global warming to 1.5°C. This scenario reflects the ambition required to achieve net-zero emissions by 2050, making it a relevant framework for shaping our long-term decarbonization strategy, identifying risks and opportunities in the transition, and aligning with investor expectations for sustainable development.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6ºC - 1.9ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Strong Policies Scenario (Net-Zero): The net-zero emissions scenario incorporates strong climate mitigation policies and indicates a pathway where carbon concentrations will evolve in such a way to enable the global energy sector to achieve net-zero CO2 emissions by 2050. It goes hand in hand with limiting global warming to 1.5°C by the end of this century with no overshoot or limited overshoot of the warming goals. The climate data used for the quantitative analysis of risks and opportunities are those derived from scenarios developed under RCP2.6. Key potential risks for the activity Metlen under this scenario: Transition Risks: - Increased emission allowances prices continue to be a potential very high risk for both of the Company's main Sectors. In this scenario, the cost increase based on the projected CO_2 emissions of each Sector is shown to be well above the existing policies scenario. - Increased electricity and natural gas prices continue to be a very high potential risk of increased operating costs in Metallurgy. - The need for increased investment in the transition to low-carbon technologies in the production of primary aluminium is likely to increase as the requirements in this scenario are maximized. - In this scenario, increased electricity and natural gas sales prices due to climate change mitigation policies are higher, therefore further reduced demand is expected, which may entail a very high risk for the Energy Sector, mainly with regard to natural gas, with greater potential revenue losses.

(5.1.1.11) Rationale for choice of scenario

Our company selected the RCP 2.6 scenario because it represents a pathway that limits global warming to below 1.5°C by the end of the century, in line with international climate goals. This scenario aligns with our environmental commitments and provides a basis for understanding the risks and opportunities associated with climate change mitigation. It helps us assess how ambitious emissions reductions can impact our operations and long-term sustainability strategy.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Chronic physical

☑ Technology

☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Current/Existing Policies Scenario: This is an intermediate scenario, which assumes a market-driven transition to a lower-carbon future, in line with the Paris Agreement. Climate mitigation policies are stronger than in the previous scenario and lead to increases in the average global temperature between 2°C and 3°C at the end of the century. The climate data used for the quantitative analysis of risks and opportunities are those derived from scenarios developed under RCP4.5. Key potential risks for the activity of Metlen under this scenario: Physical Risks: - Rising average temperatures and heat waves may affect the efficiency of the company's thermal units. This risk continues to exist, but to a lesser extent, since, under this scenario, the cost is lower than in the weak policies scenario due to climate change limitation and therefore lower impact on the efficiency of thermal plants. Transition Risks: - Under this scenario, increased prices of CO2 emission allowances constitute a high potential risk for the Metals and Energy Sectors as they may lead to a further increase in the cost of purchasing allowances. - Increased electricity and natural gas prices are a very high potential risk of increased operating costs for Metallurgy in this scenario as well, based on the projected electricity and natural

gas consumption. - Increased electricity and natural gas sales prices due to the implementation of climate change mitigation policies to tackle climate change, are a potential high risk for Energy. It relates to the likelihood of reduced demand and, consequently, possible revenue losses. - Transition to low-carbon technologies in the production of primary aluminium. The prospect of reducing emissions creates the need for increased medium- and long-term investments in this direction in Metallurgy.

(5.1.1.11) Rationale for choice of scenario

Our company chose the RCP 4.5 scenario because it represents a moderate climate pathway where global temperatures stabilize by the end of the century. This scenario is aligned with policies that aim for balanced emissions reduction efforts without aggressive mitigation. It allows us to assess the potential impacts of moderate climate policies on our business operations, including physical and transition risks, while supporting long-term resilience planning.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy
☑ Market
☑ Reputation
☑ Technology
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 3.0ºC - 3.4ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Global regulation
☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Weak Policies Scenario: This scenario assumes a world where actions to mitigate climate change are delayed. Subsequently, greenhouse gas emissions continue to rise in the 21st century and the average global temperature rises above 3°C at the end of the century. Climate-related risks and opportunities are mainly linked to natural impacts as both chronic and acute climate change effects are considerable. To perform the quantitative analysis of these risks and opportunities, climate and economic data included in scenarios developed under RCP8.5 were used. Key potential risks for the activity of Metlen under this scenario: Physical Risks: - Rising average temperatures and heat waves may affect the efficiency of the company's thermal plants. This is a high risk for the Energy Sector since it can lead to reduced production and revenues. Transition Risks: - Emission allowance prices are a very high potential risk in the Energy activities and a high potential risk in the Metallurgy activities, in both cases related with increased allowance purchase costs. - Increased electricity and natural gas prices that may result from the choice of specific climate mitigation solutions are a very high risk for Metallurgy that increase the energy cost of production processes.

(5.1.1.11) Rationale for choice of scenario

Our company chose the RCP 8.5 scenario because it represents a high-emission, worst-case pathway where little to no climate mitigation takes place. This scenario allows us to understand the potential impacts of severe climate change on our operations, including extreme weather events and physical risks. By evaluating this scenario, we can assess the resilience of our business in the face of high-stress climate conditions and plan for risk mitigation accordingly.
[Add row]

(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

The scenario analysis performed by the company, following TCFD recommendations, evaluates three main climate futures: the weak policies scenario (RCP 8.5), current policies scenario (RCP 4.5), and strong policies scenario (RCP 2.6). The analysis revealed key risks and opportunities across our business sectors (Energy and Metals) and provided insight into how these scenarios could impact our strategy and operations until 2030. Outcomes: In the weak policies scenario (RCP 8.5), greenhouse gas emissions continue to rise in the 21st century and the average global temperature rises above 3.5°C at the end of the century. Climate risks and opportunities are mainly related to natural impacts as both chronic and acute climate change effects are considerable. This poses high risks, such as reduced efficiency of our thermal plants due to rising temperatures, increased costs for emission allowances, and elevated electricity and gas prices. The most significant physical risks include rising average temperatures and heat waves, which can impact both our infrastructure and workforce productivity. Under the current policies scenario (RCP 4.5), the increase in temperature is limited to 2°C-3°C, but the risks persist, including rising electricity and gas prices, which continue to impact the Energy and Metals sectors. Emission allowance prices also remain a high risk, impacting our operating costs and competitiveness. In the strong policies scenario (RCP 2.6), designed to align with net zero by 2050, the greatest risks arise from high carbon prices and the potential for further reductions in demand for our natural gas-based products due to shifts in market preferences toward renewables. Despite these risks, the scenario highlights opportunities for our business, such as investment in renewables, battery storage, and increasing the use of recycled aluminum. These align with our broader environmental commitments. Environmental Implications: Our scenario analysis underscores key environmental implications essential to meeting long-term decarbonization goals. Central to this is a strategic shift toward renewable energy, improved production efficiency, and the integration of low-carbon technologies. Beyond carbon reduction, we rigorously evaluate impacts on biodiversity, water resources, and land use, embedding resource efficiency and minimizing our footprint in ecologically sensitive areas into our core strategy. To ensure resilience, we continuously refine our approach based on evolving scenario insights, align closely with emerging environmental regulations, and prioritize increased investment in green technologies. This proactive stance strengthens our ability to reduce emissions, safeguard natural resources, and meaningfully contribute to global climate action.
[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:
☑ Yes, but we have a climate transition plan with a different temperature alignment

(5.2.2) Temperature alignment of transition plan

Select from:
☑ Well-below 2°C aligned

(5.2.3) Publicly available climate transition plan

Select from:

☑ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:

☑ No, and we do not plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Metlen Energy & Metals adopts a strategic, balanced approach to the energy transition, prioritizing both the reduction of carbon emissions and the maintenance of reliable, competitive energy supply. We recognize the urgent global need to reduce fossil fuel dependence, yet our current operations focus on ensuring energy security for the industries and communities we serve—particularly in regions where renewable infrastructure is still developing. Our transition strategy is built on a gradual shift from fossil fuels toward low-carbon and renewable energy sources. While we are significantly increasing investments in renewables, energy storage, and decarbonization technologies, an immediate phase-out of fossil fuels is not feasible due to the energy-intensive nature of our metallurgical processes—such as aluminum production—which currently rely on natural gas and other fossil fuels because of technological and economic constraints around full electrification. To reduce our carbon footprint, we are actively improving energy efficiency and integrating low-carbon technologies within our fossil fuel operations. Concurrently, we are expanding our renewable energy portfolio, including investments in wind, solar, and energy storage projects, aiming to progressively increase the share of clean energy in our overall energy mix. This balanced approach ensures continued energy security while advancing emission reduction. In addition, Metlen actively mitigates climate-related risks through participation in carbon pricing mechanisms such as the EU Emissions Trading System (EU-ETS), which incentivizes continuous emissions reduction. We are also investing in emerging technologies like green hydrogen, which hold long-term potential to further reduce fossil fuel reliance. In summary, while Metlen Energy & Metals does not currently commit to an immediate cessation of fossil fuel activities, our evolving investments in renewable energy, carbon reduction technologies, and efficiency enhancements underscore our commitment to a pragmatic and sustainable energy transition aligned with global climate goals.

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ We do not have a feedback mechanism in place, and we do not plan to introduce one within the next two years

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

The transition plan assumes a gradual shift toward a low-carbon economy driven by changes in market structures, evolving consumer preferences, stricter environmental regulations, and increased investments in clean technologies. Key dependencies include: Macroeconomic Trends: Capital reallocation from high-emission sectors to green energy, supported by environmental taxes and regulatory frameworks. Short-term disruption is expected in fossil-fuel-dependent industries, with long-term economic benefits. Energy Mix and Consumption: A growing share of renewables in the global energy mix, driven by policy, infrastructure development, and consumer demand for energy-efficient products. Electric vehicle adoption and decentralized energy systems will further reduce fossil fuel reliance. Technological Development: Adoption of low-emission technologies (e.g., energy storage, CCS, smart grids) is critical. Transition speed depends on government incentives, R&D investment, and consumer acceptance. Resilience Analysis: METLEN incorporates climate scenario-based analysis to assess value chain vulnerabilities, covering both upstream supply risks and downstream consumer impacts.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

In the current reporting period, our progress against the transition plan showed mixed results, with a 17% increase in Scope 1 and 2 CO2 emissions from 2023 to 2024. This rise reflects both operational changes and external factors that impacted our overall emissions performance. Scope 1 Emissions: The increase in Scope 1 emissions is primarily attributed to the commissioning of our new Combined Cycle Gas Turbine (CCGT) power plant with a capacity of 826 MW, which began operations in 2023. While this modern plant contributes to improved energy efficiency and the flexibility of our energy mix, its start-up has temporarily increased direct emissions as it integrates into our broader energy system. Despite this increase, the plant is expected to play a key role in supporting the transition to lower-carbon energy, as it operates more efficiently compared to older fossil fuel technologies and can act as a balancing power source for renewable energy. Scope 2 Emissions: In 2024, the Company recorded a ~32% reduction in its indirect emissions (scope 2), despite the constant amount of electricity purchased for consumption, compared to 2023. This reduction was achieved through the purchase of Guarantees of Origin (GOs) and the utilization of the mix factor of METLEN (Protergia), which is the main electricity provider of the Company's units. The reduction of the footprint of these emissions was achieved through the purchase of guarantees of origin for part of the electricity used, ensuring that a proportion of it came from renewable sources. While we acknowledge a temporary increase in Scope 1 emissions associated with the start-up phase of our new Combined Cycle Gas Turbine (CCGT) plant, we remain fully committed to our long-term decarbonization strategy focused on reducing carbon intensity and enhancing energy efficiency across all operations. The CCGT plant will ultimately support greater integration of renewable energy, reduce reliance on less efficient power generation, and contribute to improved grid stability. To mitigate the impact of grid-related emissions, we are actively increasing our procurement of renewable energy and exploring Power Purchase Agreements (PPAs) to further reduce our Scope 2 emissions. Continued investment in clean technologies and ongoing optimization of energy consumption are central to achieving our ambitious decarbonization targets. The 2024 Scope 1 emissions increase underscores the critical nature of the strategic investments and decisions we are making today to secure a more sustainable, low-carbon future. By adhering to our transition plan, we anticipate meaningful emissions reductions in the near term as renewable energy integration and efficiency initiatives take greater effect throughout our operations.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

iar_2024_metlen_en.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☑ No other environmental issue considered

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ Other, please specify :Technological and market limitations in Energy and Metals Sectors.

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

Our organization does not currently have a climate transition plan that fully aligns with a 1.5°C world, though our existing targets are aligned with the well-below 2°C scenario. While we recognize the importance of global efforts to limit warming to 1.5°C, achieving this target presents significant challenges due to the nature of our energy-intensive operations and the current technological and market limitations in our sector. Decarbonizing key areas such as aluminum production and natural gas-based power generation requires the availability of advanced technologies like green hydrogen, carbon capture and storage (CCS), use of heat pumps and large-scale electrification. At present, these technologies are either not commercially scalable or are in early development phases, making it difficult for us to commit to a 1.5°C pathway without jeopardizing our operational efficiency and financial performance. In several regions where we operate, current regulatory and energy market frameworks do not yet facilitate a full transition to renewable energy. These energy grids remain largely dependent on carbon-intensive sources, and the infrastructure required to support greater renewable integration is still underdeveloped. Such external constraints limit the pace at which we can decarbonize, making alignment with a 1.5°C pathway challenging at present. Nevertheless, our sustainability commitments are reflected in targets aligned with the well-below 2°C scenario of the Paris Agreement. We are actively progressing by investing significantly in renewable energy, enhancing energy efficiency, and advancing research and development in low-carbon technologies. While we have not yet fully aligned with a 1.5°C pathway, we continuously monitor technological innovations and evolving market conditions to identify opportunities for deeper emissions reductions. In summary, although our current transition plan is consistent with the well-below 2°C target, we remain committed to increasing our ambition over time. As new technologies mature and market frameworks evolve, we will adapt our strategy to support global efforts to limit warming to 1.5°C wherever feasible.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our products and services have been drastically modified and enhanced within the last 5 years, after embracing and acting upon the climate-related risks and opportunities. Major or minor adjustments have been effectuated in our Sectors and subsidiaries in order to form an organization that is centered around sustainability. In Energy Sector we have proceeded to the following transitions: - building a state-of-the-art CCGT, achieving an 80% CO2 emission reduction per MWh produced compared to the Greek lignite fleet, and materializing an ambitious RES deployment plan - significantly grow our renewable generation capacity in Greece and internationally to >5.0GW and accelerate our activity on exploring the use of new technologies and low-carbon fuels. In our Metals Sector we have implemented or are planning to implement specific actions adapting to the climate change risks and opportunities. In this context, the Company plans to develop the production of secondary aluminium, reaching a production capacity of 65,000 tonnes per year with the prospect of more than doubling in the coming years, reducing the energy consumption per tonne of aluminium products, as the energy consumption requirement for the production of secondary is only 5% of that of primary aluminium. In parallel, we are planning an aspirational decarbonization agenda of our Metals Sector to decrease our absolute emissions by 65% and our relative

emissions by 75% by 2030. We have planned and budgeted a detailed agenda of initiatives across our production value chain that will help us achieve our 2030 target. We are lastly following the market and continuously examining specific solutions that could help us reach our 2050 emissions target of net zero such as Low emission fuels and Hydrogen in our CHP and furnaces, inert anodes technology in smelting, etc. Our Energy Sector and specifically the sub-sectors of M Renewables and M Power Projects play an important role in enabling decarbonization of the global energy system. Worldwide, these businesses help reduce emissions, such as through the development and construction of renewable power generation, energy storage, and other sustainable engineering solutions. To scale our positive impact, we plan and expect grow our activities in these areas by a factor of three over the next decade and become a global market leader.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

During early 2021, we initiated a project for the mapping of our Scope 3 emissions in cooperation with our main suppliers. In parallel, we have initiated an internal assessment of our procurement practicing and are working on a gap analysis of our procurement processes. In this effort we are gradually redesigning the procurement processes in order to introduce fully responsible supply chain practices that incorporate ESG criteria for the evaluation of existing and prospective suppliers across our business sectors. In this context, Metlen begun the systematic integration of sustainable development principles in its supply chain. Specifically, Metlen has created an online platform to register key suppliers that meet the ESG criteria, through the application of a specific evaluation methodology, harmonized with the requirements of its Suppliers and Business Partners Code of Conduct. The methodology, which has been developed by the Sustainable Development Division, is implemented internally through the cooperation between the Procurement/Purchasing Departments of the Business Sectors, the Central Functions and the Sustainable Development Division. Moreover, in 2024, the formal process of assessing 337 existing key suppliers against ESG criteria was launched. In 2024, 88 key suppliers of the Group participated in the key supplier evaluation process based on ESG criteria, bringing the total number of key suppliers evaluated within the 2022-2024 period to 259. The following table presents the key findings of the three-year evaluation, as well as the target set for 2025.The data submitted by suppliers was studied in order to identify any actions required in case of non-compliance, with the aim of mitigating climate-related risks in the Company's supply chain. In order to mitigate the economic consequences that may arise due to changes in consumer preferences, who will demand less carbon-intensive products, Metlen has planned to make appropriate investments to reduce the carbon footprint of aluminium. To achieve this, it plans to dramatically reduce CO2 scope 2 emissions by 2030 in the production of primary aluminium, while increasing the production of secondary aluminium which requires significantly less energy (compared to primary

aluminium). In addition, to meet consumer demands for cleaner energy, the company plans to reduce by 50% the CO2 emissions per kWh produced by 2030, compared to 2019.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our business has little exposure in R&D concerning climate-related risks and opportunities. However, there are climate-related risks which potentially could block our access to raw materials for two main reasons, the increase of raw material costs and the raw material shortage due to recycling trends. To mitigate the above risks, the Company continues consistently to invest in the establishment of pilot plants and the development of know-how in the following areas: 1.Utilization of bauxite residues, participating and conducting pilot tests in the framework of European programs for efficient environmentally friendly technologies in the production of useful products and materials (iron, alumina, cement additives and construction products). 2. Development of technologies for the production of high added value products from alumina production such as gallium, scandium and ultrapure alumina. 3.Digitization of processes in the production of alumina and aluminium. 4. Education and lifelong learning, through programs aimed at shaping new tools and training courses for engineers and craftsmen working in the Metals Sector. In this direction, the Research and Sustainable Development (R&SD) department was established under the Innovation Division of the Company's Metallurgy Business Sector. The Company participates in approximately 14 research projects co-funded by the EU or the Greek state, through Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET co-fund on Raw Materials (ERA-MIN 2) and programs of the General Secretariat for Research and Technology (GSRT). Metlen's participation in these programs is based on increasing competitiveness, but also exploring the implementation of industrial circular economy.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Environmental risks and opportunities have played a central role in shaping the Company's strategy, leading to the transformation of its operational structure to better integrate sustainable development and climate considerations. Since 2021, ESG criteria have been embedded into core business processes, including performance management, investment evaluations, budgeting, and supplier assessments. The Company has also strengthened the linkage between financial and non-financial disclosures by incorporating ESG KPIs into its main financial reports. A structured governance model has been established, involving Sustainability Leaders in each Business Sector and ESG category and initiative Owners, to ensure coordinated implementation and monitoring of climate-related initiatives and CO_2 reduction targets. These roles are instrumental in identifying and assessing climate-related risks, which are then integrated into the centralized Enterprise Risk Management (ERM) system. Going forward, the Company will continue enhancing its ESG integration by deepening collaboration across business units, refining climate risk assessment methodologies, and advancing the implementation of targeted sustainability projects through structured action plans and regular performance reviews. [Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Assets

☑ Revenues

☑ Liabilities

☑ Direct costs

☑ Indirect costs

☑ Access to capital

☑ Capital allocation

☑ Capital expenditures

☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Main economic impact of potential climate-related risks The climate-related risk analysis for Metlen, as described in the following sections, has highlighted 4 major transition risks and 2 major physical risk, which may, to a greater or lesser extent, have a significant impact on the company's revenues and/or operating costs, mainly in the Energy Sector as well as in the Metals Sector. These risks include: Transition Risks -Increased carbon allowance prices. -Increased electricity and natural gas prices. -Transition to low-carbon technologies in the production of primary aluminium. -Increased electricity and natural gas sales prices. Physical Risks - Rising temperatures. - Increased frequency of extreme weather events. Regarding climate-related opportunities, METLEN is strategically positioned to leverage energy megatrends mainly by developing and operating Renewable Energy Sources, by performing grid upgrade projects internationally, and by leveraging the growing markets of hydrogen (H2) production and carbon dioxide capture (CCUS). Furthermore, benefits for the Company's business strategy arise both from the different ways of leveraging natural gas, in the context of energy transition, and from the ever-increasing integration of recycled aluminium into its product mix, aiming at greener outflows. -Investments in renewable energies, storage systems and grid solutions. -Investments in energy efficiency and more efficient production processes. -Increased use of recycled or low-carbon materials. -Developing new products enabling the transition to a low/zero carbon economy. -Using more effective modes of transport -Investing in new technologies: energy storage systems using batteries, forecasting technologies for renewable energy systems, etc. - Electrification of final demand -Investments in secondary cast aluminium production.
[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition	Indicate the level at which you identify the alignment of your spending/revenue with a sustainable finance taxonomy
	Select from: ☑ Yes	*Select all that apply* ☑ A sustainable finance taxonomy	*Select from:* ☑ At both the organization and activity level

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ Revenue/Turnover

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

1175926000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

21

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

22

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

10

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

51

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

49

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The figures are calculated in accordance with International Financial Reporting Standards (IFRS). The assessment identifies the proportion of total turnover, CapEx, and OpEx related to economic activities that are eligible and aligned with the EU Taxonomy. The calculation is based on the total net turnover from the sale of goods and provision of services, excluding own use and intergroup transactions. The numerator includes revenue from products and services associated with economic activities that meet the Taxonomy's technical screening criteria for substantial contribution to environmental objectives, while also complying with minimum social safeguards.

Row 2

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ CAPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

546969000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

68

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

65

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

17

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

82

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

18

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The figures are calculated in accordance with International Financial Reporting Standards (IFRS). The assessment identifies the proportion of total turnover, CapEx, and OpEx related to economic activities that are eligible and aligned with the EU Taxonomy. The calculation is based on capitalized expenses for additions to tangible and intangible assets, as well as right-of-use assets, that contribute to Taxonomy-aligned activities. The denominator includes all capitalized additions during the financial year, before depreciation, amortization, revaluations, or impairments, and excluding fair value changes.

Row 3

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Climate change mitigation

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ OPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

859777000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

19

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

21

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

8

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

44

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

56

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

The figures are calculated in accordance with International Financial Reporting Standards (IFRS). The assessment identifies the proportion of total turnover, CapEx, and OpEx related to economic activities that are eligible and aligned with the EU Taxonomy. The calculation is based on operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes costs associated with maintenance, repair, and other direct expenses necessary to sustain Taxonomy-aligned operations.
[Add row]

(5.4.2) Quantify the percentage share of your spending/revenue that was associated with eligible and aligned activities under the sustainable finance taxonomy in the reporting year.

Row 1

(5.4.2.1) Economic activity

Select from:
☑ Manufacture of aluminium

(5.4.2.2) Taxonomy under which information is being reported

Select from:
☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Transitional activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

27489000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

0.5

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

0.5

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

2904000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

0.4

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

0.4

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

16168000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

0.35

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

0.35

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The Company examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all secondary aluminium plants to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

The Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2024 Integrated Annual Report. Regarding emissions (other than GHG emissions) during the production processes, the economic activity within its continuous regulatory compliance, constantly monitors emissions' levels, confirming that

they do not exceed the levels associated with the best available techniques (BAT-AEL) ranges for the non-ferrous metals industries. The said production processes regularly comply to the Directives outlined in Appendix C of the Climate Delegated Act regarding the use/manufacture of dangerous chemicals. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large scale construction projects, Metlen produces EIAs for all of its facilities including the aluminium productions sites. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, the Metallurgy Sector supported by external specialists has conducted a Techno geological-hydrogeological survey where all identified risks to the subterranean waters of the surrounding area are described and thoroughly analyzed to ensure the flawless operation of the sites and the protection of the local environment. Lastly, as certain sites of the economic activity border areas included in the Natura 2000 network of protected areas, the Group has undertaken a Special Ecological Assessment (SEA) as part of the licensing process of the said sites.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

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Row 2

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation using solar photovoltaic technology

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Adapted activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

1084232000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

19

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

19

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

493483000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

62

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

62

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

819554

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

18

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

18

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The solar parks of Metlen are running under the sub-sector of M Renewables. The Sector is involving in the construction of solar PV facilities for clients and it is responsible for the operation of the Group’s own solar PV facilities. Thus, alignment was examined from both scopes with clear distinction between them, due to the fact that certain technical screening criteria may not be applicable to both aspects of the activity.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2024 Integrated Annual Report. The said assessment was conducted thoroughly for the Company's own facilities operated by the Energy Sector. However, since no reliable projections can be made for the construction activity, this aspect (M Renewables) of the climate risk assessment is naturally limited. Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of the solar PV facilities with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely. The materials required for the construction of the solar PV facilities consist mainly of metal devices, photovoltaic panels, aluminum and copper cables, electrical equipment and concrete, most of which are recyclable, as well as packaging materials (e.g. wood, plastic and paper-cardboard) which are waste produced during construction. All the above-mentioned materials are recyclable and are properly recycled

through licensed waste management companies so as not to cause negative effects on the environment. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large-scale construction projects, Metlen produces EIAs for all of its facilities including the solar PV facilities operated by the Energy Sector. The same regulatory framework is applicable for the construction activities of the sub-sector M Renewables within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Company follows the environmental commitments set by its Environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition. Moreover, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

iar_2024_metlen_en.pdf

Row 3

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from wind power

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Adapted activity

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

47815000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

1

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

1

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

44144000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

6

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

6

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

11590000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

0

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

0

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The activity generates electricity from wind power. The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all wind farms to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2024 Integrated Annual Report. Regarding alignment to the criterion for transition to a circular economy, most of the materials and related equipment used for the construction, operation and maintenance of wind farms with modern techniques, are certified for their high durability and can be disassembled and recycled almost completely. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most large Annual Board of Directors Management Report scale construction projects, Metlen produces EIAs for all of its facilities including wind farms operated by the Energy Sector. Lastly, in case of sites of the economic activity which are situated or border areas included in the Natura 2000 network of protected areas, the Group undertakes all necessary assessments required by the applicable national and EU legislation for such projects.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

iar_2024_metlen_en.pdf

Row 4

(5.4.2.1) Economic activity

Select from:

☑ Storage of electricity

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

16390000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

0

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

0

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

6437000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

1

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

1

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

12465000

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

0

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

0

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria under the condition that said revenue does not include own use and intergroup transactions. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to aligned economic activities. The

numerator includes the activities that are considered to be aligned according to Taxonomy regulation and the relevant technical screening criteria. Proportion of the total OpEx. It was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to aligned economic activities. The numerator includes the activities that are considered to be aligned according to the Taxonomy regulation and the relevant technical screening criteria.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The activity is the construction and operation of electricity storage including pumped hydropower storage. The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all storage electricity projects to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

Specifically, the Company's climate risk assessment, which has been carried out in accordance with the recommendations of the international initiative TCFD. The information regarding this process is described in detail in the TCFD data table included in the Company's 2024 Integrated Annual Report. The Company is not involved in the construction of pumped hydropower storage units. Moreover, since the economic activity of the M Renewables is limited to the construction of electricity storage units, the owners/clients are responsible for any waste management plans. As such, this criterion is considered not applicable in this case. Concerning the Environmental Impact Assessment (EIA), since its preparation is a basic requirement of the environmental licensing process of most largescale construction projects, Metlen produces EIAs for all of the construction activities of the sub-sector M Renewables within the EEA. In case of construction projects outside the EEA (e.g. Australia, Chile, etc.), the Group follows the environmental commitments set by its environmental Policy as well as the applicable environmental legislation in the host countries. The EIAs include sections relating to the use and protection of water and marine resources as well as for maintaining their good condition.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

iar_2024_metlen_en.pdf

Row 5

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from fossil gaseous fuels

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

1029537000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

18

(5.4.2.17) Taxonomy-eligible but not aligned CAPEX associated with this activity in the reporting year (currency)

48127000

(5.4.2.18) Taxonomy-eligible but not aligned CAPEX associated with this activity as % of total CAPEX in the reporting year

6

(5.4.2.24) Taxonomy-eligible but not aligned OPEX associated with this activity in the reporting year (currency)

645816000

(5.4.2.25) Taxonomy-eligible but not aligned OPEX associated with this activity as % total OPEX in the reporting year

4

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be eligible according to the Taxonomy regulation. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible according to Taxonomy regulation. The Proportion of the total OpEx was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ No

(5.4.2.29) Details of substantial contribution criteria analysis

The Group examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all storage electricity projects to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ No

(5.4.2.31) Details of do no significant harm analysis

For the activities that are eligible but not aligned with the EU - Taxonomy, the DNSH criteria ("Does Not Significantly Harm") and the Minimum Safeguards were not assessed in 2024.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ No

(5.4.2.33) Attach any supporting evidence

iar_2024_metlen_en.pdf

Row 6

(5.4.2.1) Economic activity

Select from:

☑ Manufacture of aluminium

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

485421000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

9

(5.4.2.17) Taxonomy-eligible but not aligned CAPEX associated with this activity in the reporting year (currency)

51288000

(5.4.2.18) Taxonomy-eligible but not aligned CAPEX associated with this activity as % of total CAPEX in the reporting year

6

(5.4.2.24) Taxonomy-eligible but not aligned OPEX associated with this activity in the reporting year (currency)

285501000

(5.4.2.25) Taxonomy-eligible but not aligned OPEX associated with this activity as % total OPEX in the reporting year

6

(5.4.2.27) Calculation methodology and supporting information

The calculation of the KPIs was based on the following elements of the Company's financial reporting: Proportion of the total turnover. It was calculated based on the total net turnover from the sale of goods and provision of services. The numerator includes the activities that are considered to be eligible according to the Taxonomy regulation. Proportion of the total CapEx. It was calculated based on the capitalized expenses incurred for additions to assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible according to Taxonomy regulation. The Proportion of the total OpEx was calculated based on the operating expenses related to the repair and maintenance of assets or processes corresponding to eligible economic activities. The numerator includes the activities that are considered to be eligible.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ No

(5.4.2.29) Details of substantial contribution criteria analysis

The Company examined alignment of the activity to the criteria as presented in the Climate Delegated Act (2021/2139/EU) and confirmed the alignment of all secondary aluminium plants to said measures.

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ No

(5.4.2.31) Details of do no significant harm analysis

For the activities that are eligible but not aligned with the EU - Taxonomy, the DNSH criteria ("Does Not Significantly Harm") and the Minimum Safeguards were not assessed in 2024.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ No

(5.4.2.33) Attach any supporting evidence

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[Add row]

(5.4.3) Provide any additional contextual and/or verification/assurance information relevant to your organization's taxonomy alignment.

(5.4.3.1) Details of minimum safeguards analysis

OECD Guidelines for Multinational Enterprises Our Code of Conduct has been developed taking into account the OECD Guidelines for Multinational Enterprises. We have implemented a custom training program in the Company's Code of Business Conduct for our employees. We applied our "Zero Tolerance" approach in connection with incidents of corruption and bribery in all our activities, both domestically and internationally. We successfully continued the dialogue with our Stakeholders, implementing a special thematic Consultation focused on the creation of our corporate Human Rights Policy, gaining the almost universal acceptance and support of all our Stakeholder groups for this initiative of the Company. Respect of Human and Labour Rights: Since 2008, Metlen has committed itself to complying with the Compact's 10 Principles, annually publishing its relevant performance, both in terms of its overall operation and its broader transactions. Metlen is committed to the first six Principles of the UN Global Compact, which are based on, among others, the internationally recognized principles on the protection of Human Rights, as these are defined in the Universal Declaration on Human Rights. The Company's commitment to monitoring and publishing the impacts of its activity in this area, together with the Code of Business Conduct, which is addressed to all levels in the Company's hierarchy, promote the protection of and respect for Human Rights, mitigating the likelihood of such incidents occurring in the Company's working environment. Furthermore, during 2020 we have proceeded with the elaboration of a specialized Human Rights Policy, in dialogue with our Social Partners, during which Metlen listened to the views of all its Social Partners on the key points of the policy and integrated them into its final corporate policy document. The Human Rights Policy expresses the Company's zero tolerance of any violation of Human Rights. We fully protected labor rights as well as the other categories of Human Rights related to our activity. Responsible Risk Management: Metlen has developed a systematic approach to the recording, optimal management and disclosure of information about the ESG risks and opportunities that affect its performance, as well as about its efforts to implement its strategy. Through the ESG approach, Metlen strengthens its ability to create long-term value and manage significant changes in the environment in which it operates.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

The figures presented have been calculated and are presented in accordance with the International Financial Reporting Standards (IFRS) that have been issued by the International Accounting Standards Board (IASB) and their interpretations that have been issued by the International Financial Reporting Interpretations Committee (IFRIC) of the IASB. Their preparation requires estimations during the application of the Group's accounting principles. Important admissions are presented wherever it has been judged appropriate.

(5.4.3.3) Indicate whether you will be providing verification/assurance information relevant to your taxonomy alignment in question 13.1

Select from:
☑ Yes
[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:
☑ Yes

(5.5.2) Comment

The Metals Sector's Research and Sustainable Development (RSD) activity, under the Metallurgy Technology Division, participated in around 14 EU- and Greek state-funded projects in 2024, including Horizon 2020, EIT Raw Materials, and ERA-MIN 2. These initiatives focus on boosting competitiveness and advancing the industrial circular economy. From 2017 to 2027, METLEN has secured over €11 million in research funding, positioning it as a global leader in bauxite residue utilization, rare-earth recovery, gallium extraction, and electrification technologies. In 2024, RSD continued operating and upgrading its pilot units, 'HYDRO' and 'PYRO,' investing €470,000 in new equipment. Key projects include: Scale UP: Optimizing scandium extraction from bauxite residues, advancing toward a new production unit. Sisal: Producing high-purity alumina from alternative slags, with successful pilot tests on hydrated alumina hydrochloride. Valore: Testing multiple methods for extracting vanadium and gallium from alumina production liquids, yielding initial concentrates and metal gallium. Reactive: Converting bauxite residues into cement additives and exploring their use in cast iron and slag production. HyinHeat: Testing a pilot hydrogen burner for aluminium melting in collaboration with Linde to reduce CO_2 emissions. Electrification: Launching Elithe and Metawave projects to develop microwave and hybrid calcination technologies for aluminium production. These initiatives enhance METLEN's technological expertise, address sustainability challenges, and open potential new markets aligned with circular economy principles. The Energy Sector's Applied Research & Development and Innovation Department has evolved into Avokado (https://avokado.energy/), METLEN's innovative spin-off specializing in Artificial Intelligence (AI), technology, and digital innovation. Avokado supports the green energy transition by providing tailored AI solutions for the global smart energy market, addressing the supply-demand gap in this field. As Greece's only specialized AI group for energy and Smart Cities, METLEN is its sole shareholder. Avokado leverages deep expertise in electricity markets domestically and internationally, developing AI algorithms and machine learning models for a wide range of energy stakeholders, including producers, providers, consumers, and public authorities.

[Fixed row]

(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.

Row 1

(5.5.7.1) Technology area

Select from:

☑ Other, please specify :Industrial circular economy

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.7.3) Average % of total R&D investment over the last 3 years

80

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

2100000

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

80

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

The Metals Sector has established the Research and Sustainable Development (RSD) activity under the Metallurgy Technology Division of the Company's Metals Sector. In 2024, it participated in approximately 14 research projects, co-funded by the EU or the Greek state, through Horizon 2020, EIT Raw Materials, EIT Manufacturing, ERA-NET Cofund on Raw Materials (ERA-MIN 2) and programs of the General Secretariat for Research and Technology (GSRT). METLEN's participation in these programs is focused on increasing competitiveness but also exploring the application of industrial circular economy. The total funding of METLEN's Metals Sector from research programs, during the period 2017-2027, exceeds €11 million. Also, the Company, through the RSD activity, is placed among the leading companies in the aluminium sector worldwide in the field of research for the utilization of bauxite residues, the recovery of rare-earth elements, gallium and electrification technologies. Also in 2024, the operation of the two pilot units, 'HYDRO' and 'PYRO', continued to test new metallurgical processes. Meanwhile, extensions were implemented to the pilot units with new equipment amounting to 470,000 euros. In summary, in 2024, the RSD activity announced the following key results in selected research projects: a) Scale UP project: This is about the extraction of scandium from bauxite residues and continuous optimization of the process. b) Sisal pilot project: In the context of alumina production from alternative (secondary) sources, the EBA pilot units processed new types of slags from the silicon industry to produce metallurgical alumina, while new equipment was also designed to implement new production processes of 99.99% ultrapure alumina that requires high added value material. c)Valore project: The project pertains to the treatment of liquid solutions are performed. The pilot tests concern the investigation of at least 5 technologies to search for the most economical method of gallium extraction. d) Reactive project: The project explores ways to convert bauxite residues into cement additive in collaboration with the Cement Industry. The RSD pilot units have been implementing bauxite residue calcination tests and their conversion to SCM, and also bauxite residue melting tests for the production of cast iron and granulated slag. e)By actively implementing actions to reduce CO_2 emission, METLEN is participating in the addition of a new pilot hydrogen burner to the foundry.

Row 2

(5.5.7.1) Technology area

Select from:

☑ Other, please specify :Smart energy market

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Full/commercial-scale demonstration

(5.5.7.3) Average % of total R&D investment over the last 3 years

40

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

752000

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

50

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

The adoption of new technological solutions, especially Artificial Intelligence (AI), is a necessary condition for the implementation of the "green" energy transition. However, global supply is limited relative to demand, so Avokado aims to fill this gap with solutions tailored to the needs of the global smart energy market. AVOKADO is the only specialized Group-producer of integrated artificial intelligence solutions for energy and "Smart Cities" in Greece, and METLEN is its sole shareholder. Specifically, AVOKADO has a deep knowledge of the electricity market, in Greece and abroad, having invested in the development and standardization of algorithms and machine learning models, which cover the entire range of needs of energy producers and consumers (producers of electricity from conventional and renewable sources, electricity providers in wholesale and retail markets, household consumers, businesses of all sectors of the economy, public sector bodies, local and regional authorities, as well as central government bodies/agencies) for their green energy transition with a particular focus on Artificial Intelligence operating systems to optimize the lifecycle of home battery systems and professional energy storage systems (BESS). AVOKADO's innovative Artificial Intelligence operating system for home battery systems and professional energy storage systems (BESS) is commercially available under the AVOS™ brand. AVOKADO's comparative advantage is that it has the most comprehensive portfolio of Artificial Intelligence (AI) software and solutions for Energy and Smart Cities, because it combines Energy Machine Learning Models, Location AI and Generative AI. Specifically, AVOKADO offers: a) an AI platform under the brand name AVOX™ for the green energy transition of businesses, organizations and bodies of Central Government, Municipalities, Local Authorities and Regions, b) an AI operating system branded AVOS™ to enhance functionalities and extend the lifetime of home battery systems as well as larger energy storage systems (BESS), and c) a digital AI toolkit branded AVOKADO AI™ to meet the specific needs of the energy industry, d) a Smart GenAI CORTEX Digital Assistant for B2B Customers. The total budget managed by Avokado in 2024 was €650 thousand and the total funding received under the co-funded programmes it participates in amounted to €102 thousand.
[Add row]

(5.7) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.

Coal – hard

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not operate or invest in coal-fired power generation.

Lignite

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not operate or invest in lignite-fired power generation.

Oil

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not operate or invest in oil-fired power generation.

Gas

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

48127000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

6

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

10

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2024

(5.7.5) Explain your CAPEX calculations, including any assumptions

The CAPEX figure is based on the EU Taxonomy-aligned data for "Electricity generation from fossil gaseous fuels" as reported in the 2024 Integrated Annual Report. The total power generation CAPEX used for the percentage calculation (€585,770,000) is the sum of CAPEX for gas, wind, solar, and hydropower generation activities.

Sustainable biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not currently have sustainable biomass power generation in its portfolio.

Other biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not currently have other biomass power generation in its portfolio.

Waste (non-biomass)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not currently have waste-to-energy power generation in its portfolio.

Nuclear

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not operate or invest in nuclear power generation.

Geothermal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not currently have geothermal power generation in its portfolio.

Hydropower

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

16000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2024

(5.7.5) Explain your CAPEX calculations, including any assumptions

The CAPEX figure is based on the EU Taxonomy-aligned data for "Electricity generation from hydropower" as reported in the 2024 Integrated Annual Report. The total power generation CAPEX used for the percentage calculation (€585,770,000) is the sum of CAPEX for gas, wind, solar, and hydropower generation activities.

Wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

44144000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

6

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

10

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2024

(5.7.5) Explain your CAPEX calculations, including any assumptions

The CAPEX figure is based on the EU Taxonomy-aligned data for "Electricity generation from wind power" as reported in the 2024 Integrated Annual Report. The total power generation CAPEX used for the percentage calculation (€585,770,000) is the sum of CAPEX for gas, wind, solar, and hydropower generation activities. The approval year reflects new wind projects that commenced construction in 2024.

Solar

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

493483000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

62

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

80

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2024

(5.7.5) Explain your CAPEX calculations, including any assumptions

The CAPEX figure is based on the EU Taxonomy-aligned data for "Electricity generation using solar photovoltaic technology" as reported in the 2024 Integrated Annual Report. The total power generation CAPEX used for the percentage calculation (€585,770,000) is the sum of CAPEX for gas, wind, solar, and hydropower generation activities. The approval year reflects new solar projects that commenced construction in 2024.

Marine

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not currently have marine power generation in its portfolio.

Fossil-fuel plants fitted with CCS

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen is exploring Carbon Capture and Storage (CCS) technologies as part of its R&D efforts, but there was no CAPEX for operational plants fitted with CCS in the reporting year.

Other renewable (e.g. renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen is exploring renewable hydrogen technologies as part of its R&D efforts, but there was no CAPEX for other renewable power generation in the reporting year.

Other non-renewable (e.g. non-renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Metlen does not invest in other non-renewable power generation sources.
[Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:

☑ Smart appliances

(5.7.1.2) Description of product/service

The adoption of new technological solutions, especially Artificial Intelligence (AI), is a necessary condition for the implementation of the “green” energy transition. However, global supply is limited relative to demand, so Avokado aims to fill this gap with solutions tailored to the needs of the global smart energy market. AVOKADO is the only specialized company-producer of integrated artificial intelligence solutions for energy and “Smart Cities” in Greece, with Metlen as sole shareholder. In particular, AVOKADO has a deep knowledge of the electricity market, in Greece and abroad, having invested in the development and standardization of algorithms and machine learning models, which cover the range of needs of energy producers and consumers (producers of electricity from conventional and renewable sources, electricity providers in wholesale and retail markets, household consumers, businesses of all sectors of the economy, public sector bodies, local and regional authorities, as well as central government bodies/bodies) for their green energy transition with a particular focus on Artificial Intelligence operating systems to optimize the lifecycle of home battery systems and professional energy storage systems (BESS). AVOKADO’s innovative Artificial Intelligence operating system for home battery systems and professional energy storage systems (BESS) is commercially available under the AVOS brand. AVOKADO’s comparative advantage is that it has the most comprehensive portfolio of Artificial Intelligence (AI) software and solutions for Energy and Smart Cities, because it combines Energy Machine Learning Models, Location AI and Generative AI. Specifically, AVOKADO offers: • AI platform under the brand name AVOX for the green energy transition of businesses, organizations and bodies of Central Government, Municipalities, Local Authorities and Regions, • an AI operating system branded AVOS to enhance functionalities and extend the lifetime of home battery systems as well as larger energy storage systems (BESS), and • digital AI toolkit branded AVOKADO AI to meet the specific needs of the energy industry.

(5.7.1.3) CAPEX planned for product/service

650000

(5.7.1.4) Percentage of total CAPEX planned for products and services

15

(5.7.1.5) End year of CAPEX plan

2025

[Add row]

(5.9) 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?

(5.9.1) Water-related CAPEX (+/- % change)

0

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

0

(5.9.3) Water-related OPEX (+/- % change)

-65

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

0

(5.9.5) Please explain

In 2024 CAPEX has no 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 2024. On the other hand, in the reporting year, OPEX has declined by 65%, compared to 2023. OPEX expenditure include labor, water utilities, energy and maintenance costs for brackish, 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. [Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:

☑ No, but we plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☑ Other, please specify :Official Internal Carbon Pricing procedure is under development.

(5.10.4) Explain why your organization does not price environmental externalities

Our organization recognizes the increasing importance of pricing environmental externalities—particularly carbon emissions—as a key mechanism for managing climate-related risks and aligning with global sustainability targets. While we have not yet implemented a formal internal carbon pricing system, we have adopted an informal approach to integrate carbon cost considerations into our budgeting and investment decision-making processes. This preliminary method enables us to assess the potential financial implications of carbon emissions in project evaluations, supporting the prioritization of lower-carbon alternatives. Although not yet institutionalized, this practice reflects our proactive stance on climate risk and our awareness of the shifting regulatory landscape. Looking forward, we acknowledge the strategic value of a structured internal carbon pricing framework. We are actively reviewing industry benchmarks and methodologies with the aim of developing a formal carbon pricing mechanism that aligns with our decarbonization goals and supports more informed, climate-conscious decision-making across the organization. [Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Customers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

	Engaging with this stakeholder on environmental issues	Environmental issues covered
		☑ Water
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Other, please specify :Environmental Management Practices, Carbon Footprint, Energy Usage, Resource Efficiency, Water Management, Compliance with Environmental Regulations, Sustainability Certifications and Circular Economy and End-of-Life Management

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 26-50%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

80.01 – 100%: Negligible risk, no action required (White List entry). 60.01 – 80%: Low risk, no action required (White List entry). 40.01 – 60%: Medium risk, commitment to specific issues or creation of an adaptation action plan is required. 20.01 – 40%: High risk, commitment to specific issues or an adaptation action plan is required. 0 – 20%: Serious risk, direct dialogue with the supplier is necessary, and the continuation of cooperation with the Group is under consideration.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☑ 1-25%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

2

Water

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Other, please specify :Environmental Management Practices, Carbon Footprint, Energy Usage, Resource Efficiency, Water Management, Compliance with Environmental Regulations, Sustainability Certifications and Circular Economy and End-of-Life Management

(5.11.1.3) % Tier 1 suppliers assessed

Select from:
☑ 26-50%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

80.01 – 100%: Negligible risk, no action required (White List entry). 60.01 – 80%: Low risk, no action required (White List entry). 40.01 – 60%: Medium risk, commitment to specific issues or creation of an adaptation action plan is required. 20.01 – 40%: High risk, commitment to specific issues or an adaptation action plan is required. 0 – 20%: Serious risk, direct dialogue with the supplier is necessary, and the continuation of cooperation with the Group is under consideration.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:
☑ 1-25%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

2
[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Procurement spend

☑ Regulatory compliance

☑ Reputation management

☑ Business risk mitigation

☑ Strategic status of suppliers

☑ Product safety and compliance

☑ Supplier performance improvement

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

(5.11.2.4) Please explain

METLEN, through its structured supplier evaluation and engagement process, aims to identify critical issues, support key suppliers, and drive continuous improvement aligned with ESG goals. In 2024, it continued the annual update of its key suppliers' registry using a specialized methodology developed by the Sustainable Development Division. This approach, aligned with METLEN's Code of Conduct and Responsible Supply Chain Policy, is applied in collaboration with Procurement, Central Functions, subsidiaries, and the Sustainable Development team. ESG performance has become an added evaluation pillar in new partnerships and procurements, complementing technical and financial criteria. The process focuses on material issues tied to the UN Sustainable Development Goals, such as environmental compliance, health and safety, human rights, and business ethics. METLEN prioritizes supplier engagement on climate issues based on risk exposure, strategic importance, and procurement spend. Suppliers with high climate-related risk or critical roles are prioritized to maximize impact. Commitment to sustainability and ongoing performance are also key criteria. To support this, METLEN launched the "Responsible Supply Chain platform" in 2023, enabling digital ESG assessment and monitoring.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Procurement spend

☑ Regulatory compliance

☑ Reputation management

☑ Business risk mitigation

☑ Strategic status of suppliers

☑ Product safety and compliance

☑ Supplier performance improvement

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to water

(5.11.2.4) Please explain

METLEN, through its structured supplier evaluation and engagement process, aims to identify critical issues, support key suppliers, and drive continuous improvement aligned with ESG goals. In 2024, it continued the annual update of its key suppliers' registry using a specialized methodology developed by the Sustainable Development Division. This approach, aligned with METLEN's Code of Conduct and Responsible Supply Chain Policy, is applied in collaboration with Procurement, Central Functions, subsidiaries, and the Sustainable Development team. ESG performance has become an added evaluation pillar in new partnerships and procurements, complementing technical and financial criteria. The process focuses on material issues tied to the UN Sustainable Development Goals, such as environmental compliance, health and safety, human rights, and business ethics. METLEN prioritizes supplier engagement on water-related issues based on risk exposure, strategic importance, and procurement spend. Suppliers with high climate-related risk or critical roles are prioritized to maximize impact. Commitment to sustainability and ongoing performance are also key criteria. To support this, METLEN launched the "Responsible Supply Chain platform" in 2023, enabling digital ESG assessment and monitoring.
[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

For more info, see our Suppliers / Business Partners Code of Conduct at link: https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf In addition, find below the ESG assessment methodology: ESG Assessment Methodology Questionnaire Completion: Recording general company/ supplier information Documentation for questions related to issues that the evaluated supplier recognizes regarding its business activities Verification of responses/documents: Verification of completeness and accuracy of responses Successful Completion/ Unsuccessful Completion Supplier evaluation: Final rating (performance) and supplier classification (Negligible / Low/ Medium/ High/ Serious risk) Feedback & Handing: Creation of a customized adjustment plan for each company- supplier (Medium – High-Serious risk), with proposed corrective actions to improve ESG performance, where deemed necessary Completion of evaluation process: Regular communication with the company/ supplier to monitor the implementation of adjustment/ improvement plans Termination or exclusion from contracting with a supplier who fails/ refuses to meet ESG requirements, within the mutually agreed upon timeframe, while in all other cases the supplier is included in METLENS' list of core suppliers Consider termination or exclusion from contracting with suppliers who fail or refuse to meet ESG requirements within the mutually agreed timeframe.

Water

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

For more info, see our Suppliers / Business Partners Code of Conduct at link: https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf In addition, find below the ESG assessment methodology: ESG Assessment Methodology Questionnaire Completion: Recording general company/ supplier information Documentation for questions related to issues that the evaluated supplier recognizes regarding its business activities Verification of responses/documents: Verification of completeness and accuracy of responses Successful Completion/ Unsuccessful Completion Supplier evaluation: Final rating (performance) and supplier classification (Negligible / Low/ Medium/ High/ Serious risk) Feedback & Handing: Creation of a customized adjustment plan for each company- supplier (Medium – High-Serious risk), with proposed corrective actions to improve ESG performance, where deemed necessary Completion of evaluation process: Regular communication with the company/ supplier to monitor the implementation of adjustment/ improvement plans Termination or exclusion from contracting with a supplier who fails/ refuses to meet ESG requirements, within the mutually agreed upon timeframe, while in all other cases the supplier is included in METLENS' list of core suppliers Consider termination or exclusion from contracting with suppliers who fail or refuse to meet ESG requirements within the mutually agreed timeframe.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:
☑ Implementation of emissions reduction initiatives

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply
☑ Supplier scorecard or rating
☑ Other, please specify :Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:
☑ 76-99%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:
☑ None

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:
☑ None

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:
☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:
☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply
☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Metlen integrates sustainability into its supply chain via its "Suppliers and Business Partners' Code of Conduct" and a "Responsible Supply Chain Policy," which are prerequisites for new suppliers and attached to contracts. Key suppliers are evaluated annually on ESG criteria, including climate change and water management, through the "METLEN Responsible Supply Chain platform." In 2024, 77% of key suppliers, were assessed. Suppliers identified with medium to serious risks (7% of those evaluated) are required to implement corrective action plans. Failure to comply within an agreed timeframe can lead to the termination of the business relationship. The engagement process includes creating customized adjustment plans and monitoring their implementation to drive improvement. By digitalizing the evaluation process, Metlen achieves time savings and efficient management of suppliers' responses, facilitating direct collaboration between the Sustainable Development Division and procurement departments. After assessing supplier responses, each participating company receives a final score based on its maturity and management of material issues relevant to its industry and location. Suppliers can access the platform post-evaluation to view their overall performance and scores in each ESG pillar. Additionally, by entering their activity code, suppliers can compare their performance and ranking against the industry average of other evaluated companies.

Water

(5.11.6.1) Environmental requirement

Select from:

☑ Other, please specify :(a) Water reduction use, b) Compliance and licensing with water regulations & c) Prevention of water pollution

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Other, please specify :Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Metlen integrates sustainability into its supply chain via its "Suppliers and Business Partners' Code of Conduct" and a "Responsible Supply Chain Policy," which are prerequisites for new suppliers and attached to contracts. Key suppliers are evaluated annually on ESG criteria, including climate change and water management,

through the "METLEN Responsible Supply Chain platform." In 2024, 77% of key suppliers, were assessed. Suppliers identified with medium to serious risks (7% of those evaluated) are required to implement corrective action plans. Failure to comply within an agreed timeframe can lead to the termination of the business relationship. The engagement process includes creating customized adjustment plans and monitoring their implementation to drive improvement. By digitalizing the evaluation process, Metlen achieves time savings and efficient management of suppliers' responses, facilitating direct collaboration between the Sustainable Development Division and procurement departments. After assessing supplier responses, each participating company receives a final score based on its maturity and management of material issues relevant to its industry and location. Suppliers can access the platform post-evaluation to view their overall performance and scores in each ESG pillar. Additionally, by entering their activity code, suppliers can compare their performance and ranking against the industry average of other evaluated companies.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Other, please specify :Complying with regulatory requirements

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Other, please specify :Supplier ESG assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ None

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ None

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Metlen integrates sustainability into its supply chain via its "Suppliers and Business Partners' Code of Conduct" and a "Responsible Supply Chain Policy," which are prerequisites for new suppliers and attached to contracts. Key suppliers are evaluated annually on ESG criteria, including climate change and water management, through the "METLEN Responsible Supply Chain platform." In 2024, 77% of key suppliers, were assessed. Suppliers identified with medium to serious risks (7% of those evaluated) are required to implement corrective action plans. Failure to comply within an agreed timeframe can lead to the termination of the business relationship. The engagement process includes creating customized adjustment plans and monitoring their implementation to drive improvement. By digitalizing the evaluation process, Metlen achieves time savings and efficient management of suppliers' responses, facilitating direct collaboration between the Sustainable Development Division and procurement departments. After assessing supplier responses, each participating company receives a final score based on its maturity and management of material issues relevant to its industry and location. Suppliers can access the platform post-evaluation to view their overall performance and scores in

each ESG pillar. Additionally, by entering their activity code, suppliers can compare their performance and ranking against the industry average of other evaluated companies.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:
☑ Other, please specify :Information collection (understanding supplier behavior)

(5.11.7.3) Type and details of engagement

Capacity building
☑ Provide training, support and best practices on how to mitigate environmental impact
☑ Support suppliers to develop public time-bound action plans with clear milestones

Information collection
☑ Collect GHG emissions data at least annually from suppliers
☑ Collect targets information at least annually from suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply
☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:
☑ 1-25%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ Less than 1%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Supplier engagement is a key component of our strategy to advance environmental performance across our value chain. We prioritize collaboration with suppliers to drive measurable improvements in areas such as carbon emissions reduction, resource efficiency, and compliance with environmental regulations—directly supporting our broader sustainability objectives. Our engagement efforts are targeted and data-driven. Suppliers are selected based on criteria such as procurement spend, strategic relevance, and their potential environmental impact. This approach ensures resources are allocated effectively, focusing on suppliers that can significantly influence our environmental outcomes. Recognizing that some suppliers may face barriers to implementing sustainable practices, our strategy includes offering tailored support. This may involve training, knowledge-sharing, or joint development of innovative solutions to help build their capacity. In cases where supplier engagement is categorized as "No other supplier engagement," it is typically due to limited visibility or the early phase of our engagement initiatives. We are actively working to improve data collection, monitoring, and performance tracking to expand our reach and effectiveness over time. Our engagement has already contributed to tangible environmental benefits. Collaborative initiatives on climate action have helped lower emissions across the supply chain. Similarly, partnerships focused on water stewardship or forest conservation enhance ecosystem resilience and secure critical resources for both our operations and surrounding communities. In summary, supplier engagement is instrumental in driving environmental progress and achieving our sustainability targets. These efforts strengthen our supply chain, create shared value, and contribute to global climate and resource protection goals.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Other, please specify :Information collection (understanding supplier behavior)

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Support suppliers to develop public time-bound action plans with clear milestones

Information collection

☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 1-25%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☑ 100%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Engagement with suppliers on water security is a key element of our broader sustainability strategy. We actively collaborate with suppliers to improve their water management practices in alignment with our goals for sustainable water use, conservation, and pollution prevention. Our initiatives focus on reducing water consumption, supporting regulatory compliance, and promoting best practices in water stewardship throughout our supply chain. Suppliers are prioritized for

engagement based on factors such as procurement spend, strategic relevance, and their potential impact on our water-related objectives. This targeted approach ensures effective allocation of resources to those suppliers whose operations most significantly influence our water security outcomes. We acknowledge that some suppliers may face challenges in adopting effective water management practices due to limited resources or technical capabilities. As part of our engagement strategy, we provide support through training, knowledge sharing, and collaboration on innovative water-saving solutions. In instances where supplier engagement is reported as "No other supplier engagement," it often reflects limited visibility or the early phase of engagement activities. We are committed to strengthening our data collection and monitoring systems to better assess supplier performance on water issues over time. Our engagement efforts have the potential to deliver meaningful results. By working with suppliers to improve water efficiency and resilience, we help secure critical water resources, reduce operational and compliance risks, and contribute to the long-term sustainability of both our business and the communities in which we operate. In summary, engaging suppliers on water security is integral to achieving our environmental goals and building a more resilient, responsible, and sustainable supply chain.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders in creation and review of your climate transition plan

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 76-99%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Engaging key stakeholders—including shareholders, investors, suppliers, and local communities—is fundamental to our approach in driving transparency, accountability, and collaborative progress toward our environmental objectives. Recognizing the growing demand from shareholders and investors for clear insights into the environmental impact and sustainability of our operations, we actively communicate our initiatives, performance, and achievements to build confidence in our commitment to sustainable development. Our stakeholder engagement goes beyond information sharing; it involves meaningful dialogue to understand their priorities and expectations related to our environmental performance. For instance, we conduct regular meetings with shareholders and investors to update them on our sustainability strategies, including carbon reduction and water management efforts, ensuring alignment with their values and investment criteria. We also engage closely with suppliers through our "Metlen Responsible Supply Chain platform," which facilitates ongoing assessment and support to enhance their environmental practices in line with our sustainability goals. Engagement with local communities is equally critical, allowing us to address their environmental concerns through outreach programs focused on initiatives such as water conservation and waste reduction, thereby fostering trust and collaborative solutions. This comprehensive engagement strategy ensures inclusivity and responsiveness to the diverse interests of all stakeholders. It not only strengthens our reputation and brand but also drives collective action towards shared environmental targets, supporting a sustainable future for our business and the wider community.

(5.11.9.6) Effect of engagement and measures of success

Our stakeholder engagement efforts have delivered meaningful results, strengthening our environmental performance and reinforcing our sustainability commitments. Regular dialogue with shareholders and investors has fostered greater backing for our environmental initiatives, reflected in increased investments and enhanced

market confidence. This support enables us to channel more resources into key sustainability projects, including carbon reduction and water stewardship. Within our supply chain, the deployment of the "Metlen Responsible Supply Chain platform" has driven significant improvements in supplier environmental performance. Through ongoing feedback and capacity-building, suppliers have advanced their ESG practices, contributing to more sustainable operations. Success indicators include the proportion of suppliers achieving higher ESG ratings and a measurable decrease in supply chain-related environmental risks. Furthermore, engagement with local communities has boosted awareness and collaboration on environmental priorities, particularly water security. Positive outcomes are evidenced by community participation levels, constructive feedback, and tangible enhancements in local environmental conditions.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Local communities, NGOs, and regulatory bodies

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Engage with stakeholders to advocate for policy or regulatory change

☑ Other innovation and collaboration, please specify :Collaboration with academic and scientific institutions on environmental research and monitoring.

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

The rationale is to maintain a social license to operate, ensure compliance with environmental regulations, and build relationships of trust with key societal actors. The engagement addresses the local impacts of operations, including water use and biodiversity, and fosters partnerships for sustainable development. The scope includes an annual formal Stakeholder Consultation process, regular and ad-hoc meetings, participation in public consultations on policy, and collaborations with academic institutions like the Hellenic Centre for Marine Research (HCMR).

(5.11.9.6) Effect of engagement and measures of success

This engagement builds trust, mitigates social and regulatory risks, and enhances the company's reputation. The effect is a smoother implementation of projects and a better understanding of stakeholder expectations. Success is measured by the positive feedback from the annual consultation process, the implementation of social investment programs benefiting local communities, the absence of significant environmental conflicts or penalties, and the successful collaboration on scientific studies.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Align your organization’s goals to support customers’ targets and ambitions

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

The primary rationale is to meet the growing market demand for sustainable and low-carbon products, such as "green" aluminium and renewable energy. The engagement aims to understand customer needs, enhance satisfaction, and build long-term loyalty by providing products and services that align with their environmental goals. The scope includes regular communication through commercial divisions and conducting annual customer satisfaction surveys to gather feedback.

(5.11.9.6) Effect of engagement and measures of success

The engagement results in increased customer satisfaction and a stronger market position for the company's sustainable products. Success is measured through the results of annual customer satisfaction surveys, which track customer perceptions and loyalty, and by the increased demand and sales of low-carbon products and services.
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has adopted the operational control approach for consolidating environmental performance data based on several key considerations. Primarily, this approach ensures clear accountability by including emissions and environmental impacts from all operations where we have authority to implement environmental policies and initiatives. This focus allows us to drive sustainability improvements in areas where we have direct influence, such as energy use and waste management, enabling effective implementation of change that delivers measurable results. Additionally, the operational control approach aligns closely with our Environmental Management Systems (EMS), which emphasize the management of day-to-day operational activities. This alignment facilitates the integration of environmental data from controlled sites into our overall sustainability objectives, ensuring we prioritize actions with the greatest potential to reduce our environmental footprint. This method also streamlines data collection and reporting by concentrating on facilities under our direct control, reducing complexity and ensuring consistency across reporting units. This standardized approach improves the accuracy and comparability of environmental data over time, enabling robust tracking of our sustainability progress. Furthermore, operational control is widely recognized by leading global reporting frameworks, including the Greenhouse Gas Protocol, the Global Reporting Initiative (GRI) and the European Sustainability Reporting Standards (ESRS). By following this approach, we ensure our disclosures meet international best practices, enhancing transparency and trust among stakeholders, investors, and regulators. Ultimately, the operational control approach reflects our commitment to making tangible, measurable progress in reducing environmental impacts in areas where we have direct operational influence. It supports effective resource management, energy efficiency, and emissions reduction efforts in a focused and practical manner. In summary, operational control is the most appropriate consolidation approach for our Group, aligning with our management capabilities, simplifying data processes, and complying with established global standards.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has adopted the operational control approach for consolidating environmental performance data based on several key considerations. Primarily, this approach ensures clear accountability by including emissions and environmental impacts from all operations where we have authority to implement environmental policies and initiatives. This focus allows us to drive sustainability improvements in areas where we have direct influence, such as energy use and waste management, enabling effective implementation of change that delivers measurable results. Additionally, the operational control approach aligns closely with our Environmental Management Systems (EMS), which emphasize the management of day-to-day operational activities. This alignment facilitates the integration of environmental data from controlled sites into our overall sustainability objectives, ensuring we prioritize actions with the greatest potential to reduce our environmental footprint. This method also streamlines data collection and reporting by concentrating on facilities under our direct control, reducing complexity and ensuring consistency across reporting units. This standardized approach improves the accuracy and comparability of environmental data over time, enabling robust tracking of our sustainability progress. Furthermore, operational control is widely recognized by leading global reporting frameworks, including the Greenhouse Gas Protocol, the Global Reporting Initiative (GRI) and the European Sustainability Reporting Standards (ESRS). By following this approach, we ensure our disclosures meet international best practices, enhancing transparency and trust among stakeholders, investors, and regulators. Ultimately, the operational control approach reflects our commitment to making tangible, measurable progress in reducing environmental impacts in areas where we have direct operational influence. It supports effective resource management, energy efficiency, and emissions reduction efforts in a focused and practical manner. In summary, operational control is the most appropriate consolidation approach for our Group, aligning with our management capabilities, simplifying data processes, and complying with established global standards.

Plastics

(6.1.1) Consolidation approach used

Select from:
☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Not applicable because plastics is not a material issue for our business activities.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Our company has adopted the operational control approach for consolidating environmental performance data based on several key considerations. Primarily, this approach ensures clear accountability by including emissions and environmental impacts from all operations where we have authority to implement environmental policies and initiatives. This focus allows us to drive sustainability improvements in areas where we have direct influence, such as energy use and waste management, enabling effective implementation of change that delivers measurable results. Additionally, the operational control approach aligns closely with our Environmental Management Systems (EMS), which emphasize the management of day-to-day operational activities. This alignment facilitates the integration of environmental data from controlled sites into our overall sustainability objectives, ensuring we prioritize actions with the greatest potential to reduce our environmental footprint. This method also streamlines data collection and reporting by concentrating on facilities under our direct control, reducing complexity and ensuring consistency across reporting units. This standardized approach improves the accuracy and comparability of environmental data over time, enabling robust tracking of our sustainability progress. Furthermore, operational control is widely recognized by leading global reporting frameworks, including the Greenhouse Gas Protocol, the Global Reporting Initiative (GRI) and the European Sustainability Reporting Standards (ESRS). By following this approach, we ensure our disclosures meet international best practices, enhancing transparency and trust among stakeholders, investors, and regulators. Ultimately, the operational control approach reflects our commitment to making tangible, measurable progress in reducing environmental impacts in areas where we have direct operational influence. It supports effective resource management, energy efficiency, and emissions reduction efforts in a focused and practical manner. In summary, operational control is the most appropriate consolidation approach for our Group, aligning with our management capabilities, simplifying data processes, and complying with established global standards. [Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply
☑ Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

From 2024, Metlen uses the Protergia (supplier) Scope 2 Emission factor from DAPEEP, instead of Residual Energy Mix Emission factor (regarding market based emissions). Also, Metlen calculates location based scope 2 emissions.
[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☑ No, because the impact does not meet our significance threshold

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Our organization has established a base year emissions recalculation policy that ensures consistency and accuracy in our GHG emissions inventory. This policy is triggered when changes occur, including structural, methodological, or boundary modifications. Any minor or major change leads to a recalculation, which is carried out and corrected in the Sustainability Report issued by the company in the year following the first calculation. This approach allows us to maintain the integrity of our emissions data over time and ensures that stakeholders have a reliable basis for evaluating our climate performance and progress.

(7.1.3.4) Past years' recalculation

Select from:

☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ European Union Emission Trading System (EU ETS): The Monitoring and Reporting Regulation (MMR) – General guidance for installations

☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories
☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
☑ The Greenhouse Gas Protocol: Scope 2 Guidance
☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:
☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:
☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Gross Market Base: Use of the emissions factor based on data published by the State at regional or national level through European Residual Mix. Supplier emission factor: From 2024, Metlen uses the Protergia (supplier) Scope 2 Emission factor from DAPEEP, instead of Residual Energy Mix Emission factor (regarding market based emissions).
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:
☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

Fuel and electricity consumption.

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1
☑ Scope 3: Franchises
☑ Scope 3: Investments
☑ Scope 2 (market-based)
☑ Scope 3: Capital goods
☑ Scope 3: Use of sold products
☑ Scope 3: Upstream leased assets
☑ Scope 3: Downstream leased assets
☑ Scope 3: Processing of sold products
☑ Scope 3: Purchased goods and services
☑ Scope 2 (location-based)
☑ Scope 3: Business travel
☑ Scope 3: Other (upstream)
☑ Scope 3: Other (downstream)
☑ Scope 3: Employee commuting
☑ Scope 3: Waste generated in operations
☑ Scope 3: End-of-life treatment of sold products
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.5) Relevance of market-based Scope 2 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

7

(7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

2

(7.4.1.10) Explain why this source is excluded

Although the subsidiary "Unison" is within our reporting boundaries, its emissions have not been included in the current inventory due to the lack of reliable primary data. As a relatively new and still maturing entity, Unison has not yet developed the internal systems and processes necessary to collect and report its environmental data consistently. We are actively working with the subsidiary to build the necessary capacity, with the goal of including its emissions in future reporting cycles.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

To estimate the proportion of emissions excluded from our current inventory, we relied on available information regarding the subsidiary's operational activity and revenue contribution. These indicators served as proxies to assess the likely significance of its emissions relative to the total organizational footprint. While this method does not replace actual emissions data, it allowed us to make a reasonable estimation of the potential impact of the exclusion. We acknowledge this as a temporary measure and are working toward integrating the subsidiary into future reporting cycles through improved data collection capabilities.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

2798068.3

(7.5.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Scope 2 (location-based)

(7.5.1) Base year end

12/30/2019

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

1841255.3

(7.5.3) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1116996.8

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: 1) average-product method 2) average spend-based method

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

703208.2

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: 1) supplier specific method 2) hybrid method 3) average-product method 4) average spend-based method Since Metlen procures a wide range of capital goods, all of the above methods, depending on the significance of the procurement and the availability of data, are used in order to estimate the scope 3 emissions of this category.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1550851.9

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Secondary data describing the characteristics of fuels, the operation of an electricity generation system, etc., at national, regional or local level (average data method).

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

10991

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since there are no detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyze emissions on a distance basis. In this method, per origin (l) of each good (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

56755.6

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Given that the disposal and treatment of generated waste is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the emissions released by the group's suppliers that manage the generated waste, it is chosen to analyse the emissions on a treatment method basis, and if

necessary on a waste type and treatment method basis. In the waste type and treatment method, per waste stream (w) and treatment method (t), the quantity of waste (Q) is multiplied by appropriate emission factors (EF) in order to calculate the emissions of this category. In the treatment method approach, it is the total quantities of waste going to a particular treatment method that are of interest.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

569

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, and also due to the lack of detailed data on fuel quantities for the means of transport used for business travel, it is chosen to analyse emissions on a distance basis. In this method, for each mode of transport, the distance travelled by each commuter is multiplied by appropriate emission factors incorporating average fuel consumption and characteristics of the transport modes used.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

5169.8

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Distance basis methodology, taking into account the distances travelled and the means used.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1141

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: For the calculation of this category, the analysis of emissions is based on average spend-based method. In this case, fuel consumption is calculated from the costs, taking into account fuel prices, and then appropriate factors per fuel are used.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

13935.6

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyse emissions on a distance basis. In this method, per destination (l) of disposal of each product produced (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1208145.3

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: Average-data method Since basically Aluminum of Greece and the other Metlen companies operating in the metallurgy sector produce a variety of intermediate products, where their downstream processing takes place in various units and countries, from which it is not feasible to collect detailed emissions data, the analysis is mainly based on secondary data, characteristics of the processes that take place and the products produced, without excluding in some cases the use of specific consumptions and emissions. In particular, for all intermediate products in the sector (ipM), the quantities produced (QipM), the countries of destination (l), the processes involved, the final products (fp) produced and their quantities (Qfp) are identified.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

2271192.9

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The scope 3 emissions of category 11 emissions of this activity of Metlen concerns the supply of quantities of natural gas to final consumers, i.e. households and businesses, which are not part of the group. It should be noted that emissions from the distribution of natural gas to group companies are calculated in the context of the calculation of the group's scope 1 emissions. Its emissions are calculated according to the following equation. E_(11,NG)Σ,s(FC_NG,s) (NCV_NG) (EF_NG,s) Where E_(11,NG) are the scope 3 emissions of category 11 associated with sales of natural gas to third parties, (in t), s is the sector in which the natural gas is consumed, FC_NG,s is the consumption of the natural gas in sector s, NCV_NG is the lower calorific value of the natural gas and EF_NG,s is the emission factor of the natural gas in sector s.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

52399.2

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The emissions of this category for MYTILINEOS are expected to be not significant and the impact on the Group's carbon footprint small. However, in the context of

thisanalysis, a framework for an approximate estimate of these emissions has been formulated, based on the following assumptions: - In the case of Metallurgy Sector, the activity data used are sales of aluminum plates, columns and cylinders in the reference year. It is assumed that at the end of their life these products are recycled, and therefore the corresponding DEFRA coefficient is used. - In the case of the Energy Sector, an approximate estimate of emissions for this category can be made on the basis of the installed capacity of delivered PV modules and the relevant calculations were based on the projects delivered in the reference year.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol.
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

3962159.2

(7.6.3) Methodological details

In 2024, total scope 1 GHG emissions increased considerably, as seen in the table below. This increase is mainly due to the increase in natural gas consumption in the Company's thermal power plants, which rose by 88% compared to 2023. Of the total emissions, approximately 62.4% comes from activities under the European Union Emissions Trading Scheme (EU ETS). The emissions reported under Scope 1 are generated from sources (physical production plants or processes) owned or controlled by the Company. In this case, almost all of these emissions, come from the energy production process (fuel consumption) as well as from the production of alumina and aluminium (fuel consumption and chemical processes that are part of the production process). The direct (Scope 1) GHG emissions calculation methodology (activity-based) focuses on recording and quantifying all GHG emissions resulting from activities under the Company's control. The process begins with identifying all emission sources. The quantities of fuels used, such as natural gas, diesel, petrol, etc. are reported, and consumption is documented using bills, meters or other reliable data sources. The calculation applies emissions factors from recognized sources such as NIR (National Inventory Report) and DEFRA (Department for Environment, Food & Rural Affairs) that comply with the GHG Protocol guidelines, as they meet the requirements for the use of emission factors that are scientifically valid and adapted to local or international conditions. Moreover, these factors allow the conversion of fuel consumption to tons of CO_2 equivalent (CO_2 eq), considering not only carbon dioxide but other greenhouse gases as well, such as methane (CH4) and nitrous oxide (N_2O). The calculation method follows the Greenhouse Gas Protocol standards, ensuring data transparency and comparability. The choice of emission factors depends on their precision and suitability for the specific emission sources, ensuring that the data truly reflect the Company's actual activities. METLEN strives to continuously improve its methodology by using reliable tools and updated emissions factors, ensuring that direct emissions are accurately reported and aligned with international reporting standards.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2729731.8

(7.6.2) End date

12/30/2023

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2640850.3

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 3

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2726024

(7.6.2) End date

12/30/2021

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company’s direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the

Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 4

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2885465.3

(7.6.2) End date

12/30/2020

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.

Past year 5

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2798068.3

(7.6.2) End date

12/30/2019

(7.6.3) Methodological details

Metlen's Metals and Energy sectors produced 99% of the Company's direct and indirect carbon dioxide (CO2) emissions. Direct (Scope 1) emissions result primarily from the alumina and aluminium production process (consumption of fuels and chemical processing as part of the production process) and from the generation of electricity (through the consumption of natural gas). For operations that fall under the EU Emissions Trading System (EU-ETS), the company use the detailed, verified emissions data that is required under EU-ETS regulations. The EU-ETS mandates strict monitoring, reporting, and verification (MRV) procedures, ensuring accuracy and consistency. For activities not covered by the EU-ETS, emissions are calculated based on internal data and commonly accepted methodologies, following the Greenhouse Gas Protocol. Direct greenhouse gas emissions (SCOPE 1) are calculated using energy conversion factors from fuel consumption (in TJ) to carbon dioxide equivalent (CO2eq). The emission factor values have been obtained using the NIR (National Inventory Report) methodology.
[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

730588.5

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1060417.5

(7.7.4) Methodological details

Indirect CO_2 emissions from electricity consumption (Scope 2) primarily originate from the Company's Metals Sector operations in Greece, particularly the high-energy alumina and aluminium production processes, which account for approximately 99% of total Scope 2 emissions. In 2024, the Company achieved an estimated 32% reduction in its market-based Scope 2 emissions compared to 2023, despite maintaining stable electricity consumption levels. This improvement was primarily driven by two factors: the exclusive use of METLEN (Protergia) as the electricity supplier for all Greek facilities, and the procurement of Guarantees of Origin (GOs) for a portion of consumed electricity. METLEN (Protergia) provides a lower-emission energy mix compared to the residual mix (DAPEEP) used in 2023. As a result, emissions attributed to electricity use were significantly reduced. This switch also enhances the precision and consistency of emission reporting, in line with Greek climate legislation, which mandates the use of supplier-specific emission factors to ensure more accurate carbon accounting. Additionally, the Company purchased GOs for 101,985 MWh of electricity, verifying that this quantity was sourced from renewable energy. Although this represents only 1.3% of total electricity consumption, it supports emissions reduction goals and demonstrates a commitment to renewable energy sourcing. The GOs were acquired separately from the physical electricity supply, in accordance with market-based accounting standards. The Company calculates Scope 2 emissions using both location-based and market-based methods. Market-based emissions are calculated using the energy mix emission factor of the specific electricity provider (METLEN), and for the minor

portion of international operations (0.07%), the respective country residual mix is applied. Electricity consumption data is collected via utility invoices and energy monitoring systems where available, ensuring transparency and alignment with regulatory requirements and climate goals.

Past year 1

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1555613.6

(7.7.3) End date

12/30/2023

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 2

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1281939.2

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling

and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 3

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1337935.2

(7.7.3) End date

12/30/2021

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 4

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1573958.2

(7.7.3) End date

12/30/2020

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling

and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.

Past year 5

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1841255.3

(7.7.3) End date

12/30/2019

(7.7.4) Methodological details

Indirect GHG emissions from electricity, heat or steam generation of external origin consumed by the organization. These (Scope 2) emissions correspond primarily to the consumption of electric power. Indirect greenhouse gas emissions (Scope 2) are calculated using energy conversion factors from electricity, heating, cooling and steam consumption (in TJ) to carbon dioxide equivalent (CO2eq). The electricity generation emission values have been obtained using the Residual Mix of the country in which we operate. For that reason the CO2 scope 2 is considered as market based.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1262638.5

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Metlen supplies an extremely wide range of goods and services, of different nature and country of origin, depending on the activities of each Business Unit. Therefore, the calculation of emissions from the supplier database or through the hybrid approach is considered impossible for all the supplied goods. In this first phase of the development of the calculation system of the scope 3 emissions of the Company, it is deemed appropriate to calculate the emissions of this category based on the average-product approach if the supply quantities of the examined goods are available in physical units or on an expenditure basis if the activity data is known only as commission costs. This way it will be possible to assess, on the one hand the importance of category 1 in relation to the total scope 3 emissions of the Company, but also which goods and services contribute mainly to these emissions. For these goods in the future may be initiated the collection of more detailed data from suppliers.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1531670.5

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since Metlen procures a wide range of capital goods, all of the above methods, depending on the significance of the procurement and the availability of data, are used in order to estimate the scope 3 emissions of this category.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1270363.9

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Secondary data describing the characteristics of fuels, the operation of an electricity generation system, etc., at national, regional or local level (average data method).

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

140227.2

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since there are no detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyze emissions on a distance basis. In this method, per origin (l) of each good (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

57231.8

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Given that the disposal and treatment of generated waste is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the emissions released by the group's suppliers that manage the generated waste, it is chosen to analyse the emissions on a treatment method basis, and if necessary on a waste type and treatment method basis. In the waste type and treatment method, per waste stream (w) and treatment method (t), the quantity of waste (Q) is multiplied by appropriate emission factors (EF) in order to calculate the emissions of this category. In the treatment method approach, it is the total quantities of waste going to a particular treatment method that are of interest.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1657

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, and also due to the lack of detailed data on fuel quantities for the means of transport used for business travel, it is chosen to analyse emissions on a distance basis. In this method, for each mode of transport, the distance travelled by each commuter is multiplied by appropriate emission factors incorporating average fuel consumption and characteristics of the transport modes used.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Our commuting scope 3 emissions derive from leased cars, thus it is calculated in Category 8.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3487.4

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Scope 3 emissions cover indirect emissions not included in Scope 2, arising across METLEN's upstream and downstream value chain within the Company's operational control. These emissions stem from partners such as suppliers, customers, lessees, and end consumers. Following the GHG Protocol's framework, Scope 3 is divided into 15 categories. In 2024, the Company's total Scope 3 emissions decreased by approximately 17.6% compared to 2023. This reduction was mainly due to a substantial ~88% drop in Category 10 (processing of sold products) in the Metals Sector, as no hydrated alumina was sold to aluminium smelters, which typically emit large CO_2 amounts during smelting. Additionally, reduced natural gas consumption contributed to lower emissions in Category 11. Scope 3 emissions calculations follow the GHG Protocol methodology using secondary data, as no primary supplier data was available. Two approaches are applied: (1) activity data-based calculations, which use quantitative data (e.g., quantities, distances, energy use) combined with relevant emission factors; and (2) expenditure-based calculations, which estimate emissions based on monetary spend using environmental input-output (I-O) models. These I-O factors reflect sector-specific emissions per monetary unit spent, derived from sources like Eurostat, OECD, and WIOD, and are applied based on the geographic context of production activities.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

94408.8

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Since the transport of products is not expected to be one of the major scope 3 emission categories of Metlen, but also due to the lack of detailed data on the quantities of fuel by type of vehicle and means of transport used in these transport operations, it is chosen to analyse emissions on a distance basis. In this method, per destination (l) of disposal of each product produced (p), the distance travelled (D) by a means of transport (m) is multiplied by the mass or volume of the product (Q) and appropriate emission factors (EF) incorporating average fuel consumption of the means of transport used, utilization factors and vehicle size, etc.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

108814.6

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions calculation methodology: 1) average-data method 2) Site-specific method Because basically Aluminum of Greece and the rest of the companies of MYTILINEOS that are active in the field of metallurgy produce various intermediate products, where their downstream processing is done in different units and countries, from which it is not possible to collect detailed emission data, the analysis is mainly based on secondary data, characteristics of the processes that take place and the products that are produced. However, in some cases, specific consumptions and emissions by specific units that process the intermediate products was used. More specifically, for all intermediate products, the quantities produced, the countries available, their processing processes, the final products produced and their quantities are identified. For each final product produced and per country of production, the greenhouse gas emission rate associated with the processing of Metlen intermediate products is calculated. This rate can be derived from literature sources or calculated on the basis of energy consumption, waste generated, etc. of the processes that take place. Even for the same product, the rate may vary by processing country mainly due to the different power generation mix, and therefore the scope 2 emissions of the processes taking place. Finally, based on the mass ratio of the intermediate product of Metlen that enters a production process and the total inputs of that production process, the distribution of the total emissions is achieved.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1714742.4

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

The scope 3 emissions of category 11 emissions of this activity of Metlen concerns the supply of quantities of natural gas to final consumers, i.e. households and businesses, which are not part of the group. It should be noted that emissions from the distribution of natural gas to group companies are calculated in the context ofthe calculation of the group's scope 1 emissions. Its emissions are calculated according to the following equation. E_(11,NG)Σ,s(FC_NG,s) (NCV_NG) (EF_NG,s) Where E_(11,NG) are the scope 3 emissions of category 11 associated with sales of natural gas to third parties, (in t), s is the sector in which the natural gas is consumed, FC_NG,s is the consumption of the natural gas in sector s, NCV_NG is the lower calorific value of the natural gas and EF_NG,s is the emission factor of the natural gas in sector s.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

357221

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Indirect GHG emissions not included in energy indirect (Scope 2) GHG emissions that occur outside of the organization, including both upstream and downstream emissions. Other indirect (Scope 3) GHG emissions are a consequence of an organization’s activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. The calculation of Scope 3 Emissions has been made based on the guidelines of the Technical Guidance for Calculating Scope 3 Emissions of the Greenhouse Gas Protocol. Emissions calculation methodology: The

emissions of this category for MYTILINEOS are expected to be not significant and the impact on the Group's carbon footprint small. However, in the context of this analysis, a framework for an approximate estimate of these emissions has been formulated, based on the following assumptions: - In the case of Metallurgy Sector, the activity data used are sales of aluminum plates, columns and cylinders in the reference year. It is assumed that at the end of their life these products are recycled,and therefore the corresponding DEFRA coefficient is used. - In the case of the Energy Sector, an approximate estimate of emissions for this category can be made on the basis of the installed capacity of delivered PV modules and the relevant calculations were based on the projects delivered in the reference year.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

(7.8.5) Please explain

There are not downstream leased assets.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

122.5

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Scope 3 emissions cover indirect emissions not included in Scope 2, arising across METLEN's upstream and downstream value chain within the Company's operational control. These emissions stem from partners such as suppliers, customers, lessees, and end consumers. Following the GHG Protocol's framework, Scope 3 is divided into 15 categories. In 2024, the Company's total Scope 3 emissions decreased by approximately 17.6% compared to 2023. This reduction was mainly due to a substantial ~88% drop in Category 10 (processing of sold products) in the Metals Sector, as no hydrated alumina was sold to aluminium smelters, which typically emit large CO_2 amounts during smelting. Additionally, reduced natural gas consumption contributed to lower emissions in Category 11. Scope 3 emissions calculations follow the GHG Protocol methodology using secondary data, as no primary supplier data was available. Two approaches are applied: (1) activity data-based calculations, which use quantitative data (e.g., quantities, distances, energy use) combined with relevant emission factors; and (2) expenditure-based calculations, which estimate emissions based on monetary spend using environmental input-output (I-O) models. These I-O factors reflect sector-specific emissions per monetary unit spent, derived from sources like Eurostat, OECD, and WIOD, and are applied based on the geographic context of production activities.

Investments

(7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

(7.8.5) Please explain

There were no such investments affecting emissions in this category.
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/30/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1465664.3

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

1705297.6

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1074179.8

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

42438.9

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

38931.2

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

2084.6

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

3486.8

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

21185.8

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

888822.9

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

2407162.5

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

292962.2

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

Past year 2

(7.8.1.1) End date

12/30/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1688761.3

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

1281625.2

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1106925.3

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

12471.2

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

59545.1

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

718.5

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

2127

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

15913

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

1071653.4

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

3331599.4

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

150969.9

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

Past year 3

(7.8.1.1) End date

12/30/2021

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1074601.8

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

819923.4

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

1231685

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

13229.7

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

47239.6

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

803.1

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

1914.3

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

1155.8

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

17507.9

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

1153014

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1190582.1

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

61892

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ High assurance

(7.9.1.4) Attach the statement

Verification Report Metlen Energy & Metals (ex PROTERGIA) 2024 .pdf

(7.9.1.5) Page/section reference

1

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

17

Row 2

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ High assurance

(7.9.1.4) Attach the statement

Korinthos Power Verification Report 2024_.pdf

(7.9.1.5) Page/section reference

1

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

16

Row 3

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ High assurance

(7.9.1.4) Attach the statement

AoG_VERIFICATION_REPORT.pdf

(7.9.1.5) Page/section reference

1

(7.9.1.6) Relevant standard

Select from:
☑ European Union Emissions Trading System (EU ETS)

(7.9.1.7) Proportion of reported emissions verified (%)

30
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

iar_2024_metlen_en.pdf

(7.9.2.6) Page/ section reference

Please review pages 319-322, "INDEPENDENT ASSURANCE STATEMENT" and page 325, "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions"

(7.9.2.7) Relevant standard

Select from:
☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.2.5) Attach the statement

iar_2024_metlen_en.pdf

(7.9.2.6) Page/ section reference

Please review pages 319-322, "INDEPENDENT ASSURANCE STATEMENT" and page 325, "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions"

(7.9.2.7) Relevant standard

Select from:
☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply
☑ Scope 3: Franchises
☑ Scope 3: Investments
☑ Scope 3: Capital goods
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Waste generated in operations
☑ Scope 3: End-of-life treatment of sold products
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Use of sold products
☑ Scope 3: Upstream leased assets
☑ Scope 3: Downstream leased assets
☑ Scope 3: Processing of sold products
☑ Scope 3: Purchased goods and services

☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.3.5) Attach the statement

iar_2024_metlen_en.pdf

(7.9.3.6) Page/section reference

Please review pages 319-322, "INDEPENDENT ASSURANCE STATEMENT" and page 325, "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions"

(7.9.3.7) Relevant standard

Select from:
☑ ISAE3000

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Increased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

29388

(7.10.1.2) Direction of change in emissions

Select from:
☑ Increased

(7.10.1.3) Emissions value (percentage)

6.86

(7.10.1.4) Please explain calculation

Emission that were not derived from the consumption of electricity produced by fossil fuels (101,985 MWh from GOs purchase).

Other emissions reduction activities

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Divestment

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Acquisitions

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Mergers

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

1232427.4

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

45

(7.10.1.4) Please explain calculation

The increase in scope 1 emissions comes from the new gas-fired combined cycle power plant (CCGT) 3,962,159.2-2,729,731.8=1,232,427.4.

Change in methodology

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Change in boundary

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

Change in physical operating conditions

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

3886842.6

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Fourth Assessment Report (AR4 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ PFCs

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

75316.6

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fourth Assessment Report (AR4 - 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

	Gross Scope 1 CO2 emissions (metric tons CO2)	Comment
Combustion (Electric utilities)	*3398767.3*	*Emissions from Metlen's gas-fired thermal power plants.*

[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
Greece	*3962159.2*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

Row 1

(7.17.1.1) Business division

Metallurgy Sector

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1242156

Row 2

(7.17.1.1) Business division

Energy Sector

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2717721.9

Row 3

(7.17.1.1) Business division

METKA ATE: specializing in the field of construction (general contracting) M Concessions: which will be the investment arm in concessions and PPPs projects in Greece and abroad.

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1343.4

Row 4

(7.17.1.1) Business division

Central Functions

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

803.6
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Electricity production*	*3398767.3*
Row 2	*Production of bauxite, refined alumina, and primary & secondary aluminium*	*549073.3*
Row 3	*Rest of activities*	*14318.5*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	*3398767.3*	*It relates to the production of electrical energy by the Company's thermal plants and CHP.*

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

3962159.2

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

730588.5

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

1060417.5

(7.22.4) Please explain

Alignment with Financial Reporting: The Consolidated Accounting Group includes all entities where our company has operational control (except Unison), meaning we have the authority to implement policies and strategies that directly influence emissions. These entities are fully consolidated in our financial accounts according to accounting standards (IFRS), ensuring that both our environmental and financial disclosures align seamlessly. This consistency enhances transparency and comparability in our reporting.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Aluminium of Greece

(7.23.1.2) Primary activity

Select from:
☑ Aluminum

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

525483.69

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

718346.49

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1039441

(7.23.1.15) Comment

Aluminium of Greece company produces primary aluminium.

Row 2

(7.23.1.1) Subsidiary name

EPALME

(7.23.1.2) Primary activity

Select from:
☑ Aluminum

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

12911.61

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1565.13

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2264.48

(7.23.1.15) Comment

EPALME company produces secondary aluminium

Row 3

(7.23.1.1) Subsidiary name

IPP1 & 2

(7.23.1.2) Primary activity

Select from:

☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

2088707.39

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

3075.45

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

4449.86

(7.23.1.15) Comment

IPP 1 & 2 power plants produce electricity using natural gas.

Row 4

(7.23.1.1) Subsidiary name

Korinthos Power

(7.23.1.2) Primary activity

Select from:

☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

623106.94

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1192.78

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1725.75

(7.23.1.15) Comment

Korinthos power plant produces electricity using natural gas.

Row 5

(7.23.1.1) Subsidiary name

DELPHI - DISTOMO

(7.23.1.2) Primary activity

Select from:
☑ Bauxite mining

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

3809

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1430

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1631

(7.23.1.15) Comment

DELPHI - DISTOMO company extracts bauxite for the Aluminium of Greece (primary aluminum plant).

Row 6

(7.23.1.1) Subsidiary name

M Power Projects

(7.23.1.2) Primary activity

Select from:
☑ Energy infrastructure construction

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

1568.61

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2730.99

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

3116.76

(7.23.1.15) Comment

M Power Projects, Metlen's sub-sector is a leading international contractor in the construction of specialized, large-scale turnkey energy projects, undertaking the full range of services required for successful implementation, whether it is conventional electricity generation projects, energy transition projects (e.g. distribution networks, hydrogen etc.), or electricity saving projects, digital transition, smart cities & IoT platforms.

Row 7

(7.23.1.1) Subsidiary name

METKA ATE

(7.23.1.2) Primary activity

Select from:

☑ Transportation infrastructure & other construction

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

1127.2

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

174.76

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

252.88

(7.23.1.15) Comment

METKA ATE is a subsidiary of Metlen, which is specializing in the field of construction (general contracting, infrastructure, etc.)

Row 9

(7.23.1.1) Subsidiary name

CHP

(7.23.1.2) Primary activity

Select from:
☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

686953

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

14.97

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

21.66

(7.23.1.15) Comment

Combined Heat and Power (CHP) power plant produces steam for the needs of the Aluminium of Greece plant and electricity that delivered in the Greek national grid. [Add row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☑ More than 30% but less than or equal to 35%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:*

	Indicate whether your organization undertook this energy-related activity in the reporting year
	☑ Yes
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

19751755.58

(7.30.1.4) Total (renewable + non-renewable) MWh

19751755.58

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

101985

(7.30.1.3) MWh from non-renewable sources

2792111.23

(7.30.1.4) Total (renewable + non-renewable) MWh

2894096.23

Consumption of purchased or acquired steam

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

1295000

(7.30.1.4) Total (renewable + non-renewable) MWh

1295000.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

101985

(7.30.1.3) MWh from non-renewable sources

24133135.08

(7.30.1.4) Total (renewable + non-renewable) MWh

24235120.08
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ Yes

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Oil

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

102739.05

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

Gas

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

19648906.64

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

109.9

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

2792111.23

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0
[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Greece

(7.30.16.1) Consumption of purchased electricity (MWh)

2894096.23

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2894096.23
[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:
☑ No

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

8172.1

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

5022576.7

(7.45.3) Metric denominator

Select from:
☑ Other, please specify :Net Income in mil.€

(7.45.4) Metric denominator: Unit total

614.6

(7.45.5) Scope 2 figure used

Select from:
☑ Market-based

(7.45.6) % change from previous year

18.8

(7.45.7) Direction of change

Select from:
☑ Increased

(7.45.8) Reasons for change

Select all that apply
☑ Change in output

(7.45.9) Please explain

Due to the increase of scope 1 emissions (new CCGT power plant).
[Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

Gas

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

3398761.42

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

376.99

(7.46.4) Scope 1 emissions intensity (Net generation)

388.86

Hydropower

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Wind

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Solar

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

2090.5

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

2.14

(7.46.4) Scope 1 emissions intensity (Net generation)

2.14

Total

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

3400851.92

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:
☑ Gross

(7.46.3) Scope 1 emissions intensity (Gross generation)

321.76
[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Other, please specify :Water use

(7.52.2) Metric value

1713

(7.52.3) Metric numerator

Total water withdrawl (cubic meters)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro (€)

(7.52.5) % change from previous year

17.2

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

The water use intensity indicator recorded an increase compared to the previous year, as a result of the intensification of specific activities requiring increased water resources, as well as variations in the operation of facilities. Despite the increase, METLEN maintains its commitment to sustainable management of water resources, continuing its efforts to optimize water consumption through targeted interventions and practices that utilize the most efficient technologies available in conjunction with the needs of its projects and the specifications of its mechanical equipment.

Row 2

(7.52.1) Description

Select from:

☑ Other, please specify :Water use

(7.52.2) Metric value

6760

(7.52.3) Metric numerator

Total fresh water consumption (cubic meters)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro (€)

(7.52.5) % change from previous year

8.64

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

As a result of the above, METLEN's total water consumption marked a 21% increase compared to 2023, which is mainly attributed to increased evaporation of seawater used for cooling the Company's thermal power plants. This increase, although significant, concerns only non-drinking water, highlighting the strategic utilization of available water resources without burdening fresh water sources. In contrast to the increase in total consumption, fresh-water consumption dropped by 11% for the third consecutive year, while 34% of this quantity was used to supply neighbouring settlements and the Metals Sector's aluminium production plant in Viotia for their needs.

Row 3

(7.52.1) Description

Select from:

☑ Energy usage

(7.52.2) Metric value

39432.3

(7.52.3) Metric numerator

Total energy consumption (MWh)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro (€)

(7.52.5) % change from previous year

51.9

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

The analysis of the energy intensity indicators (MWH/million net revenues) for 2024 (compared to 2023) demonstrates the differences between METLEN's Energy and Metals Sectors, reflecting both the operational specificities and the challenges faced by the two Sectors. Specifically, the Energy Sector showed a significant increase in the energy intensity indicator, because of greater energy consumption to support growing demand, as well as changes in the Sector's energy portfolio. Respectively, the Metals Sector reported higher energy intensity indicators, since it has greater energy requirements due to the nature of its activities, reflecting the energy efficiency challenges in this area. METLEN remains committed to its strategy to enhance sustainability, through targeted actions focused both on improving energy efficiency and promoting renewable energy sources where feasible.

Row 4

(7.52.1) Description

Select from:

☑ Waste

(7.52.2) Metric value

1742.9

(7.52.3) Metric numerator

Total solid waste generated (t)

(7.52.4) Metric denominator (intensity metric only)

million net profit euro (€)

(7.52.5) % change from previous year

6.1

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

The bulk of the waste generated results from the production process and processing of raw materials (e.g. bauxite residues, sterile decalcification), maintenance operations (e.g. electrolysis basin waste) and aluminium casting (e.g. foundry foaming). The management of this waste includes sorting at source, procedures for collection, transport, recovery/disposal of all waste streams depending on the nature of each waste and the requirements of the applicable legislation. Approximately 75% of the total amount of waste in 2024, as in 2023, concerned bauxite residues and sterile decalcification, while the remaining 25% includes industrial and municipal waste as well as materials collected and include, among others, used metals (e.g. iron and steel), tires, used lubricants, electrical and electronic equipment, paper, plastic, wood, glass, lamps and consumables from photocopiers. Total non-hazardous solid waste generated increased by 4.99% (2023:1,000,342.6), due to an increase in bauxite residues. In particular, total non-hazardous solid waste recovered in 2024 corresponds to 22.27% of total non-hazardous waste, i.e. both those recovered and those disposed of. Compared to 2023, total non-hazardous solid waste recovered decreased by 10.95% (2023: 311,359.8) mainly due to the significant reduction of excavation, construction and demolition waste.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target

☑ Intensity target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.1.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.1.5) Date target was set

02/14/2020

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2798068

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

1841255

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

4639323.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

30

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

3247526.100

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

3962159.2

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

1060417.5

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

5022576.700

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

-27.54

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Metlen commits to reduce its own absolute emissions in the period 2019-2030, in line with the goal established by science not to increase the global temperature more than WB2°C. Our strategy on emission reduction targets was developed 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 activities - Identification of emission reduction levers for each of the business sectors and selections of feasible solutions in terms of technology availability and cost Following the aforementioned approach we set targets for each BU by 2030 and 2050 that are in line with a scenario of 2 degrees. The target covers all Metlen central functions, business sectors and its subsidiaries in Greece and abroad with no exclusions.

(7.53.1.83) Target objective

Reduction by -30% of total direct and indirect CO2t-eq emissions (scope 1 & 2) from all Metlen's activities.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The focus is on cutting scope 2 emissions by shifting to clean energy sources and investing in energy-saving R&D. Future emission cuts (scope 1) are expected through new technologies like inert anodes in electrolysis. Meanwhile, METLEN boosts production of recycled aluminium, which is energy-efficient, reduces bauxite demand, and aligns with the EU Taxonomy. Although both scopes are addressed, METLEN prioritizes scope 2 reductions by 2030, using renewable electricity where available. Emissions are calculated using the market-based approach based on each country's Residual Energy Mix. Scope 1 emissions are targeted for net zero by 2050, dependent on emerging technologies such as hydrogen use and carbon capture. This phased approach balances available solutions with future innovations.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.1.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.1.5) Date target was set

02/14/2020

(7.53.1.6) Target coverage

Select from:

☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1227992

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

1827569

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

3055561.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

65.8

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

65

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

1069446.350

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

1242156

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

1046442.3

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

2288598.300

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

38.62

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The specific target is referring to Metlen Metas Sector and it is part of our wider carbon neutrality goal. The base year of the target is the financial year 2019. Traditional Metallurgy is a carbon-intense activity. Although our primary aluminium production is practically a fully electrified process, already achieving massive emission reductions above 60% compared to historical levels, and a front-runner in the path of the EU industry towards climate neutrality, our Metallurgy sector is determined to maximize its positive contribution to the EU and global effort against climate change. We expect the industry in Europe to decarbonize as the EU seeks to more than halve its emissions over the next decade. At the same time, our customers are increasingly demanding low-carbon aluminum and our competitors have set targets to reduce emissions. To reduce our absolute emissions, we have the following emission reduction levers: 1) We accelerate the energy transition by sourcing 100% of our energy from RES. 2) We apply state of the art initiatives such as the digitization of our smelters, and investigate new technologies that have the potential to decline direct smelting emissions by 100% and 3) we recorded an increase in production by 5,500t for 2023 and continued investments with the ultimate goal of achieving a total of 150,000 t of secondary aluminum production in 2030. The target is considered science based because it complies with the requirements of Well-below 2°C aligned scenario as described in Science-Based Targets Initiative Tool.

(7.53.1.83) Target objective

Metals Sector: -65% reduction of total CO2t-eq emissions (scope 1 & 2).

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

In the Metals Sector, where the primary aluminium production process is particularly energy-intensive, two individual CO_2t-eq emission reduction targets (scope 1 & 2) have been set with 2019 as the base year. One absolute target for 65% reduction of total CO_2t-eq emissions by 2030. The main goal is to significantly reduce indirect CO_2emissions (scope 2) through the use of clean energy by 2030, while investing in research pilot projects for energy saving and emissions reduction in production processes, and anticipating the full development of new technologies (e.g. transition from carbon anodes to inert anodes in the electrolysis stage) that will contribute to direct emissions reduction (scope 1) after 2030. Meanwhile, the Sector strengthens its investments in the production of recycled (secondary cast) aluminium, an activity fully aligned with the EU Taxonomy, contributing significantly to tackling climate change. The production of recycled aluminium reduces the need for bauxite mining, a key natural resource, and also requires significantly less energy compared to primary production and therefore has reduced GHG emissions per tonne of aluminium produced, thus contributing positively to the reduction of global warming.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.2.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.2.5) Date target was set

02/14/2020

(7.53.2.6) Target coverage

Select from:

☑ Product level

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)
☑ Perfluorocarbons (PFCs)

(7.53.2.8) Scopes

Select all that apply
☑ Scope 1
☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:
☑ Market-based

(7.53.2.11) Intensity metric

Select from:
☑ Metric tons CO2e per metric ton of aluminum

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1

5.5

(7.53.2.14) Intensity figure in base year for Scope 2

8.2

(7.53.2.33) Intensity figure in base year for all selected Scopes

13.7000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

75

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

3.4250000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

30

(7.53.2.60) Intensity figure in reporting year for Scope 1

2.58

(7.53.2.61) Intensity figure in reporting year for Scope 2

4.23

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

6.8100000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

67.06

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Traditional metallurgy is a carbon-intense activity. Although our primary aluminum production is practically a fully electrified process, already achieving massive emission reductions above 60% compared to historical levels, and a front-runner in the path of the EU industry towards climate neutrality, our Metallurgy business is determined to maximize its positive contribution to the EU and global effort against climate change. Over the last few years, we have taken three important steps in this direction, coupled by a variety of significant operational improvements and investment to reduce emissions: First, we have improved our energy efficiency by investing in a high-efficiency combined heat and power ('CHP') facility and moving away from carbon intensive fuels in the industrial processes, drastically cutting CO2 related emissions by an incredible 40%. Spearheading sector developments, we have also promoted the use of advanced analytics, fully digitalizing our smelter, to maximize efficiency. Second, through our new calcination unit we have achieved energy savings above 12% and slashed CO2 emissions by 11%. Thirdly, we have acquired a secondary aluminium facility (EPALME) and significantly boosted remelting, through increased scrap intake. Recycled and recovered aluminium processing has a large emissions advantage over primary aluminium production, using only 5% of the energy needed in primary. The target is considered science based because it complies with the requirements of well-below 2°C aligned scenario as described in Science-Based Targets Initiative Tool.

(7.53.2.86) Target objective

-75% reduction of specific CO2 emissions per tonne of aluminum produced.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

In the Metals Sector, where the primary aluminium production process is particularly energy-intensive, two individual CO_2t-eq emission reduction targets (scope 1 & 2) have been set with 2019 as the base year. One absolute target for 65% reduction of total CO_2t-eq emissions, and one specific target for 75% reduction of total CO_2t-eq emissions per tonne of aluminium produced, by 2030. The main goal is to significantly reduce indirect CO_2 emissions (scope 2) through the use of clean energy by 2030, while investing in research pilot projects for energy saving and emissions reduction in production processes, and anticipating the full development of new technologies (e.g. transition from carbon anodes to inert anodes in the electrolysis stage) that will contribute to direct emissions reduction (scope 1) after 2030. Meanwhile, the Sector strengthens its investments in the production of recycled (secondary cast) aluminium, an activity fully aligned with the EU Taxonomy, contributing significantly to tackling climate change. The production of recycled aluminium reduces the need for bauxite mining, a key natural resource, and also requires significantly less energy compared to primary production and therefore has reduced GHG emissions per tonne of aluminium produced, thus contributing positively to the reduction of global warming.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.2.1) Target reference number

Select from:

☑ Int 2

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.2.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.2.5) Date target was set

02/14/2020

(7.53.2.6) Target coverage

Select from:

☑ Product level

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1

327.5

(7.53.2.14) Intensity figure in base year for Scope 2

1.5

(7.53.2.33) Intensity figure in base year for all selected Scopes

329.0000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

50

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

164.5000000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

30

(7.53.2.60) Intensity figure in reporting year for Scope 1

289.4

(7.53.2.61) Intensity figure in reporting year for Scope 2

1.35

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

290.7500000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

23.25

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Metlen is a frontrunner in the effort to decarbonize the Greek electricity mix by replacing highly polluting lignite based electricity generation with renewables and low carbon natural gas. We are already operating a state of the art CCGT (it starts operation during 2023), achieving an 80% CO2 emission reduction per MWh produced compared to the Greek lignite fleet, and materializing an ambitious RES deployment plan. Metlen is leading the national strive, which will call for >9 GW of additional

renewable capacity and >1.5GW of gas based capacity by 2030, according to the Greek National Energy & Climate Plan. The target of our national energy plan is to reduce emissions in the Greek power sector by >70%, from ~22.6 MT of CO2 in 2020 to ~6.6 MT by 2030. The remaining ~6.6 MT of emissions will primarily (>90%) come from the remaining CCGTs that enable the uptake of renewables and provide security to the system. Therefore, we have a target to cap our absolute emissions growth to a maximum of 30% although we double our capacity of CCGTs by 2030 based on market conditions & new technologies. In relative terms, we seek to significantly reduce our footprint approximately by 50 % per MWh generated versus 2019.

(7.53.2.86) Target objective

~50% reduction of specific CO2 emissions per MWh produced.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

The action plan to achieve this target by 2030 includes five emission reduction initiatives: • Continuous development of RES portfolio. • Use of electricity from RES in the buildings of the Sector, either by forming PPAs with RES suppliers and / or by directly installing RES & storage capabilities. • Replacement of diesel generators, renewable energy, and energy storage batteries at the construction sites of the Company's construction projects. • Replacement of all company vehicles of the Sector with electric ones, in order to reduce emissions from fuel consumption. • Use of electric heat pumps to replace the heating installations of the Sector's office spaces, based on natural gas. This intensity target decreased by 2% compared to the previous year, and the main reason is the increase of the renewable energy generated by the Energy sector. Electricity production from renewable energy sources increased significantly, compared to 2023 (42%), constituting 13.4% of the total electricity produced by the Company in 2024. The increase comes from the Company's increased energy production from RES abroad.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:
☑ Yes
[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply
☑ Net-zero targets

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

02/14/2020

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs1

☑ Abs2

☑ Int1

☑ Int2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

Our company's net zero emissions target by 2050 applies to all scope 1 and scope 2 emissions across our operations. This includes direct emissions from our activities (scope 1), as well as indirect emissions from purchased electricity, heat, and steam (scope 2). The target encompasses all geographies and sectors where we operate, ensuring a comprehensive approach to reducing our carbon footprint. By implementing energy efficiency measures, transitioning to renewable energy, and adopting low-carbon technologies, we are working toward full decarbonization within our control.

(7.54.3.11) Target objective

Net zero CO2t-eq emissions in all operations of Metlen.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ No, but we plan to within the next two years

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Aiming to achieve net-zero carbon emissions by 2050, Metlen has included in its Action Plan the feasibility of implementing the following key initiatives, subject to the further maturation of new technologies, aiming at drastically reducing CO2 emissions (scope 1) in all its activities: • Use of zero- or low-carbon hydrogen. • Use of zero- or low-carbon fuels. • Application of carbon capture and storage technologies. • Application of Inert Anode technology in aluminum production. • Further increase of secondary aluminium production. • Electrification of mining to eliminate emissions of related equipment. • Offsetting residual emissions.

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

Our company's net zero emissions target for Scope 1 and Scope 2 is regularly reviewed through a structured and comprehensive process. This involves an annual evaluation by our sustainability and executive leadership teams to assess progress against the set milestones and ensure alignment with emerging industry standards and regulatory requirements. We monitor key performance indicators (KPIs) related to energy consumption, direct emissions, and the transition to renewable energy sources. The review process also incorporates feedback from external stakeholders, including third-party auditors, to validate our reporting and ensure transparency. Adjustments to the target may be made based on technological advancements, regulatory shifts, or significant changes in our operational footprint. This flexible, data-driven approach allows us to stay on track toward net zero by 2050 while adapting to new opportunities for emission reductions. By regularly reviewing our progress, we ensure our commitment to net zero remains robust, responsive, and aligned with best practices.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*1*	*`Numeric input*
To be implemented	*1*	*10299*
Implementation commenced	*7*	*15000*
Implemented	*2*	*701374*
Not to be implemented	*0*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☑ Other, please specify :RES development plan

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

458993.5

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:
☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

36735113

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

3000000000

(7.55.2.7) Payback period

Select from:
☑ 11-15 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ 16-20 years

(7.55.2.9) Comment

This figure will be changed according to the progress of the renewable investment plan.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☑ Other, please specify :Manufacture of aluminum Taxonomy-aligned (secondary aluminum)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

77147.2

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

918416

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

100000000

(7.55.2.7) Payback period

Select from:

☑ 11-15 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ >30 years

(7.55.2.9) Comment

No additional comments.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:
☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

As a diversified conglomerate, we drive investment in emissions reduction through targeted strategies across our business segments: Capital Investment in Sustainable Technologies: We allocate significant resources to low-carbon technologies, focusing on renewable energy systems (RES), energy storage, and energy-efficient infrastructure projects. This includes expanding RES installations and optimizing our energy storage solutions to minimize reliance on fossil fuels. Operational Efficiency: In our aluminum production, we prioritize energy efficiency and emissions reduction. Recycling secondary aluminum is a key focus, reducing emissions compared to primary production. In our natural gas power plants, we invest in cutting-edge technologies to enhance efficiency and reduce emissions. Green Financing: We leverage green financing mechanisms, such as sustainability-linked loans and green bonds, to fund emissions reduction projects. These financing tools are crucial for expanding our renewable energy portfolio and retrofitting existing thermal power plants with cleaner technologies. Research and Development (R&D): A key part of our investment strategy is dedicated to R&D for low-carbon innovations. This includes advanced RES power plants and improved energy storage systems, helping us drive long-term reductions in emissions. Regulatory Alignment: Our investments are aligned with both national and international climate policies, such as the EU Green Deal and the EU-ETS, ensuring we remain competitive and compliant while prioritizing emissions reductions. Sustainability Commitments: Our goal to achieve net zero emissions for Scope 1 and 2 by 2050 serves as a driving force behind our investment decisions. This commitment ensures emissions reduction is integrated into our broader corporate strategy, guiding capital allocation to the most impactful initiatives. Through these methods, we maintain a comprehensive approach to driving investment in emissions reduction, ensuring long-term sustainability across our diverse portfolio of operations, from aluminum production to energy projects.
[Add row]

(7.58) Describe your organization’s efforts to reduce methane emissions from your activities.

Methane emissions are not relevant to our operations, because our scope 1 emissions, in a percentage of 99%, are generated by the use of natural gas. The company is not active in the field of natural gas extraction and distribution. Therefore, methane emissions during combustion are considered negligible.

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Aluminum

☑ Other, please specify :Manufacture of aluminum Taxonomy-aligned

(7.74.1.4) Description of product(s) or service(s)

This activity consists of the manufacture of aluminium through primary alumina (bauxite) process or secondary aluminium recycling. The Company operates the only vertically integrated alumina and aluminium production and marketing unit in the EU as well as a secondary aluminium production unit. The production process

includes the manufacture of primary aluminium through the processing of alumina (aluminium oxide) by electrolytic method and the recycling of secondary aluminium. The Group's production capacity reaches 250,000 tonnes of aluminium (primary and secondary cast). Their industrial complex in Ag. Nikolaos, Boeotia, which operates for over 50 years, has achieved continuous growth by the adoption of production and commercial practices comparable to those of the leading metallurgical industries worldwide, and by over €600 million of investments in the technological modernization of the plant's facilities and the increase of its production and productivity –one of the largest private investments to be carried out in Greece recently.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Customize calculations using the CO2 KPIs of primary production

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Cradle-to-gate

(7.74.1.8) Functional unit used

t CO2 (Scope 1 & 2) / t of secondary aluminium production = 0.38 t CO2 (Scope 1 & 2) / t of primary aluminium production = 7.11

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Cradle-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

77147.2

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

*Annual GHG emissions avoided (tCO2e/year): For the company Aluminium of Greece which produces secondary aluminium: Firstly, the GHG smelter intensity is estimated: AoG Smelter GHG int. (t CO2/tAl) = Smelter scope 1+2 emissions / Smelter production. Secondly, for the GHG emissions avoided are estimated as follows: Theoretical emissions - Real emissions, where: • Theoretical emissions = Casting production * AoG Smelter GHG int + Casting scope 1+2 GHG emissions • Real emissions = Smelter scope 1+2 emissions + Casting scope 1+2 emissions For the company EPALME which produces secondary aluminium: The main raw material for EPALME is aluminium scrap. The avoided emissions in this case correspond to those that would theoretically be emitted if primary aluminium was consumed instead of scrap. To estimate avoided emissions for EPALME the following equation is used: EPALME GHG emissions avoided = Aluminium scrap consumption * AoG Smelter GHG intensity.*

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0.5

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Solar PV

(7.74.1.4) Description of product(s) or service(s)

Metlen, through its Energy Sector is one of the leading manufacturers of photovoltaic and energy storage projects worldwide. This positions the company as global manufacturer and contractor for solar energy projects, offering reliable solutions across the entire range of the activities involved in developing such projects, from autonomous solar parks and energy storage projects to complex hybrid projects. The broader strategy of the Renewables & Storage Development Business Unit apart from the construction of external projects includes the use of the Build-Own-Transfer ("BOT") business model for the development of photovoltaic projects, utilizing construction technology proprietary to the Group and currently working on (including completed) about 2.5 GW of solar power plants and 400 MW of energy storage projects on all five continents. Finally, the Company (through the Energy Sector), operates PV plants with a maximum capacity up to 11.5 MW in Greece.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Solar units annually power production multiplied with the CO2 emission factor of residual energy mix of the countries that Metlen operates.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Not applicable

(7.74.1.8) Functional unit used

- photovoltaic units CO2 emission factor: 0 t CO2/MWh

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:
☑ Not applicable

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

282913.5

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Solar power generation replaces power produced by gas-fired or lignite power plants. The power produced by Metlen's solar units multiplied with the CO2 emission factor of residual energy mix of the countries that the company operates.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

19

Row 3

(7.74.1.1) Level of aggregation

Select from:
☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:
☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Onshore wind

(7.74.1.4) Description of product(s) or service(s)

Construction or operation of electricity generation facilities that produce electricity from wind power The Company owns and operates wind farms of combined capacity up to 211MW in Serres, Euboea, Fokida, Boeotia and Aitoloakarnania. In 2020, the construction of a new Wind Park with a maximum capacity up to 43 MW was also initiated.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Wind units annually power production multiplied with the CO2 emission factor of residual energy mix of the countries that Metlen operates.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Not applicable

(7.74.1.8) Functional unit used

wind farm CO2 emission factor: 0 t CO2/MWh

(7.74.1.9) Reference product/service or baseline scenario used

It is connected with Metlen's climate targets and it is based on the scenario of the development of group's climate targets.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Not applicable

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

175503.6

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Wind power generation replaces power produced by gas-fired or lignite power plants. The power produced by Metlen's wind units multiplied with the CO2 emission factor of residual energy mix of the countries that the company operates.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☑ Yes

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:

☑ Specific groups, businesses, or organizations

(9.1.1.2) Description of exclusion

Although the subsidiary "Unison" falls within our reporting boundaries, its water data has not been included in the current inventory due to the absence of reliable primary data. As a relatively new and still maturing entity, Unison has not yet established the internal systems and processes required to consistently collect and report its water consumption and withdrawal data. We are actively collaborating with the subsidiary to build the necessary capacity, with the objective of including its water data in future reporting cycles.

(9.1.1.3) Reason for exclusion

Select from:

☑ Data is not available

(9.1.1.4) Primary reason why data is not available

Select from:

☑ Data collection is in progress

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☑ Less than 1%

(9.1.1.8) Please explain

The subsidiary "Unison" primarily operates in activities with minimal water usage, such as Facility Management and Energy & Sustainability Services, which do not require significant water consumption or withdrawal. Due to the nature of its operations, Unison's water footprint is inherently low, resulting in a negligible impact on the overall water inventory of our organization.
[Add row]

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

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters

(9.2.4) Please explain

Metlen 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, 4 Gas-fired thermal plants of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters, installed in each source of withdrawal.

(9.2.4) Please explain

Metlen 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, 4 Gas-fired thermal plants of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected monthly from each Business sector HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

We monitor water withdrawals quality in all of our of its 3 facilities in Metals Sector: bauxite mining plant, secondary aluminum 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 HSE department and reported annually to the local authorities (where it is recommended). Also we disclose the relevant information at corporate level within our Integrated Annual Report 2024. There is a breakdown of freshwater and other water withdrawals according to ESRS Standards.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

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, 4 Gas-fired thermal plant of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected from each Business sector HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

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, 4 Gas-fired thermal plant of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected from each Business sector HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

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, 4 Gas-fired thermal plant of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 Photovoltaic Parks, 1 Small Hydropower Plant). These data are collected from each Business sector HSE 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 Integrated Annual Report 2024 under the new ESRS Standards - E3: Water and Marine Resources.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

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 Metals 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 HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water quality measurements in cooperation with an external certified laboratory.

(9.2.4) Please explain

The company monitors the quality of its water discharges for emissions to water 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 Metals 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 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water temperature devices.

(9.2.4) Please explain

Metlen considers this aspect as important in all its facilities where discharge temperature (see water) is increased, such as the 4 Gas-fired thermal plant of primary 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 HSE 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 Integrated Annual Report 2024 under the new ESRS Standards.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Subtracting the volumes of withdrawn water from the discharged water.

(9.2.4) Please explain

Metlen considers this aspect as important. In this context measures and monitors the total water consumption volumes from all of its industrial facilities across its business: 4 Industrial plants, 4 Gas-fired thermal plant of primary electricity production and 63 facilities which are RES plants (15 Wind Farms, 47 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 reported annually to the local authorities (where it is recommended). We disclose the relevant information at corporate level within our Integrated Annual Report 2024 under the new ESRS Standards - E3: Water and Marine Resources.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Water certified flowmeters.

(9.2.4) Please explain

The amount of water reused among the plants of METLEN's Sectors, which suggests that the Company uses a significant part of the water it has already used, reducing the need for abstraction of new quantities from natural resources, was more than 16 million m³ in 2024, a significant increase compared to 2023 due to the longer operation of the new CCGT thermal power plant. Almost all (99.9%) of this quantity relates to the quantity of waste seawater used in the Metal Sector's CHP plant, which was used for cooling the two thermal power plants of the Energy Sector.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Internal audits.

(9.2.4) Please explain

Metlen considers this aspect as important in all its facilities, so 100% of our Business sectors monitor this aspect as part of its labor 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. [Fixed row]

(9.2.1) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

Fulfilment of downstream environmental flows

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:
☑ 100%

(9.2.1.2) Please explain

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

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ 100%

(9.2.1.2) Please explain

There is a Scada system in the hydroelectric, which sends a notification when the water pressure in the water intake has dropped (i.e. 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

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ Not relevant

(9.2.1.2) Please explain

No comment.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

174463.78

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

In 2024, 174.4 million m³ of water was withdrawn for use, increased by 14.1% compared to 2023. This difference is mainly due to the individual increased amount of seawater abstraction to meet the needs of METLEN's energy complex in Agios Nikolaos, Viotia. Regarding withdrawn quantities from the various sources, all showed

a decline compared to 2023, except the amount of water produced as part of the mining process. In this latter case there was significant increase due to the heavy rainfall in the area during the year. Regarding the amount of water abstracted from environmentally sensitive areas, this was just 0.01% of the total abstraction, a significant decrease of 38% compared to the corresponding amount of 2023.

Total discharges

(9.2.2.1) Volume (megaliters/year)

164724.87

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

The amount of used water returned to the receiving water body after quality treatment and in accordance with the approved environmental terms per Business Unit, was 164.7 million m3, increased by ~14% compared to 2023. Regarding liquid waste discharges, efforts continued in 2024 to ensure best possible management

contributing to protection of the natural environment and human health. It should be noted that discharged water quality readings are lower and, in several cases, much lower than those required by law.

Total consumption

(9.2.2.1) Volume (megaliters/year)

9738.91

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:
☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:
☑ Increase/decrease in business activity

(9.2.2.6) Please explain

METLEN's total water consumption marked a 21% increase compared to 2023, which is mainly attributed to increased evaporation of seawater used for cooling the Company's thermal power plants. This increase, although significant, concerns only non-drinking water, highlighting the strategic utilization of available water

resources without burdening fresh water sources. In contrast to the increase in total consumption, fresh-water consumption dropped by 11% for the third consecutive year, while 34% of this quantity was used to supply neighbouring settlements and the Metals Sector's aluminium production plant in Viotia for their needs.
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:
☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

22.21

(9.2.4.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:
☑ Lower

(9.2.4.6) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

0.01

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

(9.2.4.9) Please explain

Our company operates in Greece, where certain regions are classified as experiencing high or very high baseline water stress, primarily due to local climatic conditions and seasonal demand peaks. Water is withdrawn only in specific operational locations, some of which may be within these higher-stress areas. 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/#/? advancedfalse&basemaphydro&indicatorbws_cat&lat-14.445396942837744&lng-142.85354599620152&mapModeview&month1&opacity0.5&ponderationDEF&predefinedfalse&projectionabsolute&scenariooptimistic&scopebaseline&timeScaleannual&yearbaseline&zoom2). The areas in which Metlen operates including the construction sites all over the world, were classified based on their water stress risk level. As water stressed areas, were selected those who are characterized as extremely high stress. Regarding the amount of water withdrawn from environmentally sensitive areas, this was just 0.01% of the total withdrawal, a significant decrease of 38% compared to the corresponding amount of 2023.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

11.05

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

Water abstracted from an adjacent stream by DELPHI-DITOMON and collected rainwater. The needs of construction sites are also included.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

166594.3

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Seawater quantities are used for cooling the Combined Heat and Power (CHP) plant of the Metals Sector, and then for cooling the IPP1 & IPP2 thermal power plants, whose production activity increased in 2024. Relevant limits on an annual and daily basis are set and are specified in the applicable AEPO of the plants. The needs of construction sites are also included.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

7277.47

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

It refers to the amount of industrial, brackish and drinking water used mainly to meet the industrial, energy and water supply needs of industrial facilities. This quantity comes mainly from a network of 17 boreholes, owned by the Metals Sector, that the Company operates in the wider area of its factory facilities, as determined by Decision of the Water Department of the Region of Central Greece. The needs of construction sites are also included.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Not relevant

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

144

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Water collected during the bauxite extraction process by METLEN's subsidiary DELPHI-DISTOMON is abstracted and then treated before final discharge. The volume of water withdrawal has increased in the current reporting period due to a corresponding rise in bauxite extraction activities.

Third party sources

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

436.69

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

Water quantities from municipal reserves and public supply services to meet the needs of METLEN's buildings and, primarily, industrial facilities, as well as seawater returns from an adjacent refinery operated by another company, used in the desalination process to produce industrial water in a thermal power plant of the Energy Sector.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

207.84

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.8.5) Please explain

The discharge of water produced by bauxite mining, wetting dirt roads and watering greenery that has been planted to restore the natural environment, and primary treated liquid waste of the secondary cast aluminium processing plant.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

164231.24

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

The amount of sea and brackish water from the cooling process of the Combined Heat and Power plant, as well as the IPP1 & IPP2 thermal power plants, of the Energy Sector, as well as the amount of brackish water from boreholes used as a coolant in the heat exchangers of the aluminium foundry of the AoG aluminium plant, as well as liquid waste at the exit of the primary treatment facilities. Also, for desalination at the "Korinthos Power" power plant, seawater from the cooling seawater returns of another adjacent unit (MOH) is used. The brine is returned and disposed of to the marine recipient together with the brim of MOH's desalination plants.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

37.05

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.8.5) Please explain

The amount of water used for drilling the subsoil during bauxite extraction by DELPHI-DISTOMON and for cleaning the solar panels of photovoltaic parks of the M Renewables segment of the Energy Sector.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

248.75

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

The amount of liquid municipal waste to public water supply and sewerage services as well as the amount of industrial water from power generation discharged at Motor Oil's waste treatment plant, after pH and temperature adjustment.
[Fixed row]

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

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

The amounts of water used for the operation of Metlen Business Sectors and subsidiaries 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 Metlen, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

The amounts of water used for the operation of Metlen Business Sectors and subsidiaries 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 Metlen, it is completely controlled and is done by monitoring parameters set by environmental regulations and Environmental Terms Approval Decisions.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

307.42

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

The 96% of the primary treated water relates to wastewater that is recycled within the production process of Metallurgy Business Sector. More specifically, the aluminum 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 4% relate to discharge of industrial wastewater to Motor Oil Company and primary-treated wastewater discharge to Asopos River.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

164268.29

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Facility expansion

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

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 discharges as a result of desalination process for the production of

industrial water. Water with no need of any treatment before its discharge was higher in 2024 compared to 2023 mainly due to the increased seawater withdrawal quantity and our Groups' activities expansion.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

39.3

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Much lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

It relates to discharges to municipal wastewater treatment plants. It is relevant to Metlen because it is the appropriate way of treatment for this type of discharges. Discharge to a third party without treatment quantity is decreased compared to the previous year mainly because of the decrease in the use of such type of water.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

(9.2.9.6) Please explain

No comment.
[Fixed row]

(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

8.1

(9.2.10.2) Categories of substances included

Select all that apply
☑ Priority substances listed under the EU Water Framework Directive

(9.2.10.3) List the specific substances included

The total figure includes Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), and Total Suspended Solids (TSS). Monitored substances also include Total Nitrogen (TN) and Total Phosphorus (TP), for which emissions were zero, as well as pH, sulphides, and fluorides.

(9.2.10.4) Please explain

The quantities of pollutants from treated liquid waste discharged to the receiving water bodies was 8.1 t reduced by 48% compared to 2023 (15.5t), and break down as follows: 1.1 t BOD, 5.9 t COD, 1.0 t TSS, 0 t TN, and 0 t TP. The company monitors priority substances as defined by the environmental permits (AEPO) of each plant and confirms that no breach of limits or noncompliance incidents occurred in 2024. Water discharge quality is subject to continuous monitoring for parameters like pH and temperature, supplemented by monthly laboratory analyses for a broader range of substances to ensure full compliance with regulatory standards. [Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

2

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 1-25

(9.3.4) Please explain

As already mentioned, 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.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

Risks exist, but no substantive impact anticipated. In Metals 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.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☑ Facility 1

(9.3.1.2) Facility name (optional)

High Efficiency Combined Heat and Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Greece

☑ Other, please specify :Sea Gulf of Antikyra

(9.3.1.8) Latitude

38.358016

(9.3.1.9) Longitude

22.689508

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

166591.39

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

166591.39

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

166591.39

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

166591.39

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

It relates to seawater used for the cooling process of the CHP facility. 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. Zero water consumption for 2024 means that there were no leaks in the cooling process CHP facility.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Alumina and Aluminum production Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Greece
☑ Other, please specify :Groundwater sources & Mornos River

(9.3.1.8) Latitude

38.360912

(9.3.1.9) Longitude

22.688575

(9.3.1.10) Located in area with water stress

Select from:
☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:
☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

7234.46

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:
☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

7194.35

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

40.11

(9.3.1.21) Total water discharges at this facility (megaliters)

3125.13

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ Lower

(9.3.1.23) Discharges to fresh surface water

31.43

(9.3.1.24) Discharges to brackish surface water/seawater

3093.7

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4109.33

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ Lower

(9.3.1.29) 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 slightly decreased 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. The decrease in total consumption compared to 2023 is mainly due to decrease in population (visitors, contractors for projects implemented at the plant), as well as drinking water leaks that are detected in the settlements' networks.
[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.

Water consumption – total volume

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review our Integrated Annual Report 2024, pages 319-322.
[Fixed row]

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

(9.5.1) Revenue (currency)

5682956000

(9.5.2) Total water withdrawal efficiency

32573.84

(9.5.3) Anticipated forward trend

The water withdrawal intensity, is expected to remain stable in the coming year, even as the Company anticipates significant growth in its operations. This stability is the result of various water efficiency initiatives that have already been implemented, as well as additional measures planned for the near future to further mitigate water-related impacts. The Company is firmly committed to aligning economic growth with sustainable water use, striving to maintain water withdrawal.
[Fixed row]

(9.7) Do you calculate water intensity for your electricity generation activities?

Select from:
☑ Yes

(9.7.1) Provide the following intensity information associated with your electricity generation activities.

Row 1

(9.7.1.1) Water intensity value (m3/denominator)

0.02

(9.7.1.2) Numerator: water aspect

Select from:
☑ Total water consumption

(9.7.1.3) Denominator

Select from:
☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:
☑ Lower

(9.7.1.5) Please explain

This intensity value refers to Gas-fired Combined Cycle Thermal Power Plant (CCGT) owned by KORINTHOS POWER SA, a subsidiary of Metlen located in Ag. Theodoroi (Korinthia). This indicator corresponds to water consumption per MWh. The largest proportion of water consumption is linked to the evaporation of the

water used for the 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, continuous monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on water-use are conducted under the framework of ISO 14001.

Row 2

(9.7.1.1) Water intensity value (m3/denominator)

2.2

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water consumption

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Lower

(9.7.1.5) Please explain

This intensity value refers to High Efficiency Combined Heat and Power Plant owned by Metlen, located in the Energy Complex of Ag. Nikolaos (Viotia). This indicator corresponds to water consumption per MWh. The largest proportion of water consumption is linked to the evaporation of the water used for the 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, continuous monitoring of the water withdrawals and discharges takes place, while relevant annual risks assessment on water-use are conducted under the framework of ISO 14001.
[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*None of the company's intermediate or final products contain hazardous substances.*

[Fixed row]

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

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ No, but we plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Important but not an immediate business priority

(9.14.4) Please explain

At present, none of our products or services are classified as having a low water impact. Nonetheless, we acknowledge the increasing importance of water conservation and intend to incorporate this focus within the next two years. Although reducing water use is a key sustainability objective, it is not an immediate business priority at this time. Moving forward, we plan to assess the water intensity of our product portfolio and explore opportunities to decrease our water footprint in alignment with our overall environmental commitments.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:
☑ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category	Please explain
Water pollution	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Water withdrawals	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Water, Sanitation, and Hygiene (WASH) services	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Other	*Select from:* ☑ No, and we do not plan to within the next two years	*The company's water-related targets are focused on the key areas of pollution prevention and withdrawal reduction.*

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☑ Target 1

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

☑ Other water pollution, please specify :Water pollution incidents

(9.15.2.4) Date target was set

12/30/2023

(9.15.2.5) End date of base year

12/30/2024

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/30/2024

(9.15.2.8) Target year figure

0

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved and maintained

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This is an annual target. Target achieved: No water pollution incidents occurred during 2024. 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 2025, the target of no water pollution incidents though the year, remains. Through this target we contribute to SDG 6 & 14.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

The primary actions contributing to this target are staff training on best practices for preventing pollution, the continuous monitoring of water discharge quality (including parameters like pH, temperature, COD, and BOD) and strict adherence to the procedures outlined in the ISO 14001 Environmental Management System. Additionally, we implemented preventive maintenance programs and enhanced controls at critical points in our production processes.

(9.15.2.16) Further details of target

This is a standing, absolute target that forms a core component of the company's environmental policy. The objective is to prevent any detrimental impact on water ecosystems from its operations by maintaining zero pollution incidents. In 2024, we successfully met our target of zero water pollution incidents, demonstrating our dedication to safeguarding the natural environment. Looking ahead to 2025, we will persist in monitoring water quality, applying rigorous controls, and strengthening preventative actions to sustain this level of performance.

Row 3

(9.15.2.1) Target reference number

Select from:

☑ Target 2

(9.15.2.2) Target coverage

Select from:

☑ Other, please specify :Company-wide (including suppliers)

(9.15.2.3) Category of target & Quantitative metric

Water, Sanitation, and Hygiene (WASH) services

☑ Other WASH, please specify :Water installations and access to fully-functioning WASH services for all our employees (direct & indirect)

(9.15.2.4) Date target was set

12/30/2023

(9.15.2.5) End date of base year

12/30/2024

(9.15.2.6) Base year figure

100

(9.15.2.7) End date of target year

12/30/2024

(9.15.2.8) Target year figure

100

(9.15.2.9) Reporting year figure

100

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved and maintained

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This is an annual target. Target achieved: All of our facilities (including RES sites) and corporate centers provide water installations and access to fully-functioning WASH services for all our employees (direct & indirect). Through this target we contribute to SDG 6.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

Key actions include regular maintenance of water installations, continuous monitoring of WASH services, and ensuring prompt repairs at all facilities, including RES sites. We also invested in employee awareness and training on water hygiene and safety. These efforts have ensured consistent access to fully functioning WASH services, contributing to SDG 6.

(9.15.2.16) Further details of target

This target ensures that all employees, both direct and indirect, have access to safe, reliable WASH services at all company facilities and corporate centers. The aim is to maintain high standards of hygiene and water availability, safeguarding employee health and well-being. This aligns with our commitment to SDG 6 and upholds our responsibility to provide safe working environments.

Row 4

(9.15.2.1) Target reference number

Select from:

☑ Target 3

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/30/2018

(9.15.2.5) End date of base year

12/30/2024

(9.15.2.6) Base year figure

14500

(9.15.2.7) End date of target year

12/30/2025

(9.15.2.8) Target year figure

13500

(9.15.2.9) Reporting year figure

12010

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.11) % of target achieved relative to base year

249

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

Water withdrawals from the network of 17 drills for industrial & water supply use should be less than 13,500 m3/day by 2025. Through this target we contribute to SDG 6.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

To achieve the target of limiting water withdrawals to less than 13,500 m³/day by 2025, we have implemented efficient water management practices, enhanced monitoring of the 17 drills, and optimized water usage in operations. Progress is closely tracked, and current withdrawals are within target limits, and contributing to SDG 6.

(9.15.2.16) Further details of target

This target focuses on reducing water withdrawals from our 17 owned drills by the Aluminium of Greece, part of the Metals Sector. It reflects our commitment to sustainable water management and aligns with our broader environmental strategy to conserve freshwater resources. Achieving this goal helps reduce operational impact on local water sources and supports SDG 6.

Row 5

(9.15.2.1) Target reference number

Select from:

☑ Target 4

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

11/30/2023

(9.15.2.5) End date of base year

12/30/2024

(9.15.2.6) Base year figure

7500

(9.15.2.7) End date of target year

12/30/2025

(9.15.2.8) Target year figure

7000

(9.15.2.9) Reporting year figure

6240

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.11) % of target achieved relative to base year

252

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

Water withdrawals from the network of 17 drills for industrial use of primary cast aluminium plant should be less than 7,000 m3/day by 2025.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

The reduction in industrial water consumption will be achieved through a project that will allow the replacement of industrial water with brackish water. Through this target we contribute to SDG 6.

(9.15.2.16) Further details of target

The target aims to reduce industrial water withdrawals from our 17 owned drills by limiting usage to less than 7,000 m³/day by 2025. This reduction will be achieved through a strategic project to replace industrial water with brackish water, minimizing our impact on freshwater resources. By implementing this sustainable approach, we aim to enhance water efficiency in our operations while contributing to SDG 6, which focuses on ensuring availability and sustainable management of water and sanitation for all.

Row 6

(9.15.2.1) Target reference number

Select from:

☑ Target 5

(9.15.2.2) Target coverage

Select from:

☑ Site/facility

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/30/2023

(9.15.2.5) End date of base year

12/30/2024

(9.15.2.6) Base year figure

400

(9.15.2.7) End date of target year

12/30/2023

(9.15.2.8) Target year figure

350

(9.15.2.9) Reporting year figure

460

(9.15.2.10) Target status in reporting year

Select from:
☑ Underway

(9.15.2.11) % of target achieved relative to base year

-120

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply
☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

Fresh water consumption at the plant from the network of 17 drills, should be less than 350 m3/day. Through this target we contribute to SDG 6.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

As part of our ongoing efforts to enhance water stewardship, we plan to implement several initiatives at the alumina and aluminium production plant. Building on past actions, we will continue our employee awareness campaign, displaying targeted water conservation messages as screensavers on employee PCs in alignment with World Water Day. We also intend to issue periodic email communications to staff, emphasizing the importance of reducing water consumption—particularly during the summer months when usage typically increases. Proactive leak detection will remain a priority, with continuous checks planned at the plant and nearby communities in collaboration with technical services to promptly identify and address any issues. Finally, we will continue to expand our water recycling and reuse programs across production processes and secondary uses within the Metals Sector, and further promote the collection and utilization of rainwater where applicable.

(9.15.2.16) Further details of target

This target focuses on minimizing water withdrawals for drinking purposes from our network of 17 drills, owned by Aluminium of Greece within the Metallurgy Business Sector. By limiting withdrawals to under 350 m³/day, we aim to conserve freshwater resources and promote sustainable water usage. Achieving this target supports our commitment to SDG 6, ensuring the availability and sustainable management of water for our employees and operations.
[Add row]

C11. Environmental performance - Biodiversity

(11.1) Within your reporting boundary, are there any geographical areas, business units or mining projects excluded from your disclosure?

Select from:

☑ No

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Land/water protection

☑ Land/water management

☑ Law & policy

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ Other, please specify :Rate of restoration of total exploitable area from mining activity

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation. In addition, Metlen operates several wind farms in protected areas, ensuring minimal impact on biodiversity. Key facilities include the "Korifi" wind farm, which conducts annual avifauna monitoring with no observed bird fatalities. The "Pyrgos" wind farm is adjacent to critical habitats, and monitoring has shown limited effects on bird populations. The "Chelona" wind farm also implements a bird collision avoidance system. Overall, the company demonstrates commitment to environmental protection through ongoing monitoring and compliance with biodiversity regulations.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

No comment.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

No comment.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

No comment.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

No comment.
[Fixed row]

(11.4.1) Provide details of your organization’s activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.1) Mining project ID

Select from:
☑ All disclosed mining projects

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Legally protected areas

☑ UNESCO World Heritage sites

(11.4.1.3) Protected area category (IUCN classification)

Select from:

☑ Unknown

(11.4.1.4) Country/area

Select from:

☑ Greece

(11.4.1.5) Name of the area important for biodiversity

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state. Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation.

(11.4.1.6) Proximity

Select from:

☑ Up to 25 km

(11.4.1.8) Briefly describe your organization’s activities in the reporting year located in or near to the selected area

The activities relate to underground bauxite mining operations.

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ No

(11.4.1.11) Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

The company's underground bauxite mining activities, while compliant with necessary permits, could potentially impact biodiversity near the Archaeological Site of Delphi and within the Natura 2000 area. While underground operations reduce surface disturbance, they may still cause subsidence or alter groundwater flow, potentially affecting local ecosystems. An environmental impact assessment (EIA) was conducted to evaluate these risks, focusing on species habitats and ecosystem integrity. To mitigate potential impacts, we implement measures such as monitoring groundwater levels, conducting regular biodiversity assessments, and maintaining strict operational protocols. Continuous consultation with environmental authorities ensures adherence to regulations and ongoing improvement of our practices.

(11.4.1.12) Further context for mining projects

The company's mining operations predate both the UNESCO designation of the Delphi site and the Natura 2000 designation, and they account for less than 20% of our bauxite activities within the Natura area. We prioritize responsible mining practices, engaging with stakeholders, and adhering to state regulations. Our commitment to sustainable development ensures that mining operations are balanced with environmental conservation efforts, contributing positively to local communities while minimizing ecological footprints.
[Add row]

(11.5) Can you disclose the mining project area and the area of land disturbed for each of your mining projects?

(11.5.1) Disclosing mining project area and area of land disturbed

Select from:

☑ Yes

(11.5.2) Comment

The company's mining activities of bauxite are close (10-15 km) to the Archaeological Site of Delphi (https://whc.unesco.org/en/list/393/). The activities predate the UNESCO designation and of course there are in force all the necessary permits from the state. Less than 20% of the company's mining activities of bauxite are located within a Natura 2000 area. There are in force all the necessary permits from the state and the activities predate the Natura 2000 designation.
[Fixed row]

(11.5.1) Provide details on the mining project area and the area of land disturbed for each of your mining projects.

Row 1

(11.5.1.1) Mining project ID

Select from:
☑ Project 1

(11.5.1.2) Total area of owned land/lease/project area (hectares)

41

(11.5.1.3) Total area disturbed to date (hectares)

101.5

(11.5.1.4) Area disturbed in the reporting year (hectares)

11

(11.5.1.5) Type(s) of habitat disturbed in the reporting year

Select all that apply
☑ Natural habitat

(11.5.1.6) Comment

The total area of land associated with our mining projects covers 41 hectares of owned, leased, or project land. As of the end of the reporting year, 101.5 hectares of land have been disturbed in total, with 11 hectares disturbed during the current reporting year. The disturbed areas primarily include natural habitats. We continually assess and monitor the impact of our operations to ensure that any disruption is minimized and managed in alignment with our biodiversity and land use policies. [Add row]

(11.6) Are there artisanal and small-scale mining (ASM) operations active in your mining project areas or in their area of influence?

Select from:

☑ No

(11.7) Do you adopt biodiversity action plans to manage your impacts on biodiversity?

Select from:

☑ Yes

(11.7.1) Describe your criteria for defining which sites are required to produce biodiversity action plans.

In our organization, the criteria for determining which sites require the development of Biodiversity Action Plans (BAPs) are based on a combination of ecological significance, regulatory requirements, and potential impact assessments. Our approach ensures that we prioritize biodiversity conservation in areas where our operations could have the most significant effects. The criteria are as follows: Ecological Significance: Sites located within or adjacent to protected areas, such as Natura 2000 sites, UNESCO World Heritage Sites, or other ecologically sensitive areas, are prioritized for BAP development. We assess the biodiversity value of the site, including the presence of rare, endangered, or endemic species and critical habitats. Sites with high ecological value or unique ecosystems warrant more comprehensive action plans. Impact Assessment: We conduct detailed impact assessments for all proposed mining sites to evaluate potential effects on local biodiversity. If a site is likely to cause significant disturbance to habitats or species, a BAP will be mandated. This assessment includes evaluating both direct impacts, such as habitat destruction, and indirect impacts, such as changes in water quality or noise pollution. Regulatory Requirements: Compliance with local, national, and international regulations is crucial. Any site that falls under legal obligations to prepare a BAP, as outlined by environmental laws or policies, is required to develop one. We stay informed of evolving regulations to ensure adherence. Stakeholder Input: Community concerns and stakeholder feedback are critical in our decision-making process. If local stakeholders express concerns regarding biodiversity impacts, this feedback may trigger the development of a BAP, even if the site does not meet other criteria. Operational Scale and Duration: The scale and expected duration of the mining activities also play a role. Larger projects or those expected to have long-term operational impacts are more likely to require a BAP than smaller, short-term projects. Monitoring and Review: We commit to regular monitoring of our sites. If monitoring results indicate significant changes in biodiversity or ecosystem health, we reassess whether a BAP is necessary, even for sites previously deemed low-risk. By applying these criteria, we ensure that our Biodiversity Action Plans are tailored to the specific contexts of our operations, effectively addressing potential risks to biodiversity. Our BAPs are designed to include actionable goals, stakeholder engagement, and ongoing monitoring to mitigate impacts and enhance biodiversity conservation efforts in alignment with our commitment to sustainable practices.

(11.8) Provide details on mining projects that are required to produce Biodiversity Action Plans.

(11.8.1) Number of mining projects required to produce a BAP

1

(11.8.2) % of mining projects required to produce a BAP that have one in place

100

(11.8.3) Format

Select all that apply

☑ Part of general Environmental Management System

(11.8.4) Frequency BAPs are reviewed

Select all that apply

☑ Eventually

(11.8.5) Please explain

Our organization mandates the production of Biodiversity Action Plans (BAPs) for specific mining projects to ensure the protection of biodiversity and compliance with environmental regulations. The criteria for determining which projects require BAPs include: Proximity to Protected Areas: Mining operations located near or within protected areas, such as Natura 2000 sites or UNESCO World Heritage Sites, are required to produce BAPs. These plans focus on mitigating potential impacts on sensitive ecosystems and species. High-Impact Activities: Projects anticipated to have significant environmental impacts, as identified through our impact assessment processes, necessitate BAPs. This includes large-scale bauxite mining or extensive surface disturbances, with plans detailing habitat restoration and species protection measures. Presence of Endangered Species: Operations situated in habitats supporting rare or endangered species are also required to develop BAPs. These plans outline strategies for habitat preservation and monitoring to ensure species survival during mining activities. Community Engagement: Projects that receive concerns from local communities regarding biodiversity impacts will produce BAPs. These plans aim to address community concerns and incorporate local ecological knowledge. Regulatory Requirements: Certain mining projects are legally mandated to prepare BAPs as part of their environmental permitting process. This ensures compliance with national and regional biodiversity regulations. Long-Term Operations: Projects with extended operational timelines are required to

implement BAPs to maintain biodiversity considerations throughout their lifecycle, allowing for adaptive management based on monitoring outcomes. By adhering to these criteria, our organization commits to minimizing environmental impacts and promoting biodiversity conservation in all our mining activities.
[Fixed row]

(11.9) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?

(11.9.1) Any projects caused, or have the potential to cause, significant adverse impacts on biodiversity

Select from:
☑ No

(11.9.2) Comment

Our organization has conducted comprehensive assessments of all our mining projects to evaluate their potential impacts on biodiversity. Based on these assessments, we confidently state that none of our current or planned projects have caused, or are anticipated to cause, significant adverse impacts on biodiversity. Several key factors contribute to this conclusion: Rigorous Environmental Assessments: Before the commencement of any mining activities, we conduct detailed Environmental Impact Assessments (EIAs) that evaluate potential biodiversity impacts. These assessments are designed to identify sensitive habitats and species that could be affected by our operations. Underground Mining Practices: Our mining operations primarily utilize underground methods, which significantly reduce surface disturbance and habitat destruction compared to open-pit mining. This approach minimizes direct impacts on flora and fauna in surrounding areas. Proximity to Protected Areas: We maintain strict operational boundaries in relation to designated protected areas, ensuring that our activities are located at safe distances from sensitive ecosystems. This proactive measure helps to preserve the integrity of these habitats. Biodiversity Action Plans: For projects near sensitive environments, we have implemented Biodiversity Action Plans (BAPs) to ensure that any potential risks are effectively managed. These plans outline strategies for habitat conservation, species protection, and restoration efforts. Stakeholder Engagement: We actively engage with local communities, environmental organizations, and regulatory bodies to gather insights and feedback on biodiversity concerns. This collaborative approach enables us to adapt our practices to further minimize any potential impacts. Monitoring and Adaptive Management: We implement ongoing biodiversity monitoring programs to track the health of ecosystems surrounding our operations. This allows us to identify any emerging issues and adapt our practices accordingly to safeguard biodiversity. In conclusion, our commitment to responsible mining practices, along with our rigorous assessments and proactive measures, ensures that our projects do not have significant adverse impacts on biodiversity.
[Fixed row]

(11.10) Are biodiversity issues integrated into any aspects of your long-term strategic business plan, and if so how?

Long-term business objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

METLEN Energy and Metals approach to managing ecological impacts from its activity includes a combination of elements related to the prevention, management and restoration of exploitable land from its activity, minimising impacts on biodiversity. The protection of biodiversity and the restoration of the natural landscape of exploitable areas associated with business activities are an essential objective for METLEN, in the context of reducing its ecological impact and contributing to sustainable development. Also, METLEN is a member of the Sustainable Development Council of SEV (Hellenic Federation of Enterprises) which participates in international business for nature alliance for the protection of biodiversity and ecosystems. The SEV Council for Sustainable Development, as a member of the World Business Council for Sustainable Development WBCSD, after co-signing the Lisbon Declaration, paved the way for Greek businesses to contribute to addressing the global challenge of environmental balance and sustainability, but also to highlight the strategies that implement the commitments they have undertaken, as well as the good practices they implement.

Strategy for long-term objectives

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

METLEN Energy and Metals approach to managing ecological impacts from its activity includes a combination of elements related to the prevention, management and restoration of exploitable land from its activity, minimising impacts on biodiversity. The protection of biodiversity and the restoration of the natural landscape of exploitable areas associated with business activities are an essential objective for METLEN, in the context of reducing its ecological impact and contributing to sustainable development. Also, METLEN is a member of the Sustainable Development Council of SEV (Hellenic Federation of Enterprises) which participates in international business for nature alliance for the protection of biodiversity and ecosystems. The SEV Council for Sustainable Development, as a member of the World Business Council for Sustainable Development WBCSD, after co-signing the Lisbon Declaration, paved the way for Greek businesses to contribute to addressing the global challenge of environmental balance and sustainability, but also to highlight the strategies that implement the commitments they have undertaken, as well as the good practices they implement.

Financial planning

(11.10.1) Are biodiversity-related issues integrated?

Select from:

☑ No, biodiversity-related issues were reviewed but not considered as strategically relevant/significant

(11.10.2) Long-term time horizon (years)

Select from:

☑ 21-30

(11.10.3) Please explain

As part of its environmental policy, METLEN integrates biodiversity considerations directly into its financial planning and operational budgeting. This approach ensures that adequate resources are allocated annually to prevent, monitor, and mitigate ecological impacts from the earliest stages of project development. In 2024, the Company invested €92,500 in environmental assessments and biodiversity studies, contributing to a five-year total (2020–2024) of approximately €235,000. These expenditures covered the ecological assessment of Antikyra Bay, biodiversity monitoring, terrestrial fauna mapping, and the Special Ecological Assessment (SEA). In parallel, METLEN allocated €115,650 in operating costs (OpEx) for bird protection actions and €113,600 in capital expenditure (CapEx) for the installation of automated bird collision prevention systems. Over the past three years (2022–2024), avifauna-related studies and protection measures have exceeded €260,000, demonstrating the Company's sustained financial commitment to species conservation. Beyond prevention and monitoring, METLEN allocates significant financial resources to ecological restoration and habitat enhancement, particularly in areas affected by mining activities. In 2024 alone, the Company dedicated €202,225 in OpEx for restoration works, including the planting of over 30,000 trees in 140 acres, replanting an additional 12,000, and producing 38,000 seedlings from local seeds in its nurseries. Over the last three years (2022–2024), restoration expenditures have reached €540,000. These investments form part of a long-term biodiversity management strategy that integrates operational planning with the Company's broader environmental objectives, ensuring compliance with regulatory requirements, alignment with ISO 14001:2015 standards, and contribution to global sustainability goals. Financial planning for biodiversity therefore remains an integral, recurring element of METLEN's environmental stewardship, supporting the resilience of ecosystems in its areas of operation.

[Fixed row]

(11.11) Have you specified any measurable and time-bound targets related to your commitments to reduce or avoid impacts on biodiversity?

Select from:
☑ Yes

(11.11.1) Provide details of your targets related to your commitments to reduce or avoid impacts on biodiversity, and progress made.

Row 1

(11.11.1.1) Target reference number

Select from:
☑ Target 1

(11.11.1.2) Target label

Rate of restoration of total exploitable area from mining activity.

(11.11.1.3) Base year

2020

(11.11.1.4) Target year

2025

(11.11.1.5) % of target achieved

Select from:

☑ 91-99%

(11.11.1.6) Please explain

As part of our commitment to sustainable mining practices, we closely monitor the rate of restoration of total exploitable areas from mining activities. Starting from a baseline of 83.0% in 2020, we have set a target of 90.5% by 2025. In 2024, we achieved a restoration rate of 89.4%, demonstrating significant progress towards our goal. This performance reflects our ongoing efforts to minimize the environmental impact of our operations and contribute to land restoration.
[Add row]

(11.12) Has your organization adopted avoidance and/or minimization as strategies to prevent or mitigate significant adverse impacts on biodiversity?

Select from:
☑ Yes

(11.12.1) Provide relevant company-specific examples of your implementation of avoidance and minimization actions to manage adverse impacts on biodiversity.

Row 1

(11.12.1.1) Mining project ID

Select from:
☑ All disclosed mining projects

(11.12.1.2) Approach and type of measure

Minimization
☑ Operational controls

(11.12.1.3) Description

In our bauxite mining operations, which are primarily conducted underground, we have implemented a comprehensive set of measures to avoid and minimize adverse impacts on biodiversity. Underground mining inherently reduces surface disturbances, limiting direct effects on ecosystems and habitats. Our approach centers on strict operational controls designed to prevent habitat disruption and reduce our environmental footprint. We also implement water management strategies to protect local water bodies and groundwater from any negative effects of extraction activities. In areas near protected ecosystems, we conduct regular air and water quality monitoring to identify early signs of environmental impact, enabling timely corrective actions. As part of our commitment to biodiversity conservation, we run ongoing monitoring programs to track the health of flora and fauna surrounding our operations. This data informs adaptive management practices, ensuring potential impacts stay within acceptable limits. Moreover, we maintain active engagement with local stakeholders, environmental experts, and regulatory authorities to align our operations with biodiversity conservation goals. This collaborative approach supports high environmental standards while preserving the natural ecosystems where we operate. Through these efforts, we demonstrate our dedication to minimizing biodiversity risks and maintaining responsible, sustainable mining operations.
[Add row]

(11.13) Have significant impacts on biodiversity been mitigated through restoration?

(11.13.1) Have significant impacts on biodiversity been mitigated through restoration?

Select from:
☑ Yes

(11.13.2) Comment

In our bauxite mining operations, significant impacts on biodiversity have been mitigated through targeted restoration efforts. Since our extraction processes are primarily conducted underground, the surface-level disturbances are already minimized, yet we recognize the importance of further mitigating any environmental impact. Restoration efforts are a key part of our strategy to maintain ecological balance in the areas where we operate. We actively monitor and restore the land impacted by our mining activities, focusing on returning disturbed areas to their natural state. As part of this commitment, we track the rate of restoration of the total exploitable area from mining activities. Using 2020 as a baseline, when the restoration rate was 83%, we have made significant progress. By 2024, our restoration rate reached 89.4%, nearing our target of 90.5% for 2025. This demonstrates our commitment to continuously improving our environmental stewardship. Our restoration activities include replanting native species, rehabilitating natural habitats, and ensuring that the land can support biodiversity in the long term. These efforts are supported by ongoing monitoring and collaboration with environmental experts to ensure that our restoration techniques are effective in promoting biodiversity recovery. In conclusion, while the underground nature of our operations inherently reduces the initial impact on biodiversity, we go beyond mitigation through active and systematic restoration measures. This approach ensures that the ecological value of the land is preserved, and any significant impacts are addressed, aligning with our long-term sustainability goals.
[Fixed row]

(11.13.1) Provide details on restoration actions you have in place in your sites.

Row 1

(11.13.1.1) Mining project ID

Select from:

☑ All disclosed mining projects

(11.13.1.2) Description of the impact being mitigated by restoration

The primary impact being mitigated by restoration in our bauxite mining operations is the disturbance of land due to ancillary surface activities associated with underground mining. Though underground extraction minimizes surface disruption, necessary infrastructure such as access roads, material handling areas, and supporting facilities can affect the natural habitat and local biodiversity. The disturbed areas may involve natural vegetation loss, soil disruption, and potential alteration of local ecosystems. This can lead to habitat fragmentation, affecting flora and fauna. Our restoration efforts aim to address these impacts by rehabilitating disturbed areas, re-establishing native plant species, and restoring the ecological balance in affected zones. Restoration focuses on returning the land to its pre-disturbance condition, ensuring that natural habitats are recovered and biodiversity can thrive once again. By doing so, we actively mitigate the ecological impact of our operations, reinforcing our commitment to sustainable mining practices and biodiversity protection. Kindly review our Integrated Annual Report 2024 (https://www.metlengroup.com/media/pooiu4em/iar_2024_metlen_en.pdf), pages 170-172, for more information.

(11.13.1.3) Type of ecosystem restored

Select from:

☑ Other ecosystems

(11.13.1.4) Total area restored to date (hectares)

268.53

(11.13.1.5) Total area to be restored (hectares)

157.4

(11.13.1.6) Target year

2040

(11.13.1.7) Describe restoration actions

Restoration actions in our bauxite mining operations focus on rehabilitating surface areas impacted by ancillary activities. Key actions include: Land Rehabilitation: After completing mining-related surface activities, we focus on leveling and reshaping the disturbed land to its natural contours. This helps in preventing soil erosion and restoring the land's natural structure. Re-vegetation: Native plant species are reintroduced to the rehabilitated areas to re-establish the natural ecosystem. By using indigenous flora, we enhance biodiversity recovery, allowing the habitat to slowly return to its original state. Soil Restoration: We improve soil quality by reintroducing organic material and managing soil composition, which is crucial for successful vegetation and long-term habitat recovery. Monitoring & Maintenance: Post-restoration, regular monitoring is conducted to ensure vegetation growth and ecological stability. If necessary, further interventions are implemented to enhance habitat restoration. These actions ensure that disturbed areas from mining activities are returned to a state where biodiversity can be sustained, mitigating long-term environmental impacts.
[Add row]

(11.14) Have significant residual impacts of your projects been compensated through biodiversity offsets?

	Have residual impacts been compensated through biodiversity offsets?	Comment
	Select from: ☑ Data not available	*No data available.*

[Fixed row]

(11.15) Is your organization implementing or supporting additional conservation actions?

	Implementing or supporting additional conservation actions?	Comment
	Select from: ☑ Data not available	*No data available.*

[Fixed row]

(11.16) Do your mining projects have closure plans in place?

	Are there closure plans in place?	Comment
	Select from: ☑ No	*No closure plans in the near future.*

[Fixed row]

(11.17) Can you disclose the area rehabilitated (in total and in the reporting year) for each of your mining projects?

	Disclosing area rehabilitated (in total and in the reporting year)	Comment
	Select from: ☑ Yes	*Yes, we can disclose the area rehabilitated for our mining projects.*

[Fixed row]

(11.17.1) Provide details on the area rehabilitated (total/reporting year) for each of your mining projects, including post-mining land use.

Row 1

(11.17.1.1) Mining project ID

Select from:
☑ All disclosed mining projects

(11.17.1.2) Total area rehabilitated (hectares)

268.53

(11.17.1.3) Area rehabilitated in the reporting year (hectares)

8.7

(11.17.1.4) Describe post-mining land use

Post-mining land use is an essential aspect of our environmental management strategy, focusing on the rehabilitation and sustainable development of areas affected by our bauxite extraction activities. Once mining operations cease, we implement a comprehensive reclamation plan that aims to restore the landscape and enhance biodiversity. The primary objectives of our post-mining land use strategy include: Habitat Restoration: We prioritize the restoration of natural habitats, including reforestation with native plant species, to promote biodiversity and ecosystem resilience. This effort helps to re-establish wildlife corridors and supports the return of local fauna. Monitoring and Maintenance: Continuous monitoring of restored areas is conducted to ensure the success of rehabilitation efforts. We assess soil quality, vegetation growth, and wildlife return, making adjustments as necessary to achieve desired outcomes.
[Add row]

(11.18) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments?

(11.18.1) Collaborating or partnering with NGOs

Select from:

☑ Yes

(11.18.2) Comment

During the reporting year, our organization engaged in strategic collaborations with various non-governmental organizations (NGOs) focused on environmental sustainability and biodiversity conservation. These partnerships are designed to leverage the expertise and resources of NGOs to enhance our environmental initiatives and ensure the effective management of biodiversity-related risks. The collaborations typically involve joint projects aimed at promoting sustainable practices, sharing knowledge, and developing tools for environmental assessment and management. For instance, we worked closely with an NGO specializing in habitat restoration to implement a project that focuses on reforestation and the rehabilitation of degraded ecosystems. This collaboration not only supports our commitment to biodiversity but also aligns with our goals for climate resilience. Additionally, we participate in capacity-building initiatives facilitated by NGOs, where we share insights on our environmental strategies and learn from their experiences in community engagement and conservation efforts. This reciprocal relationship enhances our understanding of local ecological issues and informs our policies and practices. Overall, these collaborations reflect our commitment to fostering a sustainable future by integrating environmental stewardship into our operations and engaging with stakeholders who share our vision for a healthier planet.
[Fixed row]

(11.18.1) Provide details on main collaborations and/or partnerships with non-governmental organizations that were active during the reporting year.

Row 1

(11.18.1.1) Organization

Metals and Energy Sectors

(11.18.1.2) Scope of collaboration

Select from:

☑ Company-wide

(11.18.1.4) Areas of collaborations

Select all that apply

☑ Biodiversity Action Plans

(11.18.1.5) Describe the nature of the collaboration

During the reporting year, our organization engaged in strategic collaborations with various non-governmental organizations (NGOs), such as Bee for planet and We4all, focused on environmental sustainability and biodiversity conservation. These partnerships are designed to leverage the expertise and resources of NGOs to enhance our environmental initiatives and ensure the effective management of biodiversity-related risks. The collaborations typically involve joint projects aimed at promoting sustainable practices, sharing knowledge, and developing tools for environmental assessment and management. For instance, we worked closely with an NGO specializing in habitat restoration to implement a project that focuses on reforestation and the rehabilitation of degraded ecosystems. This collaboration not only supports our commitment to biodiversity but also aligns with our goals for climate resilience. Additionally, we participate in capacity-building initiatives facilitated by NGOs, where we share insights on our environmental strategies and learn from their experiences in community engagement and conservation efforts. This reciprocal relationship enhances our understanding of local ecological issues and informs our policies and practices. Overall, these collaborations reflect our commitment to fostering a sustainable future by integrating environmental stewardship into our operations and engaging with stakeholders who share our vision for a healthier planet.

(11.18.1.6) Duration (until)

Select from:

☑ No specified timeframe

[Add row]

(11.20) Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?

Select from:

☑ Yes

(11.20.1) Provide relevant examples of other biodiversity-related engagement activities that happened during the reporting year.

Row 1

(11.20.1.1) Activities

Select from:

☑ Engaging with local communities

(11.20.1.2) Mining project ID

Select all that apply

☑ All disclosed mining projects

(11.20.1.3) Please explain

During the reporting year, we actively engaged with local communities surrounding our mining operations through workshops, informational sessions, and stakeholder consultations. These initiatives aimed to raise awareness about biodiversity conservation, sustainable resource management, and the environmental practices we follow. We collaborated closely with community leaders and local organizations to gather valuable feedback on our operations, address concerns, and identify opportunities for joint conservation efforts. This dialogue fostered a strong sense of partnership and trust, enabling us to co-develop solutions that benefit both the environment and the community. Our engagement activities included capacity-building programs to enhance community understanding of biodiversity issues and the importance of protecting local ecosystems. We also supported community-led conservation projects, such as habitat restoration and invasive species control, contributing resources and expertise to amplify their impact. Looking ahead, we are committed to deepening our community engagement by expanding these programs, incorporating traditional ecological knowledge, and integrating community input into our biodiversity management plans.

Row 2

(11.20.1.1) Activities

Select from:

☑ Funding research organizations

(11.20.1.2) Mining project ID

Select all that apply

☑ All disclosed mining projects

(11.20.1.3) Please explain

We provide funding to research organizations dedicated to conducting comprehensive biodiversity assessment studies in areas adjacent to our mining sites. These studies are designed to evaluate the ecological impacts of our operations, including potential risks to flora, fauna, and habitat integrity. Through rigorous scientific investigation, the research aims to identify key biodiversity values, assess any changes or threats resulting from our activities, and develop evidence-based strategies for biodiversity enhancement and restoration. The insights gained from these studies play a critical role in shaping our environmental management practices, enabling us to implement targeted and effective conservation measures that mitigate adverse effects and promote ecosystem resilience. By supporting these independent research initiatives, we not only deepen our understanding of local ecosystems but also demonstrate a proactive commitment to responsible environmental stewardship.
[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(13.1.1.2) Disclosure module and data verified and/or assured

Introduction

☑ All data points in module 1

(13.1.1.3) Verification/assurance standard

General standards

☑ Aluminium Stewardship Initiative (ASW)

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Audited by external independent third party organization, PricewaterhouseCoopers SA. Please review page 319 of the Integrated Annual Report 2024.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

iar_2024_metlen_en.pdf
[Add row]

(13.2) 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.

	Additional information
	No additional information

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Executive BoD Member & Chief Corporate Governance & Sustainability Officer

(13.3.2) Corresponding job category

Select from:
☑ Board/Executive board
[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:
☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute