

environment
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report
2010

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Message from the Chairman

In a society that wishes to look positively into the future, business growth must go hand-in-hand with socially responsible initiatives, as this is the only effective approach to sustainable growth and development.

For all of us in the MYTILINEOS Group, this assumption –that is to say, that the business community must contribute equally to the economy and to society– is a shared belief and a principle that guides our long-term strategic decisions as well as our day-to-day activities.

Firmly committed to our efforts for business growth, guided by our vision and following a carefully planned investment strategy, we are bolstering up the Greek market and we are helping promote Greece in the global business arena. Through our impressive portfolio of operations, we support traditional industrial sectors, such as metallurgy and EPC sector, while also consolidating our position in new, rapidly growing markets, such as the markets for Natural Gas and Electricity, which open up new prospects for businesses and society.

At the same time, we have assumed a role of active social partner in our local communities, we operate by making jobs available and we also contribute to the development of infrastructures and actions that promote cultural and economic life.

We are also taking initiatives to reduce the environmental footprint which inevitably accompanies of our operation as an industrial Group. In this area, the MYTILINEOS Group has adopted and is applying comprehensive environmental management policies, including prevention and response measures, across all its subsidiaries.

We also give priority to the management of gas emissions, to the certification and improvement of our Environmental Management Systems, and to the development of a more environment-friendly technology. Indicative of our objectives and efforts in this area is the investment currently being realised in our subsidiary ALUMINIUM S.A., budgeted at nearly €8 million and scheduled for completion in 2011, for the discontinuation of the disposal of red mud, a bauxite processing residue, in the sea area.

As part of our efforts to improve ourselves with each passing day we have been monitoring our progress and we are sharing it with you for the fourth year running in our Sustainability Report, which is structured in accordance with the GRI-G3 international standard, hoping that every year we will be successful in setting even higher targets and in proving ourselves capable of achieving them.

We are also proposing our Sustainability Report as the starting point of a dialogue with society, aimed at increasing transparency, building relations of mutual trust and understanding, and improving continuously our Group's social strategy. Our steady term goal every year is to remain a pioneering business that is actively involved in shaping and helping drive business and social developments.

Evangelos G. Mytilineos
Chairman of the Board & CEO

MYTILINEOS Group of Companies



Sustainability Report Parameters

Report Profile

The Sustainability Report 2010 of the MYTILINEOS Group (hereinafter "Report") refers to the period from 1st January to 31st December 2010. The Report, which is released and published annually, is the Group's third independent publication regarding the approach to and management of Corporate Social Responsibility issues (financial, environmental and social), in the Greek territory, which pertain to the Group's strategy for sustainable development, and is a continuation of the previous Sustainability Report 2009.

Report scope and boundary

The main purpose of the Report is to provide direct, reliable and transparent information on the Group's efforts, performance and future commitments regarding the integration of Corporate Responsibility in its operations to all social groups as well as to legal bodies which the Group acknowledges as its core Stakeholders: employees, shareholders, financial analysts, corporate clients, suppliers, business partners, government officials, the Media and the local communities where the Group deploys and develops its activities.

The Report makes short references to financial matters (which are discussed in detail in the Group's Financial Report 2010) and presents in detail the Group's approach to Corporate Social Responsibility, focusing on the environmental and social positions, initiatives and performance (sustainability framework) of MYTILINEOS HOLDINGS S.A. (Corporate Centre) and of its four subsidiaries in which it is the majority shareholder ("ALUMINIUM S.A.", "DELPHI-DISTOMON S.A.", "METKA S.A." and "PROTERGIA S.A."), by sector of industrial activity (Metallurgy & Mining, Energy and EPC Projects) in the Greek territory.

The Report places emphasis on several key issues, such as the importance of the health and safety of employees at the workplace, the Group's contribution to the development of social cohesion in the local communities where its operations are based, and the investments made to help reduce the environmental impact of its business activities.

Compared to the Sustainability Report 2009, changes have been made to the information on ELVO S.A. and ENDESA Hellas S.A. In particular, the present Report does not contain information on the following companies:

- a) ELVO S.A.: In June 2010, the Group announced its decision to withdraw from the Management of the company and retain its minority stake (43%) in the company. The decision to withdraw from the Management of ELVO S.A. is in full agreement with the business strategy of the MYTILINEOS Group, which focuses on the Metallurgy & Mining, Energy, and EPC Construction sectors.
- b) ENDESA HELLAS S.A.: After acquiring the stake (50.01%) held by ENDESA S.A. in the company, the Group became the sole shareholder of ENDESA HELLAS S.A., which was renamed "PROTERGIA S.A.". This move helped consolidate the Group's position as the largest independent energy producer in Greece.

- c) The Group's newly-established company "M&M GAS Co S.A.": This Company was established jointly with MOTOR OIL to engage in the supply and trading of natural gas.

The performance of the MYTILINEOS Group in core areas which is limited to the presentation of data from a single company, such as for example the data reported on carbon dioxide emissions and the incorporation of human rights protection criteria in business agreements, is also mentioned in the corresponding sections on the individual companies. The time foreseen for full reporting of these data by all Group companies is also mentioned.

Report Methodology

The structure of the Sustainability Report 2010 has been modified from that of the previous report for 2009. The new structure, on which the compilation of the present Report was based, was derived after adoption of the Global Reporting Initiative (GRI-G3) reporting guidelines for Application Level B.

The information presented in the sections on the Group's individual companies follows the same guidelines, with no special mention being made of the full or partial coverage of indicators.

More specifically, the Group's CSR governance model is described for the first time in the present Report. The Disclosure on Management Approach, which provides a brief overview of the Group's management approach to addressing the key CSR areas, including its goals in each area, is also published for the first time in the present Report. Finally, the procedure and the results of the Group's initiative to engage its Stakeholders in a dialogue, launched for the first time during 2010, are also presented in this Report.

The data capture and the calculation of the indicators referring to the working conditions and to the environmental performance of ALUMINIUM S.A., METKA S.A. and DELPHI-DISTOMON S.A. are checked and verified using internationally accepted calculation methods, such as those provided under the OHSAS 18001 – ELOT 1801 Occupational Health & Safety Management Systems and the ISO 14000 Environmental Management Standard, respectively. With regard to social data, these cover the initiatives taken by each company individually as well as the actions carried out by MYTILINEOS HOLDINGS S.A., which represents the entire Group. The present Report contains data obtained from direct measurements, while -to help comparisons- the corresponding data for 2009 are also given, where available.

The Sustainability Report 2010 was compiled by the collaborating CSR-dedicated teams established in all Group companies. These teams were responsible for gathering the information and data required in connection with the various CSR action lines.

The procedure to determine the areas (materiality) which are contained in the Report and pertain to the challenges facing the Group regarding sustainable development, either at the aggregate (Group) level or at the level of individual subsidiaries, was based on a number of processes such as:



- a) The results of the Corporate Social Responsibility Mapping project, which involved the assessment of the importance of the issues pertaining to responsible entrepreneurship, which are renewed annually by the Group companies and are the basis of the Sustainability Report for each year. This project involves the recording and evaluation of the existing policies, actions and results in the CSR areas, the identification of the strong and weak activity areas according to the actions undertaken by the Group companies, and the definition of the relevant areas for development in their internal as well as in their external environment.
- b) The expectations on the part of the Stakeholders exclusively in connection with CSR issues, following a quantitative survey which concerned the MYTILINEOS Group as a whole, as well as following special events held during 2010 to promote the dialogue and exchange of views with the Stakeholders and organised by ALUMINIUM S.A. and METKA S.A, the Group's largest subsidiaries (expectations of participants).
- c) The principles and values of the Group and its core commitments in the framework of Corporate Social Responsibility.

The planning and implementation of actions regarding the response to the expectations of the Stakeholders, at Group level as well as at the level of the individual companies, will take place in 2011. Therefore, the present Report does not contain any information about these.

The data and information presented in the Report have been collected under the procedures and scientific recording methods applied by each Group company and the databases held within the scope of corporate systems. The establishment of their structure, the guidance for data collection and checking, and the authoring and editing of the Report texts were carried out with the scientific support of an external associate from MEDA Communication S.A.

Acknowledging that the concept of Corporate Social Responsibility must be inextricably linked to its performance in all individual CSR areas, the MYTILINEOS Group takes particular care to create the conditions that will allow it to honour its commitment to Responsibility in its daily operations. Thus, checking, verification and publication of the information contained in the present Report are important tools for the Group in its efforts to assess its performance and to provide all its Stakeholders with the opportunity to establish the extent to which the Group is keeping in line with its commitment to achieve Sustained and Responsible Development.

Furthermore, the present Report was checked for the first time by the Global Reporting Initiative (GRI) organisation for confirming its compliance with the requirements for Application Level B, in accordance with the self-declaration made by the MYTILINEOS Group. The procedure for checking and assessment of the Sustainability Report (assurance) by an external assurance provider is scheduled to start with the Sustainability Report 2011.

As already mentioned, the Group's key objective in publishing the Sustainability Report 2010 is to provide its Stakeholders with direct access to information about its efforts, performance and future commitments regarding the integration of Corporate Social Responsibility in its operations. To this end, we would welcome all your comments on our business activity sectors as well as on the present Report.

- The terms "Corporate Centre", "Parent company", "MYTILINEOS Holdings" and the name "MYTILINEOS S.A." refer to the company under the business name "MYTILINEOS HOLDINGS S.A."

- The terms "Company", "Business" and the names "MYTILINEOS S.A.", "ALUMINIUM S.A.", "DELPHI-DISTOMON S.A.", "METKA S.A." and "PROTERGIA S.A." refer to each company that represents the respective business activity sector of the Group and to that company's activities in Greece.

- The terms "Group" and "MYTILINEOS Group" refer to MYTILINEOS HOLDINGS S.A. and to its subsidiaries, all of which together make up the MYTILINEOS Group.

Please send your views to:

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MYTILINEOS Group Profile

The MYTILINEOS Group today counts more than twenty years as one of Greece's leading industrial groups in the sectors of Metallurgy & Mining, Energy and EPC Projects.

Having evolved from a family-run metallurgy business founded in 1908, the Group's holding company, MYTILINEOS HOLDINGS S.A., was established in 1990 and proceeded to a series of dynamic acquisitions and mergers in several key and rapidly growing heavy industry sectors in Greece. Soon after that, in 1995, the company was listed on the Athens Stock Exchange and its share became a constituent of the FTSE-20 large-capitalisation index. In 2010, the MYTILINEOS Group posted a consolidated turnover of €1 billion and employed more than 2,000 people in Greece and abroad.

Responding to the domestic economic recession with optimism and a focused strategy for long-term growth, the MYTILINEOS Group today continues, more than ever before, to tap Greece's potential in terms of human resources, raw materials and technology, to strengthen infrastructures and to meet the needs of the domestic market. At the same time, by giving priority to an export-oriented strategy, it is consolidating its position as a key player in foreign markets and uses it to drive its future development.

A growth course which the MYTILINEOS Group has based on the principles of Sustainable Development and Corporate Responsibility. With respect for society, the environment, our people and our shareholders, every single one of the Group's business activities is inextricably linked to its social and environmental footprint.

MYTILINEOS Group – Structure

| ACTIVITY SECTORS | GROUP COMPANIES | OWNERSHIP STAKE | COMPANY HEADQUARTERS |
|---------------------|----------------------|-----------------|----------------------|
| METALLURGY & MINING | ALUMINIUM S.A. | 100,00% | Athens, GREECE |
| | DELPHI-DISTOMON S.A. | 100,00% | Athens, GREECE |
| ENERGY | PROTERGIA S.A. | 100,00% | Athens, GREECE |
| | M&M GAS S.A. | 50% | Athens, GREECE |
| | KORINTHOS POWER S.A. | 65,00% | Athens, GREECE |
| EPC PROJECTS | METKA S.A. | 57,4% | Athens, GREECE |

MYTILINEOS Group – Markets, Products and Services

Metallurgy and Mining

The MYTILINEOS Group holds a prominent position in aluminium and alumina production and trading in the EU. The Group is consistently seeking to enhance its competitiveness, to place top-quality products and services to the market, to create new jobs and to minimise the environmental footprint of all its activities.

ALUMINIUM S.A.: With an annual production capacity estimated at 1,100,000 tons of alumina and 180,000 tons of aluminium for 2013, and through an ambitious investment plan, the company is evolving into the sector's largest producer in Europe.

DELPHI-DISTOMON S.A.: The second largest bauxite producer in Greece and in Europe, with an annual production of 650,000 tons. The company's plants, located in the Amfissa region, supply bauxite to ALUMINIUM S.A..

EPC Projects

METKA S.A.: The construction branch of the MYTILINEOS Group and the Group's key company in the sectors of large-scale energy projects, infrastructure works and defence equipment projects. Greece's top EPC (Engineering-Procurement-Construction) contractor, METKA S.A. implements turn-key projects from design and supply through to construction, specialising primarily in power plants (combined cycle, conventional thermal and hydropower). It is also the company that most strongly expresses the Group's export-oriented strategy.

Energy

From 2002 to this day, the MYTILINEOS Group has evolved into the dominant independent energy producer in Greece. Through strategic alliances and investments which peaked in 2010, the Group is leading developments for the establishment of a new, sustainable market that secures significant gains for industry and society and, through the synergies available with METKA, today has in place broad range of vertically integrated operations in the energy sector, ranging from the construction of power plants to the injection of the electricity produced into the Transmission Network.

With a rapidly growing portfolio of thermal plants whose installed capacity is expected to reach 1.2 GW during 2011, the MYTILINEOS Group is already active in the supply and trading of natural gas. In addition, the Group's three power plants (two, in Ag. Nikolaos, Viotia and one in Ag. Theodori, Korinthia) are expected to enter into commercial operation by the end of the year.

In parallel, the Group is also developing significant operations in the sector of Renewable Energy Sources (RES), with an installed capacity of 42 MW from RES already in full commercial operation and an additional 1400 MW to be contributed from projects under way.

PROTERGIA S.A.: The establishment PROTERGIA in 2010 was a turning point for the Group's energy portfolio, as it made MYTILINEOS Group the largest independent energy producer in Greece. The activities of the new company include the trading of electrical power and CO₂ emissions.

M&M GAS S.A.: The establishment of M&M GAS in 2010 not only served as proof of the dynamic partnership between the MYTILINEOS Group and MOTOR OIL, but also marked the effective liberalisation of the Greek market for natural gas.

The supply and trading of natural gas (liquefied or non-liquefied) helped reduce significantly the energy dependency of the two Groups and demonstrate the environmental as well as the financial benefits of an energy solution which today the Greek market needs more than ever before.

MYTILINEOS Group Key figures

The MYTILINEOS Group has a long-standing presence in the Greek market and is opening up new prospects for the future. The Group's key concern is to tap Greece's potential in terms of people, raw materials and technologies, in order to meet the needs of the domestic market and to promote Greek industrial solutions and products in Europe and all over the world.

- The Group's metallurgical operations make it the largest alumina and aluminium producer in SE Europe.
- Its portfolio of energy assets makes it the largest independent energy producer in Greece.



- In the EPC Projects sector, the Group posts an unprecedented growth given the current adverse economic conditions, and a penetration of foreign markets that stands at nearly 90% of its signed backlog.

| | |
|---|-------------|
| Turnover (in thousand €) | 1,001,351 |
| Net profits (in thousand €) | 60.863 |
| Activity sectors* | 3 |
| Total number of subsidiaries | 6 |
| Total number of countries where the Group is present | 4 |
| Total number of production plants | 7 |
| Total number of employees | 2,599 |
| Average annual production of Bauxite (ton) | 800,000 |
| Average annual production of Alumina (ton) | 775,000 |
| Average annual production of finished Aluminium (ton) | 170,000 |
| EPC signed backlog (in thousand €) | 2,200,000 |
| Portfolio of RES projects in various stages of development (MW) | 1400 |
| Total number of shares MYTILINEOS HOLDINGS S.A. | 116,984,338 |
| Share price - MYTILINEOS HOLDINGS S.A. (€) (as at 31-12-2010) | 4.42 |
| Total number of shares – METKA S.A. | 51,950,600 |
| Share price - METKA S.A. (as at 31-12-2010) (€) | 9.42 |

* Metallurgy & Mining, EPC Projects and Energy

MYTILINEOS Group Strategy

Relying on its highly trained human resources, on its financial robustness and on its strong export orientation, the Group aims to remain on a steady course of growth. In parallel, as also demonstrated by the relocation of all Group subsidiaries in a common, new building complex in Maroussi, it focuses on capitalising on the significant synergies available between its core business activity sectors, seeking their balanced development.

A core strategic direction for the development of the Group is the continuation of its investments in the energy sector and

the consolidation of its position as the largest independent producer of electric power in Greece.

MYTILINEOS Group Social Product

In 2010 the Group generated a "social product" with a total value of € 297 million, which was made available for investments, employee benefits, sponsorships, payment of dividends to its shareholders and payment of taxes.

Today, in the midst of the efforts to lead Greece out of the crisis, the Group considers that its contribution to strengthening the Greek economy and to supporting the Greek society, through multifaceted initiatives in the areas of Society, Environment and Labour, is now more important than ever before.

| Social Product (in thousand €) | 2009 | 2010 |
|------------------------------------|--------|---------|
| Taxes | 10,461 | 38,566 |
| Salaries & benefits to employees | 92,154 | 87,290 |
| Investments | 58,654 | 163,868 |
| Support to local communities | 1,396 | 1,162 |
| Dividends paid out to shareholders | 20,392 | 6,154 |
| Environmental expenditures | 5,959 | 8,667 |

MYTILINEOS Group Awards

During the 5th Annual Greek Road show organised in London by the Athens Exchange in 2010, MYTILINEOS HOLDINGS S.A. was presented with an award from the Athens Stock Exchange in recognition of its participation in the Greek Road show and of its continuous support of this key event.

In addition, in the "Money Conferences: Greek Investment Forum 2010" event held in 2010, the Group was presented with the High Growth Award and the Corporate Governance Award, while the its subsidiary METKA S.A. received the Globalisation Award.

MYTILINEOS Group Business & Social/Environmental Development

Business Development Milestones

| | |
|------|---|
| 1990 | Establishment of MYTILINEOS S.A. |
| 1995 | MYTILINEOS S.A. is listed on the Athens Stock Exchange. |
| 1996 | Strategic agreements for commercial cooperation with leading metallurgy groups in the Balkan region. |
| 1998 | <ol style="list-style-type: none"> 1. Acquisition of a majority stake in METKA S.A., the largest metal construction plant in Greece. 2. Acquisition of the zinc and lead processing metallurgy plant SOMETRA S.A. in Romania. |
| 1999 | Acquisition of a 30% stake in the zinc processing company Hellenic Copper Mines Ltd. in Cyprus. |
| 2000 | Acquisition of a 43% stake in State-owned ELVO S.A. through privatisation, and takeover of the company's management. |
| 2002 | Establishment of MYTILINEOS Power Generation and Supply S.A. & MYTILINEOS Hellenic Wind Power S.A. |
| 2005 | Acquisition of 53% of ALUMINIUM OF GREECE S.A., one the largest fully vertically integrated alumina and aluminium producers in Europe. |
| 2006 | Acquisition of SPRIDER ENERGY S.A. and DELTA PROJECT S.A., active in the development, construction and operation of hydropower plants and wind farms. |
| 2007 | <ol style="list-style-type: none"> 1. Strategic partnership with Endesa. 2. Establishment of Endesa Hellas, which aims to play a key part in the Greek energy market, along with its selective development in SE Europe. 3. Completion of the triple merger by absorption of ALUMINIUM OF GREECE S.A. and DELTA PROJECT S.A. with the MYTILINEOS Group. |
| 2008 | <ol style="list-style-type: none"> 1. Signature of Strategic agreement with Motor Oil in the energy sector for the construction and operation of a commercial power plant. 2. Cogeneration plant enters into trial operation. This 334MW plant is the first thermal plant of the MYTILINEOS Group to be connected to the national power grid. |
| 2009 | The MOTOR OIL and MYTILINEOS Groups announce the establishment of a joint company for the import and trading of Natural Gas in all its forms (LNG, CNG etc.). |
| 2010 | <ol style="list-style-type: none"> 1. Establishment and operation of M&M GAS S.A., the joint company which resulted from the Group's strategic alliance with MOTOR OIL. It is the first private-sector company to enter the market for trading and supply of natural gas in Greece, thus marking the effective liberalisation of the market for natural gas. 2. Establishment of Power Projects, a subsidiary of METKA S.A. in Turkey. 3. METKA S.A. wins contract for construction of Syria's largest power plant, with a capacity of 724 MW. |

Relying on its highly trained human resources, on its financial robustness and on its strong export orientation, the Group aims to remain on a steady course of growth.

Environmental and Social Milestones

| | |
|------|---|
| 2000 | Pechiney award to ALUMINIUM OF GREECE S.A. for best safety results among all alumina and aluminium plants of the Pechiney Group. |
| 2001 | <ol style="list-style-type: none"> 1. ELVO S.A. obtains ELOT EN ISO 9001:2000 certification of its Quality Management System. 2. ALUMINIUM OF GREECE S.A. wins European Aluminium Association award for best Health & Safety results among all aluminium plants in Europe. |
| 2002 | ALUMINIUM OF GREECE S.A. wins European Aluminium Association award for best Health & Safety results among all aluminium plants in Europe. |
| 2003 | ALUMINIUM OF GREECE S.A. wins European Aluminium Association award for best Health & Safety results among all aluminium plants in Europe. |
| 2004 | <ol style="list-style-type: none"> 1. ALUMINIUM OF GREECE S.A. is ranked No 1 in the world (among all aluminium plants with 1-3 million working hours), according to the results published annually by the International Aluminium Institute (IAI). 2. ALUMINIUM OF GREECE SA. obtains OHSAS 18001 ELOT 1801 certification of its Health & Safety Management System. |
| 2005 | ALUMINIUM OF GREECE S.A. obtains ELOT EN ISO 14001: 2004 certification of its Environmental Management System. |
| 2006 | <ol style="list-style-type: none"> 1. ALUMINIUM OF GREECE S.A. obtains ELOT 9001:2000 certification of its Quality Management System. 2. MYTILINEOS Group joins the Hellenic Network for Corporate Social Responsibility. 3. ALUMINIUM OF GREECE S.A. launches operation of its 1st Filter Press for Bauxite Residues Utilisation. 4. METLA S.A. obtains ISO 9001:2000 certification of its Quality Management System. |
| 2007 | METKA S.A. obtains ISO 14001:2004 certification of its Environmental Management System. |
| 2008 | <ol style="list-style-type: none"> 1. METKA S.A. obtains OHSAS 18001:2007 Certification of its Health & Safety Management System. 2. ALUMINIUM OF GREECE S.A. launches operation of its 2nd Filter Press for Bauxite Residues Utilisation. 3. MYTILINEOS Group joins the United Nations Global Compact on human rights, labour, environment and anti-corruption. |
| 2009 | Implementation of Corporate Social Responsibility Mapping project in ALUMINIUM S.A., METKA S.A. and DELPHI-DISTOMON S.A. |
| 2010 | <ol style="list-style-type: none"> 1. Establishment of Corporate Social Responsibility Committee at the level of the Board of Directors. 2. Creation of Corporate Social Responsibility structures in all Group Companies. 3. Engagement in a dialogue with Stakeholders at the Group level as well as at the level of individual companies (ALUMINIUM S.A. and METKA S.A.). 4. Establishment of Climate Change Management Section under the Group's Legal & Regulatory Affairs Department. |



Approach to Corporate Social Responsibility

Our vision...

By pursuing business excellence and growth, with respect to society, the environment and our people and through the creation of value for our clients, business partners and shareholders, we seek to consolidate our position as the leading independent Energy producer in Greece and as a strong, competitive European Heavy Industry Group in the sectors of Energy, Metallurgy and Construction.

Corporate values



The above principles and values are fully aligned with the international standards and regulations which the Group is committed to applying in its activities, such as: The UN Global Compact, the Global Reporting Initiative (GRI) Guidelines, and the ISO 9001, OHSAS 18000 and ISO 14001 standards.

Acknowledging that corporate responsibility and the progress towards Sustainable Development are a collective responsibility that requires the convergence and collaboration of all the actors involved (State, businesses and the civil society), the MYTILINEOS Group considers that the taking of responsible entrepreneurship initiatives concerning the economy, the environment and society is most significant. To this end, the Group collaborates with, accepts or supports voluntary initiatives such as:

- 1) The UN Global Compact, which the Group has joined and co-signed since 2008.
- 2) The Global Reporting Initiative, whose reporting guidelines on the compilation of its Sustainability Reports it has adopted and has been applying since 2008.

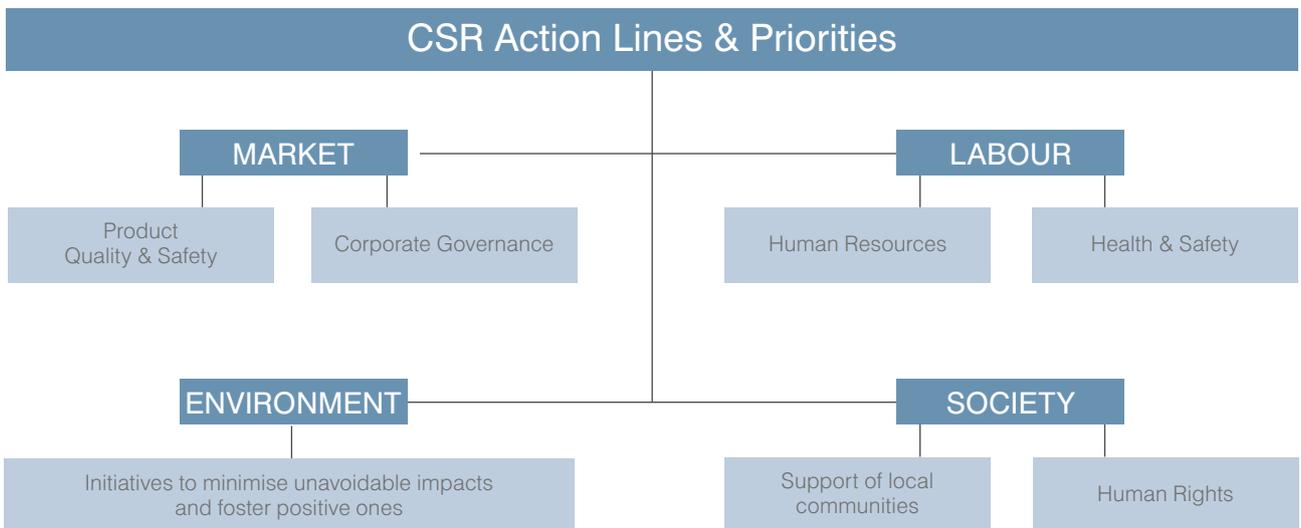
- 3) The Hellenic Network for Corporate Social Responsibility, in whose working groups and initiatives, aimed at promoting Corporate Social Responsibility, the Group participates since 2006.
- 4) The Hellenic Federation of Enterprises (SEV), in whose "Council for Sustainable Development" the Group has participated and whose Code of Principles it adopts.

Our principal corporate goal is for all Stakeholder groups to perceive the MYTILINEOS Group as a responsible business Group that constantly seeks to improve its operations and enhance its positive impact, while also recognising the Group's ongoing and systematic efforts to minimise the unavoidable implications caused by the processing of materials and the delivery of its products.

We acknowledge that the path to achieving and sustaining these goals goes through, first and foremost, our relationships with shareholders, financial analysts, corporate clients, suppliers, business partners, government officials and the local communities where the Group's operations are based, and is also influenced by the nature of our relationships with other groups which are affected to a lesser or greater extent by our operations.

Our approach to Corporate Social Responsibility is directly linked to our business operations and defines the way in which we choose each time to move forward gradually, taking steady steps towards our goal of achieving sustainable development.

The diagram below shows the Group's principal action lines and respective individual priorities in the domain of Corporate Social Responsibility to date.



CORPORATE SOCIAL RESPONSIBILITY - Fundamental Priorities & Commitments

Products

Since the very first day of our operation, ensuring and maintaining a high level of quality and safety in our products has remained inextricably linked to our activity as a responsible business partner.

Our goal: To increase our efforts for strategic investments in products and technologies, also taking into account social and environmental needs and parameters.

Corporate Governance

Our dedication to safeguarding the interests of our shareholders and to creating value for all our stakeholder groups, coupled with the continuous strengthening of our corporate culture which is characterised by integrity, ethos

and transparency, reinforce our compliance with the institutional framework on corporate governance.

Our goal: To develop and maintain corporate governance to the highest possible level, through the application of internal practices over and above those provided by the law, such as the establishment of Corporate Social Responsibility and Occupational Health & Safety Committees at the level of the Board of Directors.

Human Resources

The Group's commitment to invest in the improvement of the climate at the workplace, showing confidence in the abilities of its employees and encouraging the development of their skills, promotes individual, team and corporate results.

Our goal: Recognising the value of the contribution of our human capital, we believe that by preserving industrial peace, developing performance reward and management systems, ensuring internal communication and evaluating individual performance, we are on the right course for achieving the Group's Vision and Strategic goals.





Occupational Health and Safety

Our policy for managing Occupational Health & Safety in all workplaces and areas of activity is focusing on achieving a single target: "Zero Accidents".

Our goal: To ensure all conditions required to attain the above target, using modern methods, being on constant alert and providing appropriate education and training to employees of all levels involved in the production process across all Group companies.

Environment

Our assumption of the responsibility for the unavoidable impact of our operations on the natural environment, and the design and application of systematic special measures and principles for reducing this impact, are key to all our efforts to date for sustainable management of the environment.

Our goal: To monitor and apply systematically the Group's Environmental Measures and Principles across all Group companies and to implement coordinated "green" actions or programmes aimed at protecting the environment.

Local Communities

Focusing on people, the MYTILINEOS Group seeks to respond to key social issues and to provide assistance in order to alleviate them.

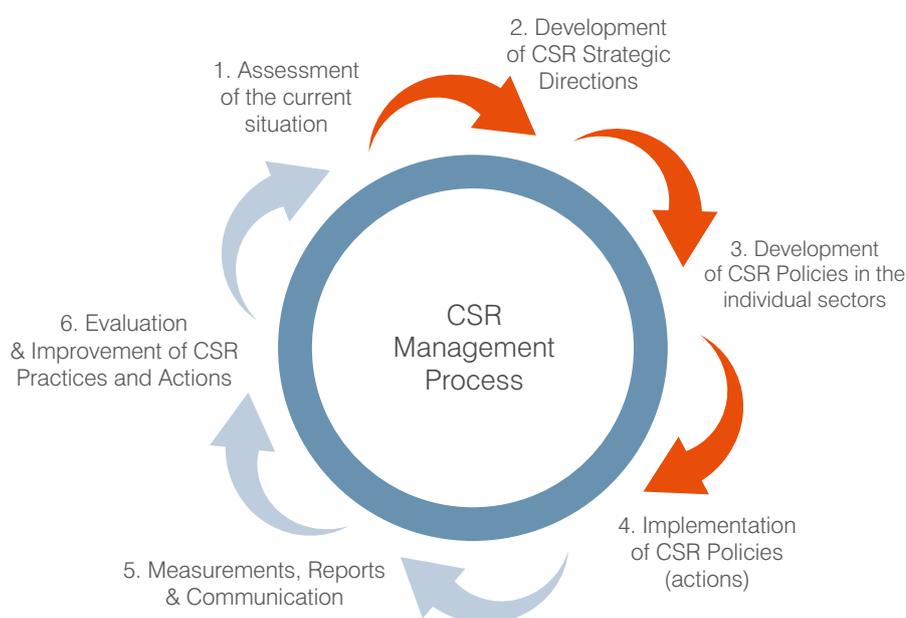
Our goal: To record local needs and help address them, so that viable conditions for sustainable development of the local communities involved may be created, especially in areas where our operations are more visible.

Human Rights

Since the very first day of its operation, the MYTILINEOS Group has exhibited an increased awareness and responsibility regarding human rights issues. In an era in which the violation of human rights has become a major social problem, our Group is explicitly committed and adheres fully to the principles of the United Nations Global Compact.

Our goal: To strive in an ongoing and concerted manner to establish procedures and methods that will define our actions, so that our commitments remain aligned with the principles of the United Nations Global Compact regarding equality in work, the protection of the rights of people with a disability etc.

Our goal for the coming years is to adopt a more systematic management of the CSR function (as shown in the diagram below) as part of our business operation, giving top priority to the communication and the exchange of views with our Stakeholders, and to respecting their views in developing the CSR policies in the sectors where the Group has chosen to develop its activities.



During 2010 the Group expanded the scope of its efforts to formulate its Corporate Social Responsibility strategy and policies, engaging for the first time in a formal dialogue with its key Stakeholder groups (employees, Press, CSR organisations, Voluntary Organisations and NGOs), at the level of the Group as well as at the level of certain of its subsidiaries, such as ALUMINIUM S.A. and METKA S.A.

The results of this dialogue, combined with the results of the CSR Mapping project carried out in the Group companies during 2009, have been taken into account not only in the definition of the key CSR subject areas but also in the development of the Management Approach to these areas, which the Group publishes for the first time with the present Sustainability Report.



Corporate Governance

The MYTILINEOS Group applies the principles of Corporate Governance in accordance with the Greek laws in force and adopts internationally recognized corporate governance practices in order to ensure transparency and to operate responsibly in all its activity sectors.

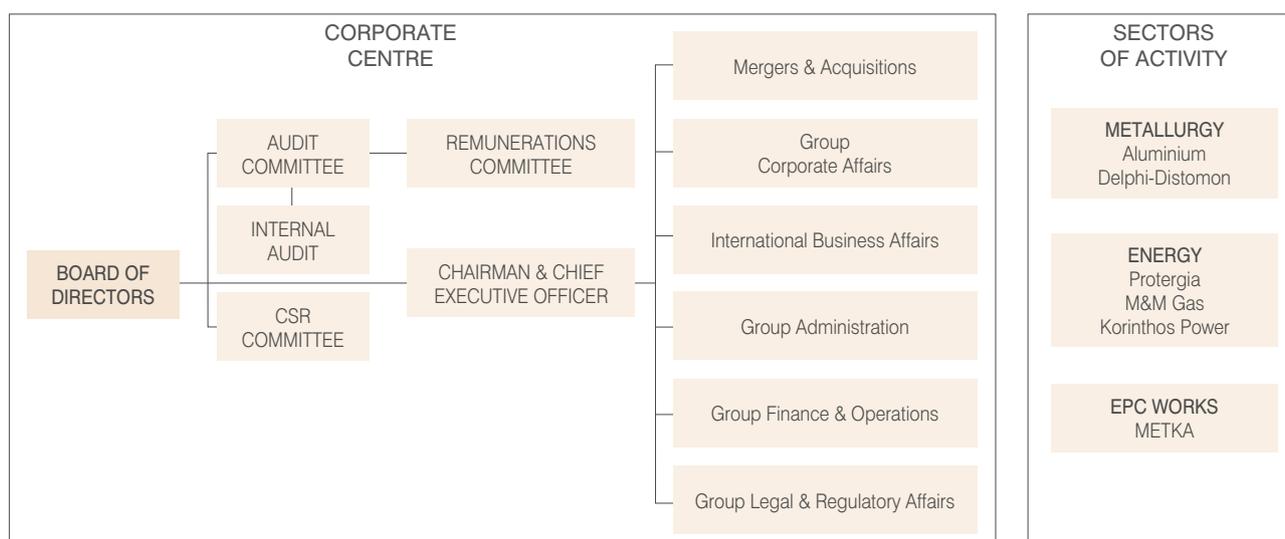
Above all, the Group seeks to safeguard the interests and the sustainability of the Group companies, and to maximise the benefits to the shareholders and the investing public. Guided by the principles of Corporate Governance, MYTILINEOS HOLDINGS S.A. formulates the strategy and lays down the general directions, policies and principles that govern the operation of all Group companies.

This section presents the structure and management of MYTILINEOS HOLDINGS S.A., the parent company of the Group's subsidiaries, as organised in accordance with the principles of Corporate Governance. The investing public in particular may obtain detailed information on matters concerning the rights of shareholders and investors and the provision of information to them, as well as on matters concerning internal audit, transparency and the management of financial risks, from the Financial Report 2010.

Group Governance Structure

The organisational structure of MYTILINEOS HOLDINGS S.A. defines the boundaries and assists and facilitates the decision-making process and the implementation of decisions in line with the Group's strategy. Its purpose is to establish the relationships and roles that guarantee the smooth operation of the Group, with MYTILINEOS HOLDINGS S.A. acting as a coordination centre.

Group organisational structure



MYTILINEOS HOLDINGS S.A. is managed by a nine-member Board of Directors elected for a term of five years, whose composition ensures the maximum possible impartiality in the decision-making of the Company's supreme administrative body. The Board of Directors is composed of two executive and seven non-executive members, five of which are independent. The executive or non-executive capacity of the Board members is specified by the Board of Directors itself, while the independent members are appointed by the General Meeting of the Shareholders.

The Internal Rules of Operation of MYTILINEOS HOLDINGS S.A. lay down the powers, duties and obligations of each statutory body foreseen by the Company's Articles of Association and the applicable laws.

Key to the Group's Governance are also the ISO 9001 Quality Management Standard, the ISO 14001 Environmental Management Standard, and the OHSAS 18001 Occupational Health & Safety Management Standard.

Composition of the Board of Directors

Composition of the Board of Directors as elected by the Extraordinary General Meeting of 30.5.2008 and formed as a body on 30.5.2008, and as formed again on 10.07.2009:

| Title | Name | Executive / Non-Executive Members | Independent Members |
|------------------------------------|-------------------------------|-----------------------------------|---------------------|
| Chairman & Chief Executive Officer | Evangelos Mytilineos | Executive | |
| Vice-Chairman | Ioannis Mytilineos | Non-Executive | |
| Executive Director | George-Fanourios Kontouzoglou | Executive | |
| Member | Nikolaos Mousas | Non-Executive | |
| Member | Christos Diamantopoulos | Non-Executive | Independent |
| Member | Apostolos Georgiadis | Non-Executive | Independent |
| Member | Dimitrios Daskalopoulos | Non-Executive | Independent |
| Member | Christos Zerefos | Non-Executive | Independent |
| Member | Michael Chandris | Non-Executive | Independent |

Key responsibilities

Principal responsibilities of the Board of Directors and of its Members

According to the Company's Internal Rules of Operation and to its Articles of Association, the Board of Directors is the body that manages the Company. It is tasked with managing (administering and investing) the company's assets and with representing the Company, seeking to enhance its economic value and profitability and to safeguard corporate interests.

The Board of Directors has the following key responsibilities, in addition to those provided for by the law:

- To establish strategic directions.
- To adopt and implement the overall Company policy.
- To draft the Company's annual budget and business plan, to set and achieve profitability targets, to monitor the Company's progress and to control large capital expenditure items.
- To ensure full and effective internal controls across all Company activities.
- To monitor the effectiveness of the corporate governance principles that forms the basis for the Company's operations and to introduce changes, if required.
- To define the Company's business risk management strategy.
- To select, utilise and develop the Company's management executives and to formulate the policy on their remuneration.

Principal responsibilities of the Chief Executive Officer

The Chief Executive Officer (CEO) is responsible for the attainment of the Company's strategic goals and for the day-to-day management of its affairs.

He takes steps to ensure and safeguard the smooth, coordinated and effective operation of the Company, and provides guidelines to its Directorates and Departments. Subject to the authorities of Committees and other Company bodies he is in charge of all Company Sectors and Departments and, inter alia, has the following responsibilities:

- To take strategic decisions regarding the development/ approval of business strategies and to recommend/approve large investments.
- To determine the Company's organisational structure.
- To ensure implementation of Company decisions and

provide the Board of Directors with information updates on Company-related matters.

- To take decisions or participate in the respective decision-making process regarding major operational decisions for the Company (relating to commercial operations, production, purchases, human resources, undertaking of projects etc.)
- To determine the risk management policies, to assess risks and to implement measures and procedures to address these effectively.
- To supervise and provide guidance to all Directorates and Departments.
- To set the budget goals, to submit proposals on the annual performance targets, and to attain the goals of annual budgets.
- To supervise the Company's financial administration, to monitor on a day-to-day basis its financial position and the progress of its business activities and to control cash flows and their requirements.
- To hold performance review meetings.
- To control the efficiency of the Company's financial, technical and human resources.
- To ensure the timely announcement of information or events that may cause considerable fluctuation in the Company's share price.
- To recruit and provide guidance to the Company's team of top management executives.
- To formulate/determine guidelines for performance evaluation, promotions and the development of management executives, as well as the system of rewards.
- To coordinate the Company's top executives and to supervise and ensure their effectiveness in order to secure the smooth operation of the Company.

Committees

Three Committees have been established at the level of the Board of Directors: the Remunerations Committee, the Audit Committee and the Corporate Social Responsibility Committee. Their mission is to support the impartial and efficient decision-making and implementation of policies by the Management of the Company, and to control the implementation of the Management's decisions in their respective areas of responsibility.

The Remunerations Committee is tasked with recommending to the Board of Directors the principles to govern the Company's policy on human resources development.

Remunerations Committee

The Remunerations Committee, as established by the Board of Directors decision of 26.3.2008, is composed of three Board members, of which one is an executive member.

| REMUNERATIONS COMMITTEE Members | Name | Executive / Non-Executive Members | Independent Members |
|---------------------------------|-------------------------|-----------------------------------|---------------------|
| Chairman | Evangelos Mytilineos | Executive | |
| Member | Christos Diamantopoulos | Non-Executive | Independent |
| Member | Dimitrios Daskalopoulos | Non-Executive | Independent |

The key responsibilities of the Remunerations Committee involve dealing exclusively with matters concerning staffing, remunerations, incentives at the level of senior executives of the Company and of its subsidiaries, and the submission of recommendations on the remunerations of these executives, so that the Board of Directors may make informed decisions in order to grant its approval. In addition, the Remunerations Committee submits to the Board of Directors recommendations on the application of compensations and benefits systems, on organisational changes regarding the Company's senior executives, on the replacement of Board members when this is judged necessary on the basis of reasoned recommendations, and on the remunerations of Board members. Furthermore, the Committee proposes to the Board of Directors possible changes of executives in the Company's organisational chart, Performance Evaluation Systems for senior executives and measures to support the professional advancement of executives, and is also supervising the procedure for filling key Company positions. Finally, the Remunerations Committee is tasked with recommending to the Board of Directors the principles to govern the Company's policy on human resources development. The Remunerations Committee draws up an annual report of its activities, which is addressed to the Regular General Meeting of the Shareholders, in line with the requirement for obtaining approvals as per the provisions of articles 23(a) and 24 of Codified Law (C.L.) 2190/1920.

Audit Committee

The Audit Committee, as established by the Board of Directors decision of 26.3.2008, is composed of three Board members who do not have executive authority within the Company. The members of the Audit Committee are appointed for a term which corresponds to that of the Board of Directors, with the duties of Secretary assigned to a Company executive from a department that is not directly audited by the Committee.

| AUDIT COMMITTEE Members | Name | Executive / Non-Executive Members | Independent Members |
|-------------------------|-------------------------|-----------------------------------|---------------------|
| Chairman | Christos Diamantopoulos | Non-Executive | Independent |
| Member | Ioannis Mytilineos | Non-Executive | |
| Member | Nikolaos Mousas | Non-Executive | |

According to the Company's Internal Rules of Operation in force, the Audit Committee reports through its Chairman to the Board of Directors, draws up regular or ad hoc reports and works closely with the Company's Internal Audit Department. The Audit Committee convenes at least four times per year, and its mandate is to help the Company operate more effectively and to safeguard the principles of transparency and Corporate Governance. The key responsibilities of the Audit Committee include the provision to the Internal Audit Department of general guidelines on the framework of its tasks and the Company activities to be audited, the evaluation and effectiveness of the Committee's activities, and the provision of regular information updates on the progress of its work. In addition, the Audit Committee has the right, whenever it considers this to be necessary, to seek from the Internal Audit Department or from third parties any information which it deems necessary in order to properly carry out its work.

Corporate Social Responsibility Committee

The Corporate Social Responsibility Committee (CSR Committee), as established by the Board of Directors decision of 17.11.2010, is composed of two Board members who do not have executive authority within the Company, with the other members of the Committee being Company executives.

| CSR COMMITTEE Members | Name | Executive / Non-Executive Members | Independent Members |
|-----------------------|-------------------------|--|---------------------|
| Chairman | Christos Zerefos | Board Member MYTILINEOS HOLDINGS S.A. Non-Executive | Independent |
| Member | Christos Diamantopoulos | Board Member MYTILINEOS HOLDINGS S.A. Non-Executive | Independent |
| Member | Sophie Daskalaki | Senior Communication Advisor | - |
| Member | Spyros Kasdas | Board Member ALUMINIUM S.A. | - |
| Member | Vivian Bouzali | Group Communication Manager | - |

The CSR Committee is responsible towards the Board of Directors for monitoring and ensuring the correct application of Corporate Social Responsibility in the Group, in terms of the policies, goals, actions and results adopted in connection with environmental, social and ethical issues arising in the internal as well as the external environment of the Group companies. The CSR Committee may also act in the role of advisor to the Management of the Group and to the relevant Board Committees on the above issues, to assist in their implementation in a more complete manner.

Mechanisms for the submission of recommendations and suggestions to the Board of Directors

The experienced executives of the Group companies handle successfully and effectively the problems that arise in the daily contacts and collaborations in the Group's work premises. The key to achieving peace in the workplace and a harmonious coexistence of the Group's employees and Management is communication – either through the collective body representing the employees to the Management or through initiatives taken by employees on an individual basis for communication with the Management of the Group companies.

Additionally, the flawless organisation of the General Meetings of the Shareholders, ensuring the timely circulation of information on the items of the agenda, the provision of adequate time in which the participants may address and discuss these, and the active participation of the CEO and other specialised Board members in these discussions, ensure the provision of complete and timely information. The relevant laws are fully applied, with emphasis on the provisions concerning minority shareholders.



At the level of the individual companies as well as at the Group level, there are Departments responsible for managing human resources and internal communication with employees at all levels.

At the level of the individual companies as well as at the Group level, there are Departments responsible for managing human resources, internal communication with employees at all levels, and communication with the local communities and the general public. There is also a Department tasked with ensuring continuous communication with the shareholders, the investing public and with all Stakeholders in general. Matters concerning the needs of employees and of the local communities, and matters concerning the environment, the needs of society-at-large and the conditions of work of employees are given priority, and the relevant initiatives taken in response to them are not limited to the contractual obligations imposed by the applicable laws.

The continuous effort for growth and the constant striving for positive financial results in the Group companies help develop a sense of security and perspective for the employees, as well as for all those who invest in the Group companies with expectations of profitability and high liquidity. In addition, at the level of the individual companies as well as at the Group level, a fully staffed, independent Internal Audit Department is in full operation: this Department monitors the application of the laws and in general of the regulatory framework that governs the operations of the Group companies, of the system of internal controls and of the procedures that the Departments follow. The Internal Audit Department reports to the Audit Committee, which is composed of non-executive Board members.

Relationship between the earnings of management executives and the performance of the Group and the Group companies

A goal-setting mechanism for all employees with executive authority is in place in all Group companies. Their results, in terms of comparing their performance against the goals agreed at the start of the year, determine the total annual earnings of these executives. Because of the nature of the business activities of the Group companies, social and environmental performance are core goals and, consequently, key criteria in this annual performance review.

Conflict of interests

The members of the Board of Directors of the Group, in collaboration with the Human Resources Department, have developed and are applying procedures to avoid

the likelihood of conditions giving rise to conflicts of interest. These procedures include continuous monitoring and information updates on the need to prevent such conditions from arising, as well as procedures for their early identification, should they arise. Additionally, the audits conducted by the Internal Audit Department also address, for each audited subject, the likelihood of conflict of interests in violation of the policies of the Group companies.

Procedure for specifying the qualifications of the Board members

The Chairman of the Board and CEO, in collaboration with other Board members and especially with the Remunerations Committee, examines the CVs of candidate Board members and the facts contained therein that guarantee their independence, in order to make sure that all required conditions (such as specialisation and experience, as well as availability in terms of time) are in place, thus allowing them to make a substantial contribution.

The criteria used to select Board members include, among others, specialisation, academic qualifications, managerial capability, honesty and professional or other experience, as the case may be, which may contribute to a more effective management of the issues which concern MYTILINEOS HOLDINGS S.A. and the MYTILINEOS Group.

Corporate policies and values relating to the Group's financial, social and environmental performance

The Group has developed a Professional Ethics Code which has been notified to all Board members and to all employees. Additionally, the Group's mission and the values that govern its operation are incorporated in all official corporate documents, such as the Internal Rules of Operation and the Internal Procedures and Quality System.

The work conditions and the environmental performance of the Group companies are checked and certified in accordance with the Occupational Health and Safety Management Systems (OHSAS 18001 – ELOT 1801) and the Environmental Management (ISO 14001) and Quality Management (ISO 9001) Standards, respectively.

The Internal Rules of Operation record the responsibilities, duties and obligations of all statutory bodies established pursuant to the Articles of Association and to the applicable laws.

Procedure for the evaluation of the performance of the Board in terms of the financial, environment and social performance of the Group

In addition to the annual evaluation, in the regular and extraordinary Board meetings extensive reference is made, if judged necessary by the Chairman and CEO, to the financial, environmental and social performance of the Group and of its companies, followed by the evaluation of the performance of the Board members in relation to these issues.

Provision of the relevant information is secured through the information available to the CEO through its presence in the Boards of Directors and through the reports submitted to the executive Board members through the management hierarchy, in line with the latter's duties.

Risk Management

Adopting a pre-emptive approach, MYTILINEOS HOLDINGS S.A. and its subsidiaries have in place a Risk Management System which is coordinated by the Board of Directors, covers the entire management hierarchy and concerns all business activity sectors.

Because of the nature of the core activities of the Group companies (heavy industries), each proposed business action is continuously monitored, in order to identify potential risks associated in business planning, in the development and presentation of new products, and in environmental protection and the protection of public health, so as to decide on the best way in which these are to be handled.

The activities of the Group companies also involve multiple financial risks, including currency and interest rate risk, market price fluctuation risk, credit risk and liquidity risk.

The risk management and risk hedging plan of the Group companies aims to limit the potential adverse impact on the Group's financial results which may result from the inability to forecast the financial conditions and the fluctuations in the cost and sales variables. In this framework, the Group employs derivative financial instruments to compensate for its exposure to specific risk categories.

The Risk Management Policy is applied by the Group's Corporate Treasury Department, which operates as a service centre within a framework of concrete directions approved by the Management. The Corporate Treasury Department identifies, quantifies, manages and offsets the financial risks created from the core operations of the Group companies.

Initiatives of the Group relating to the economy, the environment and society

In line with its Corporate Social Responsibility obligations, the Group publishes annually its Sustainability Report, which accompanies the annual financial statements.

The Sustainability Report presents in detail the financial, environmental and social performance of the Group's individual companies by business activity sector. The Group invests in principles and values that promote business excellence, striving for socially responsible development with respect to the environment, and for social acceptance of its business operations.

These values are based on the Group's continuous efforts for the development of the human resources of its companies, which rely on teamwork, personal integrity, professional conduct and good health and safety standards at the workplace. These standing corporate values, together with the rules of ethical and professional conduct, govern the Group Performance Governance System, ensuring correct operation and achievement of the desired results.

Participation in associations or international/national advocacy organisations

The Group participates actively in initiatives for financing societies and associations, providing financial assistance to local sports clubs, local communities and cultural societies, as well as to scholarship funds, in order to help them cover their needs and to support their activities.

The Group is committed to recording the needs of the local communities where its operations are located and to contribute to their fulfilment, so that the conditions for sustainable development of the communities concerned may be created. Furthermore, the Group is an active member of national bodies of strategic importance, such as the Athens Chamber of Commerce and Industry, the Association of Sociétés Anonymes and Limited Liability Companies, the Greek Mining Enterprises Association, the Hellenic Management Association and the Athens Concert Hall Organisation.

The companies of the Group are members of the Hellenic Federation of Enterprises (SEV). A Group executive participated in the work concerning the drafting of the Corporate Governance Code, which is to be submitted to the SEV members for further processing and approval, before its future adoption as an official SEV code. Finally, the Group is

a member of the Hellenic Network for Corporate Social Responsibility and, demonstrating its heightened responsibility and sensitisation with regard to human rights, has adopted the principles of the UN Global Compact, a strategic policy initiative of the UN in the areas of human rights, labour, environment and anti-corruption.

Statement of Corporate Governance

This Statement of Corporate Governance (the "Statement") is made in the context of the conformation of Mytilineos S.A. (the "company") to the provisions of article 2 of Law 3873/2010, and regards:

1. a) Conformation of the company with the code for Corporate Governance

The company conforms to the policies and practices adopted by the "Code for Corporate Governance" of Hellenic Federation of Enterprises (SEV) for listed companies ("the Code"). The full document of the Code can be found in SEV's web address www.sev.org.gr.

1. b) Gaps from the Code's special practices

The company's practices, as applied according to its Article of Association, Rules of Operation and Code of Ethics, have specific gaps from the Code's special practices in each of the following points:

- i. According to the company's Article of Association the BOD consists of three to nine members instead of seven to ten suggested by the Code (article 2.1.). The company, reassessing its BOD operation, expresses its intention to adopt the special practice of the Code, after applying all necessary changes in its Article of Association.
- ii. According to the company's Article of Association and Rule of Operation
 - (a) No independent member of the BOD can become its Vice-President (article 3.3.),
 - (b) The Vice-President cannot add a subject in the BOD agenda, when and if this BOD has been called by the President (article 3.4.),
 - (c) There is no process according to which the Vice-President facilitates the communication between the non executive and the executive members of the BOD (article 3.4.),
 - (d) there are no provisions for separate sessions of the Non Executive members of the BOD after the Vice-President, in which the latter performs also an evaluation of the President of the BOD (article 3.4.).

The company reassessing its BOD operation expresses its intention to adopt the special practice of the Code, after applying all necessary changes in its Article of Association and Rule of Operation.

- iii. The company has not disclosed to its BOD members any of their professional commitments (including important non executive commitments even deriving from their involvement in non-profit organizations). Furthermore, the company's Article of Association and Rule of Operation does not provide or prohibits regarding the participation of its BOD members in the BOD of more than five other listed companies (article 4.2.). The company reassessing its BOD operation expresses its intention to adopt the special practice of the Code, after applying all necessary changes in its Article of Association and Rule of Operation.
- iv. The appointment of an executive member of the BOD as non executive in a company that is not either a Subsidiary or an Associate of the parent company is not approved by the BOD (article 4.3.). The company reassessing its BOD operation expresses its intention to adopt the special practice of the Code, after applying all necessary changes in its Article of Association and Rule of Operation.
- v. According to the company's Article of Association the members of the BOD are elected by the General Assembly of the Shareholders with a maximum service of five years instead of four that is suggested by the Code (article 5.1.). The company expresses its intention to adopt the special practice of the Code, after applying all necessary changes in its Article of Association.
- vi. The company has no nomination committee for the appointment of BOD members (article 5.5.). However the company, considering the lack of legal obligation for the formation of such committee and the very demanding criteria that has already set for the nomination of future BOD members, reserves its intentions on this issue, while at the same time reviews and assess all possible available practices.
- vii. There is no evaluation process for the BOD members and its committees (article 7.1.) The company expresses its intention to adopt the special practice of the Code, after applying a relevant procedure.
- viii. The company's Article of Association has no provision for the electronic voting or mail voting of its Shareholders in the General Assembly (Part II. Article 1.2.). The company awaits the relevant presidential decrees in order to incorporate the procedure.



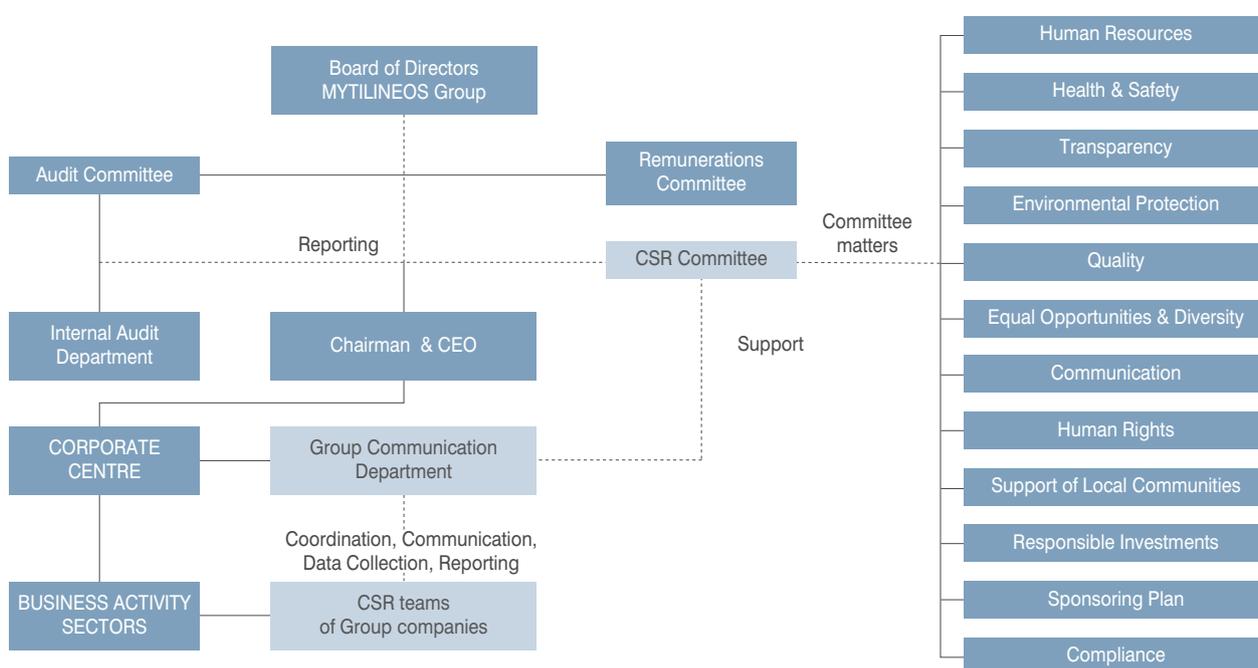
Governance of Corporate Social Responsibility

Corporate Governance and the Governance of Corporate Social Responsibility (CSR Governance) are elements that help balance the financial, social and environmental impacts of the operations of the MYTILINEOS Group companies. In 2010 the Group had already laid the foundations for the adoption of the CSR principles by its Management and for the integration of these principles into its organisational structure, by means of the following three key actions:

1. In keeping with its commitment, MYTILINEOS HOLDINGS S.A. established a Corporate Social Responsibility Committee (CSR Committee) at the level of the Board of Directors. The CSR Committee provides all Group companies with relevant guidelines for action on matters pertaining to CSR. Similarly, all Group companies have established their own CSR teams.

The CSR Committee is assisted and supported by the Group Communication Department in terms of communication and coordination with the individual CSR teams of the Group companies.

The CSR Committee within the organisational structure of the Group



Each Group company, using as starting-point the guidelines of the Corporate Centre, functions independently and approaches CSR through the particular financial, environmental and social characteristics of its specific business activity sector and local community. The CSR Committee focuses on checking the Key Performance Indicators (KPIs) of the core CSR areas in order to measure the corresponding progress made.

Scope of work of the CSR Committee

The Committee is responsible to the Board of Directors for monitoring the correct implementation of Corporate Social Responsibility in the Group in terms of the policies, targets, actions and results in connection with environmental, social and ethical issues in the internal as well as the external environment of the Group companies. The CSR Committee may also act in the role of advisor to the Group's executive management and to the relevant Board Committees on the above issues.

Duties of the CSR Committee

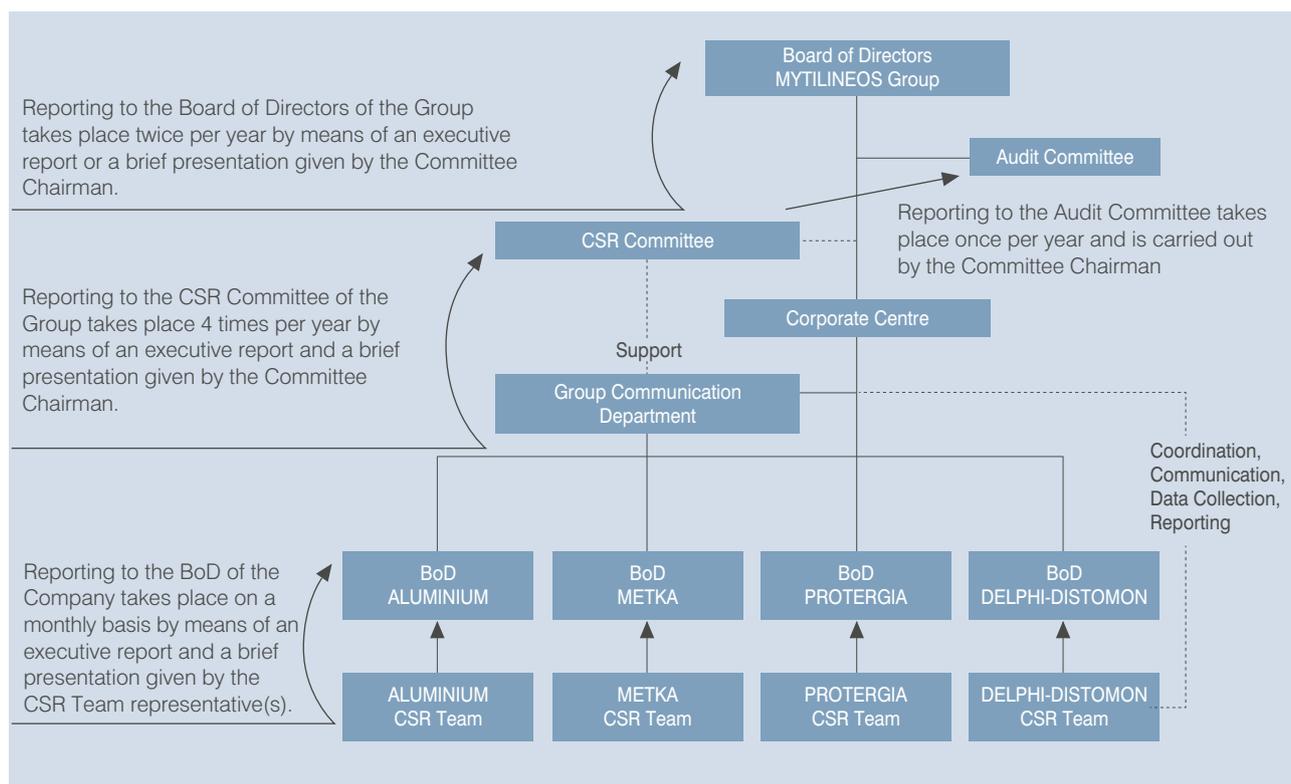
- To supervise and evaluate the CSR Strategy of the Group and the policies & practices which may potentially affect in practice the business operations, reputation and name of the Group.
- To propose the use of any support means, internal or external, which the Committee considers necessary and/or desirable in order to ensure the correct application and implementation of the CSR policies across the entire Group.

- To advise the Board of Directors of the Group on every proposed change to the corporate principles and values or to environmental and social specifications, which define the framework within which the Group develops its business activities and operations, as well as on every proposed application of corresponding measures.
- To advise the Board of Directors of the Group on every proposed adoption of international CSR indicators, such as for example the Global Reporting Initiative (GRI) and the UN Global Compact, or on any other organisation promoting Socially Responsible Investments.
- To be informed of, and to check and approve the structure of the Group's annual Sustainability Report, and to be able to advise the Board of Directors on the methods for its distribution and promotion.
- To advise the Board of Directors of the Group on the adoption of targets in individual CSR areas.
- To examine the annual report on the Group's environmental performance and progress, and to examine carefully and approve proposed measurement methods.
- To check and approve the Group's overall CSR performance, and to assign to an independent external associate, when this is considered necessary, the work of checking the direct and indirect impacts of CSR on all aspects of the Group's operation.
- To control and, when necessary, provide guidance for the training of the management executives, CSR teams and any other person or department requiring training in the Committee's opinion, assuring the Board of Directors that such training covers all key departments of the Group which influence the Group's CSR.
- To supervise, approve proposed controls and evaluate the social contribution initiatives of the Group, and especially its charity initiatives that require the immediate disbursement of significant funds.
- To evaluate on an annual basis its own performance and effectiveness and to propose to the Board of Directors of the Group the necessary corrective actions.
- The CSR Committee reports to the Audit Committee and to the Board of Directors of the Group. The Chairman of the Committee communicates the minutes of every meeting to the Audit Committee.
- The Chairman of the Committee informs the Audit Committee once per year, during the period prior to the publication of the Sustainability Report, of the progress of the key matters and initiatives pertaining to the CSR of the Group.
- The CSR Committee has the right to submit to the Audit Committee such recommendations as it considers appropriate in connection with every matter under its responsibility which may require action and development (e.g. Transparency).
- The Chairman of the Committee participates in the dialogue with the Stakeholders of the Group companies in order to answer questions by the Stakeholders concerning the activities and duties of the Committee.



The Group has encouraged the creation in all its companies of CSR Teams, whose purpose is to ensure the correct management of CSR-related matters.

Company CSR Teams within the organisational structure of the Group



Scope of work of the SCR Teams of the Group companies

Each CSR team is responsible to the Board of Directors of the respective Group Company for developing, implementing and evaluating the overall CSR strategy in terms of policies, targets, actions and results in connection with significant environmental, social and ethical in the internal as well as the external environment.

Duties of the CSR Teams of the Group companies

- To explore, identify and prioritise CSR issues adapted to the requirements of the company's activity sector (independently of each section which is represented in the composition of the CSR team).
- To synthesise the individual issues and to develop, compile and present for approval to the company's Board of Directors the overall CSR strategy.
- To set CSR objectives by activity sector and to establish respective plans and initiatives for their achievement, and to monitor and revise these, whenever this is considered necessary.

- To coordinate the required procedures for the promotion and provision of information on the implementation of the CSR policy and the achievement of the respective objectives to the departments of the company.
- To develop a procedure for the annual evaluation and dialogue on CSR with the Company's key Stakeholders, and to ensure the correct implementation of this procedure and the control of its results.
- To study and develop proposals on the coverage of the requirements specified by the indicators of the UN Global Compact and on the adoption of other CSR standards by the company.

The Professional Ethics Code is a key tool that ensures the commitment of the Group and of its companies to Responsible Corporate Citizenship.

- To develop and supervise a relevant plan for the support and participation of employees in the CSR initiatives of the company.
- To evaluate and secure a procedure for timely and reliable collection of company data, measurable or otherwise, in accordance with the GRI-G3 standard, required for publication of the Group's annual Sustainability Report.
- To evaluate requests for and approve, after holding negotiations in order to maximise the business benefits, Company sponsorships to social and environmental organisations, always in accordance with the approved CSR strategy which the CSR Team of the company is called upon to implement.
- To evaluate and develop company relations with important organisations in the local community where company operations are located (if required), always in accordance with the approved CSR strategy which the CSR Team of the company is called upon to implement.
- To ensure the participation of its members (on a rotating basis) in major CSR conferences, to enable the CSR Team to establish a complete picture of the developments in the

specific area, to collect relevant information and access relevant sources, and to evaluate and adapt these (if this is considered necessary) to the corporate strategy.

- To collect information on and evaluate the good CSR practices followed by direct competitors (where these exist) and the company's business activity sector in general.
- To compile reports at specific intervals (with the exception of extraordinary cases) for submission to the company's Board of Directors and to the CSR Committee of the Group, on the progress in the implementation of CSR in the company.
- To hold meetings, at specific intervals, with the other CSR Teams of the Group companies, for exchanging views, positions and good practices.
- To draft and manage a specific annual budget (on an aggregate or individual basis) to support all of the company's scheduled CSR actions.

3. In 2010 the Group completed its Professional Ethics Code and forwarded it to all the Group companies.

The Professional Ethics Code was planned with the aim of recording in a single document the general principles and rules that must govern the Management's commitment towards the employees and the professional conduct of all people working in the Companies of the MYTILINEOS Group.

The foundations for the development of the Code are the business activities of the Group companies, the applicable laws governing these activities, the top-level services and products that the Group provides in the pursuance of its business activities and the standards of professional conduct it has adopted to meet the requirements of these business activities.

The Code outlines the day-to-day functioning and conduct of the employees of the Group. It also serves as a manual of the rules of acceptable conduct between employees, as well as between employees and other third parties who are natural or legal persons of private or public law operating in Greece or abroad. The Code applies to all employees, irrespective of their position within the Group's hierarchy.

The Professional Ethics Code is a key tool that ensures the commitment of the Group and of its companies to Responsible Corporate Citizenship. The principles of

professional conduct that are incorporated in the Code are binding obligations of all employees, and all departments are responsible for informing the employees under their responsibility of the issues that these principles address, which include the following:

- Business ethics and adherence to the law
- Conflict of interests and anti-corruption practices
- Management of records and protection of assets
- Protection of confidential information
- Integrity of financial information and reports
- Product quality
- Relations with clients, suppliers, shareholders and investors
- Cooperation with Government authorities and transparency of transactions with third parties
- Labour relations
- Human Rights
- Occupational Health & Safety
- Environmental protection and relations with local communities

The aim of the initiatives presented above is to establish the essence of the concept of CSR for the MYTILINEOS Group and the importance and necessity of having in place such structures, which will ultimately enable the Group to focus on policies and initiatives that contribute substantially towards the achievement of sustainable development.





Stakeholders

The MYTILINEOS Group considers that the development and wise management of its Social Capital are essential prerequisites for the stability, continuity and dynamism of the relationships with its Stakeholders.

The term “Social Capital” is of special importance for the Group, as it is linked to the way in which it operates in the local communities where its operations are located. It also defines the framework within which our people operate, so that they may achieve the maximum results in whatever task they undertake, while also promoting our business values, giving real meaning to them. Above all, however, this particular term represents the strong relationship of trust between the Group and all its Stakeholders.

For the MYTILINEOS Group, investing in the term “Social Capital” means the following:

- Further increase of its social contribution, whose direct recipients are our core Stakeholders.
- Dissemination of the corporate values and rules for sustainable development to all those doing business with it, and
- Constant effort to achieve and maintain social trust, while remaining consistent with its commitments.

These elements help promote the dialogue and cooperation with our Stakeholders on a mutually beneficial basis.

In order to increase its Social Capital and define the entities to engage in the dialogue on Corporate Social Responsibility, the MYTILINEOS Group planned and launched two years ago a five-stage process scheduled for completion in 2011, in accordance with its respective commitment which was presented in the Group's previous Sustainability Reports:

Stage 1: Definition of Stakeholders.

Stage 2: Understanding of each Group company's individual motives for engaging in a dialogue with its Stakeholders.

Stage 3: Definition of the subject areas and planning of the process of dialogue with the Stakeholders.

Stage 4: Engagement in the actual dialogue and undertaking of commitments to the Stakeholders.

Stage 5: Response acting on the commitments undertaken to the Stakeholders, and continuation of the dialogue.

The Stakeholder groups for each Group company were obtained through a specific and systematic process for their identification and evaluation, which was presented in the Group's previous Sustainability Reports.

The table below shows the Group's Stakeholders by company:

| Stake-holders | Company | MYTILINEOS S.A. | ALUMINIUM | METKA | PROTERGIA | DELPHI-DISTOMON |
|---------------------------|---------|-----------------|-----------|-------|-----------|-----------------|
| Employees | | ○ | ○ | ○ | ○ | ○ |
| Corporate clients | | ○ | ○ | ○ | ○ | ○ |
| Suppliers | | ○ | ○ | ○ | ○ | ○ |
| Local communities | | ○ | ○ | ○ | ○ | ○ |
| Press & Media | | ○ | ○ | ○ | ○ | |
| Public bodies | | ○ | ○ | ○ | ○ | |
| Volunteer organisations | | ○ | ○ | ○ | ○ | |
| Shareholders/ Investors | | ○ | | ○ | | |
| Local Authorities | | ○ | ○ | ○ | ○ | |
| Financial Institutions | | ○ | | ○ | ○ | |
| Business partners | | ○ | | ○ | ○ | |
| Professional Associations | | ○ | ○ | ○ | ○ | ○ |

The key areas to be examined during this process include the identification and highlighting of Stakeholder expectations, the extent and degree to which the Group's current actions meet these needs and expectations, and the identification of methods to improve and strengthen the relationships of Stakeholders with the Group.

During 2010, and as part of the preparation of its Sustainability Report, the Group proceeded to the implementation of Stages 3 and 4 of the above process at the Group level and at the level of a number of its companies (ALUMINIUM S.A. and METKA S.A.). The results are presented in the respective Sections of the present Report.

As the examination of Corporate Social Responsibility issues at the Group level required information input from various populations each with its own particular characteristics, such as **Employees, Press, Voluntary organisations and representatives of CSR organisations**, the project development methodology employed a combination of methods, namely a combination of qualitative and quantitative research. This was proposed because the Stakeholder groups presented above have relatively good to adequate knowledge of the Company, a high educational level and particular individual characteristics – therefore the proposed methodology was seen as the most appropriate one for conducting this research.

The results of this first engagement of the Group in a dialogue with its Stakeholders are presented below:

- In general, the Stakeholder groups do not appear to be particularly familiar with the CSR strategy of the Company, despite the fact that the latter is a highly recognisable Group and its business strategy meets with their approval. Nevertheless, the general feeling is that although the Group has joined rather recently the ranks of the companies that systematically apply CSR, its size and financial strength are seen as guarantees of the correct application of CSR.
- The Group's motives for the application of CSR, as perceived by the Stakeholders, are the need for social contribution and the very nature of the business activity, which dictates the need for initiatives.
- The Group's selection of "Environment" and "Employee Health & Safety" as areas in which to take action meets with the full agreement of the majority of the participants. Reservations were expressed mainly regarding "Support of arts & culture", as –according to a significant part of the Group's Stakeholders– the pronounced social needs that arise as a result of the economic crisis have a higher priority over cultural activities, while on the other hand the cultural activities supported by the Group are not addressing a large part of society and serve primarily the Group's needs for advertising and promotion.
- The Group's individual actions are generally recognisable, however its Stakeholders appear to expect even more in the areas of Environment and Social Contribution. It is stressed that these initiatives should not stem from a Company obligation and should not be confused with activities of a business nature, in order to ensure that the financial benefit does not outweigh the respective environmental or social benefit. In this context, it is pointed out that these actions should be targeted to the general public rather than to elite groups or to financial and business lobbies, and to consist of actions with substantial subject content rather than promotional actions.
- Regarding the issue of communication with the Group, the picture which results from the contacts with its Stakeholders is that it is lacking in certain respects – a view expressed in particular by the participants from the Press and from CSR and voluntary organisations. There was a universal request for more frequent, systematic and focused information events, held at regular intervals (monthly / bimonthly / biannual etc.), for disseminating more information on the Group's work and progress made so far in the CSR area. However, in its collaborations until now, the Group has made a good impression.
- The development of the Group's Corporate Social Responsibility during the last three years shows marked improvement. In general, the wish was expressed for further promotion by the Group of relevant activities, while its policies in the areas of the environment and of the welfare for its human resources have met with positive comments.
- Considering that the Group is active in the sectors of metallurgy, energy and construction, it is of crucial significance that the Stakeholders recognise the Group's efforts to act as an organisation that helps highlight modern environmental issues (e.g. reference was made to the Group's participation in forums addressing renewable energy sources) and to comply with the operational specifications for its facilities in the various areas where these are located, with respect for society and the quality of life of the local inhabitants.
- Although a relatively recent initiative of the Group, the publication of Sustainability Reports is considered as very positive. However, the need for improvements was

expressed, especially in terms of qualitative information (primarily environment-related information), and in terms of the Reports' distribution coverage.

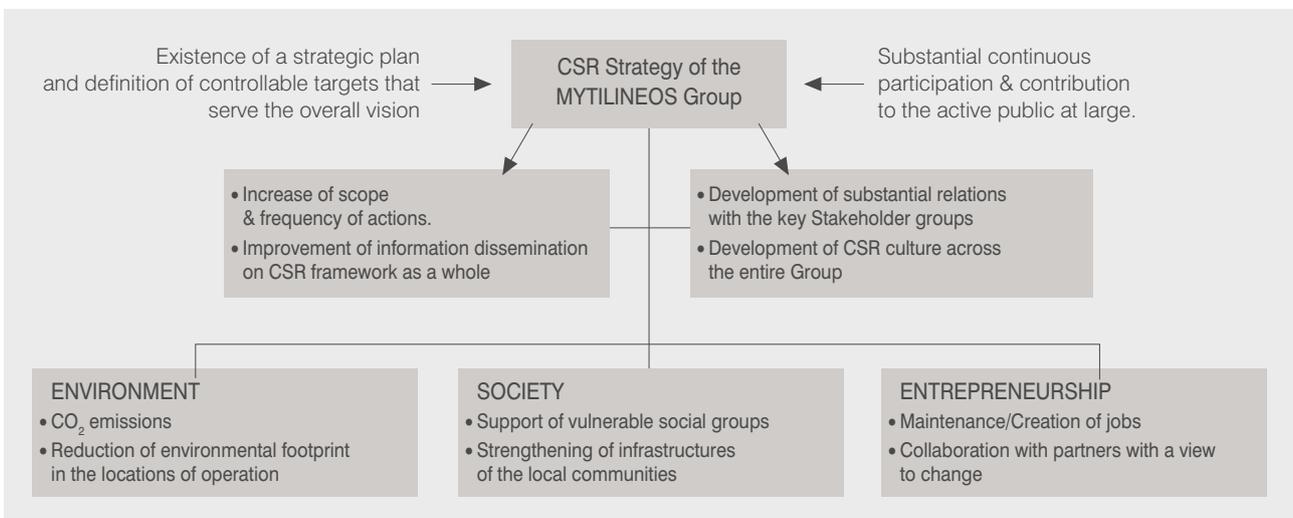
- Concerning the environment, the promotion of environmental actions in the local communities is the top priority for the Stakeholder groups, in tandem with the efforts that must be made to reduce CO₂ emissions and promote alternative/renewable energy sources. With respect to social contribution, the support of vulnerable groups of all types, given the current financial crisis, was proposed as the focus of the Group's future social activities.
- Overall, the Stakeholders expressed their trust in the Group, something that has to do primarily with the Group's perceived business status. It would seem however that there is room for improvement in the transparency of the Group's procedures and in its perceived status which is indirectly related with the CSR strategy.
- In conclusion, the Stakeholder groups have high expectations of the MYTILINEOS Group regarding its

Corporate Social Responsibility. With a standing request for improvement of the frequency and quality of the information disseminated on the Group's actions, and for promotion of the work already carried out by the Group to the general public or to reference Groups such as the local communities, the Stakeholders expect the Group to take initiatives that will focus on:

- Environmental protection,
- Reducing its ecological footprint in the local communities, and
- Supporting social structures and promoting employment,

considering that the Group's size and strength not only allow them to be carried out successfully, but also impose them as an obligation.

Main findings of the Stakeholders survey within the CSR Strategy of the MYTILINEOS Group



The Group's objective for 2011 is to extend the dialogue with its Stakeholders to its Suppliers and Corporate Clients, as well as to its Shareholders/Investors.



MYTILINEOS Group profile

Key financial figures (in €)

| Economic Value Table | 2009 | 2010 |
|---|-------------|----------------------|
| Revenues | 661,810,000 | 1,001,351,000 |
| Operating costs | 592,052,000 | 850,470,000 |
| Gross profits | 118,996,000 | 197,600,000 |
| Net profits | 13,726,000 | 60,863,000 |
| Employee salaries and benefits | 92,154,000 | 87,290,000 |
| Payments to Government bodies (taxes) | 10,461,000 | 38,566,000 |
| Payments to capital providers (shareholders' dividends) | 20,392,000 | 6,154,000 |
| New investments | 58,654,000 | 163,868,000 |
| Investments in local communities | 1,396,513 | 1,062,667 |

Management approach

The MYTILINEOS Group is today one of the largest industry groups at the global level, with activities in the sectors of Metallurgy & Mining, Energy and EPC Projects. Driven by its desire for continuous development and progress and seeking to take the lead in all its actions, having always done so in the course of its long-standing presence and activity, the Group is consistently pursuing its vision to become a strong and competitive European “heavy industry” group. In an ever-changing economic environment, maintaining high liquidity and mitigating financial risk are essential to ensuring the smooth continuation of investments, in all of the Group’s activity sectors.

Drawing on its highly qualified human resources, significant assets and financial robustness, the Group aims to achieve a steady organic growth in the wider region of SE Europe, N. Africa and the Middle East and focuses on revealing the significant synergies available between its core activity sectors, seeking their balanced development. In parallel with its investment plan, the Group develops methods to curtail costs and exploits the capabilities of sophisticated risk-hedging tools and techniques to optimise its financial performance in the coming years.

The Group’s core development goal refers to the “**EXPLOITATION OF THE OPPORTUNITIES OPENING UP THROUGH THE DEREGULATION OF THE ENERGY MARKET**” in Greece. The Group’s investment plan, with a total value in excess of €1 billion over the next three years, aims to realise the vision of creating the largest independent energy producer in Greece.

In addition, the goals of “**SEEKING NEW VERTICAL INTEGRATION PROJECTS OR PROJECTS FOR EXPANDING METALLURGY OPERATIONS**” and “**INCREASING COMPETITIVENESS THROUGH STRATEGIC INVESTMENTS AND RISK-HEDGING METHODS**” show the Group’s orientation in the Metallurgy sector, while the focus on the “**UTILISATION OF THE SIGNIFICANT INDUSTRIAL KNOW-HOW AND INFRASTRUCTURE**” and on “**MAINTAINING THE GROUP’S LEADING ROLE IN ENERGY PROJECTS IN GREECE AND EXPANDING ITS OPERATIONS ABROAD**” indicate the Group’s strategic goals in the sector of EPC Projects.

Climate change, relevant laws and regulations and greenhouse effects

Energy is a key raw material for the Group’s activities and is also expected to become a key source of income in the near future. The Group is also active within the broader energy sector through the construction of turnkey energy projects (EPC Projects). According to a view that is rapidly gaining ground, the consumption of energy produced by mineral fuels is one of the key factors that contribute to global warming. An increasing number of Governments or governmental bodies have already introduced or are about to introduce

legislative and regulatory changes as a response to the potential risks that this phenomenon poses.

The Group’s operating margins might be affected by changes which may be made to production facilities of the Group with high greenhouse gas emission levels, as well as to facilities of the Group with increased requirements in energy as a result of regulatory acts primarily in the EU, where the Group is active. The estimate of the potential impacts of the future legislation and the regulatory framework on climatic change and of the European and international conventions and agreements are uncertain, given the wide-ranging purpose of these potential changes.

The Group may be forced to carry out significant investments in the future, as a result of the need to comply with the revised legislation and the new provisions. Finally, as a result of a surplus or deficit in the management of CO₂ emission rights, the Group may have to recognise significant expenditures or revenues, respectively, in the future. On the other hand, the Group may identify opportunities in the EPC Projects sector, made possible by any one of the aforementioned changes in the legislation which relate to climate change.

Human resources

Management approach

In the MYTILINEOS Group, we invest in our people, as we recognise that our business success and our future development are due to them. In line with this approach, the Group has established a work environment in which the 2,250 employees that make up the human resources of its companies are provided with job security, equality, stability, a high level of professional and personal satisfaction, loyalty and commitment to the corporate values.

The respect of the rights and of the personal dignity of employees is a core commitment for the MYTILINEOS Group, and investing in people is part of our corporate culture. To this end:

We take care to ensure that we are able to attract and retain qualified individuals with principles and values such as integrity, consistency, loyalty, creative thinking, professional diligence and responsibility.

We seek to provide employment conditions and a work environment where the best possible conditions are in place to encourage creativity, development and full utilisation of the capabilities of each employee.

We share our knowledge and experience to promote “lifelong” learning through processes that identify the areas for development of our employees’ professional capabilities and for provision to our employees of training on subjects that conform to the Group’s strategic goals for development.

We improve the conditions and the Health and Safety standards our work areas, in order to meet the needs of our employees and help them balance their professional and family obligations.

We evolve by constantly creating new opportunities for evolution for all employees, offering equal opportunities and competitive compensations and benefits systems through a Performance Review system based on methods and tools that assess individual and team performance and their interrelationship.

We maintain labour peace, through policies and systems that foster harmonious collaboration and promote a good work environment.

We establish an Internal Communication System that promotes lateral and hierarchical communication and strengthens corporate culture.

We are standing by our people with honesty and openness, and we support them in their professional development.

Our core priority is to achieve the target of “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES” in all Group companies and we are committed to working with a sense of responsibility and consistency to our people and to remain their first choice of employer throughout the course of their career.

Workforce data

All (100%) personnel employed in the MYTILINEOS Group companies in Greece is covered by collective labour agreements. With respect to significant operational changes, all Group employees affected by such changes are informed of them within the time limits prescribed by the applicable laws to ensure that they adapt smoothly to the new situation. This timeframe varies between Group companies and in many cases (e.g. DELPHI-DISTOMON S.A.) exceeds the statutory obligation.



| Total workforce | 2009 | 2010 |
|------------------|-------|-------|
| Total workforce* | 2,599 | 2,249 |

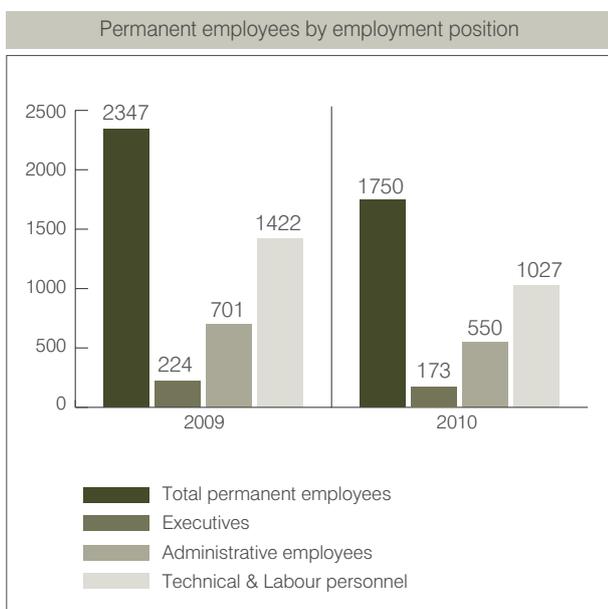
* Company employees, contractors and freelance professionals.

| Total workforce by type | 2009 | 2010 |
|--|-------|-------|
| Total employees | 2,344 | 1,839 |
| Total contractors and freelance professionals* | 255 | 410 |

* A significant part of the tasks of the Metallurgy sector and, in particular, of production tasks (mining of ores), and of the EPC Projects sector, are carried out by supervised contracted personnel.

| Personnel by employment type | 2009 | 2010 |
|------------------------------|-------|-------|
| Total full-time employees | 2,344 | 1,839 |
| Total part-time employees | 0 | 0 |

| Personnel by type of employment contract | 2009 | 2010 |
|--|-------|-------|
| Open-end employment contracts | 2,344 | 1,747 |
| Fixed-term employment contracts* | 255 | 92 |



| Personnel by geographical region | 2009 | 2010 |
|---|-------|-------|
| Personnel from the geographical department of Sterea | 1,576 | 1,399 |
| Personnel from the geographical department of Macedonia | 785 | 265 |
| Personnel from the geographical department of Thessaly | 238 | 183 |
| Personnel from the geographical department of the Peloponnese | - | 12 |
| Personnel from other regions in Greece | - | 175 |
| Personnel from Romania | - | 62 |
| Personnel from Turkey | - | 34 |
| Personnel from Syria | - | 7 |

NB: The data for 2009 also include 603 employees of ELVO S.A. As already mentioned, the Sustainability Report 2010 does not report information on ELVO S.A. Furthermore, the above data do not include 112 contractors of DELPI-DISTOMON .S.A.

Recruitment from local communities

In all the geographical regions where Group operations are located, the majority of its human resources come from the local population. In addition, the Group's practice to include members of the local communities in the management teams of its companies results in economic benefits for the local community and improves the Group's ability to understand local needs.

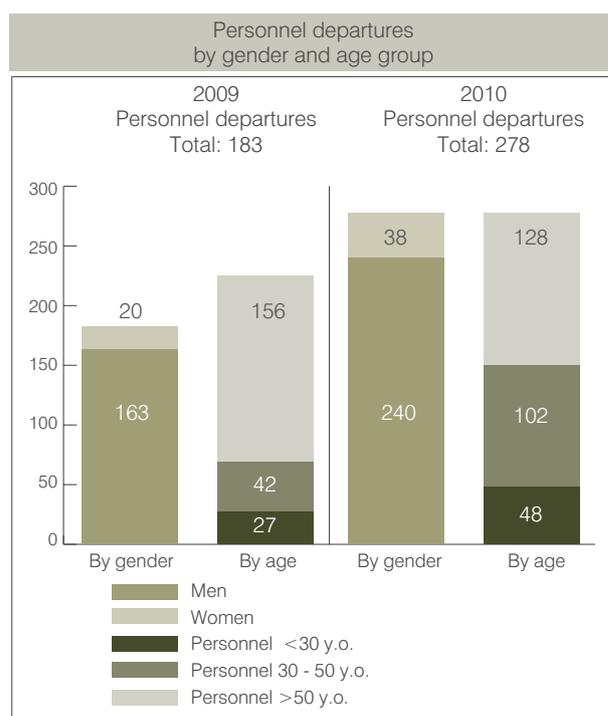
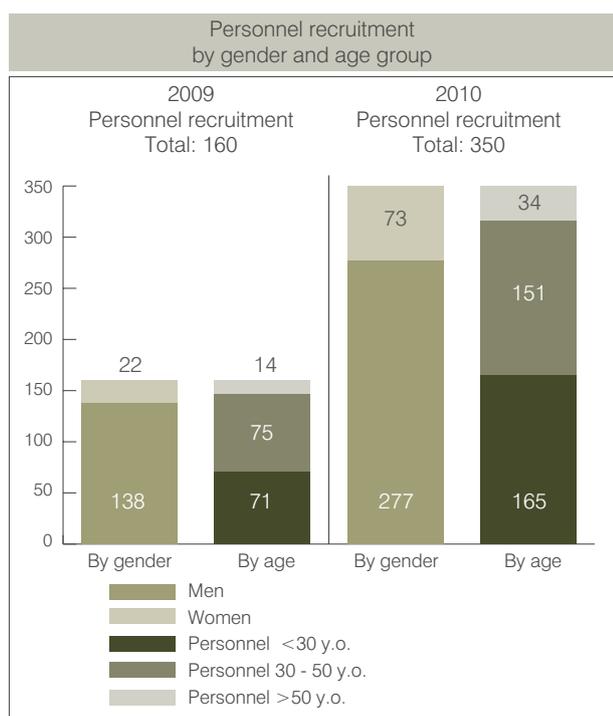
The Group companies have developed reliable personnel selection procedures adapted to the particular characteristics and needs of their industrial activity sector. These procedures are designed with the aim of assessing the qualifications/skills of candidates in relation to corporate requirements and needs as well as in terms of the extent to which these qualifications/skills match the requirements of the Group's Professional Ethics Code.

| Percentage of Management Executives of the Group companies recruited from local communities | 2009 | 2010 |
|---|-------|-------|
| Recruitment of executives from local communities | 91.0% | 86.4% |

* For the interpretation of the term "Management" by each Group company, see the respective table in the individual Company sections of this Report.

Employee turnover and retention

During 2010 the MYTILINEOS Group hired 350 new employees, while 278 employees left the Group. Of these departures, 60% were mainly retirement-related, 25% were voluntary departures, and the rest was due to reasons such as the expiry of employment contracts and dismissals.



| Personnel departures by geographical region | 2009 | 2010 |
|--|--------------|--------------|
| Departures from the geographical department of Sterea | 114 | 114 |
| <i>As a percentage of total full-time personnel</i> | <i>4.86%</i> | <i>6.19%</i> |
| Departures from the geographical department of Macedonia | 39 | 66 |
| <i>As a percentage of total full-time personnel</i> | <i>1.66%</i> | <i>3.58%</i> |
| Departures from the geographical department of Thessaly | 16 | 34 |
| <i>As a percentage of total full-time personnel</i> | <i>0.68%</i> | <i>1.84%</i> |
| Departures from the geographical department of the Peloponnese | - | 3 |
| <i>As a percentage of total full-time personnel</i> | | <i>0.16%</i> |
| Departures from other regions in Greece | 14 | 40 |
| <i>As a percentage of total full-time personnel</i> | <i>0.60%</i> | <i>2.17%</i> |
| Departures from Romania | - | 8 |
| <i>As a percentage of total full-time personnel</i> | | <i>0.43%</i> |
| Departures from Turkey | - | 1 |
| <i>As a percentage of total full-time personnel</i> | | <i>0.05%</i> |
| Departures from Syria | - | 12 |
| <i>As a percentage of total full-time personnel</i> | | <i>0.65%</i> |

Employee development

The MYTILINEOS Group considers its duty to provide its people with the means and opportunities that will help them develop their capabilities to the maximum. The Group encourages initiative, rewards innovation and evaluates individual performance, while taking care to ensure that its personnel is provided with the most complete training possible. In each one of its companies, the Group has in place advanced performance review systems for its personnel, a key element of which is to help fill all job vacancies through internal promotions in accordance with a system of strict priority, provided that the candidate employees possess the knowledge and qualifications required.

| Employee development data | 2009 | 2010 |
|--|---------------|---------------|
| Number of employees who received an official performance review* | 1,025 | 985 |
| <i>As a percentage of total full-time employees</i> | <i>43.80%</i> | <i>53.53%</i> |
| Number of internal promotions* | 18 | 36 |

*The data for 2009 include only ALUMINIUM S.A. and MYTILINEOS HOLDINGS S.A., which had available data for the specific indicator. In the data for 2010 these two companies were joined by DELPHI-DISTOMON S.A., with no data reported by METKA S.A. and PROTERGIA S.A., as the two companies did not carry out official performance reviews of their personnel in 2010

Occupational Health and Safety

The utmost priority for the MYTILINEOS Group, on a day-to-day basis, is to protect its employees in the work premises of all its companies from factors that may harm their physical integrity. The Group works constantly to achieve the only acceptable target of “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES”, which is the major challenge for the industrial sector.

The elimination of accidents at the workplace, especially in production units, is a key concern of the Group. The goal for the Group is to maintain high safety indicators across all its facilities, while continuing its significant effort regarding the implementation of action plans and specific programmes for the protection and improvement of the quality of life.

The Group's policy in this sensitive area is implemented through the continuous improvement of an Occupational Health and Safety Management System in accordance with the OHSAS 18001 International Standard and the ELOT 1801 Greek Standard, and is characterised by the

following aspects, which are gradually applied by all Group companies:

- Strict adherence to the provisions of the laws and to the applicable standards and internal guidelines.
- Continuous identification and assessment of hazards, and adoption of the necessary measures to address them.
- Operation of a Health and Safety Office in large production units and in the Group's central offices.
- Inclusion of personnel in special training programmes on Occupational Health & Safety.
- Open and transparent communication regarding all Occupational Health & Safety issues.
- Regular inspections of the organisation and procedures in place, to ensure strict compliance with safe work rules in all Group companies, while also taking care to ensure the safety of clients, associates and other citizens who visit the facilities of the Group companies.

Additionally, every year, on the basis of the accident analysis results concerning the incidents that occur in the work premises, the Group takes care to ensure the highest possible specialisation and improvement of its training programmes on the protection from accidents and occupational diseases.

The utmost priority for the MYTILINEOS Group, on a day-to-day basis, is to protect its employees in the work premises of all its companies from factors that may harm their physical integrity.

Implementation of Occupational Health & Safety standards in the MYTILINEOS Group companies

| Company | Occupational Health & Safety Standards | Comments |
|--------------------------|--|--|
| MYTILINEOS HOLDINGS S.A. | - | |
| ALUMINIUM S.A. | OHSAS 18001 | |
| METKA S.A. | OHSAS 18001 | |
| DELPHI-DISTOMON S.A. | OHSAS 18001 | |
| PROTERGIA S.A. | - | Objective: To apply the International Standard in 2011 |

| Occupational Health & Safety Data | 2009 | 2010 |
|---|--------------|--------------|
| Total workforce | 2,599 | 2,249 |
| Total days worked by workforce | 659,396 | 544,370 |
| Total hours worked by workforce | 4,678,436.14 | 4,042,386.40 |
| Total accidents* | 42 | 22 |
| Total work-related fatalities | 0 | 0 |
| <i>Injury Rate (IR)</i> | 1.79 | 1.08 |
| Total occupational disease cases | 23 | 3 |
| <i>Occupational Diseases Rate (ODR)</i> | 0.98 | 0.14 |
| Total days lost | 990 | 337 |
| <i>Days Lost Rate (LDR)</i> | 42.32 | 16.67 |
| Total days of absence from work | 19,967.0 | 15,632.50 |
| <i>Absenteeism Rate (AR)</i> | 6,056.5 | 5,743.3 |

* Does not include incidents involving very light injuries

Methods for the calculation of indicators

Injury Rate (IR)

$IR = \text{Total number of injuries} \times 200,000 / \text{Total hours worked}$

Occupational Diseases Rate (ODR)

$ODR = \text{Total number of occupational disease cases} \times 200,000 / \text{Total hours worked}$

Days Lost Rate (LDR)

$LDR = \text{Total number of days lost} \times 200,000 / \text{Total hours worked}$

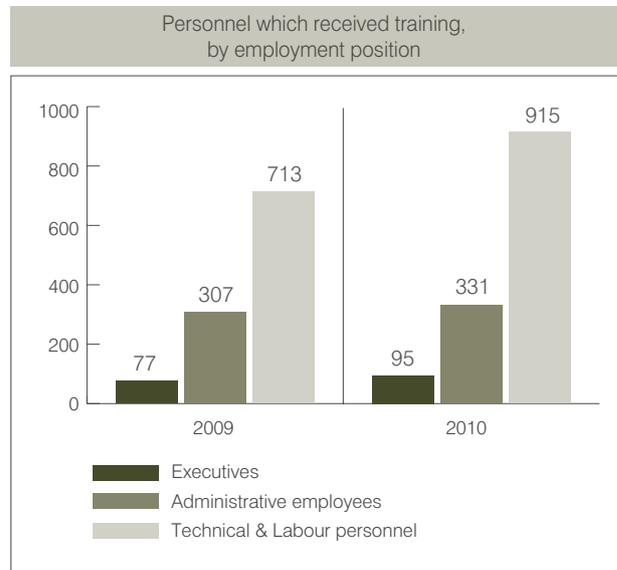
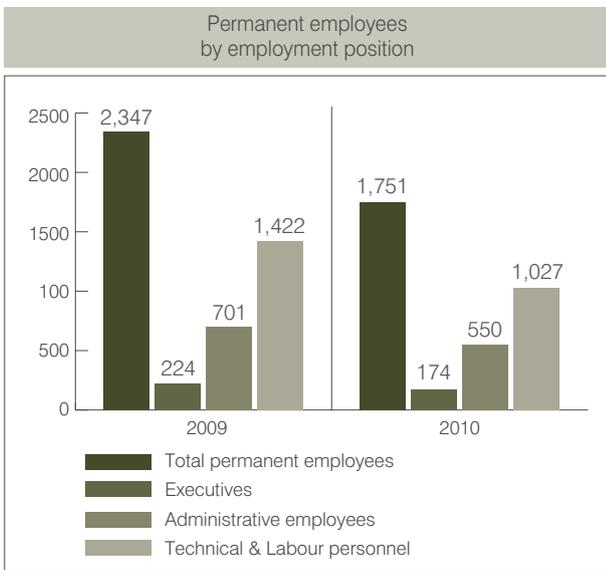
Absenteeism Rate (AR)

$AR = \text{Total days of absence in the period reported} \times 200,000 / \text{Total days worked by the workforce during in same period}$

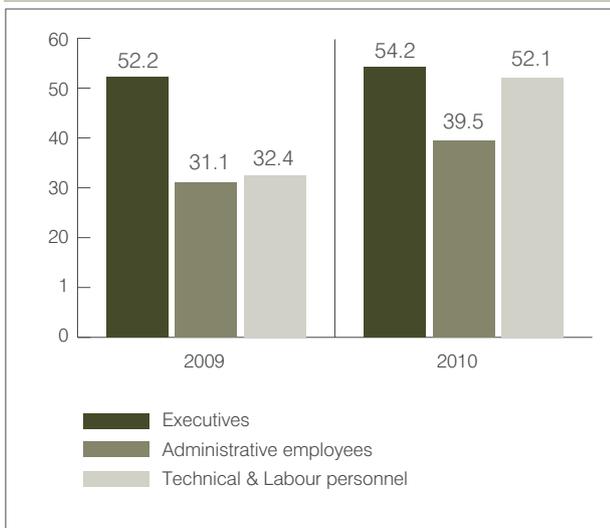
Education and Training

The MYTILINEOS Group invests in the continuous education and training of its workforce, which is one of its core principles, aiming to provide tools and know-how which facilitate day-to-day work and offer innovative solutions to the challenges that arise in the ever-changing business environment, together with ways to improve employee and Company productivity and efficiency.

The Group's training programme for 2010 consisted of 18 training modules with total of 67,388 training person-hours, which were attended by 76.6% of its permanent personnel. The Group's total training expenditure stood at €340,215.



Personnel training hours by employment position



| Training categories & corresponding training hours | 2009 | 2010 |
|--|--------|--------|
| Technical training | 25,515 | 51,891 |
| Health & Safety | 4,136 | 8,878 |
| Foreign languages | 2,216 | 1,227 |
| IT | 1,753 | 623 |
| General training | 1,162 | 863 |
| Skills development | 972 | 1,200 |
| Management - Leadership | 942 | 2,156 |
| Quality | 907 | 219 |
| Continuous Progress | 625 | 84 |
| Environment | 553 | 392 |
| Finance - Accounting | 431 | 416 |
| Energy issues | 152 | 24 |
| Public Relations | 146 | - |
| Internal Audit | 70 | 36 |
| Logistics | 56 | - |
| IFRS | 48.5 | 36 |
| Human resources | 7 | 42 |
| Corporate Social Responsibility | - | 16 |
| Project management | - | 148 |



The Group's training programme for 2010 consisted of 18 training modules with total of 67,388 training person-hours, which were attended by 76.6% of its permanent personnel.

Voluntary benefits

The human resources policy of the MYTILINEOS Group also extends to a number of initiatives aimed at meeting the needs of the particular sector where each Group company is active, while also taking into account the composition of their personnel in terms of gender and performance. In trying to help its employees balance their professional and family obligations and improve their position in the labour market, and in addition to the defined contribution retirement plan that it offers, the Group also offers an additional benefits plan.

Voluntary benefits extended to the full-time personnel of the Group companies

Life insurance

Health and medical insurance

Coverage against disability/incapacitation

Maternity/paternity leave

Retirement provisions

Other voluntary benefits* offered by the Group companies over and above their statutory obligations

Social Policy Benefits

Personnel Housing or payment of housing allowance to employees living in their own homes

Payment of one-off retirement compensation higher than the company's statutory obligation

Payment of one-off compensation for voluntary departure

Bonus paid to all personnel depending on the annual results

Personnel transport

Retirement compensation significantly higher than the minimum amount foreseen by the law

Group insurance plan for employees and their families (life, health and medical care, accident insurance)

Use of company car & parking place

Use of mobile phone, laptop & Smartphone

Fuel expenses

Special anniversary gift payments on completion of 10, 20, 30 and 35 years of service with the Company

Vouchers for Christmas and Easter purchases

Coverage of school expenses and scholarships for children of employees

Provision of company cars (through leasing) to executives

Loans – Monetary Facilities

Work gear and meals

Childrens' summer camps, excursions and theatre tickets

Additional vouchers for purchases plus a fixed amount for parents of large families

Payment of a fixed amount for childbirth

Higher compensations for day-labourer layoffs

Higher compensations for day-labourer retirement

Night Shift Allowance, depending on the specialisation

Overtime compensation (at a higher rate than the rate set by the law)

* These benefits vary between Group companies. The benefits offered by each company are presented in detail in the individual Company sections of this Report.

Human rights

Management approach

In the MYTILINEOS Group we support and defend the internationally recognised human rights in accordance with the Universal Declaration of Human Rights and the standards of the International Labour Organisation. We are committed to promoting the protection of human rights in all our business units in the locations of our operations. We are also committed to promoting the protection of human rights to our employees, contractors, subcontractors, clients and suppliers, and to include relevant clauses in the agreements that we conclude for our business partnerships in all sectors where the Group has business interests.

We secure compensations which in several cases exceed those provided for by the national laws.

We promote the provision of equal opportunities and the equal treatment of our employees, and we recognise their freedom of expression.

We rule out all types of discrimination, harassment or unprofessional behaviour at the workplace.

We prohibit the employment of minors under the age of 18, as well as all forms of forced labour (such as mandatory overtime, threat of dismissal etc.).

We consider that the key responsibility of our top executives is to manage properly all forms of individuality, in order to protect and utilise all personalities.

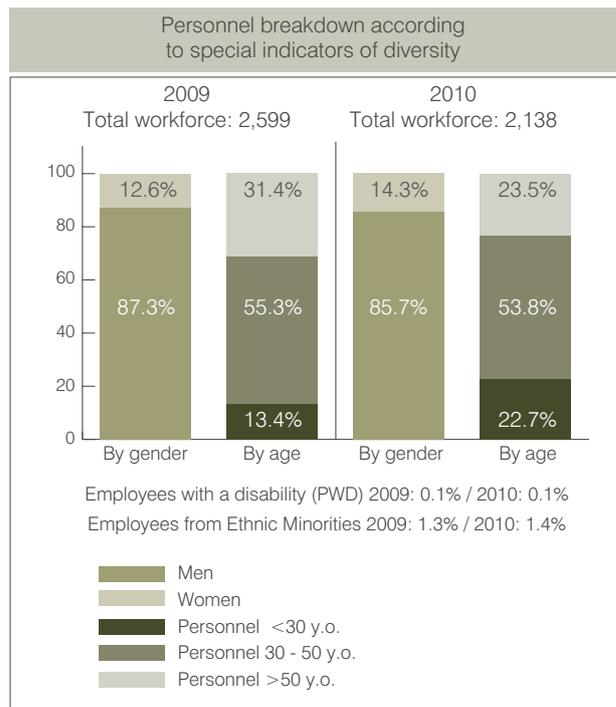
In line with the above, the more systematic “RECORDING OF SITUATIONS INVOLVING RISKS OF VIOLATION OF HUMAN RIGHTS”, the “TRAINING OF OUR EMPLOYEES” and the “PROMOTION OF THE PROTECTION OF HUMAN RIGHTS IN THE CIRCLE OF INFLUENCE OF OUR BUSINESS ACTIVITY”, are the main goals of our Group which, together with our principles and labour practices, are directly linked to the protection of Human Rights.

Equal opportunities and diversity

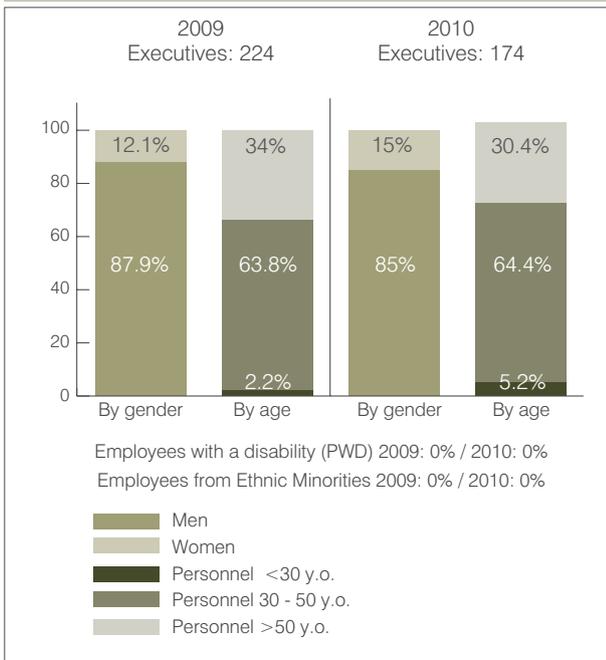
The particular characteristics and the needs of the business activity sectors of the MYTILINEOS Group, especially in the production process areas, are the factors that determine the indicators of diversity which the Group uses in connection with the promotion of equal opportunities and the respect of the individuality of every employee in its companies.

With particular respect for the personality of individuals, the Group monitors and collects data on the gender, age and ethnic origin of its human resources, together with information on any cases of disability, in the interests of proper management and in order to provide assistance – support to those who need it. Additionally, the basic salary is determined according to the managerial authorities and the position of responsibility of each employee, with the same compensation being offered for the same work and with equal opportunities for all, irrespective of gender or other element of diversity.

To this end, during 2010 the Group increased the participation percentages of women and young people in positions with extended responsibilities, while overall no reports were made of incidents of discrimination (e.g. in terms of compensation) or forced labour or of cases



Personnel in positions with extended responsibilities



involving child labour in the plant facilities or administrative premises of its companies.

Furthermore, during 2010 the Group introduced in its companies the inclusion of criteria on the protection of human rights in their financial decisions and business agreements of major significance in terms of economic volume and strategic importance.

The present Report contains relevant such information only for METKA S.A., presented in the respective Company section of this Report (under "Management of Local Suppliers").

Full reporting of data for this specific indicator by all Group companies is foreseen for the Sustainability Report 2011.

Environment

Management approach

In the MYTILINEOS Group, we wish to put our size and dynamism to conscious use aimed at the protection of the environment. To this end, we aim to ensure a better environment for ourselves and for our children, in a systematic and responsible manner, through our day-to-day practices as well as through coordinated programmes.

The rational management of the reserves of mineral resources, as well as of the natural resources (energy, water and fuels), the emissions of greenhouse gases, the utilisation of residues (e.g. bauxite), the control of air quality and the rehabilitation of the natural landscape in areas affected by mining activities, are the key environmental challenges faced by the MYTILINEOS Group across the entire range of its activities. Driven by our key concern to minimise the inevitable impacts of the operations of our companies on the natural environment, we are implementing environmental management and industrial hazard control policies that form the basis for an integrated and effective system of Environmental Management practices and methods. A management system which we aim to gradually incorporate in the business activities of all our subsidiaries and in the procedures that define their day-to-day operations.

Our efforts to address the issue of environmental management are not limited to the application of the rules and the required provisions and to the adoption of the measures which are necessary each time, but is also expressed by our self-commitment to conducting regular audits of our activities, in both the plant facilities and the headquarters of our companies, in order to have them certified in accordance with the ISO 14001 International Environmental Management Standard.

In line with all the above, the "DISPOSAL OF BAUXITE RESIDUES ON LAND FROM 2012 ONWARDS", the "REGULAR MEASUREMENT AND REDUCTION OF CO₂ EMISSIONS" in all our companies, and the "SYSTEMATIC MANAGEMENT OF THE REHABILITATION OF THE NATURAL LANDSCAPE AND OF THE PRESERVATION OF BIODIVERSITY IN THE AREAS AFFECTED BY MINING ACTIVITIES" are our key environmental goals.

The goal of sustainable development is a core strategic priority for the MYTILINEOS Group, not only as a performance

indicator of the Group's Corporate Social Responsibility but also as a factor which contributes a significant competitive advantage in the energy supply sector.

During 2010, no sanctions were imposed on the Group by administrative authorities or by the courts for non-compliance with environmental rules and regulations.

With respect to sustainable environmental management, the Group has adopted as reference for its efforts a number of measures and principles such as:

Measures and Principles adopted by the Group for the protection of the Environment

- Adherence to the agreements and commitments that the Group has undertaken over and above its statutory obligations.
- Assessment of the impacts of the activities of the Group companies on the environment, identification of risks, assessment of the risk of serious accidents due to past, present and future activities, and utilisation of these assessments in the development of long-term programmes and new plans.
- Control and continuous reduction of solid, liquid and gas waste.
- Improvement of the management of residues by promoting recycling or utilisation procedures.
- Control of the consumption of raw materials and energy.
- Prevention of all risks of permanent or accidental pollution, or of other large-scale accidents (development, testing and application of emergency response procedures).
- Study, maintenance and development of suitable prevention and suppression means, especially in cases where installations are modified.
- Correction of all deviations identified, through the introduction and implementation of corrective and preventive action plans.
- Training, sensitisation and provision of information to the personnel in a manner that is adapted to the duties and needs of each employee.
- Motivation of associates (contractors, suppliers, clients) to meet the same environmental and industrial safety requirements.
- Organisation of regular internal and external inspections to assess the performance of the Environmental Management system, the achievement of the targets set and the application of the regulations and principles.



In total, the Group in 2010 consumed more than 4.6 million m³ of water, down around 9.7% from the Group's consumption of water in 2009.

Implementation of environmental standards in the MYTILINEOS Group companies

| Companies | Environmental standards | Comments |
|--------------------------|-------------------------|--|
| MYTILINEOS HOLDINGS S.A. | - | |
| ALUMINIUM S.A. | ISO-14001 | |
| DELPHI-DISTOMON S.A. | ISO 14001 | |
| METKA S.A. | ISO 14001 | |
| PROTERGIA S.A.* | - | Objective: to obtain certification in 2011 |

Energy consumption

The tables below show the total consumption of direct and indirect energy by the MYTILINEOS Group companies for 2010. A significant initiative of the Group in this area, implemented through ALUMINIUM S.A., for reducing the consumption of direct energy was to secure the supply of the company with high-pressure steam from the new 334 MW gas fired Combined Heat and Power plant (CHP), a development that led to the abolition of the Energy Department previously serving this purpose. In energy terms, this means an annual reduction of fuel oil consumption by 150,000 tons, corresponding to approximately 6,025,500 GJ (1 ton of fuel oil corresponds to 40.19 GJ). A further positive result is that the electric power which the plant supplies simultaneously to the power grid is substituting the energy which otherwise would have to be obtained by burning lignite. It is estimated that this development will result in a reduction of carbon dioxide at the national level, according to the data presented in the plant's Environmental Impact Study.

| Direct energy consumption* (in GJ) | 2010 |
|------------------------------------|-------------|
| Total direct energy consumption | 7,737,706.9 |

* The total use of direct energy refers to primary sources of energy purchased by the Group companies and, more specifically to oil, fuel oil and natural gas for heating/transport and in part for the production processes.

| Indirect energy consumption* (in GJ) | 2010 |
|--------------------------------------|--------------|
| Total indirect energy consumption | 12,552,876.5 |

* The total use of indirect energy refers to energy which is purchased and consumed by the Group companies from non-renewable energy sources and, more specifically, to electricity and steam.

Water consumption

In total, the Group in 2010 consumed more than 4.6 million m³ of water, down around 9.7% from the Group's consumption of water in 2009. The largest part of this quantity was consumed in industrial production and the rest was made available for plain use, as well as for use in environmental rehabilitation.

Finally, of this total quantity, 94% was drawn from groundwater, 4.8% was drawn from the municipal water supply company, and the remaining 0.2% represented rainwater quantities collected and consumed.

The areas from which the Group companies draw water do not include any water masses which the experts regard as particularly sensitive because they support a specific endangered plant or animal species or are located in any other area which has been designated as a protected area.

| Total water consumption (in m ³) | 2009 | 2010 |
|--|-------------|-------------|
| Water consumption | 5,138,060.2 | 4,640,581.8 |

| Total water consumption by source (in m ³) | 2009 | 2010 |
|---|------|-------------|
| Surface water, including water from wetlands, rivers and lakes | - | - |
| Groundwater | - | 4,362,530.0 |
| Rainwater collected directly and stored by the Company | - | 6,000.0 |
| Municipal water reserves or other public water supply companies | - | 272,051.8 |

| Water recycled and reused | 2009 | 2010 |
|---|--------|--------|
| Total volume of recycled water (in m ³) | 2,000 | 2,000 |
| Volume of reused water as a percentage of the Company's total water consumption | 0.039% | 0.043% |

* The total volume of the water recycled/reused by DELPHI-DISTOMON S.A. came from natural separation in the site workshops and was used in environmental rehabilitation

Biodiversity

The MYTILINEOS Group has taken care to ensure that the facilities of its companies are not located adjacent to areas protected by law and to areas of high biodiversity value. Therefore, there are no impacts which may affect adversely, either directly or indirectly, the integrity of the geographical area or region where the operations of Group companies are located.

With respect to the activities of PROTERGIA S.A. which concern the construction of wind farms located near areas that have been designated Special Protection Areas (mentioned in detail in the corresponding Company section of this Report), it is pointed out that the operation of wind farms has no adverse impacts in terms of pollution (gas or liquid waste), the movement of animals is not obstructed, as there is no fencing, and the disturbance to the local population of birds is negligible, as has been shown by scientific studies.

The MYTILINEOS Group aims to control the volume of greenhouse gas emissions from its operations, and to reduce such emissions.

Greenhouse gas emissions – CO₂ emissions

Greenhouse gas emissions are the main cause of climate change. The MYTILINEOS Group aims to control the volume of greenhouse gas emissions from its operations,

and to reduce such emissions. As the Group launched the procedure for the control of CO₂ emissions in its companies in 2010, relevant data are available only for ALUMINIUM S.A. and are presented in the respective Company section of this Report. Full reporting of data for this specific indicator by all Group companies is foreseen for the Sustainability Report 2011

Significant spills

Spillage of various chemicals, oil and fuels may have adverse impacts on the environment, which in turn may affect the soil, the water, the atmosphere, the biodiversity and the health of humans.

Our systematic efforts to prevent spills are directly related to the Group's compliance with the regulations, to the financial risk from the loss of raw materials, to the cost of restoration and the risk of regulatory measures being imposed. In 2010, the environmental pollution incidents which were analysed numbered a total of 29 and concerned in their majority low-scale leakage of lubricants during the operation of machinery (forklifts) in ALUMINIUM S.A.

No high or medium gravity environmental pollution incidents occurred and no incidents were reported involving the spillage of hazardous materials to the environment by any Group company.

Waste disposal

As part of its environmental policy, the MYTILINEOS Group remains committed to the correct collection and utilisation of its waste, by implementing waste collection and disposal practices on a large-scale.

The production processes of the Group companies produce liquid and solid waste, which are separated at the source and collected by suitably licensed professionals for management.

During 2010, some 908,560 tons of waste from all Group companies were forwarded for disposal in Landfills (72%), disposal at sea (22%), utilisation (4%), disposal in Landfills for Hazardous Materials (1.6%), and recycling or destruction (0.8%) either by the Group companies themselves or through licensed networks.

In more detail, the categories and quantities of waste produced by the Group, by disposal method, are as follows:

| DISPOSAL OF NON-HAZARDOUS WASTE IN LANDFILLS* (in tons) | 2010 |
|---|-------------------|
| Red mud from alumina production | 545,164.00 |
| Dust and powder waste | 888.56 |
| Gravel and crushed rock waste (unbaked materials from lime production) | 2,042.67 |
| Gravel and crushed rock waste (unusable materials from limestone quarry) | 99,069.00 |
| Waste not otherwise specified (non-classified waste from alumina production) | 295.42 |
| Waste containing carbon from the production of positive electrodes (dust from bridges in the anodes baking furnace) | 229.84 |
| Waste not otherwise specified (non-classified waste from anodes production) | 771.61 |
| Non-classified waste from the cast house | 76,20 |
| Waste from lime production and lime hydration (rejected lime fraction) | 1,820.30 |
| Lime dust (t) | 929.80 |
| Solid waste from the treatment of gases (lime furnace degassing dust) | 1,999.57 |
| Waste not otherwise specified (non-classified waste from plant) | 185.51 |
| Non-classified waste from ships | 30.50 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of anode baking kiln) | 250.86 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of cast house kilns) | 114.08 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of alumina heating kilns) | 100.46 |
| Plastics from ships | 17.69 |
| Residues from street cleaning | 136.04 |
| TOTAL | 654,122.12 |

* Waste are collected and removed in accordance with the applicable laws on disposal by type of waste. Waste quantity by type is checked by weighing outgoing waste.



| DISPOSAL OF HAZARDOUS WASTE IN LANDFILLS* (in tons) | 2010 |
|---|------------------|
| Other residues containing hazardous substances from the physical and chemical processing of minerals containing metals (nitrates) | 8,826.94 |
| Non-classified waste from the alumina line (decanting filters) | 5.90 |
| Other particles and dust (including ball mill dust) containing hazardous substances (dust from anode electrodes shot blasting) | 329.90 |
| Solid waste from the treatment of gases containing hazardous substances (fluoride captation) | 9.48 |
| Waste not otherwise specified (non-classified waste from electrolysis basins) | 3,187.35 |
| Packaging containing residues of hazardous substances or contaminated by them (hazardous substances packaging) | 19.36 |
| Inorganic waste containing hazardous substances (leftovers of samples) | 0.70 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances (waste from casting) | 483.14 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances (protective side plates for basins) | 97.50 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances (carbon paste sealant) | 381.00 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (insulating bricks for basins) | 135.60 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory chamotte) | 59.40 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (mud for construction of basins) | 63.30 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory bricks for basins) | 1,185.00 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory cement) | 42.60 |
| Construction materials containing asbestos | 0.54 |
| Mud from the treatment of urban wastewater | 0.76 |
| TOTAL | 14,828.00 |

* Waste are collected and removed in accordance with the applicable laws on disposal by type of waste. Waste quantity by type is checked by weighing outgoing waste.



| WASTE DISPOSAL AT SEA (in tons) | 2010 | |
|---------------------------------|------|--------|
| Bauxite residues | 201, | 203.52 |

| WASTE UTILISATION (in tons) | 2009 | 2010 |
|--|------------------|------------------|
| Bauxite residues | 37,400.00 | 8,483.40 |
| Non-productive decalcification | 40,000.00 | 24,826.75 |
| Cathode electrodes | 286.00 | 197.40 |
| Kiln skimming | 3,020.00 | 2,165.29 |
| Iron & steel scrap | 1,055.00 | 1,157.82 |
| Paper | 6.00 | 6.15 |
| Firebricks | 910.00 | 786.40 |
| Oils | 123.00 | 57.60 |
| Batteries | 3.00 | 5.45 |
| Metal packaging (aluminium boxes) | - | 0.18 |
| Rejected electrical & electronic equipment | - | 3.44 |
| TOTAL | 82,790.00 | 37,689.88 |

| WASTE COLLECTED BY THIRD PARTIES FOR RECYCLING (in tons) | 2009 | 2010 |
|--|---------------|---------------|
| Wet cell batteries | 2,56 | - |
| Dry cell batteries | 0,79 | 0,66 |
| Light bulbs | 0,06 | 0,06 |
| Oils** | 160,30 | 24,60 |
| Paper* | 16,20 | 13,45 |
| Aluminium | 22,00 | - |
| Household waste | 4,40 | 4,50 |
| Plastic* | 6,09 | 6,24 |
| Iron (scrap)* | 705,10 | 203,70 |
| Tyres | 6,00 | - |
| Accumulators | 1,60 | - |
| Wood (Pallets) | 25,60 | - |
| Materials impregnated with other substances | - | 0,30 |
| Lighting units | - | 0,10 |
| Filters – Rags | 4,00 | 0,30 |
| TOTAL | 954,70 | 253,91 |

* Waste are collected and removed by specialised licensed contractors mentioned in the individual Company sections of this Report

** Include Mineral Oils, Lubricant Oils, Wash Oils and Burnt Oils.

| WASTE COLLECTED BY THIRD PARTIES FOR RECYCLING (in tons) | 2010 |
|---|--------------|
| Other fuels (including fuel mixtures and waste oil from plant) | 31.30 |
| Absorbents, filter materials (including oil filters not otherwise specified), sweeping/mopping cloths, protective clothing contaminated by hazardous substances (materials impregnated with oil or petroleum) | 0.52 |
| Waste not otherwise specified (non-classified waste from plant) | 185.51 |
| Transformers and capacitors containing PCBs | 244.30 |
| TOTAL | 461.3 |



Environmental expenditures

In 2010, the total expenditures of the MYTILINEOS Group for environmental protection actions stood at € 8,667,860, up 45.4% from the corresponding figure in 2009.

Of these, 64.3% concerned costs for the disposal of waste and for the treatment of gas emissions, and the remaining 35.7% concerned prevention and environmental management costs of the Group companies. In detail:

| Environmental expenditures (in €) | 2009 | 2010 |
|---|------------------|------------------|
| WASTE DISPOSAL, GAS EMISSIONS TREATMENT & REHABILITATION COSTS | | |
| Waste disposal – management | 931,755 | 3,176,531 |
| Treatment of gas emissions (e.g. expenditures for filters, active equipment) | 2,928,000 | 2,386,827 |
| Expenditures for the purchase and use of gas emission certificates | 1,600 | 6,200 |
| Study for Solvents Management Plan | 3,000 | - |
| Depreciation of relevant equipment, maintenance, operation-related materials and services, and personnel-related costs | - | 259,700 |
| Total | 3,864,355 | 5,569,558 |
| PREVENTION & ENVIRONMENTAL MANAGEMENT COSTS | | |
| External services for environmental management | 128,000 | 187,552 |
| Independent certification of Environmental Management Systems | 12,000 | 4,500 |
| Improvements to the Environmental Management System | 25,000 | 15,000 |
| Landscape restoration | 255,000 | 273,000 |
| Personnel for general Environmental Management activities | 510,000 | 487,742 |
| Additional expenditures for “green” purchases and other environmental management costs – R&D and Additional expenditures for installation of “clean” technologies | 1,165,000 | 2,082,508 |
| Expenditures for the purchase and use of gas emission certificates | - | 48,000 |
| Total | 2,095,000 | 3,098,302 |

Market – products

Management approach

All MYTILINEOS Group companies place emphasis on product quality and safety. For the Group, the quality of its products and the ongoing provision of customer service is an area of continuous development. Because of the varied nature of its activity sectors and the geographical dispersion of its operations, the Group has a broad client base.

In the Metallurgy sector, the impacts on the health and safety products of the Group’s primary products are related to the end use of the secondary products to result from its manufacturing clients. The Group is committed to ensuring the best quality in its products, in response to the expectations and requirements of each client, by **“PROVIDING THEM WITH PRODUCTS – ALUMINA AND PRIMARY CAST ALUMINIUM – AND RELATED SERVICES THAT FULLY MEET THE QUALITY REQUIREMENTS”**. To achieve this principal goal, the Group is managing proactively the processes and resources related to the improvement of the quality, safety and environmental impact of its products and services, seeking to secure benefits for its clients and, thus, for society.

In the EPC Projects sector, in addition to taking into account the internationally applicable regulations on the design of such projects and the control of subcontractors to ensure compliance with the health and safety regulations, the Group monitors in detail the quality, safety and health measurements of its end projects, in order to ensure that the stated requirements of clients are met. This is carried out at various stages during the implementation of each project, in accordance with the respective activity schedule. Our goal is to **“ENSURE THAT THE MATERIALS INTENDED FOR INCORPORATION WHICH DO NOT COMPLY WITH THE STATED QUALITY AND HEALTH & SAFETY REQUIREMENTS ARE CHECKED AND IDENTIFIED AS SUCH, SO AS TO AVOID THEIR INTENTIONAL USE AND DELIVERY”**.

Although in most cases the clients of the MYTILINEOS Group are not the end users of its products, the Group’s policy is to ensure that all the products it puts to the Greek and international markets fully meet the statutory requirements and the expectations of the end users.

Additionally, a core commitment and key pillar of the corporate philosophy of the MYTILINEOS Group, in all the markets

where the Group operates and in full alignment with the professional and ethical conduct framework that governs all its operations and activities, is the avoidance of all unfair associations with potential competitors which may lead to anti-competitive conduct or practices. As a result of this policy, the Group to this day has never been the subject of legal actions under Greek or international law for anti-competitive conduct or for practices leading to the creation of trusts or monopolies.

Management of local suppliers

The development and maintenance of good relationships with the supply chain actors is a commitment in which the Group has invested and is continuing to invest through permanent associations at the national as well as at the local level. The Group's policy in this area has made possible the manufacture in Greece of a broad range of specialised materials and of simple and tailor-made products that serve the needs of its companies.

Although varying slightly between its various activities, the term "local supplier" for the MYTILINEOS Group generally refers to suppliers of materials, products or services, both industrial and otherwise, who are located within the geographical region where the Group's companies are based and within their sphere of influence, which

frequently extends to the entire Greek territory. Because of this particularity, the total share of the Group's budget for purchases which is implemented at major locations of the Group's operations and corresponds to outlays to local suppliers cannot be estimated accurately. However, the individual Company sections that follow describe the particular characteristics of this matter and provide specific figures for these outlays. An estimate of this total share will be given in the next Sustainability Report.

In selecting their suppliers, the Group companies follow simple procedures characterized by meritocracy and transparency. The key parameters affecting supplier selection, in addition to geographical location, are the following:

- The quality of the products and services offered.
- Customer service.
- Pricing policy.
- Solvency.
- Punctuality in the delivery of products and services.
- Compliance with the key environmental and safety principles.
- Availability of suitable production equipment according to the specific needs of the Group companies, as these apply each time, and
- Experience.



Product Health and Safety specifications

The continuous and concerted efforts of the MYTILINEOS Group to enhance the quality of its end products, services and projects and to take measures to guarantee their health and safety characteristics, are crucial to the Group's growth in the current, constantly changing business environment.

Core initiatives, such as:

- The strict implementation of the procedures under the EN ISO 9001 Quality Management System;
- The development of a Hazard & Operability (HAZOP) Study for operational risk analysis;
- The staffing of the Quality Control Departments with experienced staff who are provided with continuous training;
- The strict adherence to the laws and regulations governing the manufacture of products (operating licenses, compliance with approved Environmental Terms etc.);
- The application of the principle that no product is signed off to the next production stage unless the quality criteria of the previous stage have been met;
- The maintenance and safeguarding of the quality characteristics and standards in all production or project delivery stages; and
- The steps taken to ensure full compliance of the product/project with the client's stated requirements,

are fundamental aspects of specific policies on product quality and safety, which the Group companies apply in their specific activity sectors.

In this way, the Group not only achieves high customer satisfaction, but also eliminates all likelihood of incidents and, consequently, of fines for non-compliance with the laws and regulations on the use, health and safety of its products and services.

Society

Management approach

Beyond our contribution to the economic development of the local communities where we operate, in the MYTILINEOS Group we seek to also promote the balanced and varied development of these communities, by actively and consciously supporting their cultural, intellectual and social life and by taking care to make sure that we function as a "responsible corporate citizen".

The Group's social policy is also expressed, in addition to its standing position regarding the support of Culture, Sports and Entrepreneurship, through concerted actions involving the provision of technical and financial assistance for local infrastructures. Every year, we help find solutions to a number of social issues and we provide financial assistance to actions and initiatives whose aim is to strengthen social cohesion at the central as well as at the local level.

We assist the implementation of local infrastructure works, by contributing financial, technical and other resources.

We support initiatives of high social interest taken by local social and environmental organizations.

We strengthen local cultural life and education. Our efforts to build constructive relationships of cooperation with the local communities in which we operate help us define the scope of our social goals, which involve the "CREATION OF JOBS AND DEVELOPMENT OF SKILLS", "SOCIAL INVESTMENTS IN LOCAL INFRASTRUCTURE WORKS", and "STRENGTHENING EDUCATION, CULTURE AND HEALTH".

The Group's concerted actions in 2010 involved the provision of financial assistance to major initiatives aimed at helping meet key social needs, and are presented in the individual Company sections that follow. Moreover, the Group's social policy is also expressed, in addition to its standing position regarding the support of Culture, Sports and Entrepreneurship, through concerted actions involving the provision of technical and financial assistance for local infrastructures.

The following are indicative such examples:

- a) The contribution of €53,000 for the construction of an environmental park in the Municipality of Opountion (Prefecture of Fthiotida);
- b) The contribution of €100,000 for the completion of environmental works in the Municipality of Dervenochori (Prefecture of Viotia); and

c) Maintenance and repair works for rural roads, outfitting of offices and school classrooms, and an educational trip by pupils from the Distomo and Aspra Spitia schools who excelled in their studies to the European Organisation for Nuclear Research (CERN) in Switzerland, with a total value of €31,000.

In terms of expenditures, the total social contribution of the MYTILINEOS Group in 2010 stood in excess of €1.7 million, up 42.6% from the corresponding contribution in 2009. Finally, in what concerns the Group's compliance with the regulatory provisions in all its business activity sectors, no monetary sanctions were imposed to the Group in 2010 for non-compliance with the applicable rules and regulations.

| Financial assistance to social organisations (in €) | Actions | 2009 | 2010 |
|--|--|-------------|-------------|
| Activity area | Description of action | Expenditure | Expenditure |
| Arts and culture | Financial support of theatre shows & painting exhibitions. Financial assistance to local cultural societies. | 474,147 | 507,200 |
| Sports | Financial assistance to meet the needs in uniform and equipment of 191 athletes of six local sports clubs. | 228,200 | 391,932 |
| Support of Entrepreneurship | Sponsorships for business conferences. | 137,950 | 226,335 |
| Local Government | Improvement of local infrastructures. Financial assistance to meet the needs of local organisations. Artistic events and financial assistance to local sports clubs. | 125,650 | 210,013 |
| Social bodies & organisation | Support of the work of volunteer organisations for the protection of child age and for children with a disability. | 37,850 | 176,200 |
| Employees | Financial assistance to employees' union. | 128,000 | 140,000 |
| Education | Scholarships and financial assistance to educational institutions. | 16,500 | 53,522 |
| Environment | Financial assistance for studies on the impact of climate change on Greek society. | 47,500 | - |
| Total | | 1,195,797 | 1,705,201 |





Corporate Centre: MYTILINEOS HOLDINGS S.A.

Key financial figures (in €)

| Economic Value Table | 2009 | 2010 |
|---|------------|-------------------|
| Revenues | 19,512,000 | 6,000 |
| Operating costs | 19,498,000 | 11,801,000 |
| Employee salaries and benefits | 7,264,000 | 6,858,000 |
| Payments to Government bodies (taxes) | 1,113,000 | 2,335,000 |
| Payments to capital providers (shareholders' dividends) | 10,019,000 | - |
| New investments | 597,000 | 169,000 |
| Investments in local communities | 734,379 | 829,975 |

MYTILINEOS HOLDINGS S.A. was established in 1990 and is headquartered in Athens. It is a holding company active in energy, construction (EPC projects), production and trading of aluminium and alumina, and metallurgy in general.

The most important changes in the Company's size, structure or ownership during 2010 were the following:

- In June 2010 MYTILINEOS HOLDINGS S.A. announced its decision to withdraw from the Management of ELVO S.A., a move that was completed in September 2010. Since then, the Board of Directors of ELVO S.A. is composed exclusively of representatives of the Hellenic State.
- In July 2010 MYTILINEOS HOLDINGS S.A. became the sole shareholder of "ENDESA HELLAS PRODUCTION AND TRADE OF ELECTRICAL POWER S.A.", which was renamed "PROTERGIA PRODUCTION AND TRADE OF ELECTRICAL POWER S.A.".
- In August 2010 MYTILINEOS HOLDINGS S.A. and MOTOR OIL (HELLAS) CORINTH REFINERIES S.A. established a joint company under the trade name "M and M NATURAL GAS COMPANY S.A." and the distinctive title "M&M GAS Co S.A.". Each of the two partners holds 50% of the share capital of the above company, whose activity is the supply and trade of natural gas (liquefied or non-liquefied).

Human resources

The proper development and management of human resources is at the core of the business practice of MYTILINEOS HOLDINGS S.A., and has its roots in the full respect of the rights of all its employees. To this end, the Company has integrated into its operation meritocratic systems for the development of its human resources, which include equal opportunities practices, performance evaluation systems, continuous training, talent management and procedures to ensure the health and safety of its employees at the workplace.

In line with the above practices, the Company does not have any activities perceived to involve the risk of child or forced labour, nor have any such incidents been reported in connection with its operation to date.

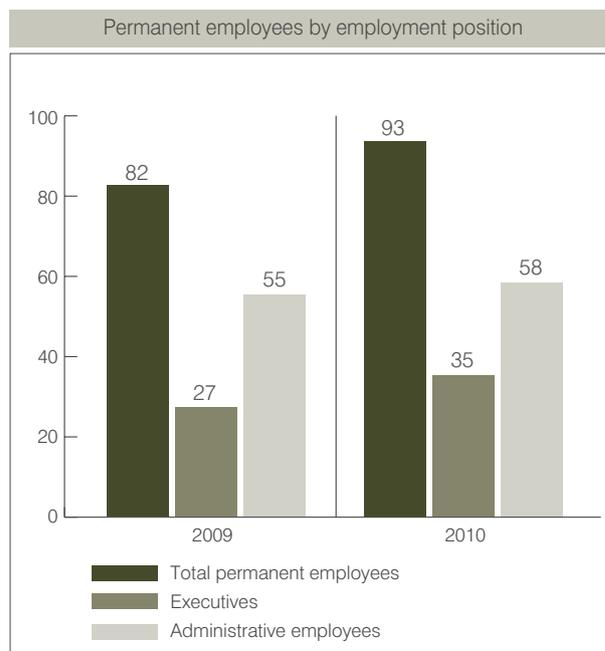
Workforce Data

| Total workforce | 2009 | 2010 |
|-----------------|------|------|
| Total workforce | 87 | 94 |

| Personnel by employment type | 2009 | 2010 |
|------------------------------|------|------|
| Total full-time employees | 86 | 94 |
| Total part-time employees | 1 | 0 |

| Personnel by type of employment contract | 2009 | 2010 |
|--|------|------|
| Open-end employment contracts | 82 | 93 |
| Fixed-term employment contracts* | 5 | 1 |

| Personnel by geographical region | 2009 | 2010 |
|----------------------------------|------|------|
| Personnel from the Attica region | 87 | 94 |



Recruitment from local communities

MYTILINEOS HOLDINGS S.A. gives priority to recruiting employees from the local community where its activities are based. In parallel, as the Group's Corporate Centre, it encourages the other subsidiaries to develop this particular practice in their local environments. All of the Company's employees come from the local community where the Company is based.

| Percentage of Group Management* Executives recruited from local communities (%) | 2009 | 2010 |
|---|------|------|
| Recruitment from the Attica region | 100% | 100% |

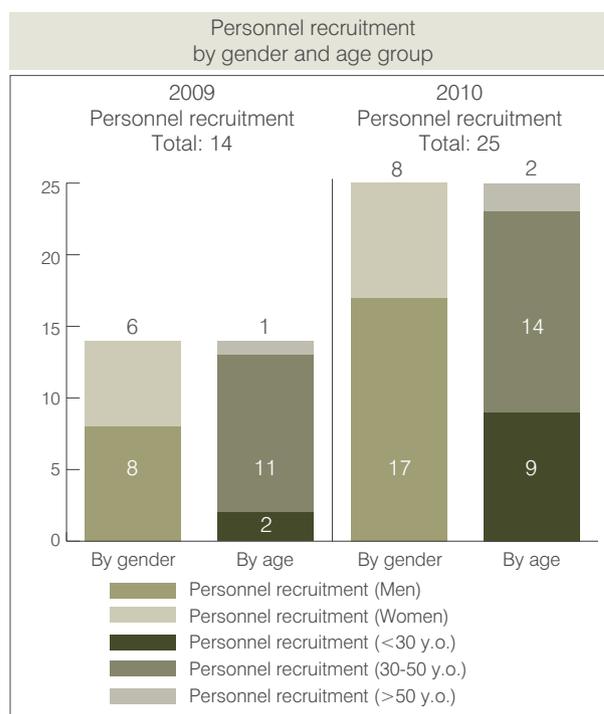
* The term "Group Management" includes all executives of the Company.

During 2010 a total of 33 employees (35% of total personnel) received a formal performance review. A total of 8 promotions took place.

Employee turnover and retention

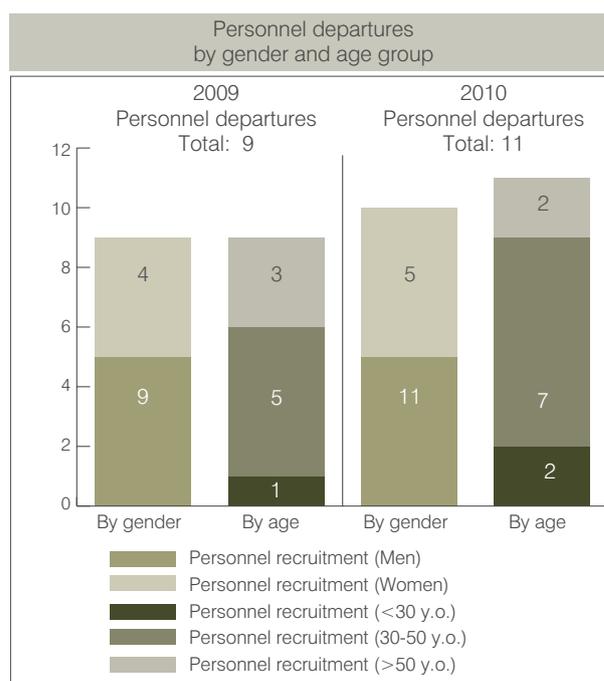
MYTILINEOS HOLDINGS S.A. seeks to treat its people with responsibility and dignity, and to remain their first choice of employer throughout the course of their career. Key to this are the proper management, development and utilisation of each employee, which help attract and retain highly-qualified and effective individuals, drive the production and application of innovative ideas, ensure the high quality of the products and services offered, and enhance the Company's public image.

During 2010 MYTILINEOS HOLDINGS S.A. hired 25 new employees, while 11 employees left the Company. These departures were due to voluntary departure (5), dismissal (3), expiry of fixed-term employment contracts (2) and retirement (1).



Personnel recruitment by geographical region

| | 2009 | 2010 |
|------------------------------------|------|------|
| Recruitment from the Attica region | 14 | 25 |



| Personnel departures by geographical region | 2009 | 2010 |
|---|--------------|--------------|
| Departures from the Attica region | 9 | 11 |
| <i>As a percentage of total workforce</i> | <i>10.3%</i> | <i>11.7%</i> |

Employee development

MYTILINEOS HOLDINGS S.A. aims to ensure that it provides its people with the tools and opportunities that help them develop their abilities and advance their careers. In addition to the performance review system currently in place, the Company aims to incorporate into its human resources management practice a Talent Management System to help get the best out of its people. Provided that they possess the knowledge and skills required, the employees of the Company are promoted according to a strict priority system to cover all job vacancies created within the Company.

During 2010 a total of 33 employees (35% of total personnel) received a formal performance review. A total of 12 promotions took place in the following Departments:

Group Human Resources, Internal Audit, Purchases, Mergers & Acquisitions, Financial Planning, Treasury and Investor Relations.

| Employee development data | 2009 | 2010 |
|--|------------|------------|
| Number of employees who received an official performance review from the Company | 65 | 33 |
| <i>As a percentage of total workforce</i> | <i>75%</i> | <i>35%</i> |
| Number of internal promotions | 3 | 12 |

Occupational Health and Safety

Although the Company's activities take place in office premises and thus the risk of accidents is low, the protection of all employees at its work premises against hazards to their physical and mental well-being is a top priority and daily concern for MYTILINEOS HOLDINGS S.A.

| Occupational Health and Safety | 2009 | 2010 |
|---|----------------|----------------|
| Total workforce | 87 | 94 |
| Total days worked by workforce | 23,329.0 | 26,362.7 |
| Total hours worked by workforce | 155,371.14 | 175,575.40 |
| Total accidents* | 0 | 0 |
| Total work-related fatalities* | | |
| <i>Injury Rate (IR)</i> | <i>0</i> | <i>0</i> |
| Total occupational disease cases | 0 | 0 |
| <i>Occupational Diseases Rate (ODR)</i> | <i>0</i> | <i>0</i> |
| Total days lost | 0 | 0 |
| <i>Days Lost Rate (LDR)</i> | <i>0</i> | <i>0</i> |
| Total days of absence from work | 180.0 | 163.5 |
| <i>Absenteeism Rate (AR)</i> | <i>1,543.1</i> | <i>1,240.4</i> |

*Includes incidents involving very light injuries.



Education and Training

MYTILINEOS HOLDINGS S.A. invests in the continuous education and training of its workforce, which is one of its core principles, aiming to provide tools and know-how which facilitate day-to-day work and offer innovative solutions to the challenges that arise in the ever-changing business environment, together with ways to improve employee and Company productivity and efficiency.

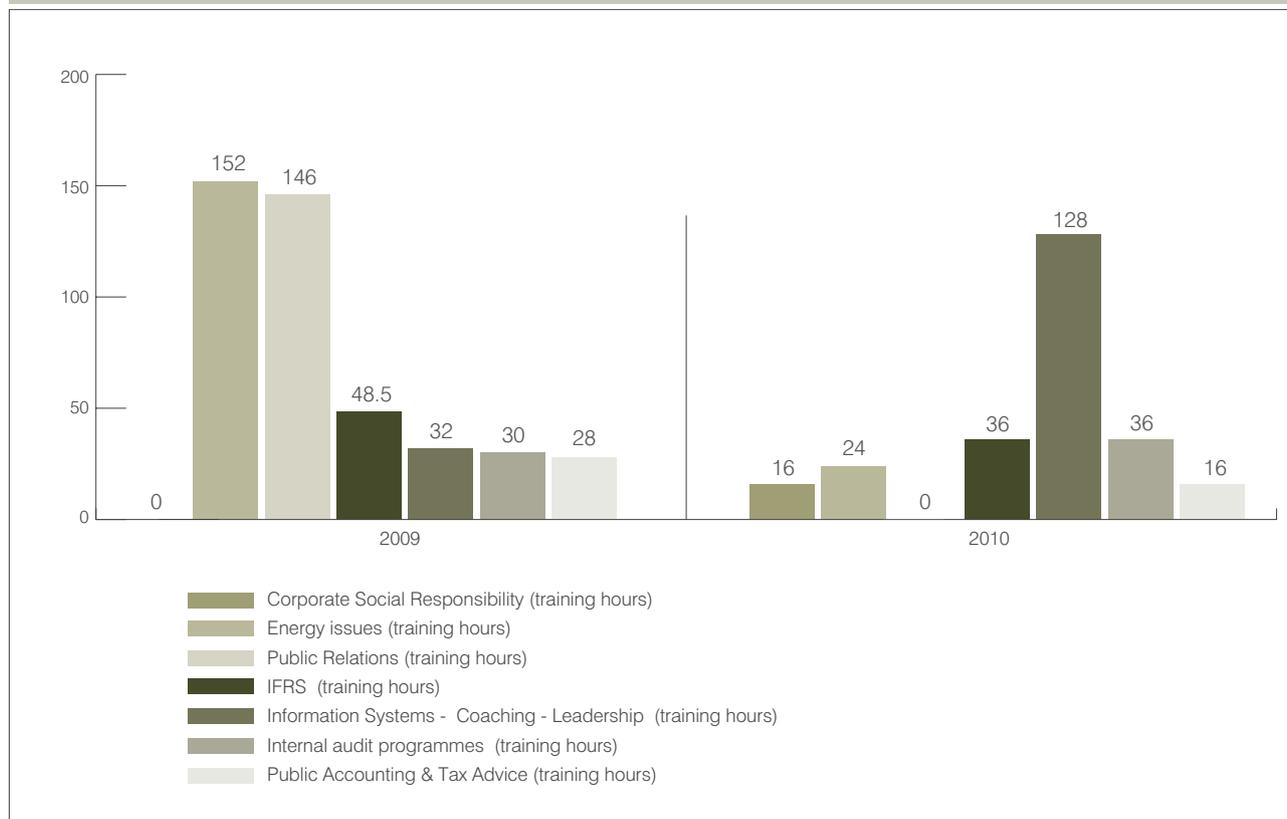
During 2010 MYTILINEOS HOLDINGS S.A. carried out six (6) training programmes totalling 256 hours. The training focused especially on Information Systems – Coaching – Leadership, and also included Corporate Social Responsibility as a subject for the first time.

These training programmes were attended by 31% of the Company's human resources and the corresponding expenditure stood at €8,960.

| Personnel which received training by employment position | 2009 | 2010 |
|--|--------------|--------------|
| Executives | 9 | 10 |
| <i>As a percentage of total Executives</i> | <i>33.3%</i> | <i>28.6%</i> |
| Administrative employees | 12 | 19 |
| <i>As a percentage of total Administrative employees</i> | <i>20%</i> | <i>32.7%</i> |

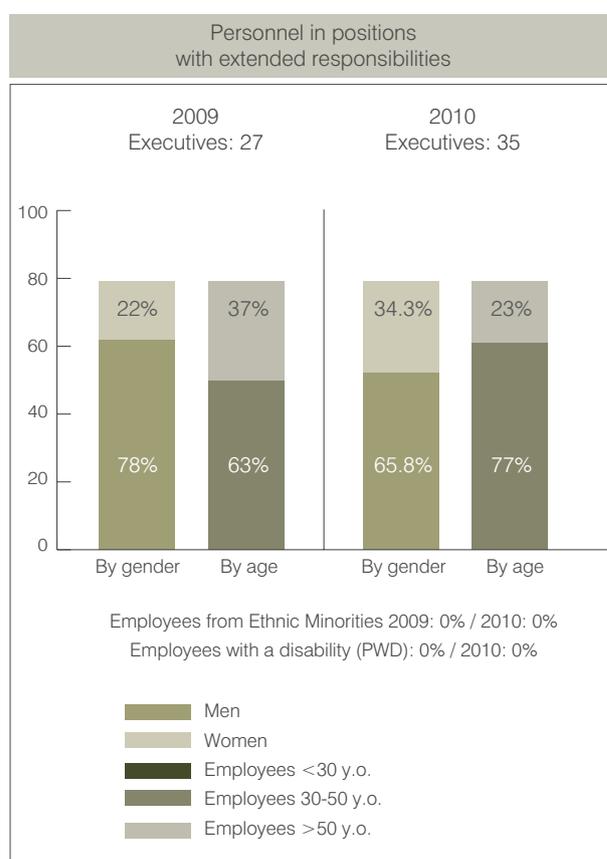
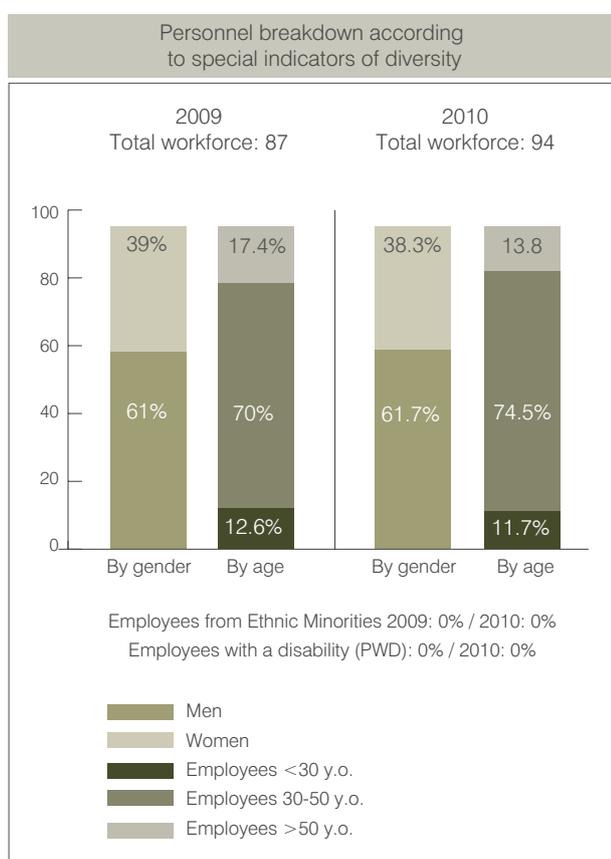
| Personnel training hours by employment position | 2009 | 2010 |
|--|--------------|-------------|
| Executives (training person-hours) | 206 | 172 |
| <i>Average training hours per person</i> | <i>22.9</i> | <i>17.2</i> |
| Administrative employees (training person-hours) | 230.5 | 84 |
| <i>Average training hours per person</i> | <i>19.29</i> | <i>4.42</i> |

Training categories & corresponding training hours



Equal opportunities and diversity

MYTILINEOS HOLDINGS respects the individuality of each employee irrespective of gender and age group (the two key indicators of diversity that the Company uses in the management of its human resources), and irrespective of religion, origin and ideology. In addition, in accordance with the principle of gender equality, no distinctions in terms of salary or other financial differentiations are made between men and women belonging in the same hierarchical level and employee category. During 2010 no incidents involving discrimination in the Company's work premises were reported.



Voluntary benefits

In addition to the various types of pecuniary remunerations, the Company also offers to its people a series of additional social benefits, to reward them for their contribution to its growth and to confirm to them that they are valuable members of its corporate family.

Voluntary benefits extended to the Company's full-time personnel

Health and medical care

Maternity/paternity leave

Retirement provisions

Other voluntary benefits offered by the Company to its Executives over and above its statutory obligations

Use of company car & parking place

Use of mobile phone, laptop & Smartphone

Fuel expenses

Environment

Given that the Company's activities are mainly carried out in its office premises, the effort to mitigate the environmental impact of its operations focuses on energy consumption, water consumption and the disposal of its waste.

Energy consumption

The only important type of secondary energy purchased and consumed by MYTILINEOS HOLDINGS S.A. from non-renewable sources is electricity. In 2010, the total consumption of electric power in the Company's offices stood at 1,918 GJ, up 3.65% from 2009.

| Total energy consumption (in GJ) | 2009 | 2010 |
|--|----------|----------|
| Indirect energy consumption (Electric power) | 1,850.40 | 1,918.08 |

Water consumption

Water consumption by MYTILINEOS HOLDINGS S.A. during 2010 stood at 1,754.8 m³, up 35% from the corresponding consumption in 2009. This difference is due to the need for additional water consumption and to the incorrect use of water by the cleaning contractor responsible for cleaning the surrounding area of the MYTILINEOS HOLDINGS S.A. premises during the summer months (from 11/5/2010 to 11/8/2010).

This specific quantity of water, which was consumed for covering the needs of the Company's building, came from a public water supply company.

| Total water consumption (in m ³) | 2009 | 2010 |
|--|---------|---------|
| Water consumption | 1,300.2 | 1,754.8 |
| Water consumption / person | 14.94 | 18.66 |

Waste disposal

The waste produced by the Company is predominantly office waste, which comprises small dry cell batteries, paper, ink (toner cartridges), electrical and electronic equipment and urban waste. The Company has in place mechanisms for the measurement and disposal of the quantities of batteries and

paper, and plans to gradually expand these mechanisms, starting in 2011, to also include the other types of waste it produces.

| WASTE RECYCLING | 2009 | 2010 |
|--------------------------|------|------|
| Dry cell batteries (kg)* | 23 | 23 |
| Paper (t) | 2.16 | 2.53 |

* Waste is collected and removed by a specialised licensed contractor.

Waste is recycled by licensed companies according to type:

- Batteries (company: POLYECO S.A.)
- Paper (company: SOLID WASTE RECYCLING SPYRIDON AP. TSILOGLOU)

Society

MYTILINEOS HOLDINGS is fully meeting its legal and regulatory obligations regarding all matters pertaining to its business role. The fact that no sanctions have been imposed on the Company by administrative authorities or by the courts for non-compliance with the applicable laws and regulations is proof of its success in this area.

The broader social contribution of MYTILINEOS HOLDINGS S.A., which expresses to a great extent the social profile of the Group, takes place through a number of initiatives and actions whose primary recipients are social bodies in the local as well as in the broader community in which the Company operates.

Support of local community

MYTILINEOS HOLDINGS S.A. allocates annually significant financial resources in support of actions and initiatives aimed at social cohesion, at the central as well as at the local level. During 2010, the Company made available for this purpose a total amount of €829,975, up 13% from the corresponding amount in 2009.

The main infrastructure which MYTILINEOS HOLDINGS S.A. helped develop by contributing €60,000 as financial

During 2010, the Company made available in support of actions and initiatives aimed at social cohesion a total amount of 829,975, up 13% from the corresponding amount in 2009.

assistance to an initiative of the Municipality of Amaroussion, was the creation and operation of a centre for children with a disability.

| Financial assistance to social organisations (in) | Actions | 2009 | 2010 |
|--|--|-------------|-------------|
| Activity area | Description of action | Expenditure | Expenditure |
| Arts and culture | Financial support of theatre shows & painting exhibitions. Financial assistance to local cultural societies. | 460,947 | 460,000 |
| Support of Entrepreneurship | Sponsorships for business conferences. | 122,000 | 212,250 |
| Local Government | Improvement of local infrastructures. | 55,000 | 19,725 |
| Environment | Financial assistance for studies on the impact of climate change on Greek society. | 47,500 | - |
| Social bodies & organisations | Support of the work of volunteer organisations for the protection of child age and for children with a disability. | 20,950 | 71,500 |
| Sports | Coverage of the cost of uniforms and equipment for 191 athletes of six local sports clubs. | 16,000 | 50,000 |
| Education | Scholarships. | 12,000 | 16,500 |

Collaborations with social partners

MYTILINEOS HOLDINGS S.A. develops collaborations with Greek and international organisations. These collaborations aim to promote CSR, facilitate the exchange of views and improve the social and environmental contribution of the participating organisations. In this context, the Company collaborates with the following social partners:

- The **Hellenic Federation of Enterprises (SEV)**, whose mission is to make a decisive contribution to the further modernisation and development of Greek businesses, and thus create a competitive national capital within the European and global competition
- The **Greek Mining Enterprises Association (SME)**, whose key purpose is to strengthen and promote the Greek mining sector as a driver for regional and national growth and for international business activity, and to foster relations with the employees and the local communities where the activities of its member-enterprises are located.
- The **Hellenic Network for Corporate Social Responsibility**, whose mission is to promote the meaning of Corporate Social Responsibility to both the business community and the social environment, with the overall objective being to balance profitability and sustainable development.
- The **United Nations Global Compact**, a voluntary worldwide strategic policy initiative of the UN for businesses that are committed to sustainable development and to the adoption of responsible behaviours and actions, by aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.
- The **Hellenic-Arab Chamber of Commerce and Development**, which coordinates, develops and facilitates the relations between the Arab countries and Greece in commerce, industry, investments, technology, agriculture, shipping and tourism.
- The **Hellenic-German Chamber of Commerce and Industry**, which offers services to assist Greek and German businesses that wish to develop activities or expand abroad (in Germany or in Greece).
- The **Hellenic Chinese Chamber of Commerce and Industry**, which actively and systematically supports the promotion of business and economic relations between Greece and China.

| GRI Code | Description | Comments /Coverage | Page |
|---|---|---|-----------|
| Organisational Profile | | | |
| 2.1 | Name of the organisation | MYTILINEOS S.A. Group of Companies | |
| 2.2 | Primary brands, products and/or services | | 9-10 |
| 2.3 | Operational structure of the organisation | | 9 |
| 2.4 | Location of organisation's headquarters | 5-7, Patroklou, Marousi 151 25 Athens, Greece | |
| 2.5 | Number of countries where the organisation operates | 4 (Greece, Romania Turkey & Syria) | |
| 2.6 | Nature of ownership and legal form | | 9 |
| 2.7 | Markets served | | 8-10 |
| 2.8 | Scale of the reporting organisation | | 11 |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | | 61 |
| 2.10 | Awards received in the reporting period | | 11 |
| Report Parameters | | | |
| 3.1 - 3.11 & 3.13 | Report parameters | These indicators covered the company since the unity of the Group | 5 - 7 |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | | 68-69 |
| Governance, Commitments and Engagement | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy or organisational oversight | | 20 |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | | 22 |
| 4.3 | Independent and/or non-executive members of the Board of Directors | | 21 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | | 24 |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance) | | 25 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | | 25 |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | | 25 |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic environmental and social performance and the status of their implementation | | 25 |
| 4.9 | Exercise of governance by the Board of Directors | | 20-33 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | | 26 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | | 26, 28-33 |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | | 15 |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | | 67 |
| 4.14 | List of Stakeholder groups engaged by the organisation | | 35 |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | | 35 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | | 36 |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | | 36-37 |
| Economic Indicators | | | |
| EC1 | Direct Economic Value | | 60 |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at locations of significant operation | | 62 |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement | | 66-67 |

| GRI Code | Description | Comments /Coverage | Page |
|--|---|--|-------|
| Environmental Indicators | | | |
| EN4 | Indirect energy consumption by primary energy source | | 66 |
| EN8 | Total water withdrawal by source | | 66 |
| EN9 | Water sources significantly affected by withdrawal of water | | 66 |
| EN22 | Total weight of waste by type and disposal method | | 66 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | No fines imposed | |
| Labour Practices and Decent work Indicators | | | |
| LA1 | Total workforce by employment type, employment contract and region | | 61 |
| LA2 | Total number and rate of employee turnover by age group, gender and region | | 62-63 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees | | 65 |
| LA4 | Percentage of employees covered by collective bargaining agreements | 100% | |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work related fatalities by region | | 63 |
| LA10 | Average hours of training per year per employee by employee category | | 64 |
| LA12 | Percentage of employees receiving regular performance and career development reviews | | 63 |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity. | | 65 |
| LA14 | Ratio of basic salary of men to women by employee category | | 65 |
| Human Rights Indicators | | | |
| HR4 | Total number of incidents of discrimination and actions taken | | 65 |
| HR6 | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor | | 61 |
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor | | 61 |
| Social Indicators | | | |
| SO4 | Actions taken in response to incidents of corruption | During 2010 Mytilineos Holdings S.A. did not make any contributions, financial or in-kind, to political parties or politicians | |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices and their outcomes | Nil | |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | | 66 |
| Product Indicators | | | |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services | Nil | |

■ Core Indicator ■ Additional Indicator



Metallurgy and mining sector

Over the past years, the MYTILINEOS Group has developed significant business activities in the sector of basic metals mining and processing, and now holds a leading position in aluminium, zinc and lead production and trade in the Balkans.

The Group's total energy, industrial and environmental investments in Agios Nikolaos, Viotia, where the industrial plant of ALUMINIUM S.A. is located, were the largest private-sector investments carried out in Greece during the three-year period from 2005 to 2007.

These investments play a major part in:

- Helping the development of the region and the creation of new jobs.
- Facilitating the penetration of natural gas in Greece while reducing the country's dependence on oil.
- Substituting 300 MW of lignite-based power production, thus contributing to a potential reduction of carbon dioxide emissions by about 1.5 million tons per year, in line with Greece's national objective to limit the increase of the domestic production of CO₂ emissions to no more than 25% compared to their level in 1990.

In parallel with its investment plan, the Group develops cost curtailment methods and takes advantage of the possibilities offered by sophisticated risk-hedging tools and techniques in order to optimise its financial performance in the next years.

The Group's strategy in the Metallurgy and Mining sector focuses on the following:

- Providing optimal products and solutions to its clients rather than merely supplying commodities.
- Seeking new projects geared towards vertical integration or expansion, to strengthen its position in the sector.
- Increasing its competitiveness through investments and the adoption of risk-hedging methods.

In the Metallurgy and Mining sector, the MYTILINEOS Group is active through its subsidiaries ALUMINIUM S.A. and DELPHI-DISTOMON S.A.

ALUMINIUM S.A.

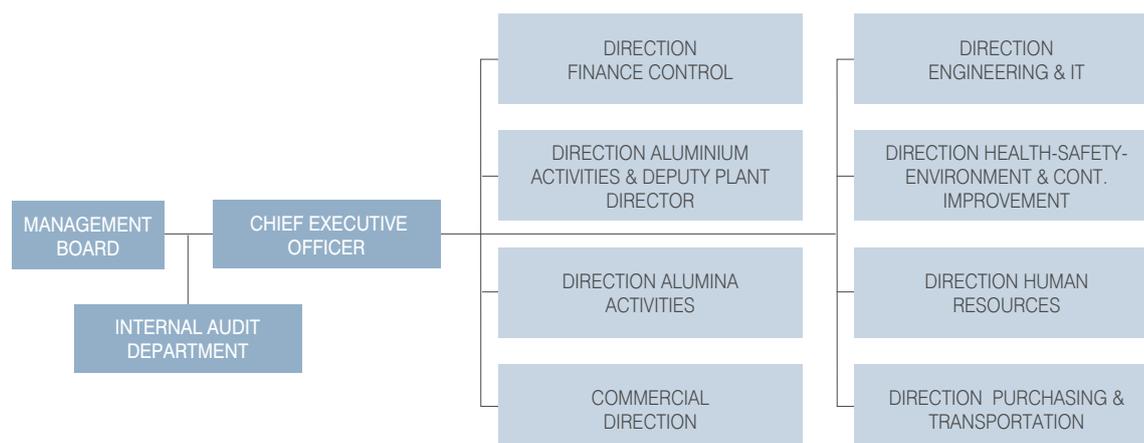
ALUMINIUM S.A. was established in 1960 as "ALUMINIUM OF GREECE S.A." and today is Europe's most modern vertically integrated alumina and aluminium production and trading plant. With an annual output capacity reaching 775,000 tons of alumina, 165,000 tons of primary-cast aluminium (electrolysis) and 170,000 tons of finished aluminium (end-product), ALUMINIUM S.A. is the largest Alumina and Aluminium producer in SE Europe. Its facilities occupy a total area of around 7,000,000 sq.m. (700 hectares) and are located in Agios Nikolaos, on the coast of Distomon, Viotia.

Key financial figures (in €)

| Economic Value Table | 2009 | 2010 |
|---|-------------|--------------------|
| Revenues | 427,348,000 | 476,918,000 |
| Operating costs | 388,694,000 | 394,236,000 |
| Gross profits | 51,075,000 | 34,346,000 |
| Net profits | 34,350,000 | 27,252,000 |
| Employee salaries and benefits | 58,828,000 | 51,916,000 |
| Payments to Government bodies (taxes) | 3,877,000 | 1,943,000 |
| Payments to capital providers (shareholders' dividends) | 0 | 0 |
| New investments | 26,500,000 | 30,094,000 |
| Investments in local communities | 267,600 | 373,800 |
| Outlays to local suppliers | 54,518,734 | 50,700,000 |

Governance structure

Organisational Structure



Composition of the Board of Directors

Composition of the Board of Directors, as elected by the Extraordinary General Meeting of 31.12.2008 and formed as a body on 31.12.2008:

| Title | Name |
|-------------------|----------------------|
| Chairman | Iason Stratos |
| Vice-Chairman | Evangelos Mytilineos |
| Managing Director | Dimitrios Stefanidis |
| Member | Spyridon Kasdas |
| Member | Georgios Lymberakis |

Functioning and responsibilities of the Board of Directors and of its Members

According to the Company's Internal Regulation, as in force pursuant to the Board of Directors decision of 16.02.2006, the Company is managed by a Board of Directors currently composed of five members. The Board exercises its responsibilities while safeguarding corporate interests, in compliance with the provisions of the laws on companies and of the Company's Articles of Association.

The members of the Board of Directors deal with current matters concerning the management of the Company and the overall direction of its operations, as these matters are specified in detail in the relevant decisions of the Board of Directors of the Company. Within the Board of Directors, the Board members are responsible for advancing all corporate matters coming under the Board's competence.

Role and responsibilities of the Managing Director

The Managing Director and General Manager of the Company exercises the authorities assigned to him by the Company's Board of Directors.

More specifically, according to the law and the Company's Articles of Association, by the Board's decision of 31.12.2008 and subject to the specific reservations as stated in that decision, all authorities of the Board of Directors are transferred to the Managing Director. The Managing Director acts as the Company's legal representative in its relations with natural or legal persons of private or public law and before authorities, institutions, Courts and judicial authorities, administers the Company's property and undertakes all types of obligations acting in a binding capacity for the Company by placing his signature under the Company's name, proceeds to all actions regarding the Company's employees and labour personnel, represents the Company on matters related to human resources and carries out all financial and other transactions of the Company with any Bank or Credit Institution and with the Greek Tax and Customs Authorities. The Managing Director & General Manager reports to the Board of Directors of the Company.

Mechanisms for the representation of the views of employees and shareholders in the Board of Directors

Other than the relevant provisions of Codified Law (C.L.) 2190/1920, no other specific formal procedure exists for the representation of the employees and shareholders in the Company's Board of Directors, either under Collective Labour Agreements or Arbitration rulings or agreements.



Human resources

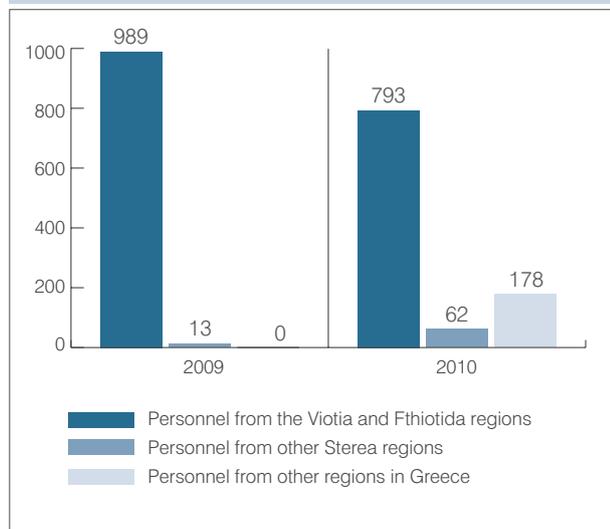
Recognising the important part that its human resources have played in its steady growth until now, ALUMINIUM S.A. has adopted a coherent framework of policies on which the utilisation and professional development of its people are based.

The Company's constant efforts for substantial improvement of its work environment, the special benefits and the training opportunities offered and its commitment to the principles of equality and equal opportunities, create a stable and secure environment for all employees, in which discrimination or child and forced labour have no place whatsoever.

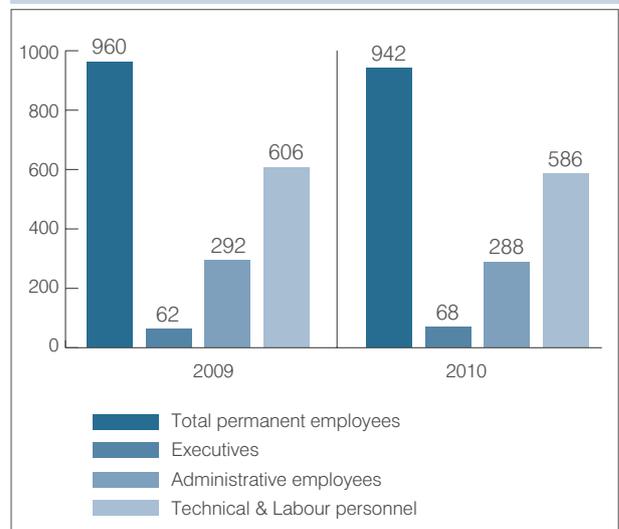
Workforce Data

| | 2009 | 2010 |
|--|-------|-------|
| Total workforce | 1,002 | 1,030 |
| Total part-time employees | 0 | 0 |
| Total Open-end employment contracts | 960 | 942 |
| Total Fixed-term employment contracts* | 42 | 88 |

Workforce Data by geographical region



Permanent employees by employment position



Recruitment from local communities

As its principal activities are located in the Greek periphery, ALUMINIUM S.A. gives priority to recruiting labour personnel as well as senior executives from the communities of the regions where its activities are based (Viotia and Fokida). Recruitment from outside these communities is only initiated in cases where the requirements of Company involve specialisations which are not available in the local communities and therefore cannot be sourced locally. The largest part of the Company's recruitment during the last ten years comes from local communities. In 2010, the Company sourced 63% of its newly-hired personnel from neighbouring

Prefectures. More specifically, 34 people are from the Prefecture of Viotia, 4 from the Prefecture of Fokida and 1 from the Prefecture of Fthiotida.

| Percentage of Senior Management Executives* recruited from local communities (%) | 2009 | 2010 |
|--|------|------|
| Recruitment from the Viotia and Fthiotida regions | 10% | 10% |

*The term "Senior Management" refers to the Company's Plant Steering Committee, which consists of nine (9) members.

Employee turnover and retention

The general principle of ALUMINIUM S.A. is to attract and retain competent professionals who will be able to help the Company maintain its business growth momentum. To this end, ALUMINIUM S.A. seeks to meet the needs of its employees through the improvement of their skills and the recognition of their contribution, while also providing them with incentives geared at maximising the length of their professional association with the Company.

The Company's regular actions in this specific area include the following:

- Provision to employees of benefits which are higher than those offered by the competition and those specified under the collective labour agreements.
- Use of the Company benefits to meet the needs for continuous improvement and recognition of the effort of each employee, with the aim of retaining and utilising employees through the Continuous Professional Development System.
- Expression of active interest in all matters of concern to the employees and, by extension, assistance to employees in maintaining a balance between their professional and family obligations.
- Extra benefits (example electrolysis).
- Career advancement opportunities for each employee.
- Bonuses paid to executives (above a certain level).

In 2010, the Company provided 100% of its workforce with official performance evaluation reviews, while a total of 19 promotions took place.

During 2010 ALUMINIUM S.A. hired 62 new employees, while 81 employees left the Company. Of these departures, 81.5% were due to retirement. The loyalty of the personnel is particularly strong, as the average period of service with the Company is around 14.6 years.

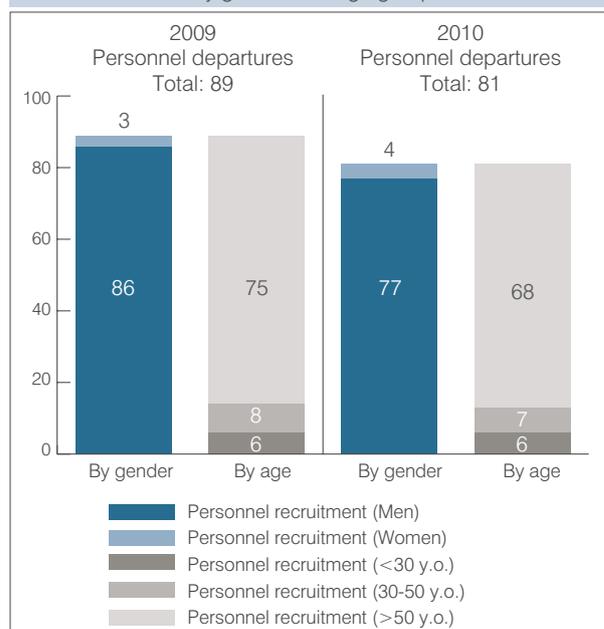
Personnel recruitment by gender and age group



Personnel recruitment by geographical region

| | 2009 | 2010 |
|--|------|------|
| Personnel recruited from the Viotia and Fokida regions | 39 | 38 |

Personnel departures by gender and age group



| Personnel departures by geographical region | 2009 | 2010 |
|--|--------------|--------------|
| Departures from the regions of Viotia and Fokida | 75 | 41 |
| <i>As a percentage of total workforce</i> | <i>7.48%</i> | <i>3.98%</i> |
| Departures from other regions in Greece | 14 | 40 |
| <i>As a percentage of total workforce</i> | <i>1.4%</i> | <i>3.88%</i> |

Employee development

According to the policy of ALUMINIUM S.A., the development of the Company relies on the continuous improvement of every employee’s skills and performance.

In ALUMINIUM S.A., employees can improve their professional skills and their performance by:

- Utilising the education and training which the Company provides or which they obtain on their own.
- Expanding their work experiences in the performance of their tasks.
- Participating in established group work mechanisms such as Continuous Progress Groups, Functional Organisational Units (FOUs) etc.

ALUMINIUM S.A. considers that all employees, both collectively and individually, go through an Iterative Continuous Progress Process that comprises the following successive stages:

- a) goal setting;
- b) obtaining (normally through training) the means to achieve them;
- c) implementation;
- d) evaluation of results;
- e) setting of new goals etc.

The professional development of employees is discussed with each employee in the context of the Professional Development Review Process. This takes the form of an annual meeting, held to facilitate the exchange of views, assessments, recommendations and information between the employee and his/her immediate supervisor, and is also attended by the next supervisor up in the management hierarchy.

During this discussion, the employee and his supervisors review jointly the employee’s progress and his/her overall career path within the Company. The general and specific criteria for advancement are examined and taken into consideration in setting the personal goals and training needs for the employee concerned, as well as in formulating

an appropriate succession plan for those employees who are close to retirement.

The annual performance review has the following key objectives:

- To assess the progress made by the evaluatee.
- To identify and agree/accept the priorities for the next year.
- To resolve problems that arise during the year.
- To mobilise personnel towards the achievement of the corporate targets.
- To ensure the coherent planning of actions and initiatives to help achieve the corporate targets.
- To provide evaluatees with counselling regarding their personal professional development.
- To provide the evaluating supervisor with feedback on the views of the evaluatee regarding any problems in their collaboration.
- To improve the performance of the evaluatee and of the Company in its entirety, and to identify priorities for improvement as input to the development and training process.



In 2010, the Company provided 100% of its workforce with official performance evaluation reviews, while a total of 19 promotions took place.

| Employee development data | 2009 | 2010 |
|--|-------------|-------------|
| Number of employees who received an official performance review from the Company | 960 | 942 |
| <i>As a percentage of total workforce</i> | <i>100%</i> | <i>100%</i> |
| Number of internal promotions* | 15 | 19 |

* Refers to promotions in the Production and Maintenance Departments.

Occupational Health and Safety

Health and Safety are always the top priority for ALUMINIUM S.A. Despite the significant reduction of the number of accidents and occupational diseases in recent years, the Company is continuing its efforts to achieve its ultimate target of “ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES”.

The development and continuous improvement of the corporate Occupational Health & Safety Management System in accordance with the OHSAS 18001 International Standard and the ELOT 1801 Greek Standard affirms the Company's commitment to the continuous improvement of work conditions and to taking preventive action so as to ensure its position as one of the world's top performers in this area.

The following are core elements of the Company's policy on Occupational Health & Safety:

- Identification and assessment of hazards under normal and, especially, under exceptional conditions of operation and adoption of measures to contain them.
- Compliance with the provisions of the laws and with the applicable standards and internal guidelines.
- Open and transparent communication regarding all Occupational Health & Safety issues.
- Regular measurement and assessment of the levels of exposure to harmful factors, systematic efforts to reduce these levels and continuous monitoring of the health of employees.
- Regular inspection of the processes, organisation and procedures in place, to ensure that the workforce is continuously updated and its response capabilities are improved, and to guarantee adherence to the regulations and achievement of targets.

The Company's regular actions in this specific area include the following:

1. Quality / effectiveness of the Company's daily operations

Improvement of the quality of Management Safety Visits (MSV), by:

- Promoting quality preventive actions.
- Inviting relevant proposals from the operators.
- Providing training on carrying out MSVs.
- Compiling quarterly reports on the MSVs carried out and presenting the results to the personnel.

Improvement of the supervision functions in the production plant, through the following:

- Emphasis on safety by the senior management, with simultaneous monitoring of their immediate subordinates for potential deviations.
- Daily recording of the “Safety Action of the Day” (by name), to address specifically safety issues.
- Monitoring the progress of the corrective actions in order to identify deviations (recommendations, penalties).
- Commitment of the management to include contracts in the daily supervision activities.
- Regular presence on-site of the entire management hierarchy for safety-related issues, at a fixed time every day (on a regular basis, arranged by the Plant Steering Committee).
- Presentation to the Plant Steering Committee of the “Safety Incident of the Week”, by the Supervisor and Chief Foreman of the department concerned.
- Daily presence on-site, for a specific period of time, of members of the top management exclusively for providing middle management with guidance on zero tolerance.
- Increased significance of the Safety Department within the overall goals of the Management.
- Review of the organisation of the Safety function (with the aim of ensuring continuity in management and support for training).

2) Occupational hazards

- Ensuring the implementation of the six top-priority guidelines (lockdown / lifting of lockdown of facilities, subcontracting, confined spaces, moving machinery and circulation, lifting equipment, and working at heights).
- Inspection of the implementation of the procedure on modifications.
- Development of a reference guide on the safety inspection of facilities and provision of training to internal inspectors who will carry out such inspections.
- Codification and continuous monitoring of the provisions of the applicable laws, and strict compliance with these.
- Reassessment of hazards & risks after the actions foreseen have been carried out (written assessment of hazards & risks) and continuation of the approach relying on the written assessment of hazards & risks for underestimated circumstances through the Hazards & Risks Assessment Councils (HRACs), within the framework of implementing the OHSAS 18001:2007 International Standard and the ELOT 1801:2002 Greek Standard.
- Extension of the on-site recommendations for work to the hazard response crews.
- Improvements in the implementation of the "Green Light Committee" procedure.



3) Behaviours

- Development and detailed description of a specific method for implementing Occupational Hazard Identification, where this does not exist. Closer monitoring of the method by the management and traceability of the relevant entries.
- Development and monitoring of at least one safety indicator regarding the identification of hazards in every Functional Organisational Unit.
- Regular carrying out a "safety mission" by newly-recruited personnel and presentation of it to the management of the Operation / Direction to which they belong
- Re-examination and revision of the Hazards & Risks Assessment Councils (HRACs) within the Functional Organisational Units, on the basis of monthly reports, and establishment of a common base for them or, alternatively, re-examination of the "Safe Professional Conduct" procedure.
- Well-organised content and delivery for the training provided to newly-recruited personnel on all activities.

4) Health / Hygiene

- Continuation of the programme for measuring exposure levels and presentation of the results to all exposed personnel.
- Surveillance and maintenance of the non-smoking policy in the work premises.
- Expansion of antitetanic vaccination.
- Actions to deal with dust and noise.
- Compilation of a Safety Data Sheet for all chemical products in use which have not yet been recorded.
- Organisation of two voluntary blood donation days / sensitisation of personnel.

During 2010, the training plan of ALUMINIUM S.A. comprised a total of 55,185 training hours, up 62.5% from the training hours provided in 2009.

| Occupational Health & Safety Data | 2009 | 2010 |
|---|---------------|---------------|
| Total workforce | 1,002 | 1,030 |
| Total days worked by workforce | 268,696 | 264,970 |
| Total hours worked by workforce | 1,781,606 | 1,785,744 |
| Total accidents* | 9 | 6 |
| Total work-related fatalities | 0 | 0 |
| Total occupational disease cases | 5 | 0 |
| <i>Occupational Diseases Rate (ODR)</i> | <i>0,56</i> | <i>0</i> |
| Total days lost | 671 | 51 |
| Total days of absence from work | 14,252 | 14,877 |
| <i>Absenteeism Rate (AR)</i> | <i>10,608</i> | <i>11,229</i> |

* Does not include incidents involving very light injuries.

As regards safety in its work premises, ALUMINIUM S.A. also utilises the following indicators:

| Additional Safety Indicators | 2009 | 2010 |
|--|--------|-------|
| Lost Time Injury (LTI): Accidents resulting in inability for work, per 1,000,000 hours worked. | 3.37 | 0.6 |
| RCR: Recorded accidents (resulting or not in inability for work) per 1,000,000 hours worked. | 5.05 | 3.4 |
| First Aid (FA): Visits to the Medical Station, per 1,000,000 hours worked. | 18.52 | 17.90 |
| Days Lost Rate (DLR): Work days lost due to accident, per 1,000,000 hours worked. | 376.63 | 28.6 |

In ALUMINIUM S.A. the Plant Health & Safety Committee (PHSC) represents all personnel in the meetings held with the Management. The PHSC is composed of five (5) members, which (in accordance with the laws and in proportion to the number of plant personnel) are elected by the personnel every 2 years. The PHSC has extended responsibilities and its members participate in all key procedures, committees or working groups.

More specifically, the PHSC members participate in:

- The “Green Light Committees” for new works and major modifications of the facilities.
- The analyses of accidents and incidents, carried out in accordance with the “Cause Tree Analysis” method.
- The working groups established for the written assessment of occupational hazards and risks, and
- The Occupational Health & Safety visits scheduled with the Occupational Physician and the Safety Officer.

Safety Objectives for 2011

Improvement of safety results:

- To decrease the likelihood and gravity of the accidents and incidents relating to our disciplines and behaviours.

- To improve the integration of associated contractors and subcontractors and of their personnel in the Occupational Health & Safety Management System of the plant.
- To mobilise the supervision function and improve its effectiveness.
- To ensure that the personnel understands and applies better the guidelines and the hazard identification procedure.
- To improve the effectiveness, quality and further utilisation of safety-related activities.
- To improve the Occupational Health & Safety Management System in accordance with the requirements of the OHSAS 18001 International Standard and the ELOT 1801 Greek Standard, while also incorporating best practices from the other companies.

Indicators:

- LTI < 0.55 for the personnel of ALUMINIUM S.A.; LTI < 1.5 for contracted personnel.
- RCR < 1.1 for the personnel of ALUMINIUM S.A.
- 10 MSVs during the year for each management executive who has received training.
- 18 Health and Safety visits during the year.
- Conduct of or participation in 5 MSVs for training purposes (coaching), for each management executive (calculated at 10 MSVs/year).
- Indicator of MSV quality preventive actions: 60%
- >70 PEA per middle-management executive per year.

Education and Training

The education and training policy of ALUMINIUM S.A. concerns the provision of training to its personnel and the development of their skills. Training is based on existing needs, is aligned with the corporate goals and is developed depending on the respective annual budget made available by the Management.

More specifically, personnel training activities are grouped into General Training, under the responsibility of the Training Department, and On-the-Job (or In-House) Training, the responsibility for which rests with the individual Operations / Departments of the Company.

The Company has in place a special-purpose "TRAINING REGULATION", which covers the following:

- Organisation, types, human resources, classrooms and resources allocated to training.
- Responsibilities of the Training Department, which cover the entire range of the training process.
- Investigation and definition of training needs, taking into account the directions given by the Group and the Human Resources Direction, to ensure that training is aligned with the Company's targets and contributes, insofar as this is feasible, to their attainment.
- Scheduling of training seminars for In-House Training (or Training within the plant facility), and Inter-Company Training (or Training outside the plant facility).
- Preparation and delivery of the training seminars within the plant facility.
- Evaluation of training seminars.
- Keeping of training records with relevant statistics and of an archive with information about the personnel that have received training.
- Implementation of subsidised training programmes.
- Training implementation methods for special subjects, such as: Information Technology, safety, quality, technical subjects and continuous professional development, induction days for newly-recruited personnel, foreign languages learning, and training of executives.

During 2010, the training plan of ALUMINIUM S.A. comprised a total of 55,185 training hours, up 62.5% from the training hours provided in 2009.

The Company's training plan, which gave priority to technical subjects as well as to Occupational Health & Safety issues, was attended by 95.7% of its personnel. The corresponding training expenditure stood at €258,422 (excluding the salaries of the trainees and of the internal trainers involved in in-house training).

| Personnel which received training, by employment position | 2009 | 2010 |
|--|--------------|--------------|
| Executives | 50 | 53 |
| <i>As a percentage of total Executives</i> | <i>80.6%</i> | <i>77.9%</i> |
| Administrative employees | 231 | 238 |
| <i>As a percentage of total Administrative employees</i> | <i>79.1%</i> | <i>82.6%</i> |
| Technical & Labour personnel | 578 | 645 |
| <i>As a percentage of total Technical & Labour personnel</i> | <i>89.2%</i> | <i>95.7%</i> |

| Personnel training hours by employment position | 2009 | 2010 |
|--|--------|--------|
| Executives (training person-hours) | 3,220 | 3,768 |
| Average training hours per person | 64.4 | 71.1 |
| Administrative employees (training person-hours) | 8,089 | 11,456 |
| Average training hours per person | 35 | 48,1 |
| Technical & Labour personnel (training person-hours) | 22,404 | 39,961 |
| Average training hours per person | 39.2 | 62 |

| Training categories & corresponding training hours | 2009 | 2010 |
|--|--------|--------|
| Safety | 2,404 | 4,932 |
| General training | 1,162 | 863 |
| Human Resources | - | 42 |
| Logistics | 28 | 0 |
| Management-Leadership | 856 | 2,009 |
| Foreign Languages | 886 | 573 |
| Finance | 90 | 204 |
| IT | 792 | 237 |
| Quality | 822 | 64 |
| Fire protection - Environment | 146 | 392 |
| Personal Skills | 880 | 734 |
| Continuous Progress | 625 | 84 |
| Technical training* | 25,123 | 45,052 |

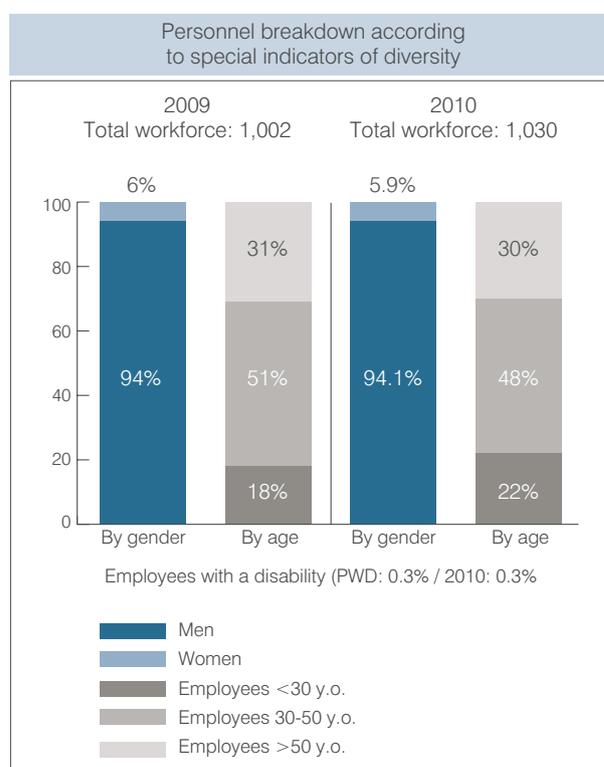
*Includes 22,647 hours (2009) and 41,916 (2010) hours of in-house technical training.

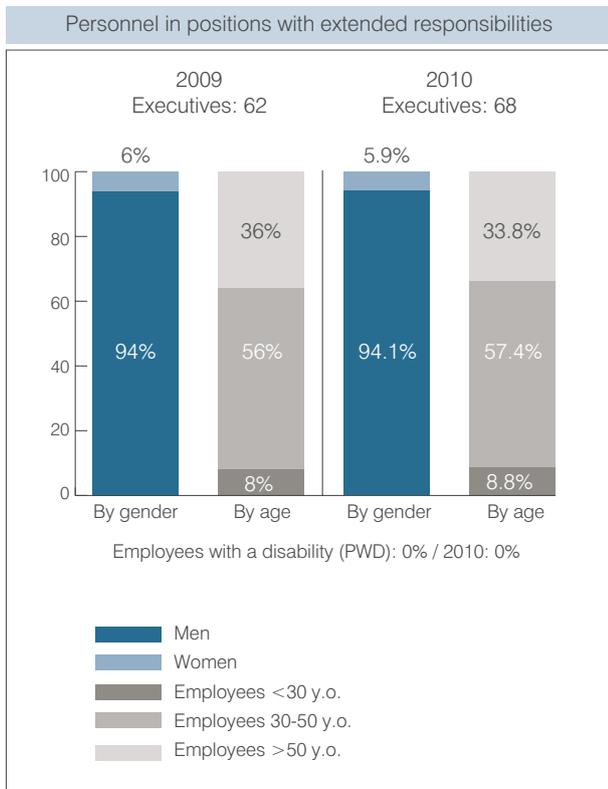
Equal opportunities and diversity

ALUMINIUM S.A. promotes equal opportunities and respects the individuality of each employee, irrespective of gender, age, religion and ideology. By ensuring that every employee is offered the same work conditions together with appropriate training, education and professional development, the Company implements, to the extent required by the conditions under which it operates, diversity in its work environment.

Although, due to the nature of the Company's activities, its workforce is predominantly male, ALUMINIUM S.A., in line with its efforts to strengthen equal opportunities, promotes the participation of women in its activities, where practicable. All stages of the recruitment process are carried out with full transparency and meritocracy, with personal data treated as confidential.

A structured evaluation and advancement system is applied for all personnel, which also ensures equal pay for the same type of work, irrespective of the gender of the employee concerned. No incidents involving discrimination in the Company's industrial or administrative work premises have been reported to date.





Voluntary benefits

Since its establishment, ALUMINIUM S.A. policy has been to invest in its human resources and in their development. To this end, the Company offers to its personnel not only a salary package which is competitive by the standards that prevail in the Greek market, but also a number of voluntary benefits over and above its obligations under the law. This policy aims to reward the professional contribution of its employees and to secure their long-term association with the Company.

Voluntary benefits extended to the Company's full-time personnel

- Life insurance
- Hospital care
- Coverage against disability/incapacitation
- Retirement provisions

Other voluntary benefits offered by the Company over and above its statutory obligations

- Social Policy Benefits
- Personnel Housing or payment of housing allowance to employees living in their own homes
- Delivery of a series of training seminars and information days/seminars aimed at providing Company employees with the opportunity to improve their skills and career prospects.

Environment

ALUMINIUM S.A. is committed to *"the correction of all environmental deviations identified, through the introduction and implementation of corrective and preventive action plans"* in order to protect the environment. This commitment stems from the Company's Environmental Management System, which has been certified in accordance with the ISO 14001 International Standard.

To identify deviations and decide on corrective action, the Company implements internal controls in the form of Internal Inspections and Management Environmental Visits, as defined under ISO 14001.

With respect to its obligations under the environmental or other legislation, the Company keeps an updated list of the applicable provisions of the laws (copies of the Government Gazette, European Union Decisions, Regulations and Directives, Approval Decisions regarding Environmental Terms, Licensing/Authorisation Decisions etc.), in accordance with the procedure specified under its ISO14001-certified Environmental Management System.

Additionally, the Company conducts an annual evaluation of its compliance with environmental requirements, whose results are used by the top Management for the setting of new targets. Finally, in June 2010 the Company was inspected by the Hellenic Environmental Inspectorate (HEI), to ascertain its compliance with environmental rules and regulations.

The results of this inspection showed no instances of non-compliance and, therefore, no fine was imposed on the Company for non-compliance with environmental rules and regulations.

Management of natural resources

“The control of the consumption of raw materials and energy” is yet another commitment undertaken by ALUMINIUM S.A. with respect to the management of natural resources

The Company has proceeded to set annual levels for specific consumption types and to specific actions in order to achieve these. In particular, the quantities of raw materials consumed in the production process are monitored and recorded on a monthly basis. Based on this, consumption levels are then set and special action plans, geared at reducing the levels of specific consumption types and setting new consumption limits, are carried out.

In 2010, the total volume of non-renewable materials used and of materials used directly in the Company’s production process stood at 2,277,397 tons, broken down as follows:

| Consumption of raw materials (in tons) | 2009 | 2010 |
|--|-----------|-----------|
| Bauxite | 1,800,000 | 1,810,257 |
| Limestone | 118,000 | 116,212 |
| Tar | 11,000 | 10,660 |
| Coke | 50,000 | 48,860 |
| Aluminium Fluoride | 2,000 | 2,481 |

| Materials required by the production process but not incorporated in the end product (in tons) | 2009 | 2010 |
|--|--------|--------|
| New Soda | 23,000 | 26,281 |
| Lime | 66,000 | 63,634 |



Energy consumption

The setting of annual targets for controlling and reducing the consumption of energy in its production sections is a key priority for the Company.

In what in particular regards consumption in peripheral departments (not directly involved in production), the Company’s approach relies on the sensitisation of employees to issues regarding rational management of light sources and electrical equipment.

The Company’s regular actions in this specific area include the following:

- Measurement of consumption levels at the plant’s individual installations, setting of consumption limits, and implementation of the special action plans prepared for reducing the consumption of energy and raw materials, and setting of new consumption limits.
- Regarding the aluminium production line (electrolysis basins), which, together with the lime production section, are the plant’s major consumers of electric power, the Company has adopted the following action lines in order to achieve energy savings:
 - Controls of work quality.
 - Controls (daily and weekly) of the quality of alumina.
 - Mobilisation-sensitisation of personnel, insofar as they are involved in the respective processes.
 - Optimisation of parameters.
 - Swift identification of problem-prone basins.
 - Improvements in equipment and methods (studies - experimentation).
- Regarding thermal energy, efforts in the production plant focus on the quality of combustion in the furnace burners, which has been set by following the standards for driving the operation of the respective installations.
- Regarding the consumption of electric power in peripheral installations (workshops, offices, dining halls, meeting rooms etc.), the corresponding efforts aim to sensitise the personnel through information campaigns. More specifically, personnel is regularly reminded of the available methods that help achieve energy savings at the workplace, such as:
 - Shutting down computers and switching off the lights and air conditioning units at the end of the working day.
 - Savings in paper (and, consequently, in the energy used to manufacture it).

The total quantity of water used in the Company's activities during 2010 stood at 4,577,620 m³, down 10% from the corresponding consumption in 2009.

- Re-examination of lighting arrangements in areas with excessive lighting, incandescent light bulbs or lighting units in poor condition.
- Regulating thermostat settings (at 21 °C for heating in the winter and at 28 °C for cooling in the summer).

| Total energy consumption (in GJ) | 2010 |
|---|-----------|
| Indirect energy consumption (Electric power) | 7,738,590 |
| Indirect energy consumption (Steam) | 4,780,000 |
| Direct energy consumption (Fuel oil input to stock) | 4,353,380 |
| Direct Energy consumption (Fuel oil consumption) | 3,243,260 |

Water consumption

The Company's environmental policy also extends to the rational management of groundwater, given that the Company's plant is the major consumer of water in the region.

The water required for the production process, as well as for human activities in the nearby housing settlements, is obtained from wells drilled in the broader region around the plant, in strict compliance with the provisions of the relevant Decision of the Water Resources Management Directorate of the Sterea Regional Administration.

Management of the drilling installations and of the water supply network (withdrawal quantities, distribution, quality control, maintenance of equipment, arrangements with the consumers) is under the responsibility of ALUMINIUM S.A. and, more specifically, of its Water Resources Management Department, which employs a total of five people.

The Company's actions in this area are guided by the principles of efficient management (zero loss-leakage) and savings (through recycling and/or placing restrictions on the use of water, when necessary). To this end:

- The Company sets annual targets for water consumption by production line (alumina or aluminium) and also takes special measures to address drought, if necessary.
- Daily inspections are conducted to check compliance with the regulations, such as for example with the prohibition

on the use of water for industrial cleaning (in cases where the use of mechanical means is practicable) and for car washing.

The total quantity of water used in the Company's activities during 2010 stood at 4,577,620 m³, down 10% from the corresponding consumption in 2009.

| Total water consumption (in m ³) | 2009 | 2010 |
|--|-----------|-----------|
| Water consumption | 5,044,000 | 4,577,620 |

| Total water consumption by source (in m ³) | 2009 | 2010 |
|---|-----------|-----------|
| Surface water, including water from wetlands, rivers and lakes | 0 | 0 |
| Groundwater | 4,680,832 | 4,326,010 |
| Rainwater collected directly and stored by the Company | 0 | 0 |
| Municipal water reserves or other public water supply companies | 363,168 | 251,610 |

The areas from which ALUMINIUM S.A. draws water do not include any water masses which the experts regard as particularly sensitive (because of their relative size, operation or condition) or as a system which is scarce, endangered or threatened with extinction (because it supports a specific endangered plant or animal species) or is located in any other national area which has been designated as a protected area.

Biodiversity

The area where the Company's plant is located does not form part of any area protected by law. The area's fauna is not particularly rich, as it is lacking in large mammals. The indigenous bird population is quite rich and includes several species of birds, such as eagles, vultures, hawks, rock partridges etc. With respect to the indigenous fish population, the most common fish species in the area are surface fishes, bogues, gray mullets etc.

There are no forests within a 10 km radius around the plant, with the exception of the Cherovouno area (some 9 km to



the east), near Kyriaki, which marks the beginning of the fir-tree zone of Mt Helikon. In general, it is estimated that 40% of the area is covered by low shrubbery, with grasslands accounting for 25%-30% of the area.

The Company is carrying out checks to monitor the quality of the flora in the wider region, to the extent that this is introduced into the food chain. The Company operates a network of 128 stations for static measurements of fluoride levels, located within a radius of 0 to 12 km around the plant (duration of sampling: one month). The checks consist in sampling olive tree leaves, vine leaves and pine needles (twice per year), as well as grapes (once per year), and running laboratory analyses to determine their fluorine content.

Pollution management and prevention – CO₂ emissions

ALUMINIUM S.A. is committed to *“the prevention of all hazards of permanent or accidental pollution or other large-scale accidents, and to the development, testing and implementation of procedures for emergency response in extraordinary circumstances”*. Additionally, in compliance with the requirements of Directive 2008/1/EC on Integrated

Pollution Prevention and Control (“IPPC Directive”), the Company is committed to applying Best Available Techniques, as the activities taking place in its facilities are included in the list of the aforementioned Directive.

The Company’s regular actions in this specific area include the following:

- Development of a Safety Study and registration of this study in the relevant register of the Viotia Prefectural Administration. This Study also covers risk analysis (causes which may result in pollution and actions to counter these).
- Management of infrastructures - Best Available Techniques (electric filters, sack filters, primary treatment of industrial waste, biological treatment of industrial wastewater, safety oil basins, sewerage oil traps, devices measuring the level of tank contents, measurement devices for waste quality, waterproof waste disposal areas, transport specifications etc.), in application of the requirements of the Approval Decision regarding the Environmental Terms of the plant.
- Calculation and submission of confirmed carbon dioxide quantities to the greenhouse gas emission register.
- Application of the provisions of the submitted monitoring

project regarding the operation of the installation which comes under the provisions on emissions trading and regarding the measures taken to ensure the quality of the samples and of the measurements introduced in the calculations (process and combustion emissions, lime production activity).

- Monthly monitoring of emissions (with timely implementation of corrective actions), in order to ensure that the annual carbon dioxide emissions are below the level allocated by the law.
- Annual calculation of indirect carbon dioxide emissions based on the usage rates of mineral fuels by the PPC for the supply of electricity.
- Carbon dioxide equivalent: Microprocessor-driven adjustment of the operation of each electrolysis basin, with provision for instructing the automated response of the basin to stop the production of PFCs or otherwise the progress of the anodic effect (accident status).
- Recording as environmental incident of any loss-leakage of material non-isolated intermediate product or even pollutant from point and diffused sources. All similar incidents are analysed thoroughly, prevention measures are decided and a relevant action plan is developed.
- Pre-emptive consideration of scenarios involving incidents to be addressed. At the level of scenarios and through the Safety Study (in accordance with the requirements of the SEVESO II Directive), the causes which could lead to potential incidents have been identified (risk assessment) and the necessary measures were taken. In addition, scheduled drills are carried out on the basis of the scenarios, in order to check and improve the existing response plans.
- Critical points are checked through preventive maintenance of the operation and control equipment (critical equipment). In parallel, leakage prevention practices and infrastructures are implemented, such as:
 - Safety basins with adequate capacity around tanks or other storage means for liquid substances (fuel, chemicals, lubricants etc.).
 - Safety basins with adequate capacity for equipment containing lubricants (transformers, capacitors etc.).
 - Maintenance of liquid waste network to provide drainage not only for washing effluents or cooling liquids (foreseen

activities) but also for liquids that result from accidents in the operation of the facilities.

- Indicative performance measurements regarding fumes suction and the operation of sack filters, and monitoring of pressure loss in the filtering systems, where this is feasible.
- Continuous monitoring of the operational characteristics of electric filters (voltage – electric current density).
- Twin equipment configuration (mechanical and analogue) for measuring the level of contents in the main fuel oil tanks.
- Annual check by the Non-Destructive Risk Control Department of the Company, of the condition of the flexible pipes used to collect fuel oil and of the metallic pipe used to collect soda in the port facilities, and issue of a fitness certificate which is also addressed to the local Port Police.
- With respect to its readiness to respond to potential sea pollution incidents, the Company has available a broad range of means for the containment and fighting of sea pollution (two floating dams, absorbers, skimming nets, emulsifier spraying pumps etc.). These means are inspected annually by the Antikyra Port Police Station.
- Finally, ALUMINIUM S.A. took the initiative to secure its supply with high-pressure steam from the new 334 MW natural gas fired Combined Heat and Power (CHP) Station, a development that led to the abolition of the Company's Energy Department, was previously serving this purpose. In energy terms, this initiative means a reduction by 150,000 tons of the annual consumption of fuel oil. A further positive effect of this decision is the fact that the electric power which the station also supplies to the national grid is now used to substitute the power which under the previous scheme would be obtained from lignite combustion. On the basis of the data presented in the Environmental Impacts Study for the Station, it is estimated that this will lead to reduced carbon dioxide emissions at the national level.

During 2010, a total of 29 incidents involving environmental pollution were analysed. In their majority, these concerned minor leakages of lubricants during the operation of machinery and the movement of vehicles (forklifts). No major or medium gravity incidents took place involving environmental pollution or the leakage of hazardous substances to the environment.

In what concerns the aggregate total direct and indirect CO₂ emissions in 2010, these stood at 1,099,675,000 tons, down 18.8% from 2009. This volume is broken down as follows:

| CO ₂ emissions (in tons) | 2009 | 2010 |
|---|-----------|-----------|
| Total CO ₂ emissions (Direct & Indirect) | 1,354,000 | 1,099,675 |

| CARBON DIOXIDE EMISSIONS REPORT | | 2010 |
|---|--|-------------|
| DIRECT EMISSIONS (in tons) | | |
| Lime calcination (confirmed) | | 50,175 |
| Fuel oil burning | | 248,401.64 |
| Consumption of anodes in the electrolysis line | | 195,935.5 |
| PFC's | | 33,825.35 |
| Burning of volatile contents of tar (anodes production) | | 12,403.08 |
| Insulation coke heating (anodes production) | | 1,781.14 |
| Total direct emissions | | 542,521.7 |
| INDIRECT EMISSIONS (in tons) | | |
| From lignite | | 459,813.12 |
| From petroleum | | 1,300.55 |
| From natural gas | | 96,040.04 |
| Total indirect emissions | | 557,153.7 |
| Aggregate Total Direct + Indirect Emissions | | 1,099,675.4 |

Calculation methods

- For the emissions from lime calcination and fuel oil burning, as well as for the indirect emissions from lignite, natural gas and petroleum, the methods proposed in Commission Decision 589/27/EC (Annexes II and VIII) were used.
- For the other emissions the methods proposed in the European Commission guidance documents published on 18/4/2011 (Guidance Document n°9 on the harmonized free allocation methodology for the EU-ETS post 2012 Sector-specific guidance /Final version issued on 14 April 2011) were used.

Waste disposal

The management of solid waste is one of the major environmental issues that the Company is called upon to address, as it is committed to *“the control and, to the extent*

allowed by our technological and financial capabilities, the continuous reduction of solid and liquid waste and waste gas, and the improvement of the management of residues through the promotion of recycling or utilisation processes.”

Thus, the Company’s efforts in this area focus on actions to minimise waste production and disposal.

The following practices are adopted in order to manage the quantities of waste produced:

- Use of network of collection means (with suitable signage and numbering) that covers all installations within the Company’s plant facility.
- Training and updating of the personnel about the methods of use and the collection points by category of waste.
- Weighing of waste and utilisation of quantitative results.
- Optimisation of the operation of industrial installations in order to reduce the leakage of materials that are regarded as waste (bauxite grinding mills etc.).
- Removal of waste quantities for utilisation or recycling (through third parties). For the quantities for which utilisation is not possible, ALUMINIUM S.A. operates premises for the permanent disposal of waste (hazardous, inert and non-hazardous) in the Ag. Athanasios area. These premises serve as the plant’s landfills for separated Disposal of Hazardous and Non-Hazardous Waste, and are operated in accordance with the licensing acts of the Sterea Regional Administration and the Viotia Prefectural Administration, respectively.

With respect to managing bauxite residues, the Company has launched the following actions, most of which have been completed:

- Permanent discontinuation of the discharge of bauxite residues to the sea from 2012 onwards.
- Installation by the end of 2011 of three dehydration facilities (two of which have already been installed and are in operation).
- Research on the possibilities to use this material in a variety of applications, such as cement production, road works and roof-tile and brick production, and as a component for soil enrichment and improvement (refers to completed research carried out in collaboration with Greek Universities).
- Activities to attract interest from potential users, as the current trend is to declassify this material from the “waste” category and designate it as a “by-product” of the process for producing bauxite from alumina.

The aggregate total direct and indirect CO₂ emissions in 2010, stood at 1,099,675,000 tons, down 18.8% from 2009.

| DISPOSAL OF NON-HAZARDOUS WASTE IN LANDFILLS | 2010 |
|---|-------------------|
| Red mud from alumina production | 545,164 |
| Dust and powder waste | 888.56 |
| Gravel and crushed rock waste (unbaked materials from lime production) | 2,042.67 |
| Gravel and crushed rock waste (unusable materials from limestone quarry) | 99,069.00 |
| Waste not otherwise specified (non-classified waste from alumina production) | 295.42 |
| Waste containing carbon from the production of positive electrodes (dust from bridges in the anodes baking furnace) | 229.84 |
| Waste not otherwise specified (non-classified waste from anodes production) | 771.61 |
| Non-classified waste from the cast house | 76.20 |
| Waste from lime production and lime hydration (rejected lime fraction) | 1,820.30 |
| Lime dust | 929.80 |
| Solid waste from the treatment of gases (lime furnace degassing dust) | 1,999.57 |
| Waste not otherwise specified (non-classified waste from plant) | 185.51 |
| Non-classified waste from ships | 30.50 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of anode baking kiln) | 250.86 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of cast house kilns) | 114.08 |
| Other linings and enamel refractories from metallurgical processes (refractory lining of alumina heating kilns) | 100.46 |
| Plastics from ships | 17.69 |
| Residues from street cleaning | 136.04 |
| TOTAL | 654,122.12 |

| DISPOSAL OF HAZARDOUS WASTE IN LANDFILLS | 2010 |
|--|----------|
| Other residues containing hazardous substances from the physical and chemical processing of minerals containing metals (nitrates) | 8,826.94 |
| Non-classified waste from the alumina line (decanting filters) | 5.90 |
| Other particles and dust (including ball mill dust) containing hazardous substances (dust from anode electrodes shot blasting) | 329.90 |
| Solid waste from the treatment of gases containing hazardous substances (fluoride captation) | 9.48 |
| Waste not otherwise specified (non-classified waste from electrolysis basins) | 3,187.35 |
| Packaging containing residues of hazardous substances or contaminated by them (hazardous substances packaging) | 19.36 |
| Inorganic waste containing hazardous substances (leftovers of samples) | 0.70 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances (waste from casting) | 483.14 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances protective side plates for basins) | 97.50 |
| Carbon-based linings and enamel refractories from metallurgical processes containing hazardous substances (carbon paste sealant) | 381.00 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (insulating bricks for basins) | 135.60 |

| DISPOSAL OF HAZARDOUS WASTE IN LANDFILLS - continued | | 2010 |
|---|--|------------------|
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory chamotte) | | 59.40 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (mud for construction of basins) | | 63.30 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory bricks for basins) | | 1,185.00 |
| Other linings and enamel refractories from metallurgical processes containing hazardous substances (refractory cement) | | 42.60 |
| Construction materials containing asbestos | | 0.54 |
| Mud from the treatment of urban wastewater | | 0.76 |
| TOTAL | | 14,828.00 |

| DISPOSAL AT SEA | | 2010 |
|-----------------------|--|---------|
| Bauxite residues (tn) | | 201.203 |

| WASTE UTILISATION | 2009 | 2010 |
|--|------------------|------------------|
| Bauxite residues (t) | 37,400.00 | 8,483.40 |
| Non-productive decalcification (t) | 40,000.00 | 24,826.75 |
| Cathode electrodes (t) | 286.00 | 197.40 |
| Kiln skimming (t) | 3,020.00 | 2,165.29 |
| Iron & steel scrap (t) | 1,055.00 | 1,157.82 |
| Paper (t) | 6.00 | 6.15 |
| Firebricks (t) | 875.00 | 786.40 |
| Aluminium (t) | 22.00 | 0 |
| Oils (t) | 123.00 | 57.60 |
| Batteries (t) | 3.00 | 5.45 |
| Metal packaging (aluminium boxes) | - | 0.18 |
| Rejected electrical & electronic equipment | - | 3.44 |
| TOTAL | 82,790.00 | 37,689.88 |

| WASTE COLLECTED BY THIRD PARTIES FOR DESTRUCTION | | 2010 |
|---|--|---------------|
| Other fuels (including fuel mixtures and waste oil from plant) | | 31.30 |
| Absorbants, filter materials (including oil filters not otherwise specified), sweeping/mopping cloths, protective clothing contaminated by hazardous substances (materials impregnated with oil or petroleum) | | 0.52 |
| Waste not otherwise specified (non-classified waste from plant) | | 185.51 |
| Transformers and capacitors containing PCBs | | 244.30 |
| TOTAL | | 461.30 |

Environmental expenditures

ALUMINIUM S.A. is committed to *“the adherence to the environment-related requirements under the law and to the agreements and commitments that it has undertaken voluntarily”*. The Company’s policy in this area is to secure the annual funds that will allow it to implement its policies on the protection of the environment and to ensure the desired performance of all actions under them.

The priorities for allocating the environmental expenditures are determined by the Company’s top Management, taking into account the key reference points for the evaluation of its performance and of its environmental impact. These reference points include the requirements resulting from all the legal provisions which govern the activities of the Company’s plant and the requirements of the licensing decisions and opinions issued by the competent public authorities.

The following is an indicative list of the Company’s activities (and corresponding expenditures) in this area:

With respect to air pollution control

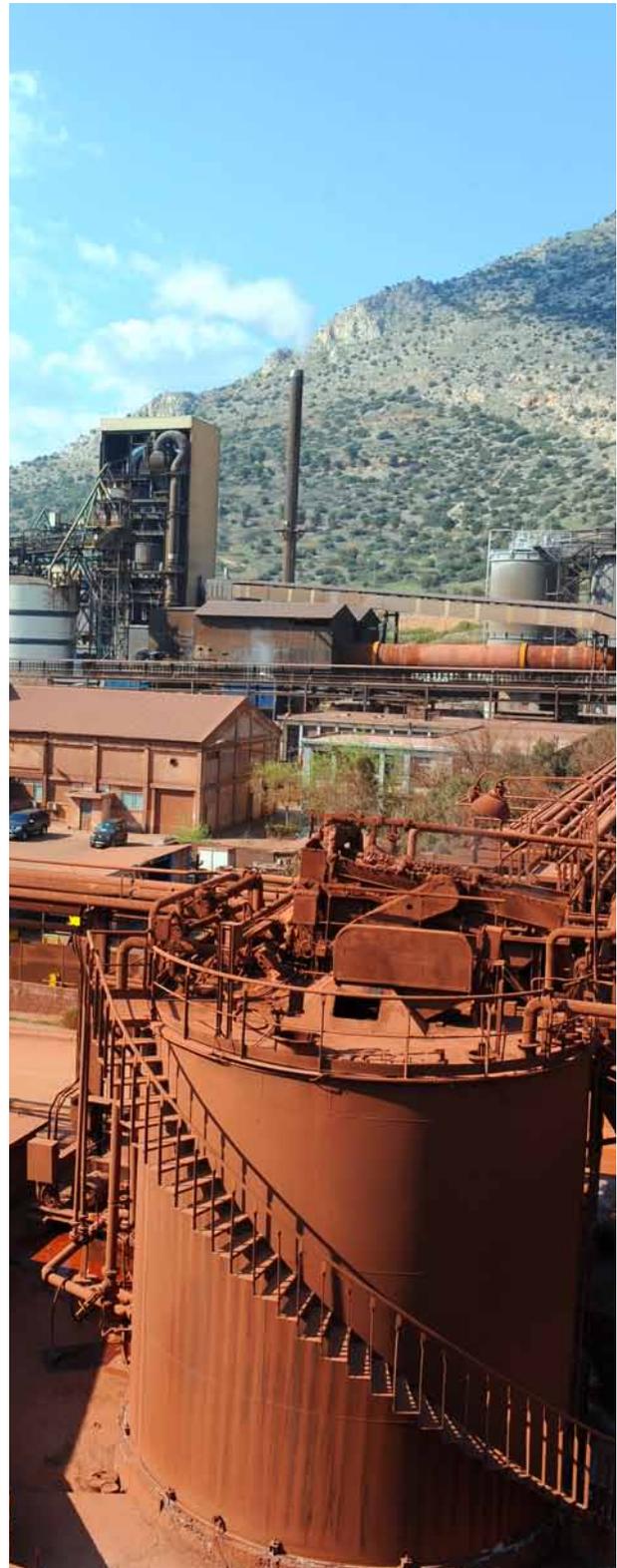
- Purchase/installation/operation of continuous operation dust measurement and analysis devices in six chimneys (control of waste gases).
- Purchase/installation/operation of an air quality measurement station in the Osios Loukas area.

With respect to the management of solid waste:

- Installation of two units for the dehydration of bauxite residues.
- Configuration of the area used for the disposal of bauxite residues.
- Rehabilitation of the area used for the disposal of inert and non-hazardous waste.
- Construction of an area for the disposal of inert waste.
- Extension of the area used for the disposal of hazardous waste and gradual rehabilitation of the Landfill for Disposal of Hazardous Waste.
- Removal of equipment containing PCBs (collection by third parties for destruction).

With respect to the prevention of industrial hazards:

- Implementation of the investments and technical interventions recommended by experts on industrial hazards.



- Continuation of the operation of a Non-Destructive Test Department to assess the condition of critical equipment and take timely preventive action.
- Construction and maintenance of infrastructures (e.g. safety tank for collecting liquid waste with PH > 9.5), to eliminate all likelihood of soil and/or sea pollution.
- Contracts with waste removal contractors.

The Company's total environmental expenditure for 2010 stood at €8,634,560, up 53% from the corresponding figure in 2009. This change was due to the increase of the expenditures for disposal and management of the Company's waste, and to the additional expenditures for "green" purchases and to other environmental management costs.

| Environmental expenditures (in €) | 2009 | 2010 |
|---|------------------|------------------|
| WASTE DISPOSAL, GAS EMISSIONS TREATMENT & REHABILITATION COSTS | | |
| Waste disposal – management | 902,000 | 3,174,331 |
| Treatment of gas emissions (e.g. expenditures for filters, active equipment) | 2,928,000 | 2,386,827 |
| Expenditures for the purchase and use of gas emission certificates | n/a | 6,200 |
| Depreciation of relevant equipment, maintenance, operation-related materials and services, and personnel- related costs | n/a | 259,700 |
| Total | 3,830,000 | 5,827,058 |
| PREVENTION & ENVIRONMENTAL MANAGEMENT COSTS | | |
| External services for environmental management | 128,000 | 187,552 |
| Independent certification of Environmental Management Systems | 12,000 | 1,700 |
| Personnel for general Environmental Management activities | 510,000 | 487,742 |
| Additional expenditures for "green" purchases and other environmental management costs | n/a | 2,082,508 |
| R&D and Additional expenditures for installation of "clean" technologies (e.g. additional costs over and above generic technology) | 1,165,000 | 48,000 |
| Total | 1,687,128 | 2,807,502 |

Environmental Objectives and Targets for 2011

Harmonisation with requirements:

- Identification of new requirements under the law and planning of harmonisation, where required.
- Continuation of the performance and of the practices adopted, as these are specified through the maximum limits and the descriptions in the Environmental Terms Approval Decision (ETAD).

Further reduction of emissions (as per the new limits set by the ETAD or by internal decisions):

- Fluorine emissions: < 1.65 kg/t Al.
- CF4 emissions: < 0.030 kg/t Al.
- Emissions of alumina kiln particles:
< 70 mg/Nm³ (from May 2011 onwards).

Improvements in the management of solid waste:

- New design regarding the management of solid waste collection means; waste separation percentage >80%.
- Final disposal of waste from Alumina production:
< 20kg/t AH.
- Final disposal of waste from Aluminium production:
<65t/cell ABeq.
- Elimination of the disposal of bauxite residues in the Corinthian Gulf.
- Conclusion of contracts with all approved alternative waste management systems – Checking of solid waste collectors and recipients to confirm that they are licensed as required by the law.
- Monitoring of the investment in the KB process – cast iron production.

Air quality control:

- Mapping of noise levels at the perimeter of the plot occupied by the plant.
- Regular monitoring of recordings and compliance with maximum allowable levels.

Provision of information – Training – Sensitisation

- Information campaign on the Environmental Management System targeted at new executives joining the Company.

- Information campaign on the Environmental Management System targeted at the environmental technicians of subcontractors.
- Provision of information to the Purchasing function about the new requirements in connection with the application of the REACH Regulation, so that they may modify their respective procedure, where required.

Proper conduct – Cleaning

- Monitoring of cleaning performance indicators.

Market

The policy of ALUMINIUM S.A. is to avoid all unfair associations with potential competitors which may lead to price fixing, concerted submissions to tenders, creation of market or production restrictions, allocation of clients and any other action or practice leading to anticompetitive behaviour. To this end, the provision of information on the latest developments in the legislation, the application of proven practices, especially regarding “below-the-line” promotion of Company products, and the Company’s corporate sponsoring policy are carried out in such a way as to ensure the Company’s commitment to responsible marketing and responsible communication in general. In addition, in what regards customer satisfaction, detailed surveys are carried out in accordance with the Company’s policy, and their results are used to support or review the corporate development strategy.

Quality Objectives for 2011

1. Sensitisation of personnel with regard to clients and the market
 - To expand the application of the complaints handling system/method to internal clients (service provision activities).
 - To develop a centralised system for handling complaints from suppliers.
 - To improve the system for handling and monitoring complaints from customers.
 - To create a system for recording customer comments.

- To prepare electronic support (management) for the Complaints Handling System (CHS).
- To implement the electronic management/issue of bauxite certificates.

2. Improvement of customer satisfaction

- To reduce the number of complaints from customers (both external and internal).
- To reduce the number of questions referred back to customers.
- To reduce the time needed to settle/respond to customer complaints, and to monitor the percentage of complaints which are still pending at the year-end.
- To apply the method for measuring customer satisfaction internally (questionnaire – indicators).



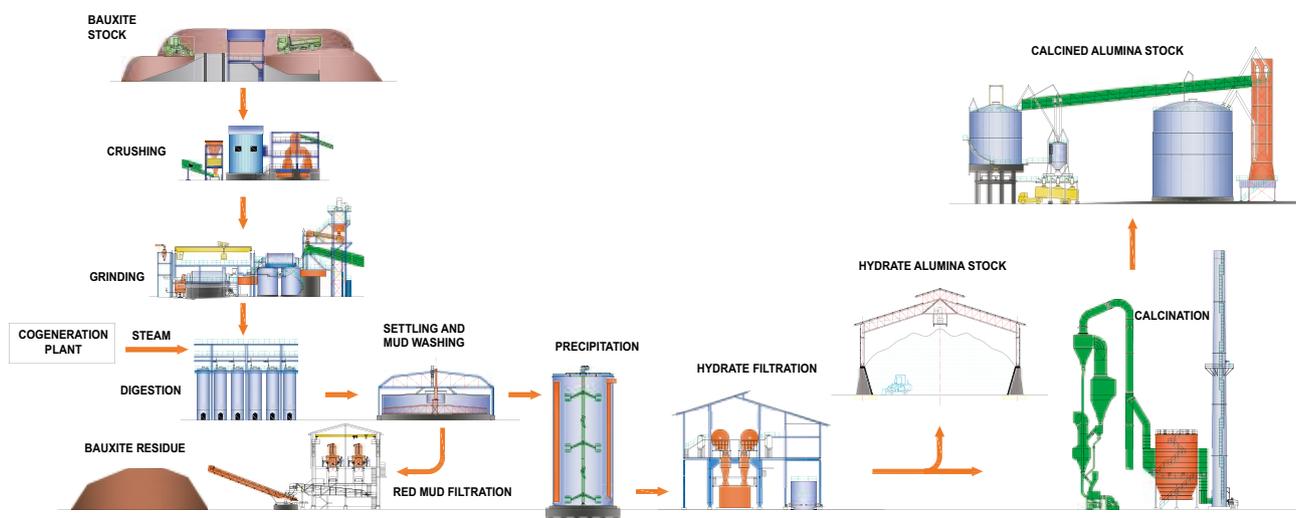
Quality and Safety of products

ALUMINIUM S.A. is committed to ensuring the ongoing satisfaction of the needs and expectations of its clients, by providing them with products (alumina and primary cast aluminium) and associated services that meet high quality requirements. To achieve this goal, the Company is managing proactively the processes and resources related to the quality of its products and services, and seeks to exploit all opportunities to improve its performance¹ in this particular area.

Alumina

Alumina is the industrial product derived from bauxite ore and is used to produce primary cast aluminium as well as other non-metallurgical products. Alumina may be hydrated or calcined (anhydrous), depending on the degree to which it has been processed. Calcined alumina, also known as metallurgical grade alumina, is obtained by baking hydrated alumina in order to remove the quantities of water contained in it.

Production Chart Alumina



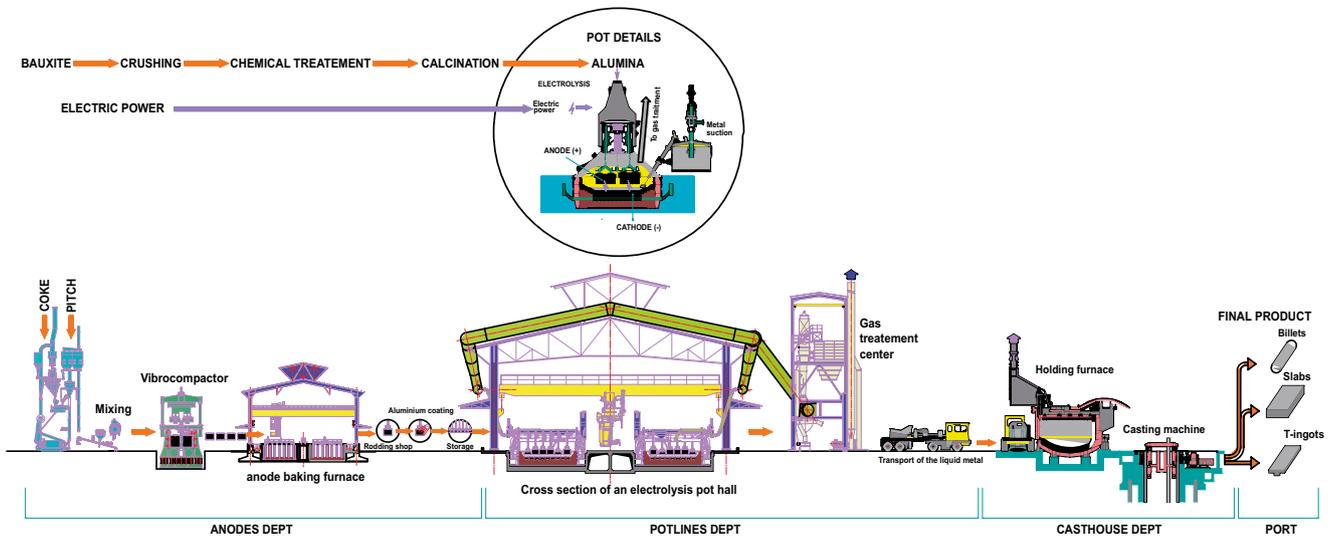
Aluminium

ALUMINIUM S.A. produces primary cast aluminium through the electrolysis of calcined (anhydrous) alumina. Primary cast aluminium is then processed to obtain the aluminium end products (billets, slabs and ingots). To this end, the Company takes the necessary steps to obtain the ISO 9002 Quality Certificate, while its quality control laboratory has been accredited by Hellenic Accreditation System S.A. (ESYD S.A.) in accordance with the requirements of the ISO 17025:2005 International Standard, for the chemical analysis of bauxite, alumina (both hydrated and calcined), and aluminium and its alloys.

This accreditation concerns the Quality Management System of the Laboratory and the technical skills and adequacy of the Laboratory for carrying out tests in the areas for which it has been accredited. As a result of the above, no incidents have been reported in the Company and, consequently, no substantial fines have been imposed for non-compliance with the laws and regulations on the use, health and safety of its products and services.

¹ The impact of the Company's primary products on health and safety is related to the end-use of the secondary products produced by its manufacturing clients. Therefore, product requirements are expressed in terms of the specifications imposed by these clients. The Company's stated policy allowing these requirements to be met is its quality policy.

Production Chart Aluminum



Quality Objectives for 2011

1. Improvement of product quality

- To improve the quality results (Cp of end products).
- To reduce the fluctuation of critical parameters in critical processes.
- To reduce the percentage of off-specs products.
- To develop new testing methods and laboratory tests for the production processes.
- To adapt the methods used to the applicable laws and regulations and to the international standards.
- To provide training on the process control method (MdP) to a selected personnel team.
- To apply the process control method to selected processes.

Management of local suppliers

For ALUMINIUM S.A., the term “local supplier” refers to the Company’s suppliers and associates who are located in the geographical region within which the Company exercises its business activity and which, depending on the Company’s needs, gradually extends to the entire Greek territory.

The policy of ALUMINIUM S.A. is to source all its supplies from the Greek market to the extent that this is possible, ensuring that the procedures and practices applied in the selection of all its suppliers are characterised by transparency and meritocracy. The criteria that the Company uses to select its suppliers include product quality, customer service, pricing policy and the overall market status of each associate.

A multitude of spare parts, including machine-processed, cast iron and cast steel spares and components, as well as elastic products, are manufactured in Greece to meet the needs of the Company. During 2010 ALUMINIUM S.A. cooperated with a total of 225 businesses located within the geographical region where the Company’s activities are located.

The table below lists in detail the nature of the supplies which the Company sourced from the local market and the percentage of the total Company purchases that these represent:

| | |
|---|------|
| Supplies sourced from the local market (% of total purchases) | 2010 |
| Raw materials | 22% |
| Materials, equipment and spare parts | 5% |
| Services | 36% |



Society

ALUMINIUM S.A. is an integral part of society and has been demonstrating this in practice through its long-standing support of efforts to meet basic social needs, expressed through the provision of financial or technical assistance or the supply of materials and equipment. With a multifaceted social presence that ranges from caring for the family life of its people to supporting the local community and society-at-large, the Company focuses on local particularities and chooses to adopt actions that contribute to social cohesion.

ALUMINIUM S.A. is fully committed to its compliance with the applicable laws on all issues relating to its business activity sectors. As proof of its successful record in this area, during 2010 no fines were imposed on the Company for non-compliance with the applicable laws and regulations.

Engagement with Stakeholders

In 2010 ALUMINIUM S.A. proceeded to engage its key Stakeholder groups in a dialogue on Corporate Responsibility, through a dedicated one-day event held in its premises. The issues discussed concerned the major social and environmental issues of concern to these groups. The level of participation was satisfactory, as the event was attended by several of the Company's Stakeholders. The subjects

addressed were prepared together with the participants, and a strong desire was expressed for holding this type of event again in the future.

In terms of the expectations on the part of each Stakeholder Group, the results are the following:

Local government

The Company's current activities are perceived positively. The need was presented for more frequent communication (with positive comments expressed about the Company's initiative to organise this specific forum), so that all the organisations involved may develop their knowledge of the Company's CSR-related activities. The need was expressed for a more systematic communication policy targeted at the citizens of the local communities and focusing on the activities of the Company in the area of CSR, so that they are provided with regular updates. A collaboration was proposed to establish the best possible way for the prevention of accidents, by examining the most frequent causes for accidents together with relevant information from the Company's archives. A negative comment was made regarding the deviation from the target, which had been set by the Company, for the disposal on land of 100% of bauxite residues.

ALUMINIUM has a multifaceted social presence that ranges from caring for the family life of its people to supporting the local community.

It was pointed out that efforts in this specific area are progressing slowly. The issue concerning the disposal of bauxite residues on land was given great emphasis. There was anxiety as to how these will be used, and the Company was asked to present its plans on the matter and its commitments for the future. The issue of sulphur dioxide emissions was also brought up: in connection with this, although the picture presented of the evolution of the matter over time showed improvement, it was mentioned that these emissions exceed the maximum allowable limits, even if this happens occasionally. A proposal was put forward for exploring, in collaboration with the local government, the possibilities and solutions available for a more active support of the local communities, especially in connection with the issues of unemployment and poverty and the utilisation of bauxite residues. Finally, the wish was expressed for the Company to trust more the service provider companies from the local communities.

The Church

The Company's initiative to disseminate information and engage in dialogue was characterised as significant. It was proposed, in the framework of the Company's social contribution, to give priority to the provision of work and medical care to people who are in real need. Special emphasis was given to the need to support and assist children with mental deficiency, whose number –as mentioned– in the regions of Thiva and Livadia is high.

A proposal was put forward to establish some form of closer cooperation between the Church and the Company, with a view to undertaking more effective and focused social benefit actions.

Media

Although the specific event organised by ALUMINIUM S.A. with its Stakeholders was characterised as positive, it was pointed out that this should have taken place earlier on. The Company's current activities and the results presented in the framework of Corporate Social Responsibility are perceived positively. The need for more tree-planting by the Company as part of environmental rehabilitation was pointed out. Particular emphasis was given to the matter of the disposal of bauxite residues, and specific, applicable proposals were asked for. The steady levels of fluorine emissions during the eight-year period from 2002 to 2010 were stressed, while the

Company was asked to pay even more attention to the issue of safety and to the recruitment of employees, especially from the local communities.

Employees

They expect the agreements with the Company regarding contracts to be adhered to in their entirety. The issue of Health and Safety is considered a matter of course, and they expect the Company to always adopt the most appropriate measures for their protection. They expect the agreement with the Company about hiring employees' children to be honoured.

A proposal was put forward for hiring new employees to cover overtime work. It was mentioned that, although there is satisfaction regarding the level of wages of employees, these could be further improved. Particular emphasis was placed on the need for a more active contribution by the Company to the efforts to address issues faced by the local communities. The need for more tree-planting by the Company as part of environmental rehabilitation was pointed out.

The need was stressed for the harmonious collaboration of all the organisations involved in order to address and improve the issues pertaining to Corporate Social Responsibility.

Non-governmental organisations (NGOs)

There was satisfaction with the specific initiative of the Company, and its actions are perceived positively. A proposal was put forward to create a Bauxite Museum in the region. Another idea put forward was to develop a prevention plan for the protection of forests, in collaboration with the Company.

Local communities

The desire was expressed for more employees to be hired from the local communities, together with the desire for the Company to trust more the suppliers in the local communities, especially service provider companies.

The idea was put forward that the Company and the Group in general should invest in the creation of technological service provider companies in the local communities, as these will help significantly the efforts for the region's development.

Collaborations with social partners

ALUMINIUM S.A. collaborates with the following social partners:

- The **Hellenic Management Association (HMA)**, whose purpose is to disseminate, develop and promote the application of modern Management principles, methods and techniques in all collective efforts undertaken by the private as well as by the public sector in Greece and abroad, and to highlight the significance of the role of management practitioners.
- The **Hellenic Federation of Enterprises (SEV)**, whose mission is to make a decisive contribution to the further modernisation and development of Greek businesses, and thus create a competitive national capital within the European and global competition.
- The **Greek Mining Enterprises Association (SME)**, whose key purpose is to strengthen and promote the Greek mining sector as a driver for regional and national growth and for international business activity, and to foster relations with the employees and the local communities where the activities of its member-enterprises are located.
- The **Athens Chamber of Commerce & Industry (ACCI)**, which functions as an Advisor to the Greek Government on matters related to commerce, industry and services, and on development policy matters more generally.
- The **IVEP Vocational Training Centre**, established in 1980 in Athens by a group of large Greek industries on the initiative of the Hellenic Federation of Enterprises (SEV), for providing vocational education and training services to the employed and unemployed.
- The **Aluminium Association of Greece**, which through its programmes and the services it offers to its members seeks to strengthen the position of aluminium in the current competitive world of materials, to increase its use and to assist its members in achieving their environmental, social and economic goals, always with a view to sustainable growth.
- The **Hellenic Foundation for European and Foreign Policy (ELIAMEP)**, whose mission is to act as a forum of public and political debate on European integration and international relations, and to carry out scientific research that helps build a fuller and documented knowledge of the European and international environment.
- The **Pan-Hellenic Exporters' Association (PEA)**, whose purpose is to promote the interests of its members and of the exporting sector in general, and to promote exports in the framework of the overall progress and openness of the Greek national economy.
- The **Viotia Chamber**, which keeps a general register with which all commercial enterprises in the Prefecture of Viotia are registered; ensures the provision to its members of information updates on a variety of subjects (Calls for Proposals – Invitations to Tender – Financing issues – Community Programmes – Insurance, market regulation and tax provisions); and issues opinions and submits studies and memos to the State and to other competent organisations on all issues of interest and concern in connection with the economic and social life in the Prefecture of Viotia.
- The **Hellenic-French Chamber of Commerce and Industry (HFCCI)**, a body that represents the business interests of the two countries, contributes to the improvement of the image of France and to the establishment of a base for mutual understanding between Greek and French businessmen, and provides significant support to the French (or Greek) businesses in their efforts to expand to Greece (or France).
- The **Association of Sociétés Anonymes and Limited Liability Companies**, whose mission is to safeguard and promote the interests of its members from a legal, economic and social point of view, as part of the efforts for Greece's economic growth.
- The **Athens Laboratory of Business Administration (ALBA)**, a non-profit educational organisation offering postgraduate studies in Business Administration.

Support of the local community

As a responsible corporate citizen, ALUMINIUM S.A. acknowledges its role and its commitment to supporting the social, cultural and sporting life of the local community whose member it has been for more than 50 years. More specifically, in addition to contributing to economic development, the Company is also committed to providing financial assistance on a broader scale to support local infrastructures, local public benefit initiatives and in general initiatives aimed at addressing local social problems.

The Company's social contribution during 2010 stood at €373,800, up 39.4% from 2009. Typical activities to which the Company made a major contribution in terms of financial

The Company's social contribution during 2010 stood at 373,800, up 39.4% from 2009.

assistance included maintenance and repair works for rural roads, outfitting of offices and school classrooms, and financing of an educational trip by pupils from the Distomo and Aspra Spitia schools who excelled in their studies to the European Organisation for Nuclear Research (CERN) in Switzerland. In more detail:

| Financial assistance social organisations | Actions | 2009 | 2010 |
|---|---|-------------|-------------|
| Activity area | Description of action. | Expenditure | Expenditure |
| Employees | Financial assistance to the Employees' Union. | 128,000 | 140,000 |
| Sports | Financial assistance to meet the needs of local sports clubs. | 53,500 | 64,500 |
| Local Government | Financial assistance to meet the needs of local communities. | 52,500 | 31,000 |
| Culture | Financial assistance to local cultural societies. | 13,200 | 24,200 |
| Entrepreneurship | Sponsorship of a business conference. | 10,000 | - |
| Volunteer organisations, societies and institutions | Financial assistance to meet the needs of volunteer organisations, local school parents' associations, and national institutions. | 8,400 | 87,000 |
| Education | Financial assistance for scholarship fund, building infrastructures, equipment and educational trips. | 2,000 | 17,000 |



| GRI Code | Description | Comments/Coverage | Page |
|---|---|---|-----------|
| Organisational Profile | | | |
| 2.1 | Name of the organisation | «ALUMINIUM S.A.» | |
| 2.2 | Primary brands, products and/or services | | 70, 92 |
| 2.3 | Operational structure of the organisation | | 71 |
| 2.4 | Location of organisation's headquarters | 8, Artemidos, 151 25 Maroussi Athens, Greece | |
| 2.5 | Number of countries where the organisation operates | | 71 |
| 2.6 | Nature of ownership and legal form | | 9 |
| 2.7 | Markets served | | 70-71 |
| 2.8 | Scale of the reporting organisation | | 71 |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | No change | |
| 2.10 | Awards received in the reporting period | Nil | |
| Report Parameters | | | |
| 3.1 - 3.11 & 3.13 | Report Parameters | These indicators covered the company since the unity of the Group | 5 - 7 |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | | 98-99 |
| Governance, Commitments and Engagement | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy | | 71 |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | | 72 |
| 4.3 | Independent and/or non-executive members of the Board of Directors | | 72 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | | 72 |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance) | | 25 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | | 25 |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | | 25 |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation | | 25 |
| 4.9 | Exercise of governance by the Board of Directors | | 20 - 33 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | | 26 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | | 26, 28-33 |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | | 15 |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | | 96 |
| 4.14 | List of Stakeholder groups engaged by the organisation | | 35 |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | | 35 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | | 36 |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | | 94-95 |
| Economic Indicators | | | |
| EC1 | Direct Economic Value | | 60 |
| EC6 | Policy, practices and proportion of spending on locally-based suppliers at locations of significant operation | | 93 |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at significant locations of operation | | 73 |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement | | 96-97 |
| Environmental Indicators | | | |
| EN1 | Materials used by weight or volume | | 81 |
| EN3 | Direct energy consumption by primary energy source | | 82-83 |
| EN4 | Indirect energy consumption by primary energy source | | 82-83 |
| EN8 | Total water withdrawal by source | | 83 |

| GRI Code | Description | Comments/Coverage | Page |
|--|--|--|-------|
| EN9 | Water sources significantly affected by withdrawal of water | | 83 |
| EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | | 82-83 |
| EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas | | 82-83 |
| EN15 | Number of IUCN Red List species and national conversation list species with habitats in areas affected by operating by level of extinction risk | Nil | |
| EN16 | Total direct and indirect greenhouse gas emissions by weight | | 86 |
| EN22 | Total weight of waste by type and disposal method. | | 86-88 |
| EN23 | Total number and volume of significant spills | | 85 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | | 81 |
| EN30 | Total environmental protection expenditures and investments by type | | 88-89 |
| Labour Practices and Decent work Indicators | | | |
| LA1 | Total workforce by employment type, employment contract and region | | 73 |
| LA2 | Total number and rate of employee turnover by age group, gender and region | | 74 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees by major operations | | 81 |
| LA4 | Percentage of employees covered by collective bargaining agreements | 100% of permanent staff of the company | |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work related fatalities by region | | 76-79 |
| LA10 | Average hours of training per year per employee by employee category | | 79-80 |
| LA12 | Percentage of employees receiving regular performance and career development reviews | | 75 |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity | | 80-81 |
| LA14 | Ratio of basic salary of men to women by employee category | | 80 |
| Human Rights Indicators | | | |
| HR4 | Total number of incidents of discrimination and actions taken | | 80 |
| HR6 | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor | | 73 |
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor | | 73 |
| HR9 | Total number of incidents of violation involving rights of indigenous and actions taken | Nil | |
| Social Indicators | | | |
| SO4 | Actions taken in response to incidents of corruption | No actions taken. No incidents of corruption reported to the Group's internal Audit Department. Full | |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices and their outcomes. | | 91 |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations. | Nil | |
| Product Indicators | | | |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their lifecycle, by type of outcomes. | | 92 |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. | | 91 |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes. | Nil | |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer personal data. | Nil | |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. | | 92 |

■ Core Indicator ■ Additional Indicator



DELPHI-DISTOMON S.A.

H «DELPHI-DISTOMON S.A. is the second largest bauxite producer in Greece and in Europe, with an annual output of more than 800,000 tons exclusively from underground sites.

These sites are located in the areas of Distomon and Amfissa, while the Company's Technical Department, responsible for supervising production and research, is located in the area of Ano Kounouklia, Eleonas, in the Prefecture of Fokida.

The Company sections responsible for Health & Safety and for the Rehabilitation of the areas affected by the mining activities are also based at these sites.

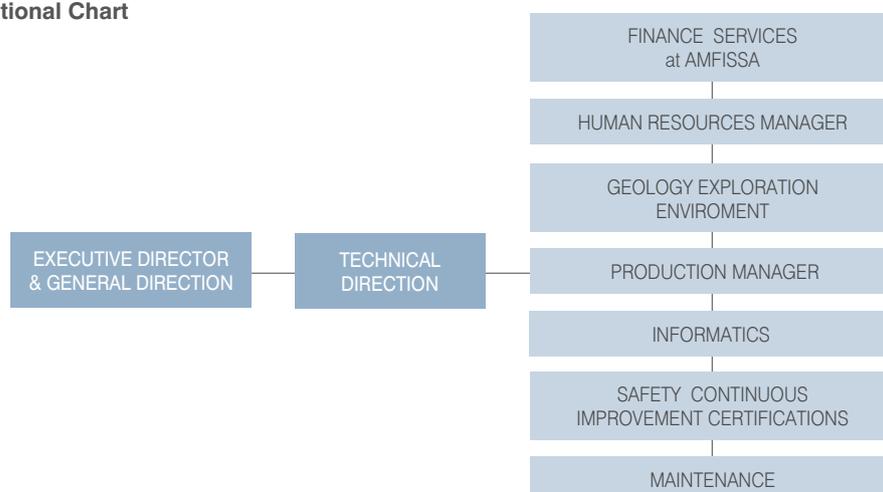
Key financial figures (in €)

| Economic Value Table | 2009 | 2010 |
|---|------------|-------------------|
| Revenues | 17,261,000 | 16,704,564 |
| Operating costs | 15,430,000 | 14,245,069 |
| Employee salaries and benefits | 4,764,000 | 4,888,325 |
| Payments to Government bodies (taxes) | 72,000 | 18,813 |
| Payments to capital providers (shareholders' dividends) | - | - |
| New investments | 2,955,000 | 2,662,183 |
| Investments in local communities | 31,850 | 18,891 |

It is pointed out that during 2010 the Company received no grant or subsidy from State/Government bodies, while the significant decrease of the amounts paid as tax is partly due to the Company's reduced production in 2010.

Governance structure

Organisational Chart



Composition of the Board of Directors

Composition of the Board of Directors, as elected by the Extraordinary General Meeting of 05.01.2009 and formed as a body on 05.01.2009:

| Title | Name |
|-------------------|-------------------------|
| Chairman | Spyridon Kasdas |
| Managing Director | Mattheos Constandinidis |
| Member | Dimitrios Bountros |
| Member | Apostolos Mitsovoeas |
| Member | Ioannis Dimou* |

*Represents the MYLINEOS Group in the Company's Board of Directors.

Functioning and responsibilities of the Board of Directors

The Board of Directors manages and represents the Company, administers its property and decides on all matters concerning the Company within the scope of the Company's business objects, with the exception of matters which according to the law and to the Articles of Association are the exclusive responsibility of the General Meeting of the Shareholders or have already been decided on by the Meeting in conformity with the law.

In discharging all its duties and responsibilities the Board of Directors acts collectively, but may also delegate, pursuant to a relevant Board decision, the representation of the Company and the related tasks, duties or rights –other than those requiring collective action– in their entirety or in part, in connection with a specific action or for a specific region, to one or more of its members or to third persons who are not members of the Board of Directors.

Role and responsibilities of the Managing Director

The Managing Director is responsible for managing the affairs of the Company. He supervises, directs and guides its

Departments and coordinates the activities of Sections in order to facilitate their collaboration for the achievement of the best possible results. He ensures the best possible operation of the Departments and the smooth, orderly and effective overall operation of the Company.

The Board of Directors has delegated to the Managing Director its authority to direct and manage all Company operations and affairs, and to represent the Company and act in a binding capacity for it in its relations with all third parties, including natural or legal persons, in connection with all actions provided for by the law and the Articles of Association and before all Courts of any degree and jurisdiction.

Mechanisms for the representation of the views of employees and shareholders in the Board of Directors

Other than the relevant provisions of Codified Law (C.L.) 2190/1920, no other specific formal procedure exists for the representation of the employees and shareholders in the Company's Board of Directors, either under Collective Labour Agreements or Arbitration rulings or agreements.

Human resources

DELPHI-DISTOMON ensures that its operations comply with the provisions of the laws regarding the absence of all types of discrimination (on grounds of race, gender, age, personality etc.). The philosophy of the Company is to engage its people in the commitment to respect the fundamental human rights, treating all cases of child or forced labour as both unthinkable and unacceptable.

During 2010, no incident involving racial or any other discrimination took place in the Company's premises nor was any report filed by a Company employee for unequal treatment.

In line with the consistency that it shows in its relations with its human resources, the Company has set specific periods for notifying and informing employees prior to the implementation of major changes in Company operations which might affect them significantly.

More specifically:

- a) For major changes (e.g. relocation of all employees because of a change in Company headquarters), the minimum notice period is between six and eight months.
- b) For isolated but significant changes (e.g. transfer of some employee to another city), the notice period is two months.
- c) For routine changes, the notice period is one month.

Workforce Data

| Total workforce | 2009 | 2010 |
|------------------|------|------|
| Total workforce* | 223 | 208 |

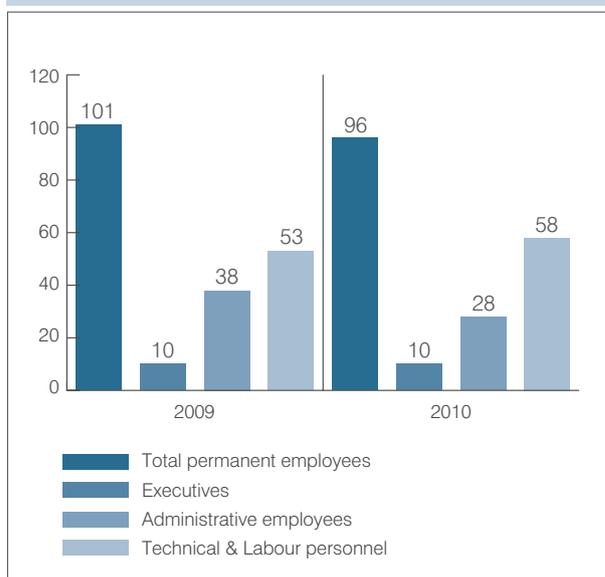
* Company employees and contractors

| Total workforce by type | 2009 | 2010 |
|-------------------------|------|------|
| Total Company employees | 101 | 96 |
| Total contractors* | 122 | 112 |

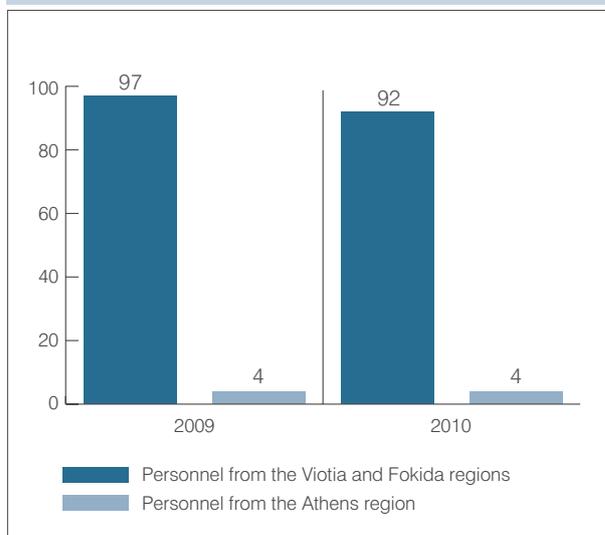
* The tasks referring to prospecting for minerals, transport of personnel and ores, loading, cleaning, guarding and environmental rehabilitation, as well as a significant part of production tasks (mining of ores), are carried out by supervised contractor personnel.

| Personnel by employment type | 2009 | 2010 |
|------------------------------|------|------|
| Total full-time employees | 101 | 96 |
| Total part-time employees | 0 | 0 |

Permanent employees by employment position



Personnel by geographical region



The loyalty of the personnel is remarkably strong, as the average period of service with the Company is 20 years.

Recruitment from local communities

As a company active in the Greek periphery, DELPHI-DISTOMON S.A. gives top priority to recruiting people from its local community, thus creating jobs and contributing to local development.

Every year, the Company seeks to fill all its job vacancies from the local community, unless the respective requirements involve specialisations that are not available –and, therefore, cannot be sourced– locally.

| Percentage of Management Executives* recruited from local communities (%) | 2009 | 2010 |
|---|------|------|
| Recruitment from the Viotia and Fokida regions | 40% | 40% |

*The term "Management Executives" includes all middle and senior Management Executives of the Company.

Employee turnover and retention

DELPHI-DISTOMON S.A. considers that although the sourcing, selection and professional development of its employees are key elements of the Company's employment process, its success depends on its ability to retain its human resources. To this end, the Company always seeks to maximise the retention of its employees, in order to utilise their experience and foster a culture of job tradition.

The Company's regular actions in this specific area include the following:

- Provision of a comprehensive benefits package to employees, including housing for employees whose place of origin is outside the region where the Company is located.
- Expression of active interest in all matters of concern to the employees and, by extension, assistance to employees in maintaining a balance between their professional and family obligations.
- Career advancement opportunities for each employee.
- Provision of employment opportunities to the children of employees.

During 2010 DELPHI-DISTOMON S.A. hired 6 new employees, while 11 employees left the Company. These

departures were due exclusively to retirement. The loyalty of the personnel is remarkably strong, as the average period of service with the Company is 20 years.

| Personnel recruitment by gender and age group | 2009 | 2010 |
|---|------|------|
| Personnel recruitment – Total | 2 | 6 |
| Personnel recruitment (Men) | 2 | 6 |
| Personnel recruitment (Women) | 0 | 0 |
| Personnel recruitment (<30 y.o.) | 2 | 4 |
| Personnel recruitment (30-50 y.o.) | 0 | 2 |
| Personnel recruitment (>50 y.o.) | 0 | 0 |

| Personnel recruitment by geographical region | 2009 | 2010 |
|--|------|------|
| Recruitment from the Fokida region | 2 | 6 |

| Personnel departures by gender and age group | 2009 | 2010 |
|---|-------|-------|
| Personnel departures – Total | 12 | 11 |
| Personnel departures (Men) | 12 | 11 |
| <i>As a percentage of total Company personnel</i> | 11.9% | 11.4% |
| Personnel departures (Women) | 0 | 0 |
| <i>As a percentage of total Company personnel</i> | 0% | 0% |
| Personnel departures (<30 y.o.) | 0 | 0 |
| <i>As a percentage of total Company personnel</i> | 0% | 0% |
| Personnel departures (30-50 y.o.) | 2 | 5 |
| <i>As a percentage of total Company personnel</i> | 2.0% | 5.2% |
| Personnel departures (>50 y.o.) | 10 | 6 |
| <i>As a percentage of total Company personnel</i> | 9.9% | 6.2% |

| Personnel departures by geographical region | 2009 | 2010 |
|---|-------|-------|
| Departures from the Fokida and Viotia regions | 12 | 11 |
| <i>As a percentage of total Company personnel</i> | 11.9% | 11.4% |

Employee development

The policy of DELPHI-DISTOMON S.A. is to foster the ongoing development of its human resources through continuous training and regular performance reviews that link their personal commitment to the success of the Company. Provided that they possess the knowledge and skills required, the employees of the Company are promoted according to a strict priority system in order to cover all job vacancies created within the Company.

With respect to the professional development of its employees, the Company takes the following regular initiatives:

- Application of a performance review and goal-setting system for Executives.
- Application of a performance review system for middle-management personnel.
- Application of a monthly performance review system for production line and support personnel.
- Provision of incentives for distinction and advancement, as all middle-management positions are covered mainly through internal promotions.



| Employee development data | 2010 |
|--|--------------|
| Number of employees who received an official performance review from the Company | 10 |
| <i>As a percentage of total Company personnel</i> | <i>10.4%</i> |
| Number of internal promotions* | 5 |

**Refers to promotions in the Company's Production and Maintenance Departments.*

Occupational Health and Safety

Because of the size and nature of its activity (bauxite mining), Occupational Health & Safety is a key issue in which DELPHI-DISTOMON S.A. takes an active interest. Although considerable progress has been made in this area, as demonstrated by the significant reduction of the number of accidents over the last years, the Company remains firmly committed to the continuous improvement of its performance, striving towards the ultimate target of "ZERO ACCIDENTS AND ZERO OCCUPATIONAL DISEASES".

As a result, the Company is today ranked among the world's top performers in the area of Occupational Health & Safety.

The Company's core commitments are the following:

- Identification and assessment of hazards under normal and, especially, under exceptional conditions of operation, and adoption of measures to eliminate or mitigate them.
- Compliance with the provisions of the laws on Occupational Health & Safety and with the applicable standards and internal procedures and guidelines.
- Open and transparent communication regarding all Occupational Health & Safety issues.
- Regular measurement and evaluation of the levels of exposure to harmful factors, systematic efforts to reduce these levels and continuous monitoring of the health of employees.
- Consistent and regular inspection of the processes, organisation and guidelines in place, with the aim of ensuring their continuous updating and improvement and to guarantee adherence to the regulations and achievement of the targets as these are set each time.

The Company's regular actions in this specific area include the following:

- Certification by TUV HELLAS of the Company's Health & Safety Management System in accordance with the OHSAS 18001:2007 International Standard.
- Training of all personnel and associates on safety-related issues.
- Implementation of a system for reporting accident statistics: every incident is recorded on a special accident or incident (near-accident) form, analysed (using the Cause Tree Analysis method), and then discussed in the safety meeting between Executives and Foremen. Accidents are also reported to the South Greece Division of the Greek Inspectorate of Mines, to which quarterly incident reports are also submitted.
- Inclusion of the Company in the ACTION application (electronic logging of incidents in a database – the same system is also used in ALUMINIUM S.A.).

| Occupational Health & Safety Data | 2009 | 2010 |
|---|-----------------|----------|
| Total Company personnel | 101 | 96 |
| Total contractors | 122 | 112 |
| Total days worked by workforce | 51,549 | 49,887 |
| Total hours worked by workforce | 412,072 | 399,096 |
| Total accidents* | 1 | 0 |
| Total work-related fatalities* | 0 | 0 |
| <i>Injury Rate (IR)</i> | <i>0</i> | <i>0</i> |
| Total occupational disease cases | 0 | 0 |
| <i>Occupational Diseases Rate (ODR)</i> | <i>0</i> | <i>0</i> |
| Total days lost | 65 | 0 |
| <i>Days Lost Rate (LDR)</i> | <i>31.50</i> | <i>0</i> |
| Total days of absence from work | 296 | 0 |
| <i>Absenteeism Rate (AR)</i> | <i>1,148.42</i> | <i>0</i> |

* Does not include incidents involving very light injuries.



As regards safety in its work premises, DELPHI-DISTOMON S.A. also utilises the following indicators:

| Additional Safety indicators | 2009 | 2010 |
|------------------------------|--------|------|
| Frequency Rate | 2.43 | 0 |
| Gravity Rate | 157.74 | 0 |

Education and Training

For DELPHI-DISTOMON, the provision of training to its employees, although mandatory under the law, is one of its core commitments. To this end, the Company plans and prepares annual corporate training programmes, delivered during working hours and aimed at meeting the current training needs of all employees and thus help the Company achieve the best possible operation. The principal training method used for the delivery of training relies on the physical presence of the trainees.

To this end:

- In-house training is always a priority choice.
- Health & Safety issues are given top priority in matters of education and training.
- The Company provides transport for its employees and ensures the availability of training materials and equipment.
- Records of the training activities are kept and used to obtain the necessary training statistics.

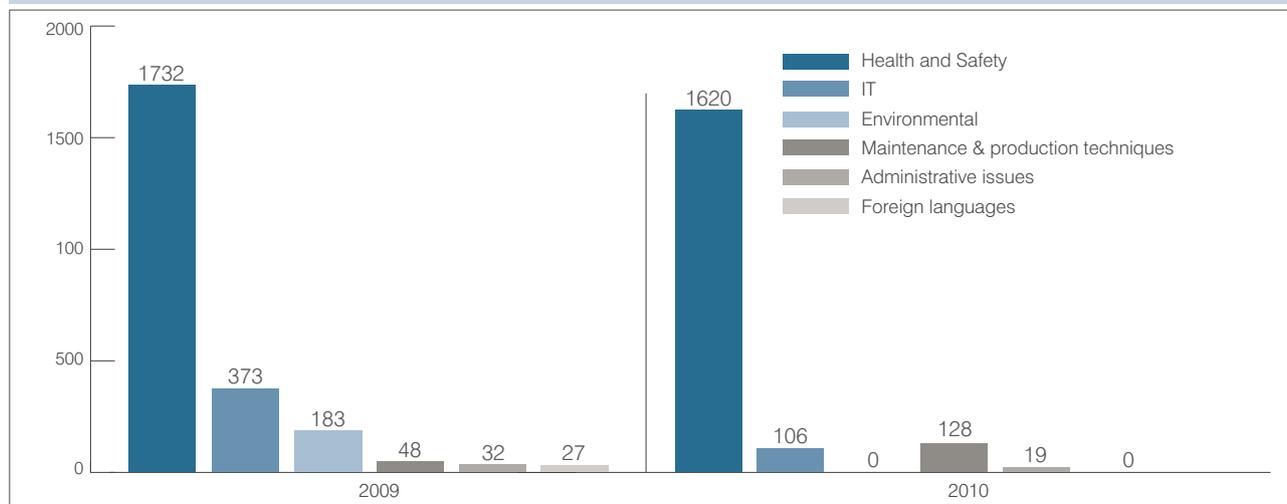
During 2010, DELPHI-DISTOMON implemented four training programmes with a total duration of 1,873 hours, which were attended by all Company employees and by the personnel of subcontractors. In terms of training subject areas, the emphasis was on Health & Safety issues, whilst the expenditure for these programmes stood at €24,500 (inclusive of personnel salaries and exclusive of the fees of trainers, who were Company executives).

Finally, as no incident of corruption has been brought to the attention of the Company to date, it was not considered necessary to schedule a training cycle on this subject.

| Personnel which received training, by employment position | 2009 | 2010 |
|--|-------------|-------------|
| Executives | 10 | 10 |
| <i>As a percentage of total Executives</i> | <i>100%</i> | <i>100%</i> |
| Administrative employees | 38 | 28 |
| <i>As a percentage of total Administrative employees</i> | <i>100%</i> | <i>100%</i> |
| Technical & Labour personnel | 53 | 58 |
| <i>As a percentage of total Technical & Labour personnel</i> | <i>100%</i> | <i>100%</i> |
| Contractors | 122 | 112 |
| <i>As a percentage of total Contractors' personnel</i> | <i>100%</i> | <i>100%</i> |



Training categories & corresponding training hours



| Personnel training hours by employment position | 2009 | 2010 |
|--|--------------|-------------|
| Executives | 406 | 80 |
| Executives (training person-hours) | | |
| <i>Average training hours per person</i> | <i>40.6</i> | <i>8.0</i> |
| Administrative employees (training person-hours) | 1.075 | 313 |
| <i>Average training hours per person</i> | <i>28.39</i> | <i>13.6</i> |
| Technical & Labour personnel (training person-hours) | 426 | 841 |
| <i>Average training hours per person</i> | <i>8.7</i> | <i>14.5</i> |
| Contractors (training person-hours) | 452 | 639 |
| <i>Average training hours per person</i> | <i>3.7</i> | <i>5.7</i> |

In terms of training subject areas, the emphasis was on Health & Safety issues, whilst the expenditure for these programmes stood at €24,500.

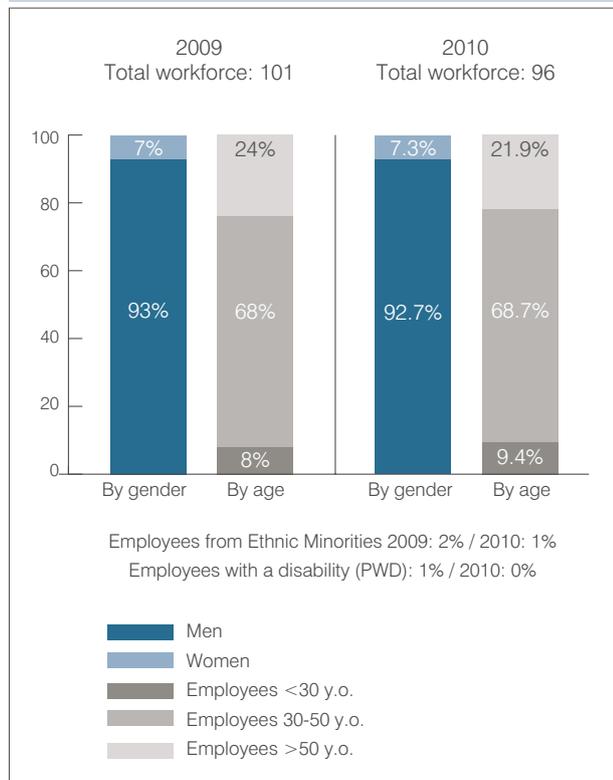
Equal opportunities and diversity

DELPHI-DISTOMON S.A. promotes the equitable and impartial treatment of all its employees irrespective of gender, age, origin or religious belief. It also seeks to create conditions that encourage and respect individuality and ensure dignity at the workplace as well as in the broader local community where the Company is active. In line with the above, the Company guarantees the provision of equal opportunities to all its employees, to the extent that the specific nature of each activity allows it to do so. For example, activities in underground tunnels require strong physical effort, something that places restrictions on several disciplines. In addition, no distinction is made in terms of salary between men and women belonging in the same employee category.

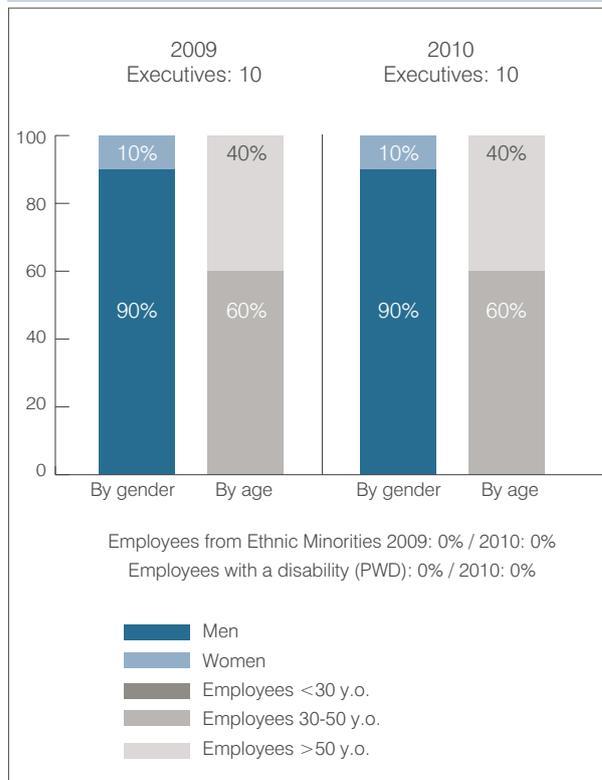
The Company's regular actions in this specific area include the following:

- Women are offered the opportunity to compete for and hold Company positions with extended responsibilities.
- The Company recruits people from minorities and different religions.
- The Company recruits people with a disability.
- Communication (language, writing etc.) is facilitated.
- Employees of different religions are facilitated in the performance of their religious duties.

Personnel breakdown according to special indicators of diversity



Personnel in positions with extended responsibilities



Voluntary benefits

A key concern of DELPHI-DISTOMON is to provide to all its personnel voluntary benefits over and above the Company's statutory obligations. These benefits aim to help employees balance their professional and family obligations, while also balancing their sense of job security and the Company's need to meet its financial obligations.

Voluntary benefits extended to the Company's full-time personnel

- Life insurance
- Health and medical care
- Coverage against disability/incapacitation
- Additional leave for parents of large families (more than 3 children)
- Housing for non-local employees
- Retirement provisions

Other voluntary benefits offered by the Company over and above its statutory obligations

- Bonus paid to all personnel depending on the annual results
- Personnel transport
- Retirement compensation significantly higher than the minimum amount foreseen by the law
- Group insurance plan for employees and their families (life, health and medical care, accident insurance).

The activities of the Company focus on the minimization of the consumption of water resources and on the systematic reuse and recycling of water.

Environment

According to the corporate Environmental Policy, as specified by the Company's ISO 14001:2004-certified Environmental Management System, adherence to and compliance with all regulations and requirements that refer to environmental issues and concern its operations is a core commitment for DELPHI-DISTOMON.

The Company's strict adherence to the applicable laws (operating licenses, approved Environmental Terms etc.), its implementation of an environmental legislation revision and updating procedure, and its application of all relevant rules and regulations on corporate activities, have resulted in the absence of sanctions (monetary or otherwise) for non-compliance with environmental provisions.

Furthermore, in the context of the ad hoc checks and inspections conducted by the Environmental Inspectors Service, no remarks were made and no violations of environmental rules and regulations were established in the Company.

Energy consumption

The consumption of energy in DELPHI-DISTOMON S.A. comes from primary energy (oil and petrol) and secondary energy (Electricity), which the Company purchases and consumes from non-renewable energy sources.

The Company's total energy consumption for 2010 stood at 53,486,1 GJ, down 4.18% from 2009.

| Total energy consumption (in GJ) | 2009 | 2010 |
|---|----------|----------|
| Indirect energy consumption (Electricity) | 14,849.7 | 12,702.2 |
| Direct energy consumption (Diesel fuel)* | 37,554.8 | 37,378.5 |
| Direct energy consumption (Fuel oil)* | 2,492.1 | 2,435.7 |
| Direct energy consumption (Petrol)** | 925.5 | 969.7 |

* 1 gallon of diesel/fuel oil = 0.138 GJ
 ** 1 gallon of petrol = 0.125 GJ

Water consumption

The policy of DELPHI-DISTOMON in this area involves systematic efforts to monitor and improve the efficient use of drinking water. To this end, the activities of the Company focus on the minimization of the consumption of water resources and on the systematic reuse and recycling of water, to the extent allowed by its operations

The Company's regular actions in this specific area include the following:

- Collection and use of stagnating waters in underground sites.
- Collection and utilisation of storm water in a special reservoir configured at the site of an inactive mine, with an approximate holding capacity of 6,000 m³.
- Use of water obtained from natural separation in site workshops to irrigate restored areas (measurements in accredited laboratories have shown this water to be suitable for irrigation).



The total quantity of water used in Company activities during 2010 stood at 49,859 m³, up 15.6% from 2009, due mainly to the increase in the quantities of water used for road sprinkling and plant watering.

The total quantity of water drawn from the Company's drillings and springs stood at 36,520 m³.

In the context of the ad hoc checks and inspections conducted by the Environmental Inspectors Service, no remarks were made and no violations of environmental rules and regulations were established in the Company.

| Total water consumption (in m ³) | 2009 | 2010 |
|--|--------|--------|
| Water consumption | 43,126 | 49,859 |

| Total water consumption by source (in m ³) | 2009 | 2010 |
|---|--------|--------|
| Surface water, including water from wetlands, rivers and lakes | n/a | - |
| Groundwater | 20,852 | 36,520 |
| Rainwater collected directly and stored by the Company | n/a | 6,000 |
| Municipal water reserves or other public water supply companies | n/a | 7,339 |

n/a: Data not available.

| Water recycled and reused | 2009 | 2010 |
|---|-------|-------|
| Total volume of recycled water (in m ³) | 2,000 | 2,000 |
| Volume of reused water as a percentage of the Company's total water consumption | 4.65% | 4.0% |

*The total volume of the water recycled/reused by the Company came from natural separation in the site workshops and was used in environmental rehabilitation.

The areas from which DELPHI-DISTOMON S.A. draws water do not include any water masses which the experts regard as particularly sensitive (because of their relative size, operation or condition) or as a system which is scarce, endangered or threatened with extinction (because it supports a specific endangered plant or animal species) or is located in any other national area which has been designated as a protected.

Waste disposal

The policy of DELPHI-DISTOMON S.A. is to continuously improve its waste management practices. The key method used by the Company for the disposal of its waste is dispatching to certified waste management contractors and to Landfills.

There are twelve different types of waste: these are initially collected in waste bins placed in the Company's sites and central facilities, then transferred to a specially configured area and from there, depending on the type of waste, are either dispatched to the respective licensed waste management contractors or collected by them.

The types of waste produced by the Company include the following: paper, plastic, wet cell batteries, dry cell batteries, burnt oils, filters-rags and elastic pipes, iron, aluminium, electronic equipment, old tyres, wood packaging materials, and household waste.

From these, only burnt oils and batteries are considered to be hazardous.

| WASTE RECYCLING | 2009 | 2010 |
|--|------|------|
| Wet cell batteries (t) | 2.56 | - |
| Dry cell batteries (kg) | 79 | 51 |
| Burnt oils (t) | 10 | 18,9 |
| Paper (t)* | 11.6 | 8.56 |
| Household waste (t) | 4.4 | 4.5 |
| Plastic (t)* | 6.09 | 6.24 |
| Iron (scrap) (t)* | 8.1 | 7.5 |
| Tyres (t) | 6 | 0 |
| Wood (Pallets) (pcs) | - | 89 |
| Materials impregnated with other substances (kg) | - | 300 |
| Light bulbs(kg) | - | 10 |
| Filters-Rags (t) | 4 | 0.3 |

* Waste is collected and removed by a specialised licensed contractor.

Recycling of waste takes place through licensed contractors for each type of waste, as follows:

- Batteries (companies: Recycling of Portable Batteries S.A. [AFIS S.A.], System for Alternative Management of Batteries S.A. [SYDESIS.A.]
- Burnt oils (company: ELTEPE)
- Tyres (company: ECOELASTICA)
- Iron (company: L. KRALLIS)
- Plastic (company: L. KRALLIS)
- Materials impregnated with other substances & Light bulbs (company: L. KRALLIS)
- Filters, rags and elastic pipes (ALUMINIUM S.A. Landfill)
- Household waste (disposal in the Uncontrolled Landfill of the Municipality of Amfissa)

For certain types of waste, a specific quantity must first be collected before it can be sent to or collected by the respective licensed contractor. In this case, the frequency of dispatch/collection may be once per year or once every two years. Tyres, electronic equipment, light bulbs and wet cell batteries are such waste.



Environmental expenditures

The commitment of DELPHI-DISTOMON S.A. to the continuous improvement of its environmental performance establishes the framework for the approval of expenditures aimed at protecting the environment and focusing on the prevention, mitigation, control and documentation of the Company's environmental activities, impacts and related risks.

The Company's regular actions in this specific area include the following:

- Budgeting and approval by the Management of expenditure items at the drafting stage of the annual budget.
- Expenditures for landscape restoration
- Expenditures for waste management.
- Expenditure for improvements to the Environmental Management System.

The Company's total approved environmental expenditure in 2010 stood at €289,500, broken down as follows:

| Environmental expenditures (in €) | 2009 | 2010 |
|--|---------|---------|
| Landscape restoration | 255,000 | 273,000 |
| Waste management | 20,000 | 1,000 |
| Environmental Management System improvements | 15,000 | 15,000 |

In what in particular concerns landscape restoration, during 2010 DELPHI-DISTOMON S.A. carried out the following:

- Purchase and planting of 36,000 plants.
- Purchase and installation of 35,000 m of watering pipes with the necessary accessories.
- Installation of 3,500 m of fencing to protect the plants from animal grazing.
- Transport of water for watering 120,000 plants.
- Maintenance work for an old 50 km-long watering network.
- Landscaping (earthworks) in a number of completed sites (VOXITOCOMATA, ANO-KATO GALARIA, GRIAS CHORAFI, KOSKINA, PROSOREMA), where planting is to be carried out in the future.

Market

Products

As already mentioned, DELPHI-DISTOMON S.A. is the second largest bauxite producer in Greece. The bauxite produced by the Company is supplied exclusively to ALUMINIUM S.A., for use in the production of alumina which in turn is used to produce primary cast aluminium.

Bauxite, named following the French city of Baux, where the ore's deposits were first found, is a mineral deposit rock formed by a mixture of metal oxides, and is the basic ore used in the production of aluminium. Bauxites were formed during a geological period some 200 to 100 million years ago.

The most important known bauxite deposits in Greece are located in the Mt Helikon - Mt Parnassus - Mt Giona zone of Mainland Greece (Sterea), and are estimated at approximately 100 million tons.



The average composition of a Greek bauxite sample is the following:

50-60% aluminium oxide (alumina, $Al_2O_3 \cdot H_2O$)

18-25% iron oxide (Fe_2O_3)

1-6% silicon dioxide (SiO_2)

2-6% titanium dioxide (TiO_2)

1-3% calcium carbonate ($CaCO_3$)

6-10% water (H_2O)

A characteristic of bauxites of this type (called “diasporic bauxites” and containing 1 molecule of alumina per 1 molecule of crystalline water), which are also found in other countries such as China, is their hardness, which requires a specific treatment in the grinding unit, as well as a high temperature in order to be digested by the caustic soda.

During 2010, the quality of the ore delivered to the plant of ALUMINIUM S.A, the Company’s end customer, use in the production of alumina, was much higher than the specified one (i.e. higher alumina content, lower silica content and calcium content as in the specs).

The number of complaints for violations of customer confidentiality made by third parties outside the Company or documented by the Company or, finally, coming from the regulatory authorities, is nil.

Furthermore, no sanctions were imposed on the Company by administrative authorities or by the courts for non-compliance with the laws and regulations, including international declarations/agreements/conventions, as well as with the national, regional and local regulations concerning the sale and use of its products and services.

Management of local suppliers

The policy of DELPHI-DISTOMON S.A. aims to ensure the adoption of practices and procedures characterised by transparency and meritocracy in the selection of all its suppliers, and to integrate its local suppliers (contractors) into its corporate systems and values.

The Company has 150 permanent associates (suppliers and contractors) who are actively involved in the implementation of the Company’s plans and the achievement of its goals, since as the Company’s production tasks, as specified in its detailed annual production plan, are implemented for the most part by subcontractor teams. The Company seeks

to foster a climate of cooperation and trust, promoting team spirit and helping the development of environmental awareness through training, inspections and penalties in cases of violations.

During 2010, the quality of the ore delivered to the plant of ALUMINIUM S.A, the Company’s end customer, use in the production of alumina, was much higher than the specified one.

The Company’s regular actions in this area include the following:

- Regular training of contractors (for a token fee).
- Provision of Personal Protective Equipment (at a charge).
- Possibility for medical exams (for a token fee).
- Organisation of social events to strengthen relationships.
- Application of a procedure promoting permanent associations. The competent Supervisor submits to the Management a documented recommendation proposing the continuation or suspension of the Company’s association with each contractor or supplier.

The Company considers as its local suppliers and associates all providers of materials, products and services that come from the regions of Viotia and Fokida. Outlays to suppliers from these two regions in 2010 stood at 71.3% of the Company’s total purchases budget, up 15% from the corresponding percentage for 2009.

The factors affecting the Company’s selection of suppliers, in addition to geographical location, are:

- (a) The cost, and
- (b) The social acceptability of the mining activity.

| Management of local suppliers | 2009 | 2010 |
|--|------|-------|
| Percentage of the Company’s total purchases budget paid to local suppliers | 62% | 71.3% |



Collaborations with social partners

DELPHI-DISTOMON S.A. collaborates with the following social partners:

- The **Hellenic Federation of Enterprises (SEV)**, whose mission is to make a decisive contribution to the further modernisation and development of Greek businesses, and thus create a competitive national capital within the European and global competition.
- The **Greek Mining Enterprises Association (SME)**, whose key purpose is to strengthen and promote the Greek mining sector as a driver for regional and national growth and for international business activity, and to foster relations with the employees and the local communities where the activities of its member-enterprises are located.
- The **Athens Chamber of Commerce & Industry (ACCI)**, which functions as an Advisor to the Greek Government on matters related to commerce, industry & services and on development policy matters more generally.

Society

To DELPHI-DISTOMON, compliance with the law is one of its core values. Although the Company understands this as its minimum obligation, it adopts and follows a policy that allows it to function in a way that ensures that all industrial viability issues (environment, health & safety etc.) in its particular industrial activity sector are fully consistent with the latest provisions of the laws and, in the cases where the Company has adopted stricter standards, even surpass them.

In order to meet the requirements of the law, the Company takes initiatives such as subscribing to legal journals and databanks, and maintaining collaborations with legal advisers.

Furthermore, it fosters a culture that promotes compliance and prevents the infringement of the provisions in force, by establishing incident response policies in the sites and checking the adherence to them.

As a result, during 2010 no monetary sanctions were imposed on the Company for non-compliance with the applicable laws and regulations.

Support of the local community

The policy of DELPHI-DISTOMON as a corporate citizen is to remain steadily oriented to acknowledging, assessing and satisfying the needs of its local community, thus strengthening its social role and the continuation and support of local developments.

The Company's regular actions in this area have led to the development of good relationships with the Local Authorities, have helped reduce substantially any objections expressed by local bodies on environmental and employment issues, and have helped promote the Company's good reputation.

These actions include the following:

- Close collaboration with Local Authorities of the First and Second Degree. Indicative Company actions through this collaboration include the donation of water tanks and water wagons for use in forest fire protection, the construction

of fencing for municipal sports facilities, the opening, maintenance and cleaning of rural and forest roads, and the donation of inert materials.

- Financial assistance to Local Districts.
- Provision of equipment and materials in response to relevant requests after evaluation, such as earthworks machinery and snow ploughs in response to requests from local bodies, depending on their needs.
- Provision of know-how in the form of specialised maps to local Technical Departments or design firms carrying out related studies/designs.
- Honesty and openness in supplying corporate data to local Media and organisations and to all other social bodies upon request.
- Involvement in seeking solutions to local problems and in matters of local interest.

| Financial assistance to social organisations (in €) | Actions | 2009 | 2010 |
|---|--|-------------|-------------|
| Activity area | Description of action. | Expenditure | Expenditure |
| Local Government | Coverage of the needs of local organisations. | 18,150 | 11,491 |
| Sports | Financial assistance to local sports clubs. | 7,700 | 2,500 |
| Education | Financial assistance to educational organisations. | 2,500 | 2,700 |
| Voluntary organisations/societies | Financial support. | 3,500 | 2,200 |

DELPHI-DISTOMON S.A. key corporate responsibility objectives for 2011

In line with its Corporate Responsibility policy, the Company has set the following three objectives for 2011:

- "NO ACCIDENTS and NO OCCUPATIONAL DISEASES" in the work premises.
- To improve the indicators concerning the collection of waste for recycling.
- To minimise (and, eventually, eliminate altogether) the new areas required for the disposal of unusable limestone materials from the mining activities, as disposal currently takes place in disused surface of underground sites, which thus are being filled up.

D E L P H I - D I S T O M O N S . A .

G R I P E R F O R M A N C E S U M M A R Y

| GRI Code | Description | Comments/Coverage | Page |
|---|--|---|-------------|
| Organisational Profile | | | |
| 2.1 | Name of the organisation. | «DELPHI-DISTOMON S.A.» | |
| 2.2 | Primary brands, products and/or services | | 70, 112-113 |
| 2.3 | Operational structure of the organisation | | 101 |
| 2.4 | Location of organisation's headquarters | 8, Artemidos, 151 25 Maroussi Athens, Greece | 100 |
| 2.5 | Number of countries where the organisation operates | Greece | |
| 2.6 | Nature of ownership and legal form | | 9 |
| 2.7 | Markets served | | 70,100 |
| 2.8 | Scale of the reporting organisation | | 100 |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | No change | |
| 2.10 | Awards received in the reporting period | None | |
| Report Parameters | | | |
| 3.1 - 3.11 & 3.13 | Report Parameters | These indicators covered the company since the unity of the Group | 5 - 7 |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | | 116-117 |
| Governance, Commitments and Engagement | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy or organisational oversight | | 101 |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | | 101 |
| 4.3 | Independent and/or non-executive members of the Board of Directors | | 101 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | | 101 |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance). | | 25 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | | 25 |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | | 25 |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation | | 25 |
| 4.9 | Exercise of governance by the Board of Directors | | 20-33 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | | 26 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | | 26, 28-33 |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | | 15 |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | | 114 |
| 4.14 | List of Stakeholder groups engaged by the organisation | | 35 |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | | 35 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | | 36 |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | | 94-95 |
| Economic Indicators | | | |
| EC1 | Direct Economic Value | | 100 |
| EC6 | Policy, practices and proportion of spending on locally-based suppliers at significant locations of operation | | 113 |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at locations of significant operation | | 103 |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement | | 115 |
| Environmental Indicators | | | |
| EN3 | Direct energy consumption by primary energy source | | 109 |
| EN4 | Indirect energy consumption by primary energy source | | 109 |
| EN8 | Total water withdrawal by source | | 109-110 |
| EN9 | Water sources significantly affected by withdrawal | | 110 |
| EN10 | Percentage and total volume of water recycled and reused | | 110 |

| GRI Code | Description | Comments/Coverage | Page |
|--|---|--|----------|
| EN13 | Habitats protected or restored | | 112, 155 |
| EN15 | Number of IUCN Red List species and national conversation list species with habitats in areas affected by operating by level of extinction risk | Nil | |
| EN22 | Total weight of waste by type and disposal method | | 110-111 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | | 109 |
| EN30 | Total environmental protection expenditures and investments by type | | 112 |
| Labour Practices and Decent work Indicators | | | |
| LA1 | Total workforce by employment type, employment contract and region | | 102 |
| LA2 | Total number and rate of employee turnover by age group, gender and region | | 103 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees by major operations | | 108 |
| LA4 | Percentage of employees covered by collective bargaining agreements | 100% of permanent staff of the company | |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities by region | | 104-106 |
| LA10 | Average hours of training per year per employee by employee category | | 106-107 |
| LA12 | Percentage of employees receiving regular performance and career development reviews | | 104 |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity | | 107-108 |
| LA14 | Ratio of basic salary of men to women by employee category | | 107 |
| Human Rights Indicators | | | |
| HR4 | Total number of incidents of discrimination and actions taken | | 102 |
| HR6 | Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour | | 102 |
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labour, and measures taken to contribute to the elimination of forced or compulsory labour | | 102 |
| HR9 | Total number of incidents of violation involving rights of indigenous and actions taken | Nil | |
| Social Indicators | | | |
| SO4 | Actions taken in response to incidents of corruption | No actions taken. No incidents of corruption reported to the Group's internal Audit Department. Full | |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices prohibition and their outcomes | Nil | |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | | 114 |
| Product Indicators | | | |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their lifecycle, by type of outcomes | Nil | |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction | «ALLUMINIUM S.A.» is the sole client of the company | 113 |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes | Nil | |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer personal data | | 113 |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services | | 113 |

■ Core Indicator ■ Additional Indicator



EPC Projects Sector: METKA S.A.

Key financial figures (in □)

| Economic Value Table | 2009 | 2010 |
|----------------------------------|-------------|--------------------|
| Revenues | 339,390,008 | 613,703,879 |
| Operating costs | 283,596,277 | 484,749,066 |
| Gross profits | 78,076,798 | 159,785,219 |
| Net profits | 35,235,574 | 87,043,778 |
| Employee salaries and benefits | 19,723,882 | 20,491,808 |
| Payments to Government bodies | 4,861,228 | 33,131,011 |
| Payments to capital providers | 21,897,327 | 11,408,526 |
| New investments | 2,589,740 | 4,271,931 |
| Investments in local communities | 161,950 | 339,415 |
| Outlays to local suppliers | 98,410,900 | 96,107,514 |

In the sector of large-scale energy and environmental projects, infrastructure works and defence equipment manufacturing, the MYTILINEOS Group is active through METKA S.A.

The Company's strategy in the above sectors has the following key goals:

- To utilise the significant industrial know-how and infrastructure developed in recent years.
- To maintain its leading role in SE Europe and to continue the expansion of its activities abroad.
- To invest in the continuous training of its highly specialised scientific personnel.

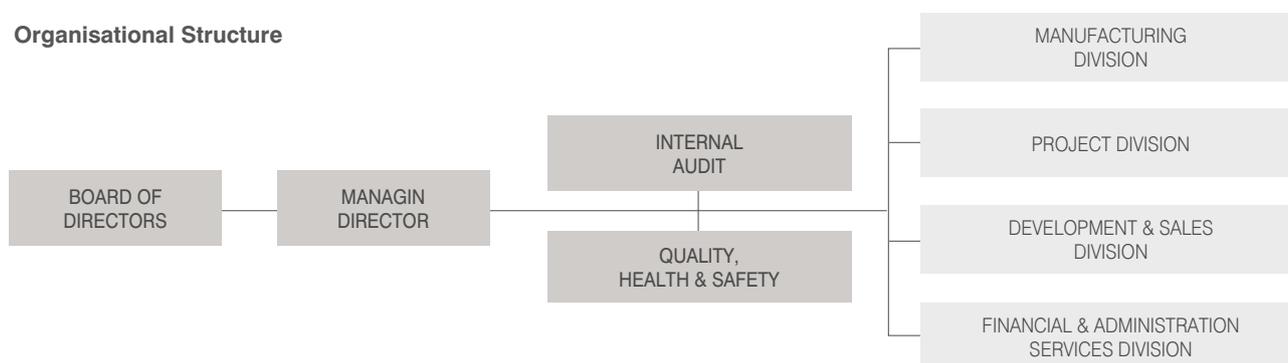
METKA S.A. was established in 1962 in Nea Ionia, Volos, and the operation of its plant was launched in 1964. Today its headquarters are located in Athens, and the Company has evolved into the leading EPC contractor in Greece and one of Europe's most highly specialized EPC contractors. The Company's industrial production is structured in a way that enables it to respond successfully to highly demanding technology-driven applications in the Energy, Defence and Infrastructure sectors, thus reflecting the Group's capability and stated goal to exploit synergies between its subsidiaries.

In the Energy sector, METKA specialises in delivering complete power plants and implements turn-key projects involving the complete range of Engineering, Procurement and Construction ("EPC") activities for combined-cycle as well as conventional thermal and hydropower plants. The diversification and expansion of the Company's list of clients, together with its strong international orientation, are the solid foundations that ensure its further growth.

The Company's largest plant is located in Volos and covers an area of 80,000 m², of which 25,000 m² are covered spaces. Through its subsidiaries, METKA is also operating plants in various locations across Greece (Volos, Thessaloniki, Kavala etc.) with a total area of 141,290 m².

Governance Structure

Organisational Structure



Composition of the Board of Directors

Composition of the Board of Directors, as elected by the Extraordinary General Meeting of 31.12.2008 and formed as a body on 31.12.2008:

| Title | Name | Executive Non-Executive Members | Independent Members |
|------------------------------|-----------------------|---------------------------------------|------------------------|
| Chairman & Managing Director | Ioannis Mytilineos | Executive | |
| Vice-Chairman | George Pallas | Non-Executive | |
| Member | George Ikonomou | Executive | |
| Member | Filippos Zotos | Executive | |
| Member | Panagiotis Gardelinos | Executive | |
| Member | Iosif Avagianos | Non-Executive | Independent |
| Member | Nikolaos Bakirtzoglou | Non-Executive | Independent |

Functioning and responsibilities of the Board of Directors and of its Members

The Board of Directors has been established and is acting in compliance with the provisions of the law and of the Company's Articles of Association.

The responsibilities of its executive members are specified and described in detail in the relevant Minutes of the Board. Non-executive members are charged with supervising corporate activities.

They are selected among established professionals from the business and academic community with experience of corporate operations in Greece and abroad.

The Board of Directors has the following key responsibilities:

- To establish strategic directions, including the sale or otherwise disposal of Company shares, the acquisition of any business or the recommendation for a merger of the Company with another business.
- To manage the Company's property and to represent the Company before the Courts and in out-of-Court arrangements.
- To draft the Company's annual budget and business plan, to set and achieve profitability targets, to monitor the Company's progress and to control large capital expenditure items.
- To ensure full and effective internal controls across all Company activities.
- To monitor the effectiveness of the corporate governance principles that form the basis of the Company's operations, and to introduce changes if required.
- To monitor and settle instances of conflict of interests, if any, between the Management, the Members of the Board of Directors and the shareholders, including cases involving mismanagement of the Company's property and abuse in the transactions of associated persons.
- To determine the Company's business risk management strategy.
- To select and develop the Company's top management team.

The fees and benefits of all types paid to the executive members of the Board of Directors are specified by resolution of the Board of Directors and in accordance with the provisions of Codified Law (C.L.) 2190/1920.

Role and responsibilities of the Managing Director

The Managing Director reports to the Board of Directors of the Company. He provides guidance for strategic choices and approves the key Company and Group decisions. He is responsible for ensuring the smooth, orderly and effective operation of the Company in accordance with the strategic goals, the business plans and the action plan, as these are specified by the resolutions of the Board of Directors and of the General Meeting of the Company's Shareholders.

He heads all Company Divisions and has the following responsibilities, inter alia:

- To take strategic decisions regarding the development/ approval of business strategies and to recommend/ approve large investments.
- To determine the Company's organisational plans.
- To ensure implementation of Company decisions and provide the Board of Directors with information updates on Company-related matters.
- To coordinate the top management executives and to monitor and ensure their efficiency in order to secure the Company's smooth operation.
- To take decisions or participate in the respective decision-making process regarding business decisions of major importance for the Company (relating to production, purchases, human resources, undertaking of projects etc.).
- To determine the risk management policies, to assess risks and to implement measures and procedures to address these effectively.
- To set the budget goals and submit proposals on the annual performance targets.
- To implement the goals of annual budgets.
- To supervise the Company's financial administration.
- To hold performance review meetings.
- To ensure the procedure for the achievement of targets and results.
- To recruit and provide guidance to the Company's team of top management executives.
- To formulate/determine guidelines for performance evaluation, promotions and the development of management executives, as well as the corresponding system of rewards.

The Company's industrial production is structured in a way that enables it to respond successfully to highly demanding technology-driven applications.

Mechanisms for the representation of the views of employees and shareholders in the Board of Directors.

Other than the relevant provisions of Codified Law (C.L.) 2190/1920, no other specific formal procedure exists for the representation of the employees and shareholders in the Company's Board of Directors, either under Collective Labour Agreements or Arbitration rulings or agreements.

Corporate Governance Statement

This statement is made as part of the Company's compliance with the provisions of article 2 of Law 3873/2010 and concerns the following:

1.1 Compliance of the Company with the Corporate Governance Code

Our Company complies with the policies and practices adopted by the "SEV Corporate Governance Code for Listed Companies" (hereinafter the "Code"), whose text has been posted on the website of the Hellenic Federation of Enterprises (SEV) (also available from http://www.sev.org.gr/Uploads/pdf/KED_TELIKO_JAN2011.pdf).

1.2 Deviation from the special practices of the Code

The Company's practices, as applied in accordance with its Articles of Association, Internal Regulation and Ethics Code, deviate from the special practices of the Code in terms of the following:

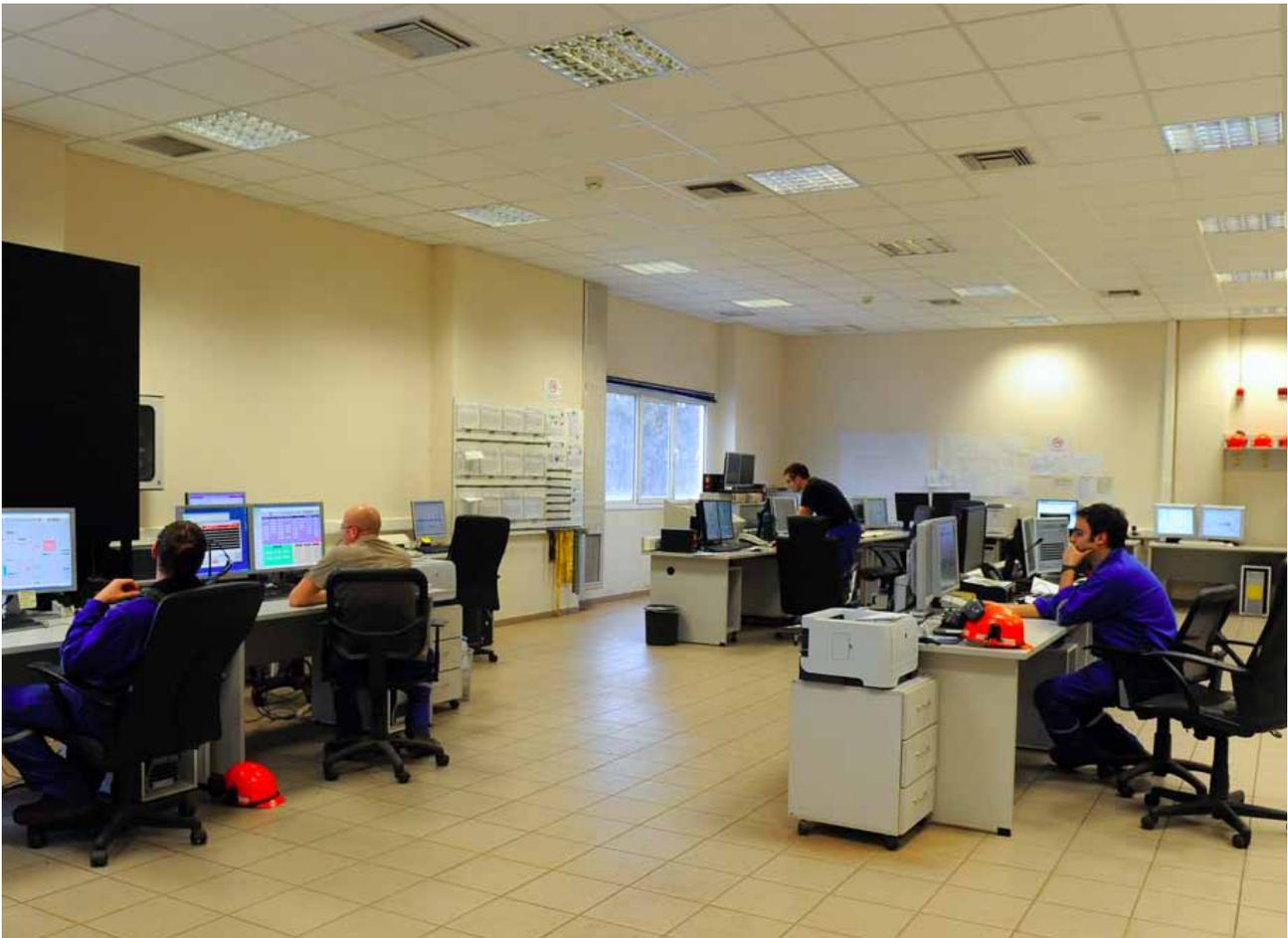
- i. According to the Company's Articles of Association, as in force, the Board of Directors is composed of five to seven members, instead of seven to fifteen members as provided by the Code (article 2.1). Although the organisation of the Company does not justify the existence of a multi-member Board of Directors, the Company, having re-examined the functioning of the Board, intends to adopt the special practice of the Code after amending accordingly its Articles of Association.
- ii. According to the Articles of Association and the Internal Regulation of the Company, no provision is made for:
 - (a) the appointment of the Vice-Chairman of the Board from among its independent members (article 3.3);
 - (b) the possibility for the Vice-Chairman to include items on the agenda of the meeting of the Board, when the meeting is called by its Chairman (article 3.4);
 - (c) a procedure whereby the Vice-Chairman undertakes to coordinate communication between the non-executive and the executive members (article 3.4); and,
- (d) a special meeting of non-executive members of the Board, which moreover is led by the Vice-Chairman who also evaluates the Chairman (article 3.4). The Company, having re-examined the functioning of the Board, intends to adopt the said special practices of the Code after amending accordingly its Articles of Association and its Internal Regulations.
- iii. The Board of Directors has received no report of professional commitments of its members (including significant non-executive engagements in companies and non-profit institutions), while the Articles of Association and the Internal Regulation of the Company contain no provision to the effect that Board Members may not sit on the board of more than five (5) other listed companies (article 4.2). Our Company, having re-examined the functioning of the Board, intends to adopt the said special practice after amending accordingly its Internal Regulation.
- iv. Appointment of an executive member of the Board of Directors as non-executive board member in a company other than a subsidiary or an associated company is not approved by the Board of Directors (article 4.3). The aforementioned practice had not been adopted, as any restriction of the professional activities of the Board's executive members was not considered advisable. Our Company, having re-examined the functioning of the Board, intends to adopt the said special practice after amending accordingly its Articles of Association.
- v. According to the Company's Articles of Association, the members of the Company's Board of Directors are elected by the General Meeting for a maximum term of five (5) years instead of four (4) years as provided by the Code (article 5.1). It had been thought that the reduction by one year of the maximum term of office of the Board members would not necessarily help optimise its functioning, however our Company intends to align itself with the said special practice after amending accordingly its Articles of Association.
- vi. No committee exists for nominating candidate members for the Board of Directors (article 5.5). Given that there is no statutory obligation to establish such a committee, and that our Company has in place strict criteria regarding the selection of candidates, the Company reserves its right to establish a committee for nominating candidate Board members, seeking/exploring in parallel the possibility to apply a commonly accepted methodology and procedure to this end.

- vii. No evaluation procedure exists for evaluating the performance of the members of the Board of Directors and of its committees (article 7.1). The adoption of this specific procedure had not been considered necessary, given the existing organisational structure. Our Company intends to align itself with the said special practice after developing a relevant procedure.
- viii. The Board of Directors is not composed of a majority of non-executive members, but is composed of four (4) executive and three (3) non-executive members, as this particular composition ensures the effective functioning of the Board.

Human resources

METKA S.A. has been systematically investing in the establishment of a flexible, people-centred framework for the management of its human resources, with the aim of providing professional and personal satisfaction and development to its people. Recognising its human resources as the key driver of its continuous evolution and growth, the Company ensures that its human resources management policy is consistent and aligned with the principles and values of the MYTILINEOS Group. For METKA S.A., the respect of the rights and of the personal dignity of employees represents a core commitment.

Although certain geographical regions where Company operations are located (e.g. the Arab countries) are considered as areas with a certain risk of occurrence of incidents involving child labour, no such incidents have been reported to date.



The Company does not allow child labour in any way whatsoever in the premises of its operations and takes all necessary steps to ensure compliance with the provisions of laws prohibiting child labour, by means of its internal regulations and its Code of Professional Ethics, which reflect the Company's business ethics and values. In addition, the contracts and agreements which the Company enters into with its business partners rule out all likelihood of child labour in the Company's business activity sectors, as they include clauses on the mandatory compliance with the relevant laws.

The same policy is also applied in the case of forced labour, for which no business activity sector or geographical region where the Company is active presents a risk of occurrence of such incidents.

Workforce Data

| Total workforce | 2009 | 2010 |
|------------------|------|------|
| Total workforce* | 755 | 858 |

* Employees and freelance professionals. The figure for 2010 also includes the personnel of the companies headquartered in Romania and Turkey, which was not included in the figures reported in the Sustainability Report 2009.

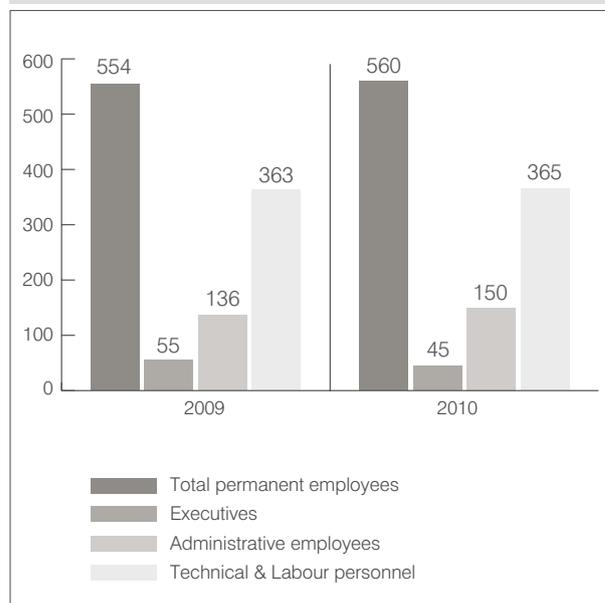
| Total workforce by type | 2009 | 2010 |
|--------------------------------|------|------|
| Total employees | 554 | 560 |
| Total freelance professionals* | 201 | 298 |

* A significant part of the Company's work is carried out by freelance professionals.

| Personnel by employment type | 2009 | 2010 |
|------------------------------|------|------|
| Total full-time employees | 552 | 560 |
| Total part-time employees | 2 | 0 |

| Personnel by type of employment contract | 2009 | 2010 |
|--|------|------|
| Open-end employment contracts | 552 | 558 |
| Fixed-term employment contracts* | 2 | 2 |

Permanent employees by employment position



For METKA S.A., the respect of the rights and of the personal dignity of employees represents a core commitment.

| Personnel by geographical region | 2009 | 2010 |
|--|------|------|
| Personnel from the Attica region | 317 | 239 |
| Personnel from the Thessaloniki region | 147 | 214 |
| Personnel from the Volos region | 233 | 183 |
| Personnel from the Kavala region | 45 | 47 |
| Personnel from the Evia region | - | 32 |
| Personnel from the Viotia region | - | 24 |
| Personnel from the Korinthos region | - | 12 |
| Personnel from the Kozani region | - | 4 |
| Personnel from Romania | - | 62 |
| Personnel from Turkey | - | 34 |
| Personnel from Syria | - | 7 |

With respect to the minimum notice period regarding significant operational changes in the Company, the term “minimum notice period” does not apply to METKA S.A. in connection with significant changes in the Company’s model of operations. For every change or development that concerns the Company’s activities, the Management takes care to ensure that the employees are informed in advance, with a reasonable period of time to go, so that they may adjust smoothly to the new situation. This period of time cannot be specified, as it varies depending on each specific case.

Recruitment from local communities

As a company located and operating not only in many Greek regions but also abroad, METKA S.A. strives to ensure that the largest part of its planned recruitment is sourced from its local communities, thus strengthening its presence as a corporate employer with close ties to the local population.

| Percentage of the Company’s Management Executives* in significant locations of operation recruited from local communities | 2009 | 2010 |
|---|------|------|
| Recruitment from the Attica region | 100% | 100% |
| Recruitment from the Thessaloniki region | 100% | 100% |
| Recruitment from the Volos region | 100% | 100% |
| Recruitment from the Kavala region | - | 100% |
| Recruitment from the Korinthos region | - | 50% |

*The term “Management Executives” refers to all middle- and senior management executives of the Company, with the exception of the persons sitting in Boards of Directors.

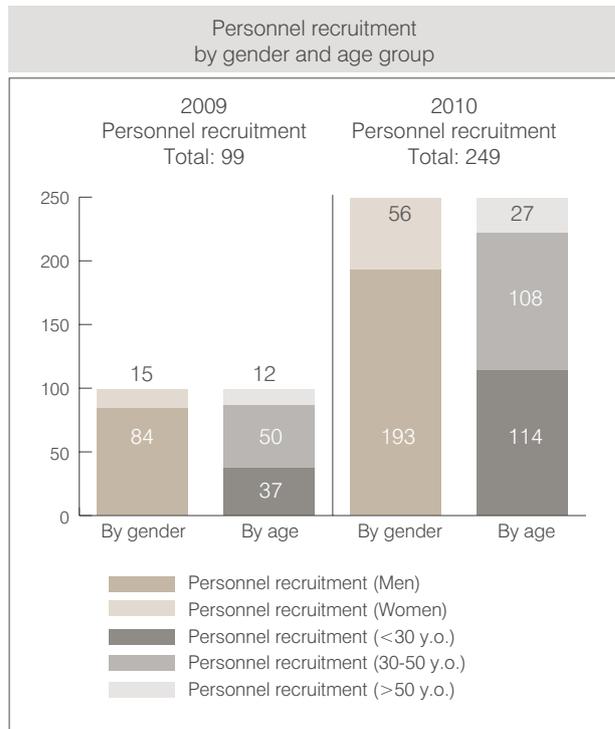
Employee turnover and retention

The policy of METKA S.A. is to attract and retain talented professionals by creating and maintaining a good and stable work environment coupled with competitive salaries and benefits and the provision of opportunities for training and development. As employee retention is included in the Company’s general strategic goals, the Company has designed systems to measure employee retention and to help understand correctly the reasons for which people depart or stay with the Company. It should be pointed out here that the loyalty of personnel is quite strong, driving the average length of service with the Company to more than 10-12 years.

The Company’s regular actions in this specific area include the following:

- Provision of a comprehensive compensations and benefits package.
- Education and training opportunities.
- Opportunities for development and advancement through Job Rotation programmes that provide employees with work experiences in a variety of Company departments (a key stage in the development of employees wishing to apply for higher management positions).
- Exit interviews held in cases of departures, so that the Company may improve itself as a corporate employer.

During 2010 METKA S.A. hired 249 new employees, while 165 employees left the Company. These departures were due to a variety of reasons: retirement (29), voluntary departure (69), expiry of fixed-term employment contracts (9), death (1) and internal transfer (1). A small percentage of the departures were due to termination of employment contracts.



| Personnel recruitment by geographical region | 2009 | 2010 |
|---|------|------|
| Recruitment from the Attica region | 42 | 130 |
| <i>As a percentage of total workforce</i> | 5.5% | 15% |
| Recruitment from the Thessaloniki region | 36 | 43 |
| <i>As a percentage of total workforce</i> | 4.8% | 5% |
| Recruitment from the Volos region | 4 | 1 |
| <i>As a percentage of total workforce</i> | 0.5% | 0.1% |
| Recruitment from the Kavala region | 15 | 27 |
| <i>As a percentage of total workforce</i> | 2.0% | 3.2% |
| Recruitment from the Viotia region | 2 | - |
| <i>As a percentage of total workforce</i> | 0.3% | - |
| Recruitment from the Drama region | - | 1 |
| <i>As a percentage of total workforce</i> | - | 0.1% |
| Recruitment from the Evia region | - | 22 |
| <i>As a percentage of total workforce</i> | - | 2.6% |
| Recruitment from the Korinthos region | - | 2 |
| <i>As a percentage of total workforce</i> | - | 0.2% |
| Recruitment from Romania | - | 5 |
| <i>As a percentage of total workforce</i> | - | 0.6% |
| Recruitment from Turkey | - | 1 |
| <i>As a percentage of total workforce</i> | | 0.1% |
| Recruitment from Syria | | 17 |
| <i>As a percentage of total workforce</i> | | 2% |

| Personnel departures by gender and age group | 2009 | 2010 |
|---|------|-------|
| Personnel departures – Total | 73 | 165 |
| Personnel departures (Men) | 60 | 141 |
| <i>As a percentage of total workforce</i> | 7.9% | 16.4% |
| Personnel departures (Women) | 13 | 24 |
| <i>As a percentage of total workforce</i> | 1.7% | 2.8% |
| Personnel departures (<30 y.o.) | 20 | 39 |
| <i>As a percentage of total workforce</i> | 2.6% | 4.5% |
| Personnel departures (30-50 y.o.) | 27 | 75 |
| <i>As a percentage of total workforce</i> | 3.6% | 8.7% |
| Personnel departures (>50 y.o.) | 26 | 51 |
| <i>As a percentage of total workforce</i> | 3.4% | 5.9% |

| Personnel departures by geographical region | 2009 | 2010 |
|--|------|------|
| Departures from the Attica region | 15 | 25 |
| <i>As a percentage of total workforce</i> | 2.0% | 2.9% |
| Departures from the Thessaloniki region | 19 | 44 |
| <i>As a percentage of total workforce</i> | 2.5% | 5.1% |
| Departures from the Volos region | 16 | 34 |
| <i>As a percentage of total workforce</i> | 2.1% | 4.0% |
| Departures from the Kavala region | 20 | 22 |
| <i>As a percentage of total workforce</i> | 2.6% | 2.5% |
| Departures from the Viotia region | 3 | 11 |
| <i>As a percentage of total workforce</i> | 0.4% | 1.3% |
| Departures from the Evia region | - | 5 |
| <i>As a percentage of total workforce</i> | - | 0.6% |
| Departures from the Korinthos region | - | 3 |
| <i>As a percentage of total workforce</i> | - | 0.3% |
| Departures from Romania | - | 8 |
| <i>As a percentage of total workforce</i> | - | 0.9% |
| Departures from Syria | - | 1 |
| <i>As a percentage of total workforce</i> | - | 0.1% |
| Departures from Turkey | - | 12 |
| <i>As a percentage of total workforce</i> | - | 1.4% |



Employee development

The continuous development of employees through training and other initiatives is an integral part of the philosophy of METKA S.A. The Company's policy is to invest continuously in the capabilities and skills of its people and, through a process of regular reviews, to provide each employee with opportunities for advancement to a higher level in the management hierarchy. The principal aim of the Company is to fill job vacancies through internal promotions, provided that the candidate employees possess the knowledge and qualifications required.

The Company's current employee performance review procedure is organised in the following steps:

- Definition of a performance review schedule and allocation of reviewers for each employee.
- Provision of information to reviewers.
- Employee performance review.
- Collection and processing of review results.
- Processing and keeping of relevant records.

During 2010 no formal employee performance review was conducted, as the system was under reorganisation. A total of four (4) promotions took place, involving promotions in the Sales Department, the Project Management Departments and the Procurement Department.

Occupational Health and Safety

METKA S.A. is committed to carrying out all actions required to improve Occupational Health & Safety conditions and the Company's performance in this area, in order to ensure the protection of the life and health of its employees, but also of suppliers, subcontractors, clients and visitors at the Company's facilities and construction sites, in accordance with the provisions of the applicable Greek and Community laws.

The following are core elements of the Company's policy on Occupational Health & Safety:

- Identification of hazards and adoption of the necessary measures to contain them.
- Development of preventive action plans and of plans to improve work conditions.

- Maintenance and monitoring of their safe operation of resources and facilities.
- Compliance with the legislative provisions and with the applicable standards and internal guidelines.
- Open and transparent communication regarding all Occupational Health & Safety issues, and provision of continuous and suitable training on Health & Safety.
- Regular inspection of the processes, organisation and procedures in place, to ensure adherence to the regulations and the achievement of targets.

For METKA S.A., the ultimate goal is for all Company operations to be carried out to optimal quality and time requirements and without any accident or incident that could be detrimental to human health.

The Company's strategy for mitigating the hazardousness of its activities relies on the prevention of hazardous situations from arising, on the identification and prompt elimination of such hazardous situations, on the prevention of the occurrence of undesirable incidents while a hazardous situation persists, and on containing the loss and damage created by undesirable events.

The Company's regular actions in this specific area include the following:

1. Commitment to the application of the principles of the **OHSAS 18001:2007** Occupational Health & Safety Management System.
2. Development of a "HSE Manual" laying down for implementation a specific framework of Occupational Health & Safety guidelines for every project undertaken by the Company. The key elements of the "HSE Manual" are the following:
 - **Design:** This procedure involves a number of actions, including the identification of the hazards and risks related to each type of work, the definition of the obligations of personnel, the setting of targets etc.
 - **Risk Assessment:** This is a structured procedure for identifying and specifying all types of risk in every Company project, together with the respective safety measures required in order to eliminate or isolate or minimise these risks.
 - **Implementation of Controls:** Refers to a procedure for implementation of specific controls (administrative,

The principal aim of the Company is to fill job vacancies through internal promotions, provided that the candidate employees possess the knowledge and qualifications required.

engineering or combined) which essentially will facilitate the implementation of the Occupational Health & Safety policy for every Company project.

- **Application and Operation:** Involves the definition of the Company's responsibilities in terms of Occupational Health & Safety, in its capacity as the main contractor of the projects it undertakes. It also involves the definition of the respective responsibilities of subcontractors, the appointment of a Safety Coordinator with specific authorities for the area where the project is implemented, and the preparation of plans to respond to unforeseen situations or emergencies which may arise during the implementation of the project.
 - **Accident Control:** Refers to the procedure for recording and dealing with accidents or incidents which may occur during the project carried out by the Company
3. Regular training of the personnel involved in the implementation of every Company project, as well as of visitors, on Health & Safety issues. Where unforeseen or new hazards and risks arise in connection with a particular task, all employees are promptly informed about the necessary protective measures.
 4. Effective internal communication, ensuring the secure and timely flow of information about Occupational Health & Safety matters across the entire Company.
 5. Conduct of inspections on a number of matters related to Occupational Health & Safety. These inspections function

as an effective means to identify and address problems or increased occupational hazards and risks before any accident occurs.

6. Results assessment procedures and actions for introducing further improvements, seeking to prevent effectively the occurrence of all conditions which could jeopardise Health & Safety at the Company's work premises as well as in the respective project construction sites.

| Occupational Health & Safety Data | 2009 | 2010 |
|---|---------------|---------------|
| Total workforce | 755 | 858 |
| Total days worked by workforce | 186,657 | 189,831 |
| Total hours worked by workforce | 1,383,150 | 1,575,411 |
| Total accidents* | 15 | 16 |
| Total work-related fatalities* | 0 | 0 |
| <i>Injury Rate (IR)</i> | <i>2.16</i> | <i>2.03</i> |
| Total occupational diseases | 1 | 3 |
| <i>Occupational Diseases Rate (ODR)</i> | <i>0.14</i> | <i>0.38</i> |
| Total days lost | 132 | 264 |
| <i>Days Lost Rate (LDR)</i> | <i>19.08</i> | <i>33.5</i> |
| Total days of absence from work | 774 | 518 |
| <i>Absenteeism Rate (AR)</i> | <i>829.32</i> | <i>545.74</i> |

* Does not include incidents involving very light injuries.



Education and Training

For METKA S.A., the policy on education and training for its people aims to ensure that they are able to meet in the best possible way the actual needs in the Company's modern work environment. Training needs are approved by the Company's General Management and are defined based primarily on the employee performance reviews, the extraordinary requirements for staffing sections and the installation of new technologies. To this end, training needs are grouped by the Company's Human Resources Section using the following criteria: the development of capabilities by training category and the level of development of the trainees (basic or advanced).

This grouping aims to assist in the preparation of the training schedule and the list of participants. The final list and schedule are drawn up by the Human Resources Section in consultation with the Section/Division Heads. METKA S.A. seeks to design training programmes that support its employees so that these are able to fulfil their assigned duties and further develop their knowledge and skills.

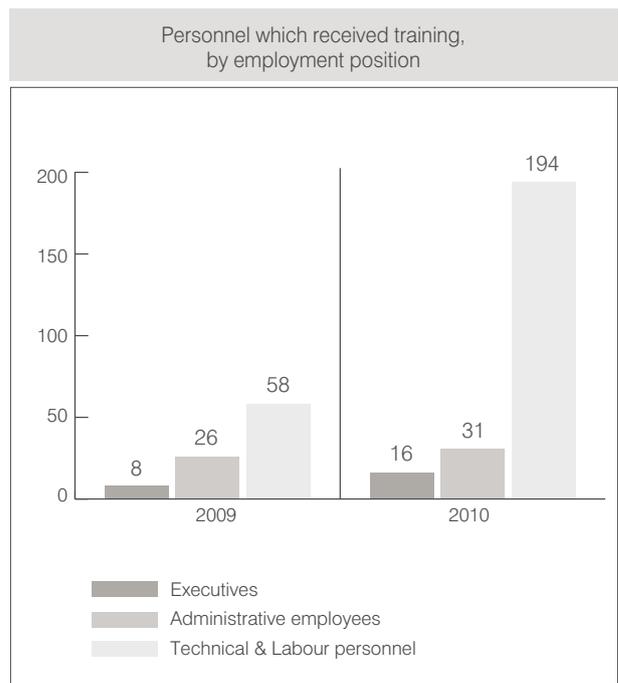
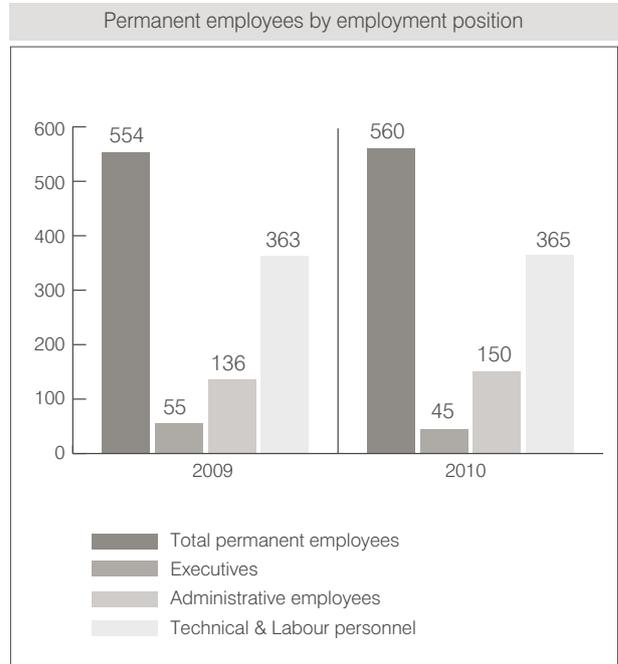
The Company's policy is to provide its employees with training on, inter alia, subjects covered by the Company's Corporate Operations System, such as Quality, Environment, and Health & Safety.

The Company's regular activities in this specific area include the following:

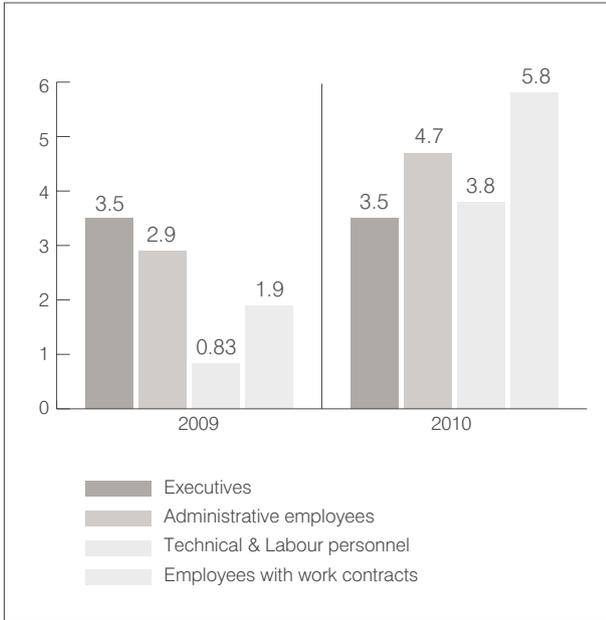
1. Implementation of training seminars by external vocational training organisations, focusing on the continuous training of personnel (administrative employees and management executives) and the development of their skills.
2. Implementation of training seminars by external technical training organisations, for production personnel.
3. Implementation of in-house training seminars for personnel, delivered by employee trainers.
4. Procedure for the evaluation of training results.

During 2009, METKA implemented 7 basic training modules with a total duration of 4,000 hours, attended by approximately 28% of its permanent employees and external associates.

The total cost of this training programme, which focused on Health & Safety and on providing employees with specialised technical skills, stood at €33,000.



Personnel training hours by employment position



| Training categories & corresponding training hours | 2009 | 2010 |
|--|------|-------|
| Health & Safety | - | 1.918 |
| IT | 482 | 280 |
| Accounting – Finance | 313 | 196 |
| Environmental training | 200 | - |
| Skills development | 92 | 466 |
| Quality | 85 | 155 |
| Internal audit | 40 | - |
| Logistics | 28 | - |
| Technical specialisation | 16 | 861 |
| Project administration | - | 148 |
| Human resources | 7 | - |



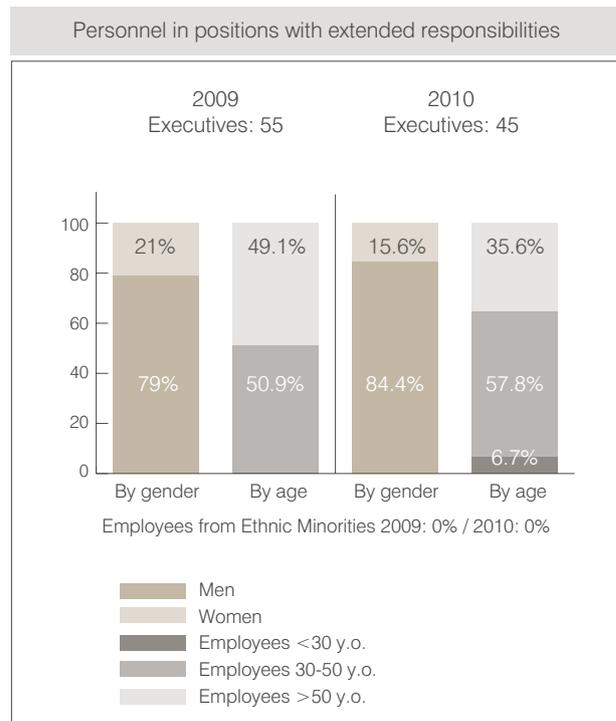
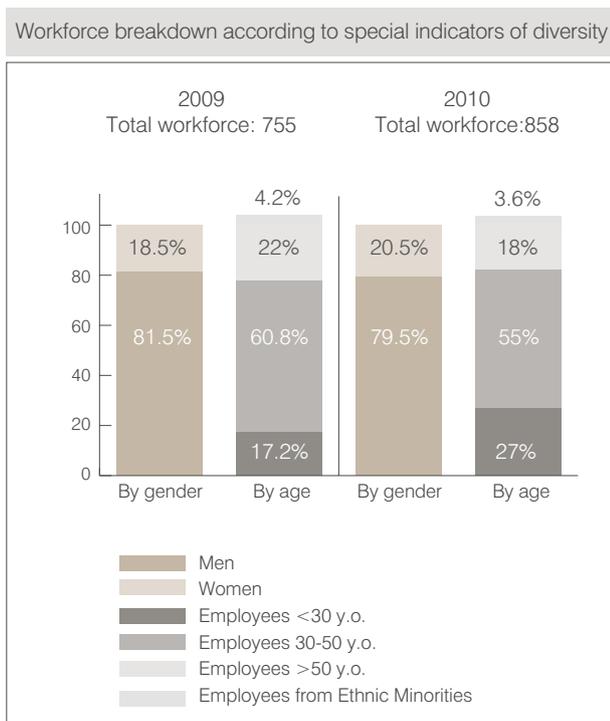
Equal opportunities and diversity

A key priority for METKA S.A. is to take initiatives to encourage equal opportunities at all stages (selection, recruitment, advancement and training of personnel), and the provision of a work environment free from all kinds of discrimination. The Company's goal is to ensure that all employees, irrespective of their position in the hierarchy, are treated with dignity, respect and equality regardless of social origin, gender, skin colour, religion, financial and social status, political beliefs, age, physical disability or sexual orientation.

Despite the multinational character of METKA S.A. and its presence in a number of geographical regions with diverse nationalities and religions, no incident involving discrimination on the grounds of gender, skin colour, religion or political beliefs was recorded during 2010 in the Company's work premises. In addition, no distinction exists in the Company in terms of salary between men and women (executives, administrative employees or technical and labour personnel) in the same level of the hierarchy.

The Company's policy in this specific area includes the following:

1. Recruitment of persons of different nationalities and origin.
2. Recruitment of persons irrespective of gender (e.g. women engineers are recruited and work in construction sites).
3. Recruitment of persons irrespective of age (e.g. selection of young persons with no professional experience record, recruitment of persons over 50).
4. Participation of women in Managerial positions.
5. Equal compensations for Men and Women.



Voluntary benefits

With the aim of improving the standard of living of its people and of helping them balance their professional and family obligations, and in addition to its competitive compensation package, METKA S.A. offers a varied employee benefits plan over and above its statutory obligations. These benefits are adapted depending on the capabilities and level of managerial responsibility of each employee.

Voluntary benefits offered by the Company over and above its statutory obligations

Personnel Group Insurance Plan, which includes: life insurance – permanent and total incapacitation due to illness – death due to accident – permanent total and permanent partial incapacitation due to accident – loss of income due to illness or accident – hospital and out-of-hospital health and medical care

Special anniversary gift payments on completion of 10, 20, 30 and 35 years of service with the Company

Vouchers for Christmas and Easter purchases

Coverage of school expenses and scholarships for children of Company employees

Organisation of a festive event for children in collaboration with the Employees' Union or the Group*

Festive Event organised by the Union of Plant Employees with the financial assistance of the Company*

Provision of company cars (through leasing) to the Company executives

Corporate card for fuel expenses and free use of mobile phones

Free Laptop and BB

Loans – Monetary Facilities

Work gear and meals*

Childrens' Summer Camp

Tickets for theatre shows and various cultural events*

Additional vouchers for purchases plus a fixed amount for parents of large families

Payment of a fixed amount for childbirth

Higher compensations for day-labourer layoffs

Higher compensations for day-labourer retirement

Night Shift Allowance, depending on the specialisation

* Also applies to part-time employees or employees with fixed-term contracts.



Environment

According to the corporate Environmental Policy, as specified by the Company's ISO 14001:2004-certified Environmental Management System, adherence to and compliance with all regulations and requirements that refer to environmental issues and concern its operations is a core commitment for METKA S.A.

The Company's strict compliance with the applicable laws (operating licenses, approved Environmental Terms etc.), its implementation of an environmental legislation revision and updating procedure, and its application of all relevant rules and regulations on corporate activities, have resulted in the absence of any sanctions (monetary or otherwise) for non-compliance with the environmental rules and regulations.

Management of natural resources (materials)

The activities of METKA S.A. concern the manufacturing and assembly of products, i.e. involve the use of complex materials/products such as turbines, power generators, pumps etc. for incorporation in the products, as well as the use of more simple materials/products, such as merchant bars (beams, pipes, steel plates, axles, cast parts etc.) for manufacturing (cutting, welding, processing, hardening) in its industrial installations or in those of its subcontractors. The manufactured products are then taken to the project construction sites, so that assembly/erection of the final product (e.g. a power plant) can take place.

Thus, METKA S.A. does not manage primary natural resources, but instead manages semi-finished or finished products, in accordance with the detailed plans/blueprints and procedures for each project, which specify with great accuracy all materials to be used, their manufacturing method and their exact position and operation. These plans/blueprints and procedures constitute the Company's know-how, which conforms to the latest developments in the respective fields of expertise.

Energy consumption

According to the Company's Environmental Policy, its efforts in this area focus on taking significant initiatives aimed at the rational management of energy consumption.

The Company's regular activities in this area include the following:

1. Replacement of plant-workshop floors with translucent panels to increase natural light and reduce the usage periods of light bulbs.
2. Replacement of incandescent light bulbs with fluorescent lamps to reduce energy consumption.
3. Replacement of company cars every three or four years with new vehicles with anti-polluting technology and low fuel consumption.



The continuous supervision and guidance of its personnel in order to reduce water consumption is a standing practice in the Company's operation.

4. Continuous regular maintenance of the Group's vehicles and machinery.
5. Placement of reflective membranes on the window panes of the Company's main building to reduce the use of air conditioning during the summer months.
6. Replacement of the cladding of the Company's main building with special insulating material to reduce heat loss.
7. Programme for the replacement of Plant Equipment with newer technology, reduced consumption modern equipment.
8. Use of software applications for correspondence and electronic exchange of documents, to reduce printouts and photocopies.
9. Use of "energy saver" technology photocopiers and other machines.
10. Replacement of fuel oil with natural gas for heating, as natural gas is more environment-friendly.
11. Use of re-filling services for ink containers and toner cartridges.
12. Collaboration with companies and suppliers that have in place an environmental policy or implement related programmes.
13. Selection, during the design stage, of recyclable materials in the projects that METKA S.A. is implementing as EPC Contractor.

| | |
|---|------------|
| Direct energy consumption* (in GJ) | 2010 |
| Total direct energy consumption (GJ) | 100,283.00 |
| Total direct energy consumption / person (GJ) | 8.30 |

* The total use of direct energy refers to primary sources of energy purchased by the Company for its own consumption and, more specifically, to diesel oil and natural gas which are used for heating/transport and not for the Company's production activities. No energy is produced or sold by the Company.

| | | |
|--|-----------|-----------|
| Indirect energy consumption* (in GJ) | 2009 | 2010 |
| Total indirect energy consumption | 18,056.00 | 18,690.00 |
| Total indirect energy consumption / person | 24.8 | 26.14 |

* The total use of indirect energy refers to secondary energy which is purchased and consumed by the Company from non-renewable energy sources and, more specifically, to electricity. The quantity of primary fuels for the consumption of electricity cannot be estimated.

Water consumption

According to Environmental Policy of METKA S.A., the Company's initiatives in this area focus on systematic efforts for rational consumption of drinking water. The total quantity of water used by the Company during 2010 and drawn from public water supply companies was reduced by 12% compared to the previous year.

The continuous supervision and guidance of its personnel in order to reduce water consumption is a standing practice in the Company's operation. Total water consumption per person for 2010 stood at 15.65 m³, down 25.4% from 2009.

| | | |
|--|--------|--------|
| Total water consumption (in m ³) | 2009 | 2010 |
| Water consumption | 11,391 | 10,030 |
| Water consumption / person | 15.65 | 11.68 |

Waste disposal

The policy followed by METKA S.A. aims to ensure the correct management of the waste produced by the Company's activities, giving priority to separation at the source, recycling and final disposal in order to conserve natural resources.

The Company's regular actions in this specific area include the following:

1. Development of a Site Waste Management Plan (SWMP) for every project carried out by the Company. The SWMP, which is developed prior to the commencement of all construction activities, aims to minimise the generation of waste by the project and to examine ways to reuse or recycle this waste.
2. Definition of waste types, categories and quantities, so that they can be classified either for reuse or for recycling or otherwise disposal:

Urban wastewater

With regard to urban wastewater, chemical toilets are used or a sealed cesspit is constructed.

Non-hazardous waste

- Areas for disposal of non-hazardous waste are designated, and marked with appropriate signage.

- Waste is grouped by type (metals, wood, paper, inert materials, household waste etc.), aiming to increase recycling activity using the infrastructures available locally.
- All contractors are informed about the locations for the disposal of materials.
- Waste is collected in disposal areas or bins and, where waste management is not conducted by the Project Owner, is made available to certified removal companies for recycling or final disposal.

The Company's policy is to secure the annual funds that will allow it to implement its policies on the protection of the environment.

Hazardous waste

- Used mineral oils, accumulators' equipment and vehicle tyres remain in the workshop where their replacement takes place or are carried outside the Project site by the crew carrying out the replacement for final management.
- Tanks with appropriate signage are installed for mineral oils or batteries or other hazardous waste which may be collected within the plant.
- For chemical waste, a file is kept containing all Material Safety Data Sheets (MSDS) with information about the method for their discharge and their characteristics, and about the method for dealing with leakages.
- Where waste management is not carried out by the Project Owner, this waste is delivered to licensed removal companies.
- All Company employees and contractors are informed about the locations for the disposal of materials and about the waste management methods in accordance with the MSDS.

| WASTE RECYCLING | 2009 | 2010 |
|---|------|-------|
| Batteries (kg) | 75 | 13 |
| Light bulbs (kg) | 60 | 60 |
| Paper (m³) | 54 | 56 |
| Urban waste (m³) | 53 | 53 |
| Printer consumables (toner cartridges etc.) (pcs) | 259 | 397 |
| Iron and steel scrap (tn) | 697 | 196,2 |
| Mineral oils (tn) | 3.1 | 5.7 |
| Wash oils (tn) | 22 | - |

Recycling of waste is carried out by licensed companies for each type of waste, at no direct cost to the Company:

- Batteries (companies: Recycling of Portable Batteries S.A. [AFIS S.A.], System for Alternative Management of Batteries S.A. [SYDESIS.A.]
- Toner cartridges, Ink Containers (company: Mr. Print)
- Paper (company: S. Tsiloglou)
- Light bulbs (company: Appliances Recycling S.A.)
- Electrical and Electronic equipment (company: Appliances Recycling S.A.)

Urban waste is collected in special recycling bins installed by each Municipality. Used mineral and wash oils are made available by the Company's plants to a licensed company for further treatment/recycling, and scrap quantities are sold and made available to the steel industry for recycling.

Environmental expenditures

The Company's policy is to secure the annual funds that will allow it to implement its policies on the protection of the environment and to ensure the continuous improvement of its environmental performance.

The Company's key environmental actions refer to its environmental certification, the training of its personnel, the waste management and the improvements of its Environmental Management System.

Disposal and restoration of waste is carried out at no cost to the Company, while during 2010 the cost for its environmental certification stood at €2,800.

Market

A key pillar of the corporate philosophy of METKA S.A. is the avoidance of all unfair associations with potential competitors which may lead to price fixing, concerted submissions to tenders, creation of market or production restrictions, allocation of clients and any other action or practice leading to anti-competitive conduct.

As a result of this policy, the Company has never been the subject of any petitions to the Courts for anti-competitive conduct or infringement of the law in connection with incidents involving the Company.

METKA S.A. has also concluded significant investment agreements with foreign companies in which the signature of a "Code of Conduct" on (among others) human rights was a key condition. These agreements were of particular significance not only in terms of the financial investments involved, but also in terms of the prospects for expansion of the Company's activities in the rapidly growing energy market and in the defence industry.

During 2010, a total of two (2) such significant investment agreements containing clauses on human rights were concluded, and the corresponding percentage is 67%.

Client satisfaction

The policy of METKA is to continuously monitor and improve client satisfaction, incorporating the results of this procedure into its operations.

Furthermore, the Company seeks to satisfy its clients and its other stakeholders, in terms of the quality of its products (materials-services), the protection of the environment and the safety of employees.

The Company's regular actions in this specific area, which refer to the frequency of assessment of the client's satisfaction upon delivery of the project, are the following:

1. Progress and results evaluation for every project, after completion. The Project Officer completes a relevant questionnaire and provides comments on the following key points concerning the project:
 - Administrative issues, adherence to the schedule, submission of documents.

- Quality issues – coverage of quality requirements, occurrence of cases of non-compliance.
- Financial issues.
- Communication issues.
- Issues concerning flexibility and the ability to understand needs.
- Environmental and Health & Safety issues.

At the next step, the information collected is translated into numeric values and an aggregate client satisfaction indicator is obtained.

2. Furthermore, in order to improve client satisfaction, the Company also adopts the following actions:

- Establishment of objectives.
- Internal audits.
- Data analysis.
- Preventive and corrective actions.
- Employee training.
- Use of specialised software to manage information exchange.
- Environmental protection and Health & Safety plans.
- Management reviews.

During 2010 no complaints (with corresponding justification) were made to the Company for breaches of client privacy and loss of personal data of clients.

Health and safety of products

The policy of METKA S.A. is to monitor the quality, safety and health measurements and characteristics of its end-products or projects, in order to ensure that the client's stated requirements are met. This is carried out at appropriate stages during the implementation of the product or project in accordance with the respective activity schedule. An additional target is to ensure that the materials/ products to be incorporated which do not comply with the stated quality; safety & health requirements will be checked and identified as such, so as to avoid their intentional use or delivery.

The Company's regular actions in this specific area include the following:

1. Design/planning Stage: The internationally applicable European Directives on the design of such projects, such as the Directive on the non-use of prohibited materials such as asbestos, the ATEX (ATmosphères EXplosibles) Directive, the PED Directive (Pressure Equipment Directive) etc. are taken into account, and relevant studies are produced, such as the Hazard and Operability study (HAZOP).
2. Procurement and manufacturing stage for incorporated materials: Subcontractors are inspected to confirm the application of the design and of the European Directives (pressure equipment – machinery - low voltage - CE marking), the compliance with the health and safety regulations, and the implementation of the manufacturing Inspection and Testing Plan (ITP).
3. Construction Stage: Implementation of the Health, Safety and Environmental Plan, keeping of the Material Safety Data Sheets (MSDS) file for the management of hazardous materials, application of the design/study and of the European Directives, implementation of the construction Inspection and Testing Plan (ITP).
4. Implementation, under the responsibility of the Company's Quality Division, of an Inspection and Testing Plan (ITP) for the materials due for incorporation as well as for the construction activities. The purpose of this plan is to coordinate the measurement/control and monitoring activities regarding the product/project.
5. Issue, under the responsibility of the Company's Quality Division, of a Health, Safety and Environmental Plan for the construction activities.
6. Strict adherence to the applicable laws (operating licenses, approved Environmental Terms etc.).
7. Keeping of a file with the results of the monitoring and measurements processes as hard evidence of the compliance of the product/project with the stated requirements, with copies delivered to the client.
8. Adoption of measures to eliminate non-compliance of the materials due for incorporation.
9. Approval of the use, acceptance or sign-off of the materials due for incorporation, with the consent of the relevant competent authority and, where required, of the client.
10. Adoption of measures to rule out the use or application of non-compliant materials for the purposes originally intended.
11. When a non-compliant material due for incorporation is subject to corrective action, this material is checked again to confirm its compliance with the requirements.
12. When a non-compliant material due for incorporation is identified after it has been delivered or used, the action taken by the Company depends on the effects of the non-compliance.
13. The nature of cases of non-compliance and the adoption of the respective measures are recorded and kept on file.
14. The equipment operation and maintenance instructions are delivered to the client.
15. The Health & Safety File is forwarded to the client, who will keep and use it during the operation of the project.

As a result of the above policy and initiatives, no project has gone through the final delivery stage to a client of METKA without first ensuring that all statutory Health & Safety requirements (as specified by the contract, the applicable laws and the project specifications) have been met.

Additionally, no sanctions have been imposed on the Company by administrative authorities or by the Courts for non-compliance with the applicable laws and regulations on the sale and use of its products and services.

Responsible product Marketing

The policy followed by METKA S.A. is to monitor closely the framework of legislative provisions regarding the transparency of its communication.

Our communications aim to provide transparent information and to ensure that our messages are fully understood by all our clients. It is our standing policy to collaborate with companies that are bound by the Hellenic Code of Advertising-Communication Practice, whose principles provide that all advertising should be legal, decent, honest and truthful, should be prepared with a due sense of social responsibility and should conform to the principles of fair competition, as generally accepted in business.

During 2010 no cases were brought against the Company for non-compliance with the regulations and voluntary codes on marketing communications, including product promotion and sponsoring.

During 2010 there were no incidents of refusal or non-compliance by a Company supplier or contractor regarding the requirement for compliance with the clauses on the protection of human rights.

Management of local suppliers

METKA S.A. sources the complex products incorporated in its projects primarily from specialised suppliers located in economically developed countries. The products sourced by the Company for its construction sites and offices in the local market comprise mainly office consumables (paper, stationery etc.), energy, water, lubricants and paints. The cost of these products as a share of the Company's total purchases is very low.

Management/selection of all Company suppliers takes place based on their solvency, reliability in terms of quality and punctuality in terms of delivery, capability to ensure the quantities required, and compliance to the key environmental and safety principles. The term "local supplier" is a function of the region where each project is carried out (e.g. offices and construction sites in Greece, Pakistan, Romania, Syria, Turkey), progressively extending to cover the entire territory of each country.

The Company's important suppliers and contractors number around 500 in total. All the contracts that the Company concludes with them contain clauses regarding their obligation to adhere to the legislation and to comply with the provisions of the laws, to ensure and maintain the safety and protection of personnel, to pay to personnel all

types of statutory or contractual wages and salaries, to take out and maintain in effect insurance policies for, among others, Employer and General Third Party Liability, Personnel Compensation etc. A small number of contractors and suppliers also sign a separate "Code of Conduct" on human rights, in addition to the aforementioned contract clauses.

Finally during 2010 there were no incidents of refusal or non-compliance by a Company supplier or contractor regarding the requirement for compliance with the clauses on the protection of human rights.

Collaborations with social partners

METKA S.A. is collaborating with the **Association of Industries in Thessaly and in Central Greece (AITC)**, which aims to protect and promote the financial, ethical and professional interests of its members and to carry out studies and scientific research to support industrial development in Thessaly.

Furthermore, Company employees participate in trade unions (local, sectoral or professional), in the Volos Labour Unions' Centre or also in the Pan-Hellenic Metalworkers' Federation (POEM), either in their Administrations or as members.



Society

METKA S.A. is actively committed to the respect of the legal order and of the environment, to safe working conditions, to the satisfaction of its clients and in general to the strict compliance with the standards and laws governing its business activity sector. In line with the above, the Company is taking a number of initiatives that comprise the following: (a) following closely all developments in the legislation that governs its business activities; (b) bearing the cost (pecuniary or organisational) of fulfilling all its obligations under the applicable laws; (c) collaborating with auditing mechanisms of the Public Administration; and (d) using specialised external services (legal, technical, auditing etc.), wherever required.

Engagement with Stakeholders

In 2010 METKA S.A. proceeded to engage its key Stakeholder groups for the first time in a dialogue on Corporate Responsibility, through a dedicated one-day event held in its premises. The purpose of the event was to provide a forum where Stakeholders could express their opinions and expectations in response to the business, environmental and social policies and initiatives of METKA S.A., and the mutual exchange of views thereon. The subjects addressed were prepared together with the participants. In summary, the results in terms of the expectations on the part of the Company's Stakeholders are the following:

Business partners

They expressed their strong satisfaction with the presence and contribution of METKA, especially in the local market, the particular information and dialogue initiative of the Company, and its social and environmental actions. They proposed the support of research institutions for strengthening the dissemination of technological knowledge. They also proposed to the Company to adopt and launch an initiative for granting scholarships to engineers and other specialisations of interest to the Company. The need for further cooperation of the Company with Universities was pointed out.

Non-Governmental Organisations (NGOs)

They expressed their satisfaction with the particular Company initiative and with the Company's continued positive contribution to their work. They asked the Company to continue to assist and support their activities.

Associated companies - Suppliers

They expressed their overall satisfaction with the particular initiative of the Company and responded positively to the presentation of the Corporate Social Responsibility subjects. They expressed the need for systematic measurement of the total carbon dioxide emissions produced by the Company's activities.

Press

They expressed their very positive impression for the particular social consultation initiative of the Company.

Support of local community

METKA supports the local communities by providing assistance to social actions in the local communities of N. Iraklion (Attica) and Magnisia, and in several cases provides support to local communities located near the construction sites of the Company's projects. The Company's sponsoring and social actions cover sports and social activities (coverage of the needs of voluntary organizations), as well as cultural events. The key beneficiaries of the Company's initiatives are Educational Institutions, Municipal Authorities, Sport Federations and Sports Clubs, Charities, Public Benefit Organisations, NGOs and Employee Unions.

The Company's total social expenditure during 2010 stood at €339,415, up 11% compared to 2009, and is broken down as follows:

| Financial assistance to social organisations (in €) | Actions | 2009 | 2010 |
|--|---|-------------|-------------|
| Activity area | Description of action. | Expenditure | Expenditure |
| Support of NGOs, societies, associations and organisations of public benefit | Financial support to cover the needs of children with a disability, with chronic illnesses etc. | - | 15,500 |
| Community development | Financial assistance to local sports clubs. | - | 3,076 |
| Arts and Culture | Financial assistance to cultural events. | - | 20,000 |
| Sports | Financial assistance to Federations and major sport events. | 151,000 | 269,432 |
| Support of Entrepreneurship | Financial support of events held by business organisations. | 5,950 | 14,085 |
| Education | Assistance to educational institutions for addressing their needs in equipment. | - | 17,322 |
| Health | Financial support of an association for children with a disability. | 5,000 | - |



| GRI Code | Description | Comments/Coverage | Page |
|---|---|---|-----------|
| Organisational Profile | | | |
| 2.1 | Name of the organisation | «METKA S.A.» | |
| 2.2 | Primary brands, products and/or services | | 70, 118 |
| 2.3 | Operational structure of the organisation | | 119 |
| 2.4 | Location of organisation's headquarters | 8, Artemidos, 151 25 Maroussi Athens, Greece | |
| 2.5 | Number of countries where the organisation operates | 4 (Greece, Romania, Turkey & Syria) | 71 |
| 2.6 | Nature of ownership and legal form | | 9 |
| 2.7 | Markets served | | 118-119 |
| 2.8 | Scale of the reporting organisation | | 118 |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | No change | |
| 2.10 | Awards received in the reporting period | | 11 |
| Report Parameters | | | |
| 3.1 - 3.11 & 3.13 | Report Parameters | These indicators covered the company since the unity of the Group | 5 - 7 |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | | 140-141 |
| Governance, Commitments and Engagement | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy or organisational oversight | | 118-122 |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | | 120 |
| 4.3 | Independent and/or non-executive members of the Board of Directors | | 119 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | | 121 |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance) | | 25 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | | 25 |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | | 25 |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation | | 25 |
| 4.9 | Exercise of governance by the Board of Directors | | 20-33 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | | 26 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | | 26, 28-33 |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | | 15 |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | | 137 |
| 4.14 | List of Stakeholder groups engaged by the organisation | | 35 |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | | 35 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | | 36 |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | | 138 |
| Economic Indicators | | | |
| EC1 | Direct Economic Value | | 118 |
| EC6 | Policy, practices and proportion of spending on locally-based suppliers at significant locations of operation | | 137 |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at locations of significant operation | | 124 |
| Environmental Indicators | | | |
| EN1 | Materials used by weight or volume | | 132 |
| EN3 | Direct energy consumption by primary energy source | | 133 |
| EN4 | Indirect energy consumption by primary energy source | | 133 |
| EN6 | Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. | | 132-133 |
| EN8 | Total water withdrawal by source | | 133 |

| GRI Code | Description | Comments/Coverage | Page |
|--|---|--|---------|
| EN9 | Water sources significantly affected by withdrawal of water | | 133 |
| EN22 | Total weight of waste by type and disposal method | | 133-134 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | | 132 |
| EN30 | Total environmental protection expenditures and investments by type | | 134 |
| Labour Practices and Decent work Indicators | | | |
| LA1 | Total workforce by employment type, employment contract and region | | 123 |
| LA2 | Total number and rate of employee turnover by age group, gender and region | | 124-125 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees by major operations | | 81 |
| LA4 | Percentage of employees covered by collective bargaining agreements | 100% of permanent staff of the company | |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities by region | | 126-127 |
| LA10 | Average hours of training per year per employee by employee category | | 128-129 |
| LA12 | Percentage of employees receiving regular performance and career development reviews | | 126 |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity. | | 130 |
| LA14 | Ratio of basic salary of men to women by employee category | | 130 |
| Human Rights Indicators | | | |
| HR1 | Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening. | | 137 |
| HR2 | Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken | | 137 |
| HR4 | Total number of incidents of discrimination and actions taken | | 130 |
| HR6 | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor. | | 123 |
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor | | 123 |
| HR9 | Total number of incidents of violation involving rights of indigenous and actions taken | Nil | |
| Social Indicators | | | |
| SO4 | Actions taken in response to incidents of corruption | No actions taken. No incidents of corruption reported to the Group's internal Audit Department. Full | |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices and their outcomes | Nil | |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | | 138 |
| Product Indicators | | | |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their lifecycle, by type of outcomes | | 135-136 |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction | | 135 |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes | | 136 |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer personal data | | 135 |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. | | 135-136 |

■ Core Indicator ■ Additional Indicator



Energy Sector: PROTERGIA S.A.

Key financial figures (in €)

| Economic Value Table | 2010 |
|--|------------|
| Revenues | 11,693,016 |
| Operating costs | 13,026,998 |
| Employee salaries and benefits | 3,724,960 |
| Payments to Government bodies (taxes) | 2,811,979 |
| Payments to capital providers (interest and shareholders' dividends) | 3,386,709 |
| New investments | 48,604,645 |
| Investments in local communities | 209,249 |
| Outlays to local suppliers | 477,932 |

The MYTILINEOS Group anticipated and envisioned the potential for the energy sector in Greece and the catalytic role that a Greek business could have in helping bring about the conditions that would allow the deregulation of the energy market and the promotion of private-sector initiatives.

Today the MYTILINEOS Group is active in the energy sector through its participation in wholly-owned subsidiaries such as PROTERGIA S.A., ALUMINIUM S.A. or in Joint Ventures with other business partners such as KORINTHOS POWER S.A., established in association with MOTOR OIL.

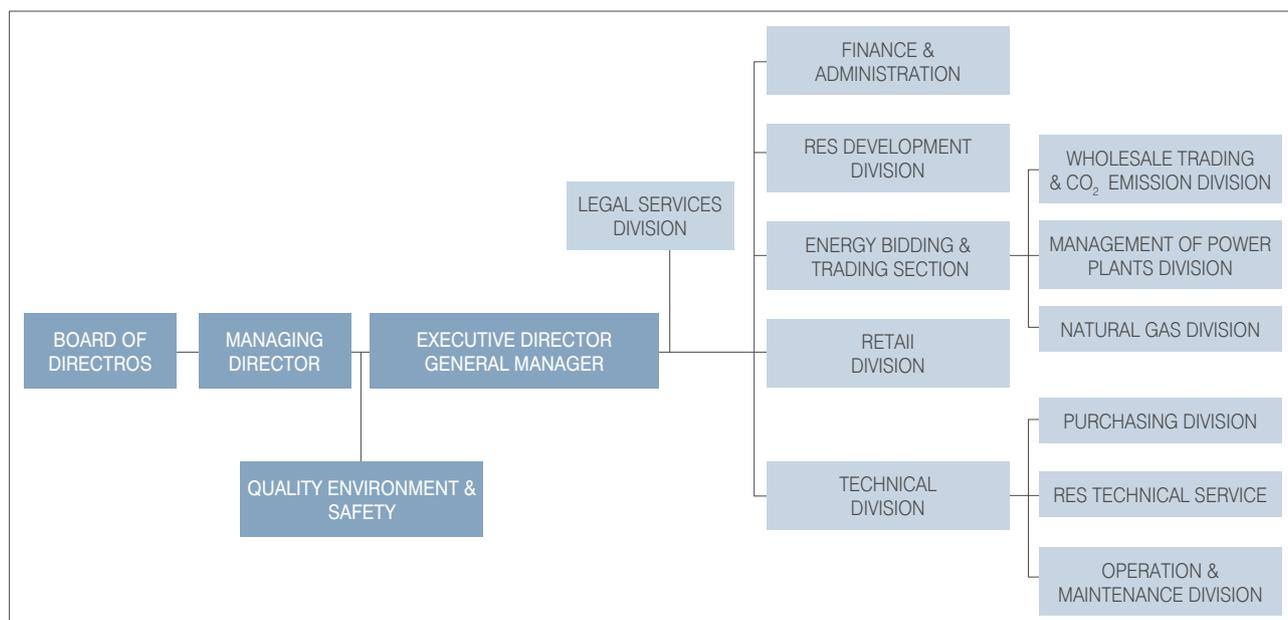
The establishment in July 2010 of PROTERGIA S.A., the new strong Greek enterprise in the energy sector and a wholly-owned subsidiary of the MYTILINEOS Group, was the natural outcome of the strategy which the Group established from its entry in the energy production and trading market in 2002 to this day. PROTERGIA S.A. is the company managing all energy assets and operations of the Group.

PROTERGIA S.A., headquartered in Maroussi, was established in 2010. It was conceived and implemented aiming to become the largest independent energy producer in Greece. The Company owns or manages, directly and/or on behalf of other Group subsidiaries, a substantial portfolio comprising thermal and RES plants in operation or under construction or development, which include:

1. A total of 1.2 GW from thermal plants in operation by 2011:
 - a) One 444 MW combined cycle gas fired plant (CCGT), owned by PROTERGIA S.A., in the Energy Complex of Ag. Nikolaos (Viotia). The plant operates since January 2011,
 - b) One 334 MW gas fired combined heat and power plant (CHP), owned by ALUMINIUM S.A., operating in the Energy Complex of Ag. Nikolaos (Viotia). The plant was connected to the National Grid in April 2008 and
 - c) One 436 MW combined cycle gas fired plant (CCGT), owned by KORINTHOS POWER S.A., in Ag. Theodori (Korinthia). The plant is expected to enter into operation in 2011.
2. A total of 41.7 MW from RES plants in operation today (35.6 MW from Wind Farms and 6.06 MW from Small Hydropower Plants).
3. A total of 500 MW from RES plants in operation by 2015.
4. A total of 1,200 MW from RES plants in various stages of development.
5. Electricity trading licence (310 MW).
6. Greenhouse gas emissions trading platform.
7. Natural Gas Supply.

Governance Structure

Organisational Structure



Composition of the Board of Directors

Composition of the Board of Directors as elected by the Extraordinary General Meeting on 03.11.2010 and formed as a body:

| Title | Name |
|-----------------------------------|----------------------|
| Chairman | Evangelos Mytilineos |
| Vice-Chairman & Managing Director | Ioannis Mytilineos |
| Executive Director | Dinos Benroubi |
| Member | Ioannis Desypris |
| Member | Evangelos Chrysafis |
| Member | Ioannis Dimou |
| Member | George Pallas |

The term of the members of the Board of Directors expires on 2/11/2015 with an option for automatic extension until 30/06/2016.

Role and responsibilities of the Managing Director

All the authorities of the Board of Directors have been delegated to the Vice-Chairman & Managing Director of the Company. The Vice-Chairman & Managing Director is the Company's legal representative, acts in a binding capacity for the Company in all transactions with natural or legal entities of private or public law, administers the Company's property and undertakes all types of obligations in the name and on behalf of the Company, binding the Company in general by placing his signature under the Company's name. In addition, the Vice-Chairman and Managing Director shall have the right to delegate in writing to one or more members of the Board of Directors or to third parties the exercise of part or all of his authorities and responsibilities regarding the representation and administration of the Company.

Role and responsibilities of the Executive Director – General Manager

On 03.11.2010 the Board of Directors of the Company appointed Executive Director Mr Dinos Benroubi as General Manager of the Company. The Executive Director – General Manager leads all Company managers, manages the Company and takes the necessary decisions within the framework of its Articles of Association and of the general and special authorisations he has been granted by the Board of Directors and by the General Manager, for the purpose of resolving the day-to-day issues arising in connection with the management of the Company. In addition, he submits to the Management the proposals and recommendations required for the attainment of the objects specified in the Articles of Association and for the establishment of the Company's strategic and business action planning, and ensures and coordinates the implementation of the strategic, business and financial planning, decided by the Management based on his proposals, as well as the Company's transactions.

Finally, he issues instructions and guidelines to the Company's managers on the implementation of the Company's general policy, the implementation of the annual budgets approved by the Management based on his proposals, and the implementation of long-term development programmes; sets targets for the Company's Departments and follows up their achievement, ensures the application of the approved procedures in all Company sectors and activities; executes the decisions of the Board of Directors and the Managing Director, decides on Company personnel matters; and takes all measures necessary for the development and utilisation of Company personnel.

Human resources

PROTERGIA S.A. gives particular attention to the management of its human resources, who share the corporate vision and contribute to the Company's business orientation.

For PROTERGIA S.A., its human resources are its most important. Stakeholder group, and for this reason the proper management, development and utilisation of every employee are key parameters that influence the position of the Company and the achievement of its business goals.

PROTERGIA S.A. complies with the provisions of the laws and rules out all likelihood of forced labour in its business activity areas, while in connection with child labour no business activity of the Company presents a risk of occurrence of such incidents.

Furthermore, it is the policy of the Company to ensure the absence of any discrimination whatsoever in terms of salary between men and women in the same category of personnel, guaranteeing a level of compensation that cannot under any circumstances be lower than the statutory compensation levels provided for by the Collective Labour Agreements. The Company is using the Collective Labour Agreements for the various professional specialisations in industry.

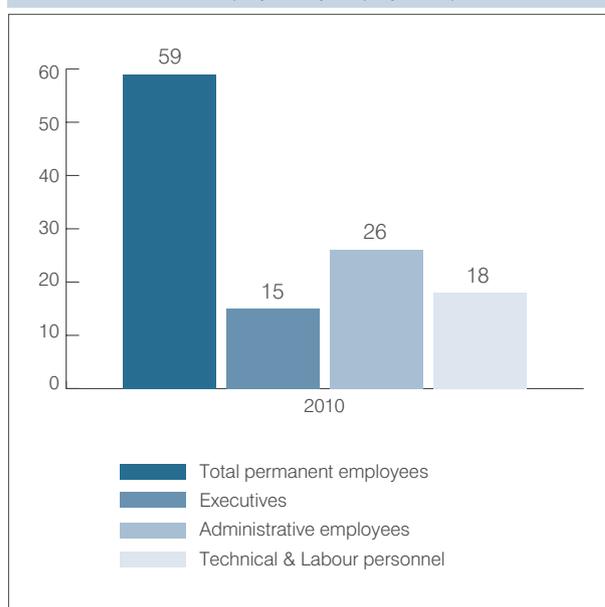
Workforce Data

| | |
|-----------------|------|
| Total workforce | 2010 |
| Total workforce | 59 |

| | |
|------------------------------|------|
| Personnel by employment type | 2010 |
| Total full-time employees | 59 |
| Total part-time employees | 0 |

| | |
|--|------|
| Personnel by type of employment contract | 2010 |
| Open-end employment contracts | 58 |
| Fixed-term employment contracts | 1 |

Permanent employees by employment position



| | |
|--|------|
| Personnel by geographical region | 2010 |
| Personnel from the Athens region | 39 |
| Personnel from regions outside Attica (personnel from the Ag. Nikolaos region) | 20 |



Employee turnover

During 2010, the total number of Company employees increased by eight (8). More specifically, 22 new employees joined the Company and 14 employees left (of which 6 and 2, respectively, were internal transfers within the MYTILINEOS Group). Of the remaining 12 employees who left the Company, 7 were voluntary departures and the other 5 left because their contracts were terminated due to management changes in the Company's structure.



| Personnel departures by gender and age group | 2010 |
|--|-------|
| Personnel departures – Total | 14 |
| Personnel departures (Men) | 9 |
| <i>As a percentage of total personnel departures</i> | 64.3% |
| Personnel departures (Women) | 5 |
| <i>As a percentage of total personnel departures</i> | 35.7% |
| Personnel departures (<30 y.o.) | 1 |
| <i>As a percentage of total personnel departures</i> | 7.1% |
| Personnel departures (30-50 y.o.) | 11 |
| <i>As a percentage of total personnel departures</i> | 78.6% |
| Personnel departures (>50 y.o.) | 2 |
| <i>As a percentage of total personnel departures</i> | 14.3% |

| Personnel departures by geographical region | 2010 |
|--|------|
| Departures from the Attica region | 14 |
| <i>As a percentage of total personnel departures</i> | 100% |
| Departures from regions outside Attica | 0 |
| <i>As a percentage of total personnel departures</i> | 0% |

Occupational Health and Safety

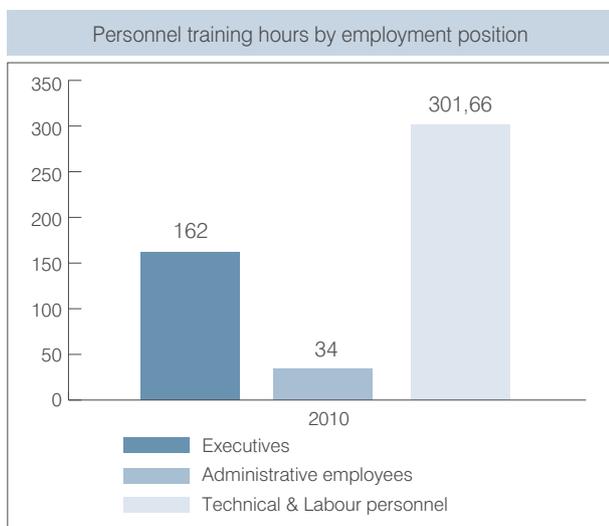
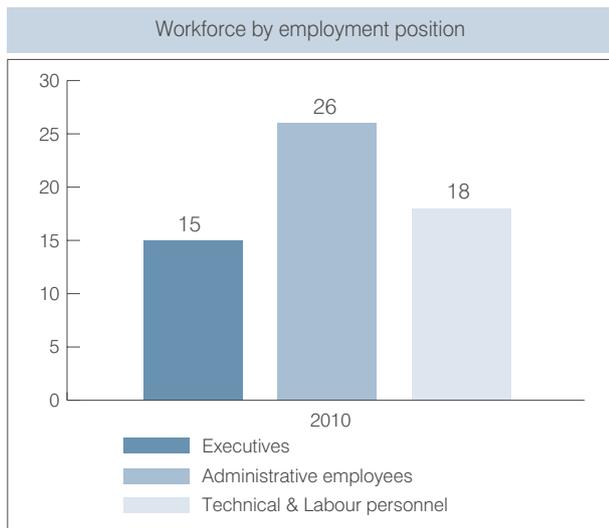
PROTERGIA S.A. places particular emphasis on occupational health and safety, in line with its efforts to upgrade its work environment as well as the working conditions in its individual installations.

| Occupational Health & Safety Data | 2010 |
|---|----------|
| Total workforce | 60 |
| Total days worked by workforce | 13,320 |
| Total hours worked by workforce | 106,560 |
| Total accidents* | 0 |
| Total work-related fatalities* | 0 |
| <i>Injury Rate (IR)</i> | 0 |
| Total occupational diseases | 0 |
| <i>Occupational Diseases Rate (ODR)</i> | 0 |
| Total days lost | 0 |
| <i>Days Lost Rate (LDR)</i> | 0 |
| Total days of absence from work | 74 |
| <i>Absenteeism Rate (AR)</i> | 1,111.11 |

* Does not include incidents involving very light injuries.

Education and Training

During 2010 PROTERGIA S.A. implemented 3 training programmes with a total duration of 6,192 hours, attended by 65% of the Company's human resources. The training subjects focused on technical training targeted especially to the Company's technicians and labour personnel. The Company's training expenditure for these programmes stood at €15,333.

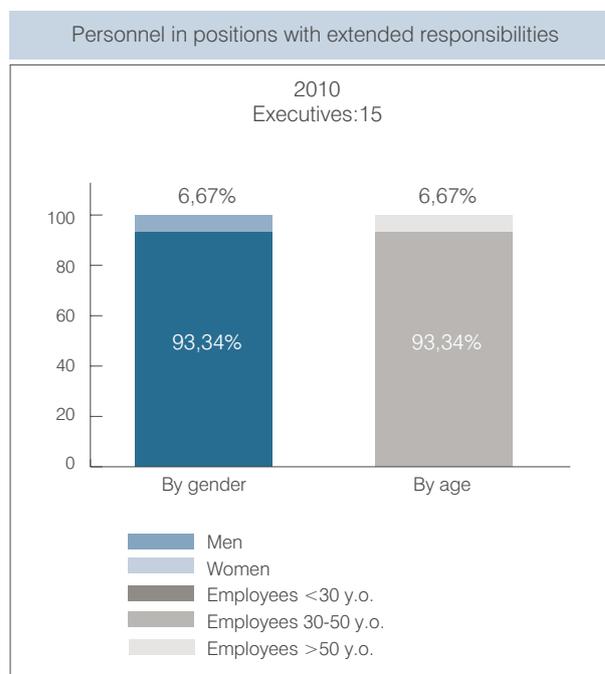
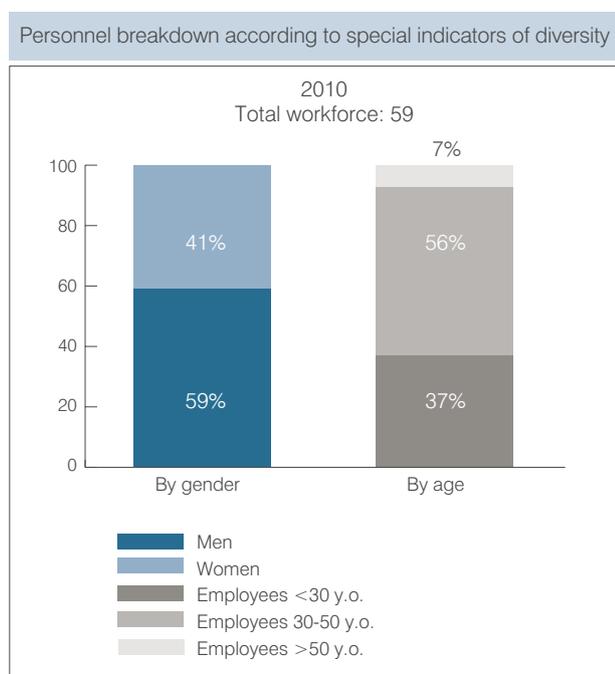


| Training categories & corresponding training hours | 2010 |
|--|-------|
| Technical Training | 5,850 |
| Health & Safety Training | 408 |
| Foreign Languages | 654 |



Equal opportunities and diversity

As a new company, PROTERGIA S.A. applies a policy of equal opportunities for all its employees and ensures the absence of incidents involving discrimination on the grounds of gender or age group across all its activities, from recruitment through to the development of employees and their advancement in the Company. No persons with a disability or persons from ethnic minorities work in the Company. Although it has no official policy in place, PROTERGIA S.A. seeks to recruit executives from the local communities and thus 100% of its senior management executives (the term "senior management" refers only to managers) come from the local community where the Company's operations are located. In addition, no distinction exists in the Company in terms of salary between men and women (executives, administrative employees or technical and labour personnel) in the same level of the hierarchy and in the same category of personnel.



Voluntary benefits

In line with its efforts to help its employees balance their professional and family obligations and to improve their position in the labour market, PROTERGIA S.A. is consistently implementing a statutory and additional voluntary benefits plan. This plan is addressed to all Company personnel, as almost all Company employees are full-time employees.

Voluntary benefits extended to the Company's full-time personnel

Life insurance

Health and medical care

Coverage against disability/incapacitation

Maternity leave in accordance with the provisions of the law

Retirement provisions in accordance with the law

The production units of the Company which are located adjacent to or inside protected areas, are wind farms and as such are environment-friendly.

Environment

PROTERGIA S.A. is actively concerned about its environmental footprint, an attitude that reflects the Company's commitment to sustainable development. This means that a proper risk management system is in place to ensure the protection of the environment. The achievement of this goal requires proactive management of and approach to environmental risks, as part of a comprehensive framework comprising preventive measurements, systematic monitoring, assessment and regular inspections.

As already mentioned, the Company's key concern is to ensure its compliance with the environmental laws and regulations. The Company's success in this area is demonstrated by the fact that no sanctions have been imposed by administrative authorities or by the Courts for non-compliance with such laws and regulations.

Energy consumption

The consumption of energy in PROTERGIA S.A. refers to the consumption of secondary energy from non-renewable sources and, more specifically, to the consumption of electricity.

| | |
|--|--------|
| Total energy consumption (in GJ) | 2010 |
| Indirect energy consumption (Electricity)* | 975.88 |

*Electricity purchased by the PPC for the Company offices.

Water consumption

The total volume of water used during 2010 in Company activities (Company offices) and drawn from public water supply companies stood at 1,318 cubic metres.

| | |
|--|-------|
| Total water consumption (in m ³) | 2010 |
| Water consumption | 1,318 |

Waste disposal

The activities of PROTERGIA S.A. during 2010 produced a significant quantity of used paper, which was collected and forwarded for recycling through a licensed contractor (Solid Waste Recycling S.A.).

In order to reduce the use of paper, the Company is promoting electronic mail (e-mail) as the solution to internal communication needs.

| | |
|-------------|------|
| RECYCLINIG* | 2010 |
| Paper (t) | 1.8 |

* Waste is collected and removed by a specialised licensed contractor.

Biodiversity

In connection with the impacts of the Company's operations on Biodiversity, it is pointed out that the production units of the Company which are located adjacent to or inside protected areas, are wind farms and, as such, are environment-friendly (with zero pollutant emissions and no disturbance to the local flora and fauna). In addition, they have obtained all the environmental permits and approvals required under the current national and Community legislation on the protection of the environment and of natural resources.

More specifically, the Sidirokastro wind farm located in the Prefecture of Serres, which is already in operation, as well as its future expansion, are marginally located within the designated area of the Natura 2000 network, as a Site of Community Interest (SCI) with code the GR 1260001, at a distance of approximately 1.5 km from the zone's outer perimeter. These wind farms are also located at a distance of more than 15 km from the Special Protection Area (SPA) with the GR 1260008.

In addition, the Chelona and Pyrgos wind farms in Karystos (Evia), the Xirokampi wind farm (Andros) and the Profitis Ilias wind farm (Lagkadas, Central Macedonia), currently in the licensing stage, will be constructed in SPA areas.

Environmental expenditures

The Company's environmental expenditures for 2010 were limited to the management of its waste and, in particular, to the recycling of paper, at a cost of €1,200. The Company has also approved an expenditure for the implementation of an Environmental Management System, scheduled for 2011.

| | |
|----------------------------------|-------|
| Environmental expenditure (in €) | 2010 |
| Waste management | 1,200 |

Market

PROTERGIA S.A. has the following strategic priorities:

- To acquire and/or manage a dynamic and diversified portfolio of production assets, so as to be able to respond successfully to the ever-changing environment of the Greek energy market and to the European requirements.
- To establish a balanced mix of thermal (gas driven) and renewable energy sources, with a clear emphasis and focus on “green” energy sources.
- To enter dynamically the retail and wholesale markets for electricity trading and the market for trading greenhouse gas emissions.
- To expand in the future in neighbouring countries with increased energy needs.

The objective of PROTERGIA for 2011 is to create a special area on its website (which currently is under construction), which will enable the clients to log their potential complaints at any time.

Non-compliance regarding the use of products

Because of the nature of its product, no sanctions can be imposed on the Company regarding product quality. The Company is always acting in full alignment with the provisions of the laws. However, should a complaint be made against it, as a result of the competition, for non-compliance with the legislation, this will be reported in future Sustainability Reports.

Client satisfaction

The Company's daily contacts with its customers by phone or via e-mail, made necessary due to the nature of its product (daily scheduling of units and Trading), provide its clients with the opportunity to make any complaints or raise any problems they may have, on a daily basis. The objective of PROTERGIA for 2011 is to create a special area on its website (which currently is under construction), which will enable clients to log their potential complaints at any time.

Collaborations with social partners

PROTERGIA S.A. collaborates with the following social partners:

- The **Institute of Energy for South East Europe (IENE)**, whose main activity is the study of energy - related issues and the provision of qualified information to professionals and to the public at large on developments in the energy sector in the broader region.
- The **Hellenic Wind Energy Association (ELETAEN)**, which seeks to promote science and research in the field of wind energy, while also seeking to express effectively the interests of the industry and the market, acting as a lobbying organisation.
- The **Hellenic Association of Electricity Producers from Renewable Energy Sources (HAEPRES)**, whose purpose relates to the construction of wind power plants and facilities to exploit wind energy, as well as other renewable energy sources. The association informs its member companies on matters concerning their activities and the improved promotion and more efficient exploitation of wind power and other renewable energy sources. It represents its member companies before the Greek, international and foreign authorities and organizations.
- The **Hellenic Association of Independent Power Producers (HAIPP)**, an initiative of the largest private power companies, which –after having already implemented significant investments of €1.5 billion in six (6) cutting-edge gas fired power plants– decided to establish an association aiming to manage generation issues and promote matters related to the supply of reliable, affordable and environment-friendly electric power, as well as the deregulation of the market regarding all energy resources.

Society

For PROTERGIA S.A., a fundamental principle and a key part of its mission is its commitment to the compliance with the applicable laws and regulations that govern its business activity sector. The Company believes that its social policy can be effective only if it acts itself as a responsible corporate citizen. Thus, no sanctions by administrative authorities or by the Courts have been imposed on the Company for non-compliance with the applicable laws and regulations.

The social policy of PROTERGIA S.A. is exercised based on the Company's values and visions, and aims to expand and strengthen its social role through specific actions that help address the needs of the local communities where its operations are located.

Support of local community

The Company's total social expenditure during 2010 stood at €164,271 and was allocated to actions aimed at improving infrastructures and at supporting local organisations in specific Municipalities and settlements.

| Financial assistance to local communities (in €) | Actions | 2010 |
|---|---|-------------|
| Name of organisation | Description of action | Expenditure |
| Municipality of Opountion (Prefecture of Fthiotida) | Construction of environmental park | 53,000 |
| Municipality of Dervenochori (Prefecture of Viotia) | Environmental works of the Municipality | 100,000 |
| Various local organisations in Chalkida and Livadia | Donations to local organisations | 2,721 |

| Financial assistance to social organisations (in €) | Actions | 2010 |
|---|--|-------------|
| Activity area | Description of action | Expenditure |
| Sports | Financial assistance of the "Karaiskakis" Sports Club (Mavrommati) | 5,550 |
| Arts and culture | Financial support of an event organised by the Municipality of Opountion | 3,000 |

PROTERGIA S.A. - Key CRS objectives for 2011

In line with its approach to its Corporate Social Responsibility, the Company has set the following objectives for 2011:

- To implement the ISO 9001:2008 International Standard and to obtain the respective certification of its Quality Management System.
- To implement the ISO EN 14001 International Standard and obtain the respective certification of the Environmental Management System for the Viotia IPP.
- To implement the OHSAS 18001 International Standard and obtain the respective certification of the Occupational Health & Safety Management System for the Viotia IPP.

The implementation of the above will allow the establishment of measurable targets and actions for improvement.

- To establish measurements and reports of total direct and indirect greenhouse gas emissions.
- To improve its indicators concerning the collection of waste for recycling.
- To create a special area for customer complaints on its website.
- To develop and apply a procedure for reducing paper consumption, with a targeted 10% reduction for 2011.
- To develop and apply a procedure for the recycling of paper, batteries etc., with a targeted 10% increase of the respective quantities for 2011.
- To develop and apply a procedure for measurement-monitoring of CSR indicators, with a targeted 10% improvement for 2011.

| GRI Code | Description | Comments/Coverage | Page |
|---|---|---|-----------|
| Organisational Profile | | | |
| 2.1 | Name of the organisation | «PROTERGIA S.A.» | |
| 2.2 | Primary brands, products and/or services | | 70, 142 |
| 2.3 | Operational structure of the organisation | | 143 |
| 2.4 | Location of organisation's headquarters | 8, Artemidos, 151 25 Maroussi Athens, Greece | |
| 2.5 | Number of countries where the organisation operates | Greece | |
| 2.6 | Nature of ownership and legal form | | 9 |
| 2.7 | Markets served | | 142-143 |
| 2.8 | Scale of the reporting organisation | | 142 |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | No change | |
| 2.10 | Awards received in the reporting period | None | |
| Report Parameters | | | |
| 3.1 - 3.11 & 3.13 | Report Parameters | These indicators covered the company since the unity of the Group | 5 - 7 |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | | 152-153 |
| Governance, Commitments and Engagement | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy or organisational oversight | | 142-144 |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | | 144 |
| 4.3 | Independent and/or non-executive members of the Board of Directors | | 144 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | | 24 |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance) | | 25 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | | 25 |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | | 25 |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation | | 25 |
| 4.9 | Exercise of governance by the Board of Directors | | 20-33 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | | 26 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | | 26, 28-33 |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | | 15 |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | | 150 |
| 4.14 | List of Stakeholder groups engaged by the organisation | | 35 |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | | 35 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | None | |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | None | |
| Economic Indicators | | | |
| EC1 | Direct Economic Value | | 142 |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at locations of significant operation | | 148 |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement | | 151 |
| Environmental Indicators | | | |
| EN4 | Indirect energy consumption by primary energy source | | 149 |
| EN8 | Total water withdrawal by source | | 149 |
| EN9 | Water sources significantly affected by withdrawal of water | | 149 |

| GRI Code | Description | Comments/Coverage | Page |
|--|---|--|------|
| EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | | 149 |
| EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas | | 149 |
| EN22 | Total weight of waste by type and disposal method | | 149 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | | 149 |
| EN30 | Total environmental protection expenditures and investments by type | | 149 |
| Labour Practices and Decent work Indicators | | | |
| LA1 | Total workforce by employment type, employment contract and region | | 145 |
| LA2 | Total number and rate of employee turnover by age group, gender and region | | 146 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees by major operations | | 148 |
| LA4 | Percentage of employees covered by collective bargaining agreements | 100% permanent staff of the company | |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities by region | | 146 |
| LA10 | Average hours of training per year per employee by employee category | | 147 |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity | | 148 |
| LA14 | Ratio of basic salary of men to women by employee category | | 145 |
| Human Rights Indicators | | | |
| HR4 | Total number of incidents of discrimination and actions taken | | 148 |
| HR6 | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor. | | 145 |
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor | | 145 |
| HR9 | Total number of incidents of violation involving rights of indigenous and actions taken | Nil | |
| Social Indicators | | | |
| SO4 | Actions taken in response to incidents of corruption | No actions taken. No incidents of corruption reported to the Group's internal Audit Department. Full | |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices prohibition and their outcomes | Nil | |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | | 151 |
| Product Indicators – Description | | | |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction | | 150 |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes | Nil | |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer personal data | Nil | |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services | | 150 |

Core Indicator

Additional Indicator



Aggregate Performance Summary

MYTILINEOS Group: Triple Bottom Line Performance

The MYTILINEOS Group is committed to the “Triple Bottom Line” approach, which recommends CSR as the modern method for the management of businesses, according to which the calculation of the overall performance of a company should be based on the company's combined contribution to:

- The Economy (the company's contribution to economic development),
- The Environment (the company's contribution to the protection of natural resources), and
- Society (the company's contribution to maintaining and developing of social cohesion)

| MYTILINEOS GROUP | 2009 | 2010 |
|--|-----------|-----------|
| Economic performance | | |
| Turnover (in million €) | 661.8 | 1,001.3 |
| Gross profits (in million €) | 118.9 | 197.6 |
| Net profits (in million €) | 13.7 | 60.8 |
| Total outlays for new investments (in million €) | 58.6 | 163.8 |
| Total outlays for dividends to shareholders (in million €) | 20.4 | 6.1 |
| Total outlays for employee salaries and benefits (in million €) | 92.1 | 87.2 |
| Total outlays for tax obligations (in million €) | 10.4 | 38.5 |
| Environmental performance | | |
| Total direct energy consumption (in million GJ) | - | 12.55 |
| Total indirect energy consumption (in million GJ) | - | 7.37 |
| Total consumption of water (in million m ³) | 5.13 | 4.64 |
| Total CO ₂ emissions (in tons)* | 1,354,000 | 1,099,675 |
| Total surface of areas affected by mining activities and rehabilitated by 31/12/2010** | - | 82% |
| Total waste recycled or utilised (in tons) | - | 37,943 |
| Total expenditure for environmental protection (in million €) | 2.09 | 3.09 |
| Total number of Environmental Training hours | 553 | 0 |
| Social performance | | |
| Total workforce | 2,599 | 2,249 |
| Total number of women in positions with extended responsibilities | 27 | 26 |
| Share of Executives recruited from local communities | 91.2% | 86.4% |
| Total number of employees from ethnic minorities | 34 | 30 |
| Total number of employees with a disability | 4 | 2 |
| Total number of accidents | 66 | 22 |
| Number of work-related fatalities | 0 | 0 |
| Total number of days lost due to accidents | 990 | 337 |
| Total number of employees who attended Education & Training programmes | 1,229 | 1,341 |
| Average training hours / employee | 32.8 | 50.2 |
| Total number of Occupational Health & Safety training hours | 4,136 | 8,878 |
| Total expenditure for actions promoting social cohesion (in million €) | 1.07 | 1.49 |
| Total expenditure for addressing pressing needs of local communities (in million €) | 0.12 | 0.21 |

*Does not include CO₂ emissions of MYTILINEOS HOLDINGS S.A., METKA S.A., PROTERGIA S.A. and DELPHI-DISTOMON S.A.

** Concerns the Group's mining activities through DELPHI-DISTOMON S.A.

Coverage of the GRI indicators and of the Principles of the UN Global Compact

As already mentioned, this Report has been compiled in accordance with the GRI reporting guidelines. In addition, as part of its obligations stemming from its participation in the UN Global Compact, the MYTILINEOS Group publishes information about the practices it follows regarding the implementation of the Compact's Ten Principles.

The Ten Principles of the UN Global Compact are described in detail below and, in the table that follows, their correspondence is shown with the specific GRI indicators that cover the practices followed to ensure the Group's compliance with to these Principles, as well as the results or expected results of these practices.

The Ten Principles of the UN Global Compact

Human rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

Labour

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4

Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5

Businesses should uphold the effective abolition of child labour.

Principle 6

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges.

Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

| Code GRI | Description of indicators | Page | Comment / Explanation | Correspondence with the UNGG Principles |
|---|--|-----------|--|---|
| Strategy and Analysis | | | | |
| 1.1 | Statement from the most senior decision maker of the organization about the relevance of sustainability to the organization and its strategy | 3 | | |
| 1.2 | Description of key impacts, risks, and opportunities | 3 | | |
| Organisational profile | | | | |
| 2.1 | Name of the organisation | | MYTILINEOS S.A. Group of Companies | |
| 2.2 | Primary brands, products and/or services | 9-10 | | |
| 2.3 | Operational structure of the organisation | 9 | | |
| 2.4 | Location of organisation's headquarters | | 5-7, Patroklou, Marousi 151 25 Athens, Greece | |
| 2.5 | Number of countries where the organisation operates | | 4 (Greece, Romania Turkey & Syria) | |
| 2.6 | Nature of ownership and legal form | 9 | | |
| 2.7 | Markets served | 8-10 | | |
| 2.8 | Scale of the reporting organisation | 11 | | |
| 2.9 | Significant changes during the reporting period regarding size, structure or ownership | 61 | | |
| 2.10 | Awards received in the reporting period | 11 | | |
| Report parameters | | | | |
| 3.1 | Reporting period for the information provided | 5 | | |
| 3.2 | Date of most recent previous report (if any) | 5 | | |
| 3.3 | Reporting cycle | 5 | | |
| 3.4 | Contact point for questions regarding the report or its contents | 7 | | |
| 3.5 | Process for defining report content | 6 | | |
| 3.6 | Boundary of the report (e.g. countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers) | 5 | | |
| 3.7 | State any specific limitations on the scope or boundary of the report | 5 | | |
| 3.8 | Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations | 5-6 | | |
| 3.9 | Data measurement techniques and the bases for calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report | 5 | | |
| 3.10 | Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement | 5 | | |
| 3.11 | Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report | 5 | | |
| 3.12 | Table identifying the location of the GRI-compliant Standard Disclosures in the report | 157 | | |
| 3.13 | Policy and current practice with regard to seeking external assurance for the report | 7 | | |
| Governance, commitments and engagement | | | | |
| 4.1 | Governance structure of the organisation, including committees under the highest governance body responsive for specific tasks, such as setting strategy or organisational oversight | 20 | | |
| 4.2 | Role and responsibilities of the Chairman of the Board of Directors | 22 | | |
| 4.3 | Independent and/or non-executive members of the Board of Directors | 21 | | |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body | 24 | | |
| 4.5 | Linkage between compensation for members of the highest governance body, general managers and top management executives and the organisation's performance (including social and environmental performance) | 25 | | |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided | 25 | | |
| 4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics | 25 | | |
| 4.8 | Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation | 25 | | |
| 4.9 | Exercise of governance by the Board of Directors | 20-33 | | |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance | 26 | | |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organisation | 26, 28-33 | | |
| 4.12 | Externally developed economic, environmental and social charters, principles, or other initiatives subscribed to or endorsed by the organization | 15 | | |
| 4.13 | Membership of associations (such as industry associations) and/or national/international advocacy organisations in which the organization participates | 26-27 | | |

| Code GRI | Description of indicators | Page | Comment / Explanation | Correspondence with the UNGG Principles |
|---|--|------------------|-----------------------|---|
| 4.14 | List of Stakeholder groups engaged by the organisation | 35 | | |
| 4.15 | Basis for identification and selection of Stakeholders with whom to engage | 35 | | |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by Stakeholder group | 36 | | |
| 4.17 | Key topics and concerns raised through Stakeholder engagement | 36-37 | | |
| Economic Performance | | | | |
| | MANAGEMENT APPROACH | 39 | | |
| EC1 | Direct Economic Value | 38 | | |
| EC2 | Financial implications and other risks and opportunities for the organization's activities due to climate change | 39 | | Principle 7 |
| EC6 | Policy, practices and proportion of spending on locally-based suppliers at significant locations of operation | 57, 93, 113, 137 | | |
| EC7 | Procedures for local hiring and proportion of senior management executives hired from the local community at locations of significant operation | 41 | | Principle 6η |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement | 58-59 | | |
| Environmental Performance | | | | |
| | MANAGEMENT APPROACH | 49 | | |
| EN3 | Direct energy consumption by primary energy source | 51 | | Principle 8 |
| EN4 | Indirect energy consumption by primary energy source | 51 | | Principle 8 |
| EN5 | Energy saved due to conservation and efficiency improvements | 51 | | Principles 8 & 9 |
| EN8 | Total water withdrawal by source | 51 | | Principle 8 |
| EN9 | Water sources significantly affected by withdrawal | 51 | | Principle 8 |
| EN10 | Percentage and total volume of water recycled and reused | 52 | | Principles 8 & 9 |
| EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | 52, 82-83, 149 | | Principle 8 |
| EN12 | Description of significant impacts of activities, products, and services on biodiversity | 52, 82-83, 149 | | Principle 8 |
| EN15 | Number of IUCN Red List species and national conversation list species with habitats in areas affected by operating by level of extinction risk | | Nil | |
| EN16 | Total direct and indirect greenhouse gas emissions by weight | 52-86 | | Principle 8 |
| EN22 | Total weight of waste by type and disposal method | 52-55 | | Principle 8 |
| EN23 | Total number and volume of significant spills | 52 | | Principle 8 |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | 50 | | Principle 8 |
| EN30 | Total environmental protection expenditures and investments by type | 56 | | Principles 7, 8 & 9 |
| Labour Practices and Decent Work | | | | |
| | MANAGEMENT APPROACH | 39-40 | | |
| LA1 | Total workforce by employment type, employment contract and region | 41 | | |
| LA2 | Total number and rate of employee turnover by age group, gender and region | 42 | | Principle 6 |
| LA3 | Benefits provided by the Group to full-time employees of its companies, which are not provided to temporary or part-time employees | 47 | | |
| LA4 | Percentage of employees covered by collective bargaining agreements | 40 | | Principle 3 |
| LA5 | Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements | 40 | | Principle 3 |
| LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities by region | 43-44 | | Principle 1 |
| LA10 | Average hours of training per year per employee by employee category | 45-46 | | |
| LA12 | Percentage of employees receiving regular performance and career development reviews | 43 | | |
| LA13 | Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity | 48-49 | | Principles 1 & 6 |
| LA14 | Ratio of basic salary of men to women by employee category | 48 | | Principles 1 & 6 |
| Human Rights | | | | |
| | MANAGEMENT APPROACH | 48 | | |
| HR1 | Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening | 49 | | Principles 1, 2, 3, 4, 5 & 6 |
| HR4 | Total number of incidents of discrimination and actions taken | 48 | | Principles 1, 2 & 6 |
| HR6 | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor | 48 | | Principles 1, 2 & 5 |

| Code GRI | Description of indicators | Page | Comment / Explanation | Correspondence with the UNGG Principles |
|-------------------------------|---|------------------|--|---|
| HR7 | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor | 48 | | Principles 1, 2 & 4 |
| HR9 | Total number of incidents of violation involving rights of indigenous and actions taken | | Nil | |
| Social Performance | | | | |
| | MANAGEMENT APPROACH | 58 | | |
| SO4 | Actions taken in response to incidents of corruption | | No actions taken. No incidents of corruption reported to the Group's internal Audit Department. Full | Principle 10 |
| SO7 | Total number of legal actions for anticompetitive behaviour, anti-trust and monopoly practices and their outcomes | | Nil | |
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | 59 | | |
| Product Responsibility | | | | |
| | MANAGEMENT APPROACH | 56 | | |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their lifecycle, by type of outcomes | 58 | | |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction | 91, 135-136, 150 | | |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes | | Nil | |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer personal data | | Nil | Principle 1 |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services | 58 | | |

■ Core Indicator ■ Additional Indicator

MYTILINEOS Group Sustainability Report

Evaluation Questionnaire

We would be honored if you could take the time to help us improve our Sustainability Report, by answering the following six questions.

1. To which stakeholder category of the MYTILINEOS Group do you belong?

| | | | | | |
|----------|--------------------------|------------------|--------------------------|-----------------------|--------------------------|
| Employee | <input type="checkbox"/> | Journalist/Media | <input type="checkbox"/> | Business organization | <input type="checkbox"/> |
| Client | <input type="checkbox"/> | Local Government | <input type="checkbox"/> | Financial analyst | <input type="checkbox"/> |
| Supplier | <input type="checkbox"/> | NGO | <input type="checkbox"/> | Other _____ | <input type="checkbox"/> |

2. Having read the Sustainability Report of the MYTILINEOS Group, which of the Group's activity areas did you find particularly interesting?

| | |
|---------------------|--------------------------|
| Metallurgy & Mining | <input type="checkbox"/> |
| Energy | <input type="checkbox"/> |
| EPC Projects | <input type="checkbox"/> |

3. What is your impression of each one of the following sections of the Sustainability Report of the MYTILINEOS Group?

| | Very Interesting | Of little interest | Not at all interesting |
|---|------------------|--------------------|------------------------|
| Corporate Governance | | | |
| Governance of Corporate Social Responsibility | | | |
| Approach to Corporate Social Responsibility | | | |
| Dialogue with Stakeholders | | | |
| Financial Resources | | | |
| Human Resources | | | |
| Environment | | | |
| Market | | | |
| Society | | | |

4. How much would you agree that the Sustainability Report of the MYTILINEOS Group...:

| | I fully agree | I rather agree | I rather disagree | I fully disagree |
|---|---------------|----------------|-------------------|------------------|
| ...is easy to understand | | | | |
| ...contains issues that interest me | | | | |
| ...documents the information presented in a manner that conveys honestly and transparency | | | | |
| ...presents values and principles clearly | | | | |

5. Are there any sections which, in your opinion, should be treated more thoroughly by the MYTILINEOS Group?

6. Would you like to make comments or suggest improvements?

Thank you for your interest and feedback. Please return the completed questionnaire by mail to MYTILINEOS S.A., 5-7 Patroklou street, 151 25 Maroussi, or by fax to +30 210 6877 400



Statement GRI Application Level Check

GRI hereby states that MYTILINEOS HOLDINGS S.A. has presented its report "Sustainability Report 2010" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B.

GRI Application Levels communicate the extent to which the content of the G3 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 28 June 2011

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a large, faint watermark of the GRI logo.

Nelmara Arbex
Deputy Chief Executive
Global Reporting Initiative



The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.
www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 10 June 2011. GRI explicitly excludes the statement being applied to any later changes to such material.



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