# **HELLENIC PETROLEUM**CORPORATE RESPONSIBILITY REPORT 2013



### HELLENIC PETROLEUM

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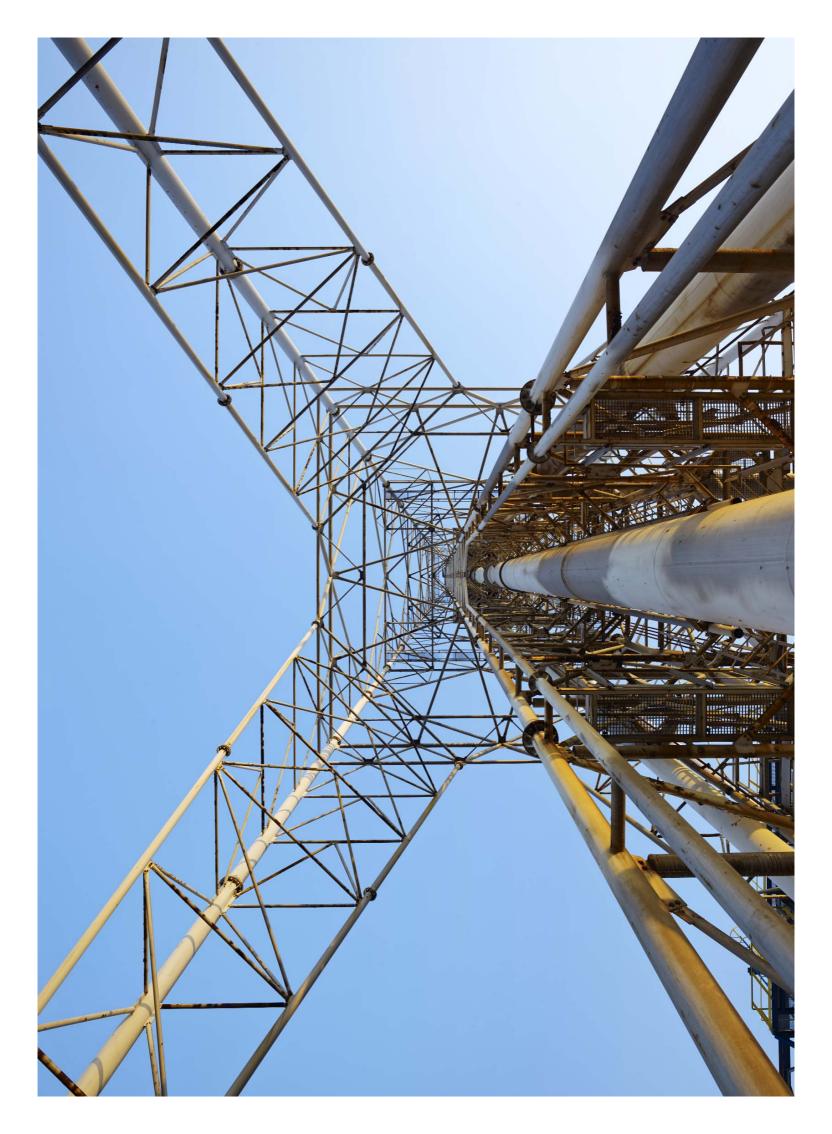
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## Introduction

Since 2006, HELLENIC PETROLEUM Group has published an annual Corporate Responsibility & Sustainability Report, the objective of which is to improve communication and the sharing of information with the company's social partners (stakeholders). This year's 9th annual edition presents the Group's business performance, taking into account economic, environmental and social perspectives from 01.01.2013 to 31.12.2013.

Additional comprehensive business and financial information can also be found in the Group's 2013 Annual Report (http://www.helpe.gr/userfiles/8ea1f0cb-9e62-48e4-b947-a27b00fb14bb/AR-2013-ENG-2706146.pdf).



## 1. Message to our Stakeholders



**J. Costopoulos**Chief Executive Officer

#### Message to our Stakeholders

HELLENIC PETROLEUM has acted proactively in coping with the adverse economic conditions in Greece, as well as the tough European refining environment, through asset-modernization investments and broad-based transformation efforts that have enhanced our competitiveness.

From early 2008, our Group began implementing important strategic initiatives, including the upgrades of the Elefsina and Thessaloniki refineries, the operational optimization of all business units, the competitiveness of domestic and international marketing operations and the increased mobilization and teamwork of our people.

The successful implementation of these strategic actions has supported us in managing effectively the extended recession and the challenging business environment and strengthened competitive position enabling us now to capitalise further on the expected economic recovery both in Greece and regionally.

During the last six years, we focused on:

#### Our clients

By completing the "Koryfi" transformation program and restructuring the operating model of our marketing activities we reduced our operating costs and capital employed, enhanced our service levels and deployed new control mechanisms to ensure quality and quantity of the fuels we sell.

We also introduced new products with a better value-for-money profile across all the markets where we operate (Greece, the Balkans and Cyprus), which together with the optimization of our supply chains enhanced both customer service levels as well as our competitive position. Our efforts in the marketing sector has led, amongst others, to the award of two Guinness world records for the lowest and most efficient fuel consumption in Diesel powered vehicles, thus further strengthening client awareness and loyalty.

At the same time, the export orientation of the Group was significantly enhanced. Exports in 2013 represented 45% of our production, compared with 22% in 2008.

#### The environment

The implementation of best available technologies in the upgrade of the Elefsina refinery resulted in an impressive reduction of all local emissions and the further improvements in air quality. Through active consultation and cooperation with our social partners, both at local and national levels, we respond actively to the increasing need for sustainable solutions, implementing consistently best practices to protect the environment.

In 2013, the Group increased its participation in Renewable Energy Sources, adding to its portfolio a 7MW wind farm. We also note that a number of projects, with a total capacity of 200MW, are at various stages of development.

#### Our employees

Based on the three pillars of our Human Resources policies —Meritocracy, Recognition and Development we seek to strengthen and to empower our people. We have increased our focus on the development of appropriate skills and know-how. Through the Hellenic Petroleum Training Academy we are rolling out specialised Management Development Programs (Education and Development for Growth and Excellence-EDGE). In 2013 alone, a number of targeted programs were planned and implemented, totaling 75.000 hours of training for the Group's employees and managers.

#### Safety

Safety at work remains our top priority as we continue to pursue a continuously improving performance record. In 2013, the primary index for plant operations safety was up 30% compared to 2012. We are proud to have been recognised at a European level through the award of the EU-OSHA European Good Practices Award in occupational safety and health, for a safety program that involved the active participation of our employees.

#### Our suppliers

We consider our suppliers as strategic partners for accomplishing the Group's objectives of competitiveness and sustainable development. During 2013, we focused our efforts on signing long term contracts with suppliers whose principles are aligned with our Group's values and objectives for sustainable development, thus ensuring a reliable supply chain during a time of crisis. This effort contributed to the national economy and created tens of thousands of indirect job positions both in Greece and regionally. These significant contributions have been confirmed in a recent study for the refining sector in Greece by the Foundation for Economic and Industrial Research (IOBE).

#### Society

For several years now, we are consistently implementing a large number of targeted programs primarily supporting socially vulnerable groups, as well as rewarding young talented people by providing them with opportunities for learning and professional experience.

Local communities remain our priority and more than 30% of our workforce now comes from areas where we have facilities and operations. We actively monitor the procurement of goods and services from local suppliers which have increased and now constitute over 15% of our total procurement budget.

#### Our shareholders

We believe that the complete embedding of Sustainable Development within our Group's strategy creates value for our shareholders and further builds their trust and support for our corporate choices.

The effort we have undertaken across all aspects of Sustainable Development is detailed in this year's edition of our Corporate Social Responsibility Assessment Report. The methodology adopted is based on the Global Reporting Initiative (GRI) G4 directive, with a particular emphasis on the identification of material issues which are important both for the Group and our Stakeholders.

The external evaluation of the Corporate Responsibility Report by an independent third party ensures an objective verification that the report does fulfill all the requirements of the GRI-G4 Comprehensive Option framework, including the Oil and Gas Sector Supplement; while at the same time it confirms the significant progress achieved, as well as our strong position across industry as a whole.

We also remain fully committed in applying and disseminating the principles of the United Nations Global Compact (UNGC) — and thus we actively contribute to their adoption throughout the full extent of our supply chain. This is further confirmed by the fact that meets the requirements of the Communication on Progress (Advanced Level).

We, at HELLENIC PETROLEUM, believe that the recovery of the Greek and regional economies is on its way. Looking forward, we plan to broaden our strategy for Sustainable Development and will continue to rely on the active involvement of our people, as well as the trust and support of all our stakeholders.

John Costopoulos

Chief Executive Officer



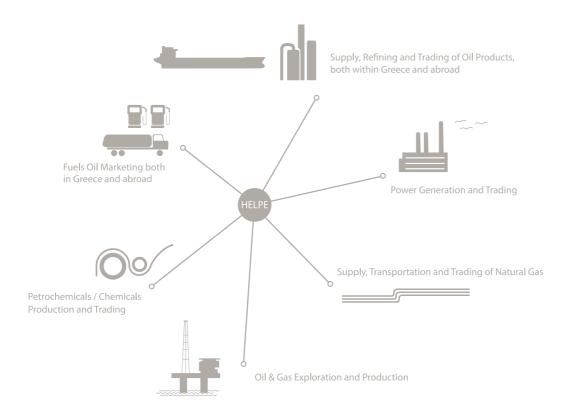
## 2. THE HELLENIC PETROLEUM GROUP



HELLENIC PETROLEUM is one of the leading energy groups in South-eastern Europe.

The Group has a wide range of activities in the energy sector, of which the most significant are the following:

- Supply, Refining and Trading of Oil Products, both within Greece and abroad.
- Fuels Oil Marketing both within Greece and abroad.
- Petrochemicals / Chemicals Production and Trading.
- Oil & Gas Exploration and Production.
- Power Generation and Trading.
- Supply, Transportation and Trading of Natural Gas.



#### 2.1 Vision - Mission - Values

Our mission, vision and values express our shared aspirations and guide us in everything that we do. Our mission defines our core purpose as an energy group whereas our vision points us in the right direction to fulfill that mission:

# Our mission: "Energy for Life"

To produce and offer top quality products and services in the energy sector, serving our customers in both the Greek and international market, both with efficiency and innovation.

## Our vision

leads us in the direction with which to fulfill our mission, that being: "To be a leading regional Energy Group with sustainable growth embedded in our strategy".

## Values – Principles

Our values and principles are the foundation of who we are and how we interact with everyone we come into contact with during the course of our daily activities. It is our mission, vision and values that define our culture and help us in securing our leading position in the S.E. European energy industry.

The Group's business principles constitute a code of principles and values that define attributes and modes of actions that we believe are essential parameters for the creation of sustainable value.

#### **OUR PRINCIPLES**

- Safety is always our First Priority.
- Offering Value to our Customers.
- Operating Responsibility towards Society and the Environment.
- Respecting our Colleagues and Partners, promoting Meritocracy, Teamwork, Innovation, Continuous Improvement and Results Orientation.
- Investing in Sustainable Development.
- Continuously enhancing our Competitiveness.
- Applying high standards of Corporate Governance.
- Creating Value for our Shareholders and focusing on the Continuous Improvement of our Results and Cash Flows.

#### OUR ATTRIBUTES

- (1) integrity
- (2) professionalism
- (3) commitment
- (4) sound judgment
- (5) initiative
- (6) extroversion

The aforementioned behaviours (attributes), principles and values are in perfect alignment with the strategic objectives and the standards, regulations and directives that we are committed to disseminating and applying across the entire range of our activities.

#### 2.2 Our Performance

#### **GROUP**



A Group that is active in 7 countries



€9,674 mil. in turnover

3 refineries in Greece (covering

65% of the country's refining capacity) as well as 1 refinery in FYROM Holds 30% of retail market with

1,816 service stations in Greece and 279 abroad



15 bulk storage and supply terminals



22
aircraft
refuelling stations
& 2 LPG
bottling plants



lubricants production and packaging unit



Participation in the cross-border gas pipelines in South-eastern Europe Crude oil and petroleum product storage facilities (in Greece) with a capacity of

 $6.65 \text{ mil. m}^3$ 

#### **EMPLOYEES**



2,691 employees in Greece & a total of 3,718 employees in seven countries



around 75,000 training hours



20% women in the workforce and 13% women in senior management positions



152 employees with special needs



95.4% average employee loyalty indicator

ENVIRONMENT/ SAFETY



€4.08 mil investments made in H & S



€3.82 mil made in environmental investments



3,727 hours of environmental training

#### SOCIETY

Over

100

initiatives / CSR

programs in 2013



Approximately
€3.5 mil
has been invested in
CSR activities both in
Greece and abroad



"buying locally"



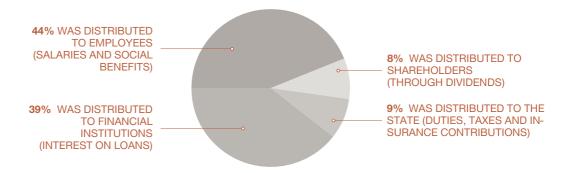
30% of our employees are sourced from neighbouring areas



#### **Social Product**

In 2013, the Group's turnover was € 9,674 mil. (2012: €10,469 mil.), whereby the social product was worth €492 mil., (2012: €517 mil.) distributed as presented in Chart 2.1.

Chart 2.1: Breakdown of the social product



Note that the above figures do not include levies and duties for product purchases made by the marketing companies EKO and HELLENIC FUELS. Including taxes and duties, the Group's social product for 2013 amounted to €1,667 mil. (2012: €1,721 mil.).

#### 2.3 Materiality Assessment

In order to be consistent with our commitment to meeting the needs of all our stake-holders, as well as being relevant and meaningful, we implemented a Materiality Assessment to identify and evaluate the most essential aspects of social responsibility and sustainable development (material aspects).

The results of the study (materiality matrix) are reflected in Chart 2.2 in which the Group's stakeholders are depicted in different colours.

The evaluation and prioritization of the material aspects, as presented in Chart 2.2, led us to the decision to directly focus on 18 topics (all with high probability and high risk) which are briefly presented in Table 2.3. The relevant methodology is presented in Section 7.1 (later on in this report).

Chart 2.2: Materiality Matrix

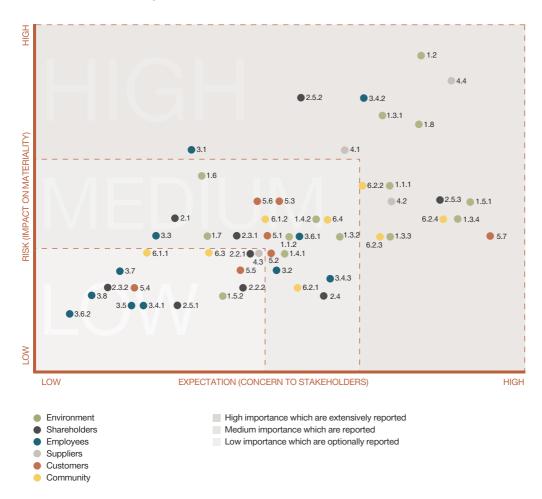


Table 7.3 (in Section 7.1) further presents the connection between the material aspects, the Report's sections and GRI indicators.

Table 2.3: Material Aspects

ENVIRONMENT	
Material Consumption	(1.1.1)
Energy Use	(1.2)
CO <sub>2</sub> Emissions	(1.3.1)
NOx Emissions	(1.3.3)
VOC Emissions	(1.3.4)
Oil Spills & Leakages	(1.5.1)
Product Impact	(1.8)
SHAREHOLDERS	
Supply Security	(2.5.2)
Operational Continuity	(2.5.3)
SUPPLIERS	
Supplier Assessment	(4.4)
Responsible Buying	(4.1)
Operational Support	(4.2)
EMPLOYEES	
Job Position Security	(3.1)
Occupational Health & Safety	(3.4.2)
CUSTOMERS	
Anti-competitive Behaviour	(5.7)
COMMUNITY	
Accident Impact	(6.2.2)
Health Screening	(6.2.4)
Acoustic Impact	(6.2.3)





#### 2.4 Risk Management

The Group's risk management system has been designed to identify and manage threats and opportunities. Effective risk management enables HELLENIC PETRO-LEUM to capitalise on opportunities within a strictly controlled environment.

The Group uses a set of measures - as part of its risk management and monitoring system. These measures include our Business Principles which represent the Group's beliefs, values and expected behaviour. Along with the Code of Conduct, these principles form a key part of the internal environment in which risk management is conducted. Other risk management tools include the 5-year rolling business plan, per sector of activity, budgeting, reporting and scheduled internal controls.

The entire Group uses uniform guidelines, procedures and policies which serve as the basis for all financial and management reporting activities.

The Internal Audit and Risk Management System includes safeguards and monitoring mechanisms at various levels within the organization, as described in detail in the Annual Financial Report for the Fiscal Year 2013 (p. 153–156 and 161–163), available on the Group's website at: http://www.helpe.gr/userfiles/8ea1f0cb-9e62-48e4-b947-a27b00fb14bb/ANNUAL\_FINANCIAL\_REPORT\_BoD-2013.pdf.

Further details regarding risk management can also be found in the 2013 Annual Report (p. 79–83) on the Group's website at: http://www.helpe.gr/userfiles/8ea1f0cb-9e62-48e4-b947-a27b00fb14bb/AR-2013-ENG-2706146.pdf.

The Group's Internal Auditing Department, which is part of the Internal Auditing System, contributes to the improvement of the Group's performance in the fields of Risk Management, Internal Control Systems and Corporate Governance so that the Group's strategic objectives can be achieved.

During 2013, a total of 34 audits were conducted, covering 100% of the annual audits program. The audits themselves were as follows:

- 26 audits were related to financial & administrative matters, and
- 8 were related to technical issues

From these audits and furthermore taking into account the risk assessment of 2012:

- 24% were conducted in high-risk areas,
- 44% were conducted in medium risk areas, and
- 32% were conducted in low risk areas

Out of the total of 34 audits, 14 concerned the full implementation of procedures in the supply chain across the entire Group (land & sea transportation network, petroleum products marketing facilities and service stations' network — including the Group's managed service stations network). N.B. Corrective measures for full compliance with procedures were implemented in the limited number of cases where deviations were discovered.

Additionally, in 2013, the suggestions — for improving weaknesses identified in 2012 — were followed up. During the audit, over 95% of the identified weaknesses were either resolved, or are in the process of being solved. N.B. The relevant disciplinary procedure was triggered in one case where there was a conflict of interests.

In addition to the risks already mentioned, the following parameters were also evaluated as being important:

#### LOCAL COMMUNITIES - ASSESSMENT OF IMPACTS

Our Group implements a policy concerning environmental protection that complies with current legislation and the requirements that arise from the environmental and operating permits pertaining to its business activities. So that it can comply with all the relevant rules and regulations, the Group has implemented a system with which to monitor the different parameters which both international rules and the State's competent authorities deem as necessary for public health and safety. In addition, the Group adjusts its various investment programs and adopts methods and techniques with the relevant capacity to meet future environmental requirements.

The views as well as opinions of local communities are also identified through regular public opinion surveys (stakeholder engagement).

#### CORPORATE STANDARDS AND REGULATIONS

The adoption and implementation of international standards, codes and best practices constitute a dynamic approach in the consideration of potential risks. We are fully committed to implementing, disseminating and integrating these standards, codes and practices — which are completely aligned with our strategic objectives — into all of our operations and policies.

Specifically, these include:

- The Global Reporting Initiative (GRI G4 indicators) as well as the specific Oil & Gas Sector supplement.
- The United Nations' Global Compact (UNGC) principles & criteria.
- ISO 9001, ISO 14001 & OHSAS 18001 International Standards.
- The international MARPOL convention.
- The ISGOTT safety guide.
- · ISM Standards.
- EU's regulations (such as REACH), Best Available Techniques (BATs), etc.
- The Internal Labour Regulation and the Group's Code of Conduct.

Scheduled inspections and audits (1st, 2nd and 3rd party) are conducted; certifications are provided with reference to the above standards and codes so that these standards are complied with and any potential risks are minimized.

#### OCCUPATIONAL RISK MANAGEMENT

The Group applies a precautionary approach in the field of occupational risk management so that potential health and safety risks can be anticipated and as a result, controlled. Specifically, any such potential risks are identified and consequently controlled according to criteria as set forth in Greek legislation (Law 3850/2010) as well

as European and international codes and good practices. Written occupational risk assessment studies feature in all of the Group's facilities, also including measures that need to be taken to eliminate or control hazards - thereby keeping them at low and acceptable levels.

The studies themselves are developed (taking employees' opinions and viewpoints into account) through employees filling out questionnaires concerning the nature of their work as well as the environment that they work in and are revised whenever working or environmental changes take place (in the event that changes do not arise, every five years at the most). These revisions are communicated to all staff so that each and every employee is aware of the risks that he/she may face as well as the required actions that need to be taken in order to eliminate or minimize them.

During the scheduling of corrective safety actions, immediate priority is given to those considered most critical, as classified according to their ranking in the Hazards Assessment Table.

#### STAKEHOLDER RELATIONSHIPS

An important parameter in how the Group improves, is the process of recognizing, understanding and applying principles, values, initiatives and standards which exhibit personal, business and corporate responsibility as well as reflect our respect for the views, suggestions and needs of our stakeholders. Our approach includes satisfaction and opinion surveys, public dialogue, debates, meetings, publications, etc.

This approach towards our stakeholders—as a means of minimizing potential risks—is presented in more detail in section 7.1 of this report.

#### INACCURATE INFORMATION DISSEMINATION RISK

Inaccurate information dissemination risk (reputational risk) can potentially impact the stock, or adversely affect any one of the Group's interested parties.

In order to avoid the above, the Group is in regular contact with the investment community, both in Greece and abroad, through various information initiatives such as teleconferencing for quarterly results and roadshows/participation in international industry conferences. The general public can view any related material (presentations, transcripts, webcasts) on the Group's website (www.helpe.gr).

Risks related to the proper management and dissemination of information are dealt with through controlling the mode of information and constant communication with both financial media services and analysts in order to ensure that the investment community is presented with accurate and fair information.

#### RISK OF FAILURE TO IMPLEMENT LEGISLATION

The risk of failure in implementing legislation, or complying with internationally accepted norms and standards (Compliance Risk), is controlled and monitored through many safeguards in each critical area (such as IT, the handling of sensitive information, the environment, customer information and public opinion surveys).





HELLENIC PETROLEUM, dedicated to its commitment to protect the environment, rigorously implements its environmental policy, a policy that is integrated into each of its activities and which all of its employees follow.

A key element of the Group's environmental policy is upholding Greek and European legislation as well as, to this end, cooperating with the competent authorities. HEL-LENIC PETROLEUM systematically monitors developments in environmental law and actively participates in consultation processes whilst applying the Best Available Techniques which arise as a result.

Within this context, HELLENIC PETROLEUM is continuing with its preparations for the implementation of the new Directive concerning industrial emissions (Industrial Emissions Directive – 2010/75/EE) which, as of June 2013, is already part of the national legislation; while new emission limit values are scheduled to come into force in 2019.

Furthermore, as part of the consultation on the revision of Reference Documents on Best Available Techniques (BREF), the Group made suggestions and interventions through the Ministry of Environment, Energy and Climate Change (participated in the European Technical Group as national representatives for the industry) as well as through CONCAWE, which with its role as a representative of the European refineries, is actively participating in the consultation and formulation of the final texts. The Reference Documents (BREF), as well as the decision on the refinery BAT conclusions, are expected to be issued by the end of 2014.

With the objective of improving its environmental performance and corporate culture in regard to environmental issues, the Group is in the process of gradually, as well as consistently, implementing a number of initiatives concerning ongoing environmental education and awareness amongst its employees and also customers, suppliers, sub-contractors, citizen groups etc.

#### 3.1 Reducing Energy & Water Consumption

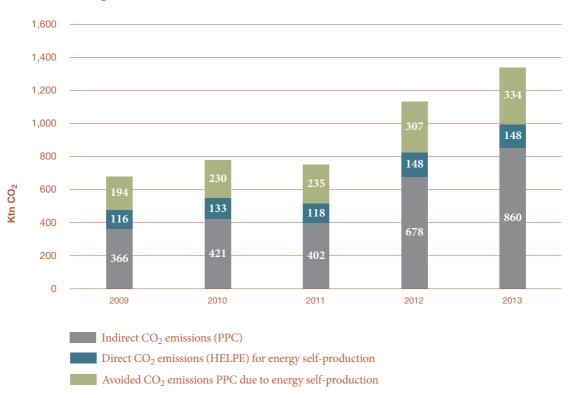
Energy saving in the refineries was and still is an area that is given particular emphasis and is a key tool for the Group's contribution to tackling climate change.

The Group's refineries have managed to produce cleaner fuels and are highly efficient in terms of energy consumption, , by continuous improvement , despite the increased energy requirements that are needed during the production of fuels. Although increasingly stringent fuel specifications (zero sulphur fuels) now made available to consumers, on the one hand, help in reducing gaseous emissions, such as sulphur dioxide ( $SO_2$ ) and particulates, on the other hand however, they call for increased energy consumption.

CHP units for combined heat and power are installed in all of the Group's refineries covering about 35% of the Group's facilities electricity needs. In 2013, these units' op-

eration meant that the emission of approximately 330 thousand tons of  $CO_2$  (based on the PPC's weighted average emission factor of 1.19 kg  $CO_2$ /kWh for 2012) did not come about, thereby significantly contributing to the reduction of nation — wide levels of greenhouse gases emissions.

Chart 3.1: Contribution of self-produced electricity and CO<sub>2</sub> emissions in the Group's domestic refineries



The Group's refineries consume natural resources (crude oil, water) for the production of end products that reach the consumer.

So that raw material waste can be mitigated, the refineries possess the adequate systems with which to collect the produced waste and then re-use it.

Wherever it is technically feasible, Best Available Techniques are implemented in order to recover raw materials from various waste streams. Recovery amounts for 2013 are presented in Table 3.2.

Table 3.2: Raw Material Recovery

Facility	Recovery percentage	Quantity
Aspropyrgos refinery	0.11 %	10,180 tn
Elefsina refinery	2.40 %	114,274 tn
Thessaloniki refinery (limited operation)	1.57 %	48,358 tn

Significant measures are also implemented in order to recycle and reuse consumed water. Part of the refinery production process is the pre-treatment of polluted wastewater streams and their reuse within processes which results in a significant reduction in the consumption of fresh water as well as the reduction of wastewater.

Amounts of reused water in 2013 are presented in Table 3.3. The benefit of this process is twofold: saving water and energy.

Table 3.3: Water reused & recycled

Facility	Recovery percentage	Quantity
Aspropyrgos refinery	10.58%	536,509 m <sup>3</sup>
Elefsina refinery	1.09%	107,523 m <sup>3</sup>
Thessaloniki refinery	1.12%	23,443 m <sup>3</sup>

Chart 3.4: Water withdrawal per source of origin

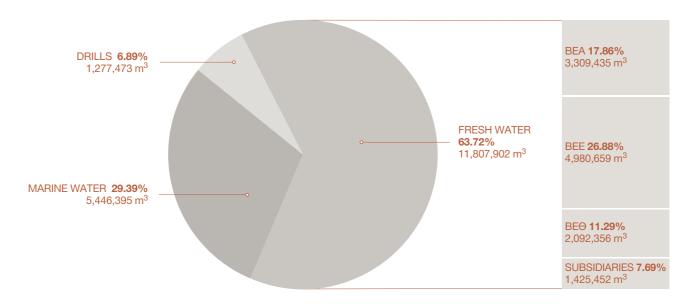


Chart 3.5: Total energy consumption per Group's facility

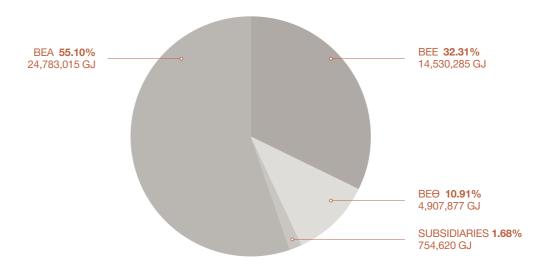


Chart 3.6: Total electricity consumption per Group's facility

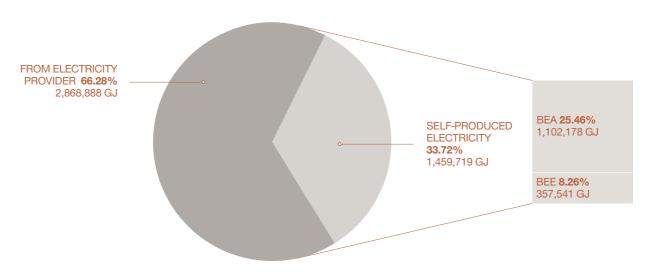
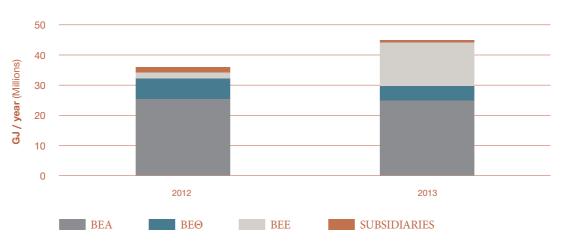


Chart 3.7: Energy consumption 2012 vs 2013 per facility



#### 3.2 Air Emissions

Apart from supplying the market with cleaner fuels, HELLENIC PETROLEUM uses cleaner fuels for energy (own consumption) required by the production process (such as furnaces, boilers) in order to reduce air emissions. Abatement technologies are also used. The refineries also maximize the use of gaseous fuels, derived primarily from process gases undergoing purification (zero sulphur concentration). This reduces liquid fuel consumption (despite the fact that they are low sulphur fuels). A typical example is the use of flexigas, a gas fuel produced by the Flexicoker unit in the upgraded refinery of Elefsina, which is a fuel of high environmental standards. Significant reductions in emissions of sulphur dioxide ( $SO_2$ ) in all refineries have been achieved as a result.

Charts 3.8 – 3.10 present the total air emissions from the Group's refineries. The volume of these emissions is either the result of measurements based on international and European standards or estimates using methodologies recognized by international and European organizations. Note that the reported emissions are much lower than the emission limit values allowed.

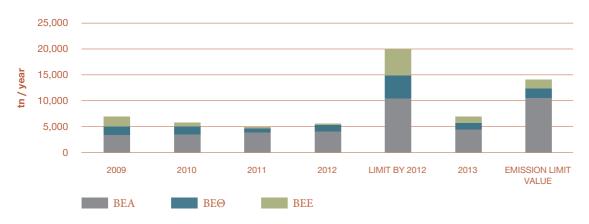


Chart 3.8: Sulphur Dioxide (SO<sub>2</sub>) emissions





Chart 3.10: Volatile organic compound (VOC) emissions



Moreover, all of the Group's installations use vapour recovery systems when loading gasoline, as provided by the relevant legislation.

EKO and HF's petrol stations are also equipped with vapour recovery systems which are utilized when gasoline is received from tank-trucks (stage I).

EKO has furthermore progressed with the gradual introduction of vapour recovery systems when cars are fuelled with gasoline (stage II) at EKO's fuel stations (at controlled and owned stations being renovated).

#### 3.3 Waste Management

Best Available Techniques are implemented in the refineries' liquid and solid waste management and treatment process, through which the goal is to minimise the production of waste and to confirm that the measured values are well below the imposed limits before the waste is finally discharged or disposed of.

The three refineries already have operational up to date waste water treatment units (WWTP) in place which include 3-step treatment. The efficiency of the unit is continuously monitored by the facilities' specialized laboratories, based on the physicochemical characteristics of the discharged wastewater.

Moreover, priority is given to recycling where this is technically possible, such as the further process of recovered hydrocarbons from the wastewater treatment units and the use of treated wastewater for auxiliary uses and fire-fighting.

As a result of the treatment and recycling, there has been a significant reduction in the volume of discharged treated waste (Charts 3.11 and 3.12).

All of the facilities have emergency plans in place which have been approved by the relevant port authorities, for dealing with marine pollution incidents. Scheduled drills are conducted, on an annual basis, in order to maintain a high degree of readiness.

With regard to solid hazardous waste, environmentally friendly hazardous waste treatment methodologies are used, in order to assure for their safe disposal. In situ treatment is used wherever possible, e.g. for the bioremediation of oily sludge from wastewater treatment units. Wherever this cannot be performed on site, licensed and

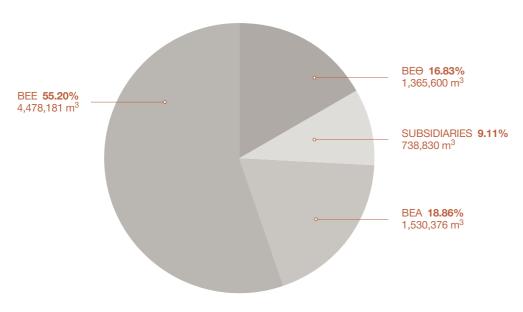
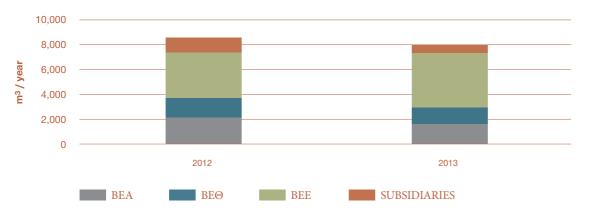


Chart 3.11: Wastewater volume per facility





qualified hazardous waste management companies perform the pre-treatment of waste and safe disposal.

Significant efforts in recycling old metal and plastic materials, as well as wood, tyres and lubricants, continued throughout the industrial complexes as well as in the Group's offices; existing recycling programs cover all relevant waste streams (such as paper, plastic, batteries, light bulbs, electrical and electronics, printer cartridges and cooking oil). The

recycling of all of the above is facilitated through dedicated recycling bins which are located at various points throughout the workplaces. The Group's relevant performance, concerning the volume of solid waste in 2013, is presented in Charts 3.13 – 3.15.

INCINERATION 3.05% 565 tn

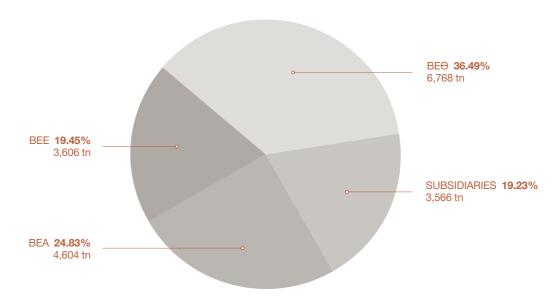
LANDFILL 38.47% 7,128 tn

RECYCLE 25.00% 4,633 tn

REUSE 0.26% 48 tn

Chart 3.13: Solid waste breakdown by disposal method













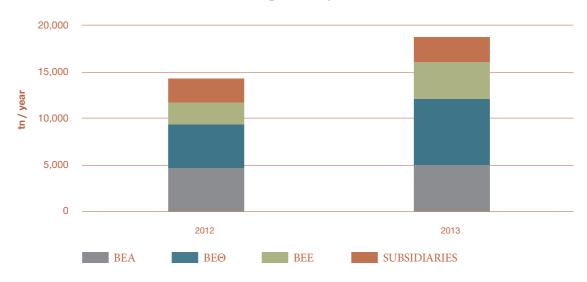


Chart 3.15: Solid waste volume per facility (2012 vs 2013)

It is noted that the production of wastes is strongly associated with maintenance procedures, catalyst turnovers, and other one off operations beside the production activities, which affect significantly the quantities produced yearly.

#### 3.4 RES & BioFuels

With regards to Renewable Energy Sources (RES), the Group already owns a wind farm, a number of operational photovoltaic parks as well as an RES portfolio amounting to a total of 200 MW (in various stages of development). This RES portfolio will help to balance greenhouse gas emissions through reducing the Group's carbon footprint—corresponding to the activities pertaining to refining and power generation from natural gas—by at least 250,000 tons per year.

In November 2013, ELPE Renewables acquired the Energiaki Pylou-Methonis S.A. company which owns a 6.8 MW wind farm (in operation) comprised of 8 wind turbines with an estimated annual electricity production of 15,000 MWh.

Photovoltaic stations with total nominal power of 1.4 MW have been in operation (2,000 MWh annual production) since 2012. A further three mature PV projects with a nominal power of 10.5 MW will also be realized. Five biomass plants of 24.7 MW in total are also under development.

Moreover, in partnership with LARCO, ELPE Renewables is developing a photovoltaic portfolio of 147.5 MW as well as a 7 MW hybrid (wind-hydro) project.

HELLENIC PETROLEUM is also exploring the potential use of bioethanol as a gaso-line component through a relevant research program conducted in cooperation with the National Technical University of Athens' Fuels and Lubricants Laboratory. The research program is investigating the pilot introduction of bioethanol, as a raw material for bio-ETBE (ethyl-tertio-butyl-ether) production which will be used as a component in gasoline. N.B. Bioethanol can either be blended directly or as an ingredient with gasoline and can be used in conventional gasoline vehicles.

Today, biofuels are the only available substitutes of fossil fuels in terms of transportation. Biofuels are environmental friendly and are broadly used since only minor changes in existing vehicles and infrastructure are required. As a fuel, biodiesel possesses properties similar to those of diesel and can be used in conventional diesel vehicles blended with conventional diesel fuel.

Table 3.16: Biodiesel received and used as conventional diesel additive

Year	Biodiesel (m <sup>3</sup> )	% v/v in diesel
2006	46,580	2.01
2007	79,010	3.65
2008	62,788	3.04
2009	68,961	3.84
2010	108,063	6.39
2011	78,623	6.37
2012	100,993	6.49
2013	101,269	6.73

#### 3.5 Biodiversity

The HELLENIC PETROLEUM Group recognizes the importance of preserving biodiversity, within the context of the rising demand for energy, sustainable development and improving the quality of life in the regions that neighbour its industrial complexes.

In order to protect the natural environment and biodiversity, the Group has designed a comprehensive system for managing environmental incidents and the immediate remediation of potential environmental impacts.

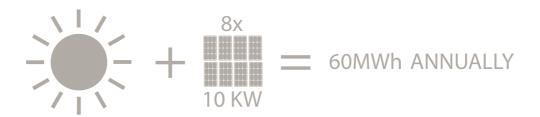
In addition, over the last few years, the Group has undertaken major initiatives to protect and promote the wider area of Lake Koumoundouros.

The above indicative actions, along with reforestation programs, and the configuration and enhancement of the areas, constitute aspects of a comprehensive biodiversity program.

All these initiatives are solely aimed at protecting and promoting the region for the benefit of Local Society and the residents of Thriasio.

#### *Respecting the environment ...*

As part of the comprehensive Corporate Social Responsibility program, we sponsored the installation of four photovoltaic systems (10 kW each) in four schools in the Kordelio-Evosmos and Delta Municipalities (in the 2nd Elementary School of Evosmos, the 2nd & 3rd High Schools of Kordelio, the Kalochorio High School, Lyceum of Nea Magnesia). This sponsorship covered a significant proportion of the schools' energy consumption and helped in reducing their running costs.



In the same context, four photovoltaic systems (10 kW each) were also installed in the 2nd Elementary School of Magoula, the Special Elementary School of Elefsina, and the 10th Elementary School and the 10th Kindergarten in Elefsina. The project covers, to a large extent, the schools' energy demands as well as contributing to energy saving and environmental protection. These photovoltaic systems will produce, on an annual basis, approximately 60 MWh of green energy whilst reducing the emission of carbon dioxide by approximately 60 tons — with beneficial effects equivalent to those that would result from 60 acres of forest with 3,000 trees. This energy production balances the power of approximately 10–12 housekeepings.





Continuously developing our people and improving their knowledge and skills set are amongst our pivotal objectives. At the same time, our commitment to ensuring a safe working environment for our employees, partners and neighbouring communities is a continuous process.

We have designed and implemented a social benefits program in order to ensure that our employees enjoy a healthy balance between their work and their social life. The program covers, amongst other areas, health issues, financial support and generally improved living standards.

In 2013, the expenses for employee benefits exceeded the amount of  $\in$ 23 mil. with the average employee retention rate (loyalty indicator) over the same period at 96.1% (indicator G4-LA1, Table 7.6c).

Additional insurance and pension plans cover 100% and 87% respectively of employees (averages). The current value of pension benefits (defined contribution and benefits plan) is based upon a number of factors which are determined using actuarial methods and assumptions.

Table 4.1: **Group's Employees\*** 

HELLENIC PETROLEUM SA.	1,964
EKO ABEE	277
HELLENIC FUELS SA	170
ASPROFOS ENGINEERING	184
DIAXON ABEE	96
OKTA AD SKOPJE (FYROM)	645
JUGOPETROL AD KOTOR	212
HELLENIC PETROLEUM CYPRUS LTD	59
EKO BULGARIA EAD	63
EKO SERBIA A.D.	48

<sup>\*</sup> The above information only concerns companies included in this Corporate Responsibility and Sustainability Report as well as employees who have work contracts with the Group's companies. Additional information, concerning human resources, is provided in Tables 7.6a & 7.6c, G4-10 & G4-LA12 indicators.

The continued provision of education and training (lifelong learning), the securing of jobs, performance assessment, incentives, an equal opportunities policy and health and safety, are all key aspects of our commitment to our employees.

Through the implementation of its non-discrimination principle, the Group employs 152 permanent employees with disabilities (end of 2013).

Chart 4.2a: Group's employees breakdown by gender

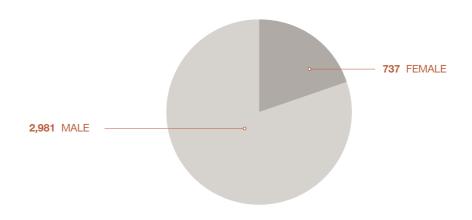
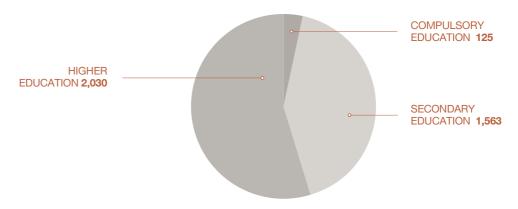


Chart 4.2b: Group's employees breakdown by gender



Chart 4.3: Group's employees breakdown by educational level







In the context of strengthening the Group's culture and homogenizing its human resources management framework, uniform policies and practices have been gradually adopted that are applicable to the Group's employees.

Through the use of up to date approaches, employees have the opportunity to both grow and advance through the administrative hierarchy due to the fact that consistently filling vacancies through rotating or promoting employees within the Group, is a key objective.

The achievement of Company and Individual objectives is directly linked to the formation of an annual variable remuneration scheme for the Group's top level executives. In particular, specific objectives in health, safety and environmental protection, which are a permanent component of the annual target, are weighted (20%) and affect remuneration.

In 2013, all employees were evaluated according to the standard evaluation system. For further information see indicator G4-LA11 (Table 7.6c).

All employees are subject to and participate in an annual performance review in order to assess performance and plan further knowledge and skills development

40.4% of HELPE, EKO & HF's permanent employees participated in the Best Workplaces 2013 employee satisfaction survey. The survey highlighted the Group's strengths as well as identifying areas for improvement. Findings were officially presented and discussed in detail in order to gather opinions and suggestions for further improvement and planning initiatives. The major findings are presented as follows:

- + employees' loyalty
- + pride in the Group and its achievements
- + very good compensation and fringe benefits framework
- strengthening of meritocracy
- enhancing communication and understanding between hierarchy and workers
- encouraging teamwork and the spirit of cooperation

#### 4.1 Training & Development

The continuous development of our people and the improvement of their knowledge and skills are amongst the Group's central objectives. Our approach to education focuses on creating a safe working environment that provides employees with an element of challenge and gives them the opportunity to develop skills and techniques that successfully meet the Group's current requirements and strategic objectives. In order to fulfill this objective, the Group has implemented policies which focus on continuous education, covering the following: employee participation in seminars and conferences in Greece and abroad, studying at the Open University, attending postgraduate programs and studying foreign languages.

Significant investments in employees' education continued into 2013 whereby training and education programs were related to areas such as New Technologies (refining, maintenance, etc.), Safety & Fire Safety, Labour and Insurance, Quality Management, Health, Safety and the Environment, Project Management, First Aid, etc.

Under the umbrella of the HELPE ACADEMY, two innovative educational programs, EDGE and EDGE Commercial, now meet the needs of our people and are aligned with the Group's strategy and objectives. During the course of the first year of their operation, over 320 employees attended more than 16,000 hours of training. The programs were evaluated as 95% successful, according to their organization, content of topics and speakers' ability.

Table 4.4: Training breakdown by gender & company

	HELPE	ЕКО	HF	ASPROFOS	OKTA	EKO SERBIA	HP CYPRUS	EKO BULGARIA	JPK MONTE- NEGRO
Number of women who participated in at least one training course/seminar	149	19	17	60	114	29	9	6	39
Number of men who participated in at least one training course / seminar	1,488	76	69	96	523	18	18	7	29

Chart 4.5: Training expenditure breakdown

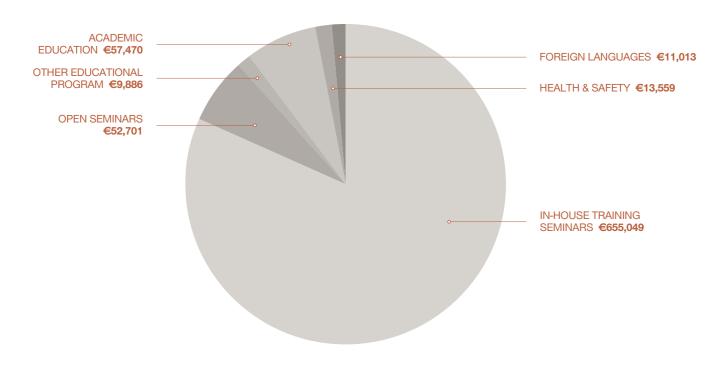
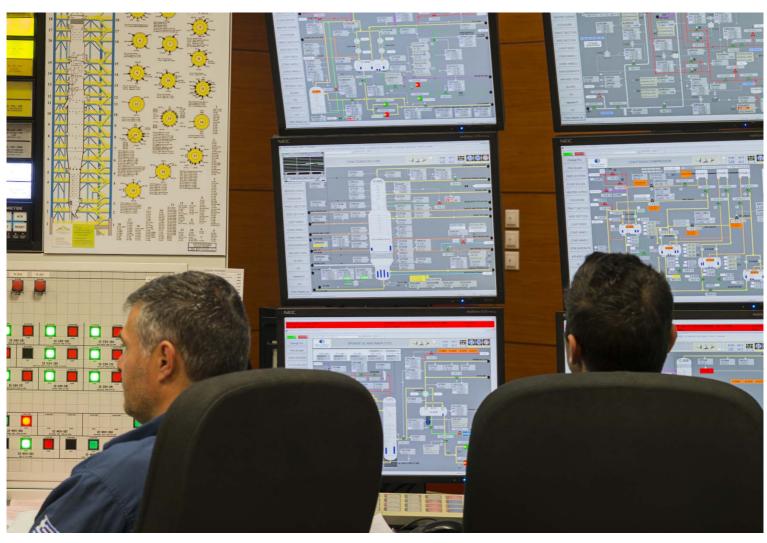


Table 4.6: Training activity breakdown by participation

	HELPE	ЕКО	HF	DIAXON	ASPROFOS	OKTA	EKO SERBIA	HP CYPRUS	EKO BULGARIA	JPK MONTE- NEGRO
In-house training seminars	1,621	89	83	34	217	165	48	16		40
Open seminars	109	11	6	3	53	30	20	11	13	4
Foreign languages	36	3	5	1	12	3	10		4	8
Health & Safety	1,131	3			92	676	46	29	4	16
Academic education	13	2		1		5				
Other type of training						104	4			





The Group's total educational investment for 2013 amounted to €788,805 (for 2012, the amount was €721,000) with around 75,000 completed training hours.

As part of its training policy, in 2013, the Group invested €465,813 in enriching its libraries/subscriptions to scientific and professional associations and journals.

#### 4.2 Occupational Health & Safety

The Group's first priority is the health and safety of its employees as well as residents of local communities which are located close to our industrial facilities. As a result, HELLENIC PETROLEUM takes all the necessary measures to provide a safe workplace to its employees, partners, visitors and trainees in all of its workplaces.

Further information, concerning occupational Health & Safety, may be viewed at: http://www.helpe.gr/en/health-and-safety/health-and-safety/

Within the Group's organizational framework for health and safety, the following have been established and are currently operational:

- A Corporate Occupational Health, Safety, Environment & Sustainable Development Division.
- Departments for Health, Safety and Environment at each facility.
- Appointed safety technicians, in-house physicians and nurses, over and above the requirements set by the relevant occupational health and safety legislation (Law 3850/2010).
- Internal Service for Safety and Prevention (ESYPP), according to P.D. 95/1999, which oversees the health of employees, compliance with sanitary conditions, protection measures and accident avoidance measures.
- Employee Committee for Occupational Health & Safety (E.Y.A.E.) at each facility which is comprised of representatives that represent all employees and are elected by the employees (according to Law 3850/2010). Every employee also has the right to be elected onto these committees (100% participation) which participate in scheduled meetings with the facility's management and makes suggestions for Health & Safety improvements in the workplace.

The establishment of uniform corporate policies and procedures also constitutes a continuous process — as part of the effort to strengthen the Group's common culture and utilise the experience of the industrial facilities in the adoption of the best H & S management practices.

All of the Group's uniform procedures and policies are posted on the company's internal company network (Intranet), whilst the most important of them are communicated through appropriate presentations made to all relevant staff.

For further information concerning Occupational Health & Safety you may visit the site: http://www.helpe.gr/en/health-and-safety/health-and-safety/

#### 4.2.1 Health and Safety Training

A common procedure pertaining to basic health and safety training is implemented across all of the Group's facilities so that a uniform safety culture applies in all of the industrial complexes. The training of the Group's personnel is multifaceted and includes the following topics:

- Fire safety (the use of fire-fighting equipment).
- First aid (how to treat burns).
- Use of personal protective equipment (respirators, masks, etc).
- Presentations concerning international incidents and accidents (causes / conclusions).
- Periodic reviews (refreshing important safety and emergency procedures).
- Participation in drills.
- Material Safety Data Sheets.
- The distribution of the monthly CCPS Process Safety bulletin (Beacon) to all employees (the Group is the official translator of the CCPS "Beacon" into the Greek language).

Training in evacuation procedures from confined spaces and high points was successfully conducted during 2013. Firefighters from the Group's industrial complexes in the Hub and Thessaloniki, were trained by the Special Disaster Response Unit (EMAK) and a Group of Mountain Rescuers from the Greek Mountain Rescue Team respectively.

Moreover, 14 employees attended the 100 hour "safety technician" training seminar organized by the Hellenic Institute for Occupational Health and Safety (ELINYAE) in the Elefsina industrial complex. Three safety technicians of the Aspropyrgos and Elefsina refineries were certified, whilst part of the seminar was also attended by 33 other employees from various departments within the Group.

Coordinated Fire Drills were also successfully conducted in all of the industrial complexes, in collaboration with the Fire Department and relevant authorities, following specific extreme scenarios. Indicative scenarios included:

- Tackling the leak of an LPG tank and the subsequent pool fire (Thessaloniki refinery).
- Excessive leakage during the unloading of an LPG-ship (port facilities at the Elefsina refinery).

2013 also signified a year of training initiatives, amongst other areas, in the area of safety, the objective of which is to continuously develop our people's skills and expertise which is a prerequisite for sustainable development and competitiveness.

Employees' training needs are evaluated by their immediate supervisor annually following which, an implementation program is then scheduled in order to meet any needs that may arise.

The scope of the training extends beyond employees to also include contractors, customers, truck drivers, petrol station personnel and students. Visitors to the facilities

are informed on safety instructions provided through the facilities' relevant informative leaflets.

Specifically with regard to contractors, training is based on extensive educational material which HELLENIC PETROLEUM provides to the contracting companies. The trained contractors' employees must successfully pass written exams in order to be granted an access card to enter the premises for work.

Table 4.7: Health & Safety Training man-hours per facility & gender

	BEA-BEE-BEΘ	EKO & HF	OKTA	DIAXON	ASPROFOS	HP CYPRUS SU	EKO's JBSIDIARIES
No of employees (Male/Female)	1,743 (1,579/164)	462 (314/148)	645 (530/115)	95 (81/14)	179 (103/76)	53 (36/17)	322 (201/121)
No of trained employees (Male/Female)	1,616 (1,519/97)	213 (179/34)	637 (523/114)	26 (25/1)	149 (93/56)	11 (11/0)	88 (55/33)
Training manhours (Male/Female)	21,812 (20,682/1.130)	2,094 (1,891/203)	1,587 (1,302/285)	60 (58/2)	624 (366/258)	142 (142/0)	412 (313/99)
No of trained contractors & others (Male/Female)	6,940 (6,468/472)	146 (134/12)	104 (98/6)	3 (3/0)	_	27 (27/0)	427 (262/165)
Training manhours (Male/Female)	14,240 (13,244/996)	2,819 (2,658/161)	92 (87.5/4.5)	3 (3/0)	_	112 (112/0)	1,064 (683/381)





#### 4.2.2 Investments in Health and Safety

In 2013, the Health & Safety investment program invested €4 mil. for the purposes of safety issues for the procurement of personal protective equipment, supply and maintenance of instruments and safety equipment, upgrading of fire fighting equipment, safety studies, etc.

The Group's safety investment program implemented in 2013, as well as the approved investment program for the period 2014-2018, are presented in Tables 4.8a and 4.8b.

Table 4.8a: Group's safety investments per facility

Facility	Investments amounts (K€)
BEA, BEE, BEΘ	3,096.00
EKO & HF	875.16
DIAXON	105.34
TOTAL	4,076.50

Table 4.8b: Group's approved safety investment program per facility (2014-2018)

Facility	Investments amounts (K€)
BEA, BEE, BEΘ	15,994.00
EKO & HF	2,830.00
DIAXON	63.00
TOTAL	18,887.00

Note that significant safety investment programs concerning general maintenance, major projects and refinery upgrades, amounting to tens of millions of euros, are not included in these tables.

#### 4.2.3 Health and Safety Indices and Goals

Each industrial facility sets annual measurable targets for improving its performance in terms of Health and Safety. The performance, against set targets, is reviewed on a monthly and annual basis, following which, the relevant report is presented to Management.

Since 2012, amongst other goals, individual safety goals have also been set for all senior and middle managers in the industrial facilities.

In addition, HELLENIC PETROLEUM participates in the European Organization CONCAWE's annually conducted survey and benchmarking for accidents, through

which the Group keeps abreast of international developments in the establishment of additional indicators to measure safety performance.

Over a total of 8,113,000 man hours worked, 29 lost workday injuries occurred during the course of 2013 concerning personnel and contractors either employed in the Group's refineries/chemical plants or by the EKO/HF marketing companies.

Table 4.9: Incidents based on CONCAWE's guidelines

Facility	HELPE BEA, BEE, BEΘ	HQs	EKO & HF	DIAXON	ASPRO- FOS	HP CYPRUS	OKTA	EKO SERBIA	EKO BUL- GARIA	JPK MONTE- NEGRO
Lost Workday Injuries LWIs (Male/Female)	28 (26/2)	0	1 (1/0)	1 (1/0)	0	0	5 (5/0)	0	0	0
Lost Workday Injuries (employees/contractors)	17/11	0	0/1	0/1	0	0	5 (own staff)	_	0	_
Fatalities (Male/Female)	0	0	0	0	0	0	0	0	0	0
MTC <sup>1</sup> – Medical Treatment Cases (Male/Female)	4 (4/0)	0	0	0	0	0	0	0	0	0
Restricted Workday Injuries - RWI (Male/Female)	4 (4/0)	0	0	1 (1/0)	0	0	0	0	0	0
LWIF (Male/Female)	4.9*	0	1.7 (1.7/0)	4.7 (4.7/0)	0	0	4.3 (4.3/0)	0	0	0
LWIS (Male/Female)	41.2*	0	4 (4/0)	5 (5/0)	0	0	20.2 (20.2/0)	0	0	0
AIF - All Injury Frequency (Male/Female)	6.35*	0	1.7 (1.7/0)	9.4 (9.4/0)	0	0	4.3 (4.3/0)	0	0	0
Occupational diseases rate ( / 10 <sup>6</sup> hours)	0	0	0	0	0	_	_	0	0	0
% Absenteeism <sup>2</sup> (Male/Female)	*	_	_	2.2 (1.8/0.4)	_	_	3.9 (1.5/2.4)	1.38 (0.5/0.87)	_	5.74

<sup>1</sup> Cases concerning first aid are not included

<sup>2</sup> Absences due to every type of incapacity are included (illness, accident, etc)

<sup>\*</sup> These indices are analytically presented in Table 7.6c, indicator G4-LA6

Chart 4.10a presents the evolution of the AIF incident index in the Group's facilities, compared with the corresponding CONCAWE index. Since 2010, injuries concerning the HF & EKO marketing companies as well as contractor employees have been also included so that comparisons can be made with the corresponding CONCAWE data.

53% of lost workday accidents concerning permanent employees were due to slips, trips and falls on the same level. As part of ongoing efforts to reduce these types of accidents, upgrades were made in the protection characteristics and specifications of allocated safety shoes given to personnel. Non-slip flooring and stairs specifications in the production sites were also improved.

As the European statistics for 2013, as is the norm, will not be issued till September of the next year, they were not available at the time this report was released.



Chart 4.10a: AIF Index

There was no recorded case of any occupational diseases in the Group's industrial facilities. Generally, there are no employees who are at high risk of occupational diseases and where significant risks exist (e.g. hearing loss due to noise at airports), appropriate measures are taken to prevent them.

In the context of the joint efforts made by European refineries to establish specific indicators concerning the process safety, HELLENIC PETROLEUM was one of the first companies (globally) to have adopted them and monitored the new process safety performance indicators , in accordance with CONCAWE's instructions and in line with API RP 754, 2010 (Recommended Practice 754 "Process Safety Performance In-

dicators for the Refining and Petrochemical Industries"). The relevant data for 2013 is presented in Table 4.11.

Chart 4.10b presents the total process safety index (PSER - Process Safety Event Rate) trend which corresponds to all process safety incidents per one million man-hours, compared with the CONCAWE's corresponding index, from which it is evident that the Group's index is reduced by 30% compared to 2012 and close to that of the European average.

In order to reduce these indicators, all of the Group's facilities are striving to reach an annual target to minimize leakages with the ultimate goal of no leakages at all.

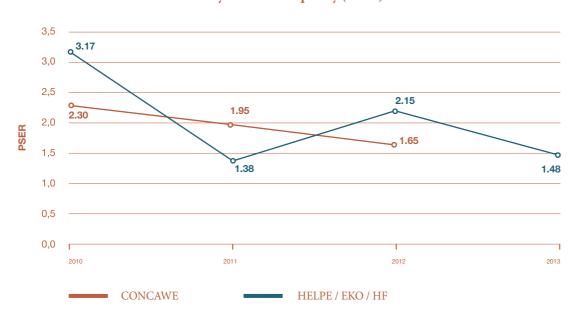


Chart 4.10b: Process Safety incident Frequency (PSER)

Table 4.11: Process safety incidents based on CONCAWE's definitions

Facility	BEA, BEE, BEΘ	EKO & HF	OKTA
Process Safety Event (PSE-1)	6	0	1
Process Safety Event (PSE-2)	6	0	
PSER-1 Index	0.74	0	0.86
PSER-2 Index	0.74	0	
Total PSER Index	1.48	0	0.86

With the objective of further raising employee awareness concerning accident prevention, combined with operating the facilities in a safe manner, we continued with the implementation of the Rewarding Safety Performance Policy for groups of employees who manage to achieve the objectives that are set regarding work hours, without incurring lost workday injuries.

In this regard, the following safety goals were achieved in 2013:

- 500,000 hours without lost workday injuries, for Elefsis and Thessaloniki refineries
- 300,000 & 400,000 hours without lost workday injuries at DIAXON

In addition, the "Health, Safety, Environment and Sustainable Development" newsletter continued to be distributed to all employees in order to keep them regularly updated in a timely manner.



# 5. OUR COMMITMENT TO OUR CUSTOMERS & SUPPLIERS



Customer service and looking after the environment constitute two parameters which are closely connected to all of our products that apply to the Group's production and marketing of high-quality petroleum products, petrochemicals and lubricants for various uses.

We make every effort to produce environmentally friendly products whilst also taking end users' health into consideration. We consistently strive to meet the requirements of our customers, through creating mutual trust and seeking customer satisfaction, from the product's entry onto the market all the way through to the end of its use.

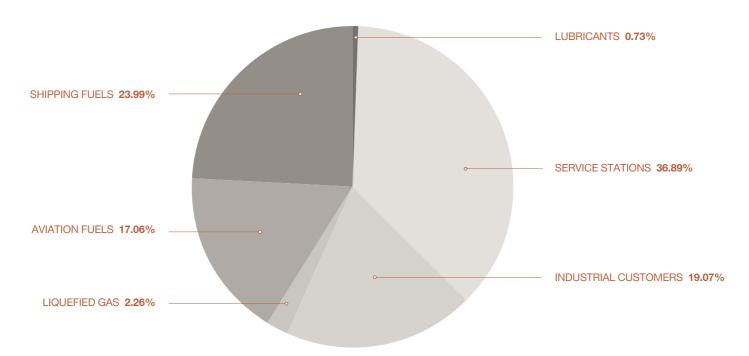


Chart 5.1: EKO's sales breakdown by customer type in Greece

The Group is operational in Greece, Cyprus, Bulgaria, Serbia, Montenegro and FYROM (through its subsidiaries). Exports are also made to all the major markets in S.E. Europe.

The Group meets the needs of all of its domestic customers (industry, transport, shipping, aviation, etc.) and is active in retail and wholesale sales in both the domestic as well as international markets. Apart from the sales of fuels and lubricants through its network of service stations, a wide range of other services, both within and outside Greece, are provided. Table 5.2 presents the 'product mix' in the domestic and international markets in 2013.

**Table 5.2**: Percentage of sales by product for each of the Group's companies

PRODUCTS	ЕКО	HF	EKO SERBIA	OKTA	EKO BULGARIA	HP CYPRUS	JPK MONTE- NEGRO
Unleaded gasoline 95 octane	18.69	45.06	20.15	13.50	11.34	31.7	15.88
Unleaded gasoline 98 octane			4.32	2.39		2.1	3.27
Unleaded gasoline 100 octane	0.66	1.73			1.1	0.2	
LRP gasoline	0.09	0.34					
Automotive gas oil	25.39	34.91	50.08	51.58	64.01	27.1	58.32
Heating gas oil	6.02	14.48		3.29	1.78	9.2	4.12
Marine fuel	4.56					15.7	1.89
Lubricants	0.73	0.03				0.2	0.05
Kerosene	0.16					1.1	
Mazout (fuel oil)	23.17	1.03	0.15	22.96		3.1	
Bitumen	0.72	0.73	0.14		4.13		
LPG	2.75	1.7	25.17	1.88	15.47	5.3	2.07
CNG					1.5		
Jet A1	17.07			4.37	0.67	4.3	14.40
Other (sulphur)				0.03			

The Group's subsidiary HELLENIC PETROLEUM CYPRUS is a Fuels Marketing Company that serves Cypriot Consumers and Businesses through the sale of EKO products, through a retail network of 83 service stations.

Table 5.3 presents the market sectors that the company covers and their respective sales volumes.

Table 5.3: Fuel percentages as sold by HP CYPRUS per business sector

BUSINESS SECTOR	FUEL PERCENTAGES
Retail Business (service stations)	61%
Commercial and Industrial Customers	13.4%
LPG Business	5.3 %
International Sales (marine & aviation fuels)	20 % (15.7 % & 4.3 %)
Lubricants Business	0.2 %

EKO SERBIA's retail network is comprised of 50 service stations, covering 8% of local needs and representing 4% of the domestic market (based on the number of service stations). The volume of sales is 8% wholesale and 92% retail.

OKTA covers 57% of the local market in FYROM and also has a presence in Kosovo (where it covers 28% of local needs). The company is also active in, Serbia, Montenegro and Albania. Through its network of 26 service stations, OKTA covers 9% of the domestic retail market.

In geographical terms, EKO BULGARIA's service station network covers 90% of the country's retail market; meanwhile covering (again in geographical terms) 100% of the country's wholesale market. Its market share in retail is 9% (82 service stations, which are supported by two owned LPG depots, one rented depot for light fuels and 27 leased car washing facilities).

JPK MONTENEGRO, with a network of 38 stations and 3 Yacht Services facilities, covers 53% of the domestic market. The company also has one light fuel depot in Bar and two aviation fuel depots in Tivat and Podgorica. The breakdown of the fuel sold, by business sector, was as follows: 57% retail market, 12% commercial and industrial customers and 31% other service stations.

DIAXON produces polypropylene film of which 30% is exported (see Chart 5.4).

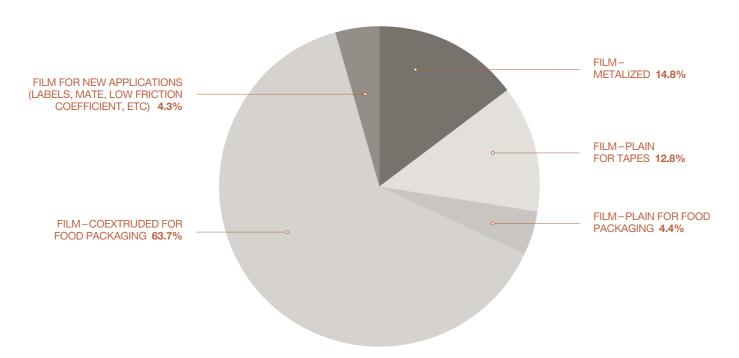


Chart 5.4: DIAXON's sales breakdown by type of film

#### 5.1 Customer Satisfaction

Our aim is to optimize customer satisfaction through placing a further emphasis on the customer and creating value for all parties. In this context, the Group provides its business partners with various support programs and activities with which to improve the business environment and working conditions, whilst ultimately ensuring for competitive advantage.

The Group's marketing companies, in cooperation with the NTUA's Fuels and Lubricants Laboratory, implements a Fuels Quality Control Program and Measuring Equipment Calibration Service at all of the marketing companies' service stations.

Regular inspections conducted at the Group's service stations measure the effective implementation and levels of safety, operation and service. Termed "mystery shopping", the inspections are carried out four times a year and entail the following:

- Mystery visitors are selected (mystery motorist).
- 30 elements are then evaluated, divided into 6 sections (forecourt and equipment, service, safety, store, uniforms, WCs).
- Results, per inspector, per service station are monitored.
- Service station managers are briefed, corrective actions are taken.
- Rewards/incentives are then awarded for the best managers and their staff.

Customer surveys also evaluate the degree of customer satisfaction, customer loyalty, service station commitment, brand health and employee satisfaction. Where appropriate, specific surveys are made, via questionnaires, to record specialized issues such as the success of a promotional program or the degree of customer preference for/acceptance of a scheme etc.

An illustrative example of one such initiative, which took place during 2013, was conducted in Cyprus through a Retail Mystery Shopper Survey (measuring customer service) in all of HPC's service stations (as well as in a number of competitors' service stations). Aspects that were assessed included: "Effectiveness of Service offered", "Staff Appearance & Wearing of Uniforms" and the "Politeness" of personnel. A similar customer satisfaction survey exercise was conducted in Serbia concerning the company's service stations as well as specific consumer group surveys concerning the market response to new products.

#### PETROL STATIONS REWARD PROGRAM - RETAIL CHAMPIONSHIP

With its objective of assessing the performance of EKO and HF's service stations as well as relevant sales executives in Greece, Cyprus, Montenegro, Bulgaria, Serbia and FYROM, the "Retail Championship" program continued for its 4th year.

The program which entails evaluating and rewarding participants (managers, service station owners, sales staff) is conducted according to a set of specific criteria, aimed at ensuring that service stations operate safely, that effective levels of customer service are offered and that annual operational objectives are achieved.





#### **5.2 Product Quality**

To ensure that our products reach the final consumer without any form of alteration/distortion, annual scheduled inspections are conducted throughout the entire service stations network through the collection of product samples. Particular emphasis is placed on large urban centres and geographical sites where the probability of fuel adulteration is in fact more probable.

Ongoing approaches (such as training, mystery shopping, competitive pricing and promotional activities) ensure that our partners comply with our corporate policy and regulations, thereby confirming the loyalty of our customers and improving sales methods, as reflected in surveys that are periodically undertaken.

With the objective of achieving customer satisfaction, EKO created the first comprehensive fuel quantity and quality control program through its ongoing inspection process which tests quality from the refinery all the way through to the customer's fuel tank. Named "EKO ASSURANCE", the program ensures that the customer receives both quality and quantity in terms of the fuel purchased through specific actions which include:

- Ongoing qualitative fuel tests in the refinery and storage facilities
- Sealed tanks for fuel transportation
- Monitoring tankers transport routes through GPS systems
- Petrol pumps are checked and sealed with special, visible sealing tape
- Customers are given the opportunity to check fuels' quality on site, with free spot test kits
- Unannounced quantitative controls at service stations using conventional vehicles
- Continuous qualitative and quantitative controls at service stations performed by the NTUA's mobile laboratories

In the context of the EKO ASSURANCE program, in 2013 our customers carried out 26,140 free spot test kits. During the same period, through the Fuels Quality Control & Calibration Program, 2,342 service stations were also audited (through which 5,136 fuel pumps and 9,978 nozzles were checked).

#### 5.3 Customer Information

Accessible and adequate information is made available to the Group's customers and users of products. The types of products that are subject to labelling requirements include lubricants (both imported and domestic blended) and car care chemicals (such as antifreeze fluid and brake fluid). Lubricants (industrial, commercial & consumer) are, in general, deemed as low-volatility products and are not assessed as being dangerous (hazardous) substances.

Labels and Material Safety Data Sheets – MSDS substantiate the safety of the product, provide information on how to use it, as well as its specifications and ultimately, how to dispose of it.

Each product is labelled in accordance with the relevant European legislation whereby the required information is visible on the packaging (with that said, mention of the product's shelf life is not mandatory).

All activities concerned with the advertising and promotion of the products. fully complies with the Code of Conduct of the Association of Advertisers and the Association of Advertising and Communication. The Group's marketing staff also participates in educational programs and training seminars so that they are kept abreast of best practices and new regulations.

For better service and meeting the needs of their customers, EKO & HF operate 24-hour telephone service lines whereby all manners of concerns, questions, thanks, congratulations or customer complaints are answered and resolved directly by qualified personnel. Any issues that cannot be directly and verbally answered and addressed are recorded in a database and the process of resolving them begins immediately. If the complaint can be resolved at a Customer Service or Sales Dept level, then the process, which involves oral or written communication with the customer, is completed. If the complaint requires specific information, it is conveyed to the Marketing Dept, whereby the issue is settled through written or oral communication with the customer.

In 2013, HF's helpline received 2,767calls (of which 2,644 were directly answered by qualified personnel, whilst 123 calls were resolved by the Group's staff). Similarly, EKO's helpline received 928 calls (of which 761 calls were directly answered by our partner's specialized staff, whilst 167 calls were resolved by the Group's staff).

#### **5.4 Facilities Certifications & Awards**

As part of its Quality, Safety and Environmental Policy, the Group is committed to supplying products and services which fully comply and/or are better than the agreed specifications, concerning the provision of full technical data on the quality of products/services to all concerned and to offer its customers, collaborators and managers the opportunity to evaluate and assist in further improving the quality of its products and services.

So that the Health, Safety and Environmental Policy and the implied objectives can be achieved, the Group has designed and implemented Management Systems which meet the requirements of international quality, safety and environmental standards.

Table 5.5: Certification of Group's industrial facilities, storage facilities and service stations, in accordance with internationally recognized standards

FACILITY	ISO 9001	ISO 14001	OHSAS 18001	ISO 17025**	ELOT 1429
Aspropyrgos (BEA)	✓	✓	$\checkmark$	<b>√</b>	
Elefsina (BEE)	<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>	
Thessaloniki (ΒΕΘ)	<b>√</b>	✓	<b>√</b>	<b>√</b>	
DIAXON	<b>√</b>		<b>√</b>		
HF liquid fuel storage facilities at Aspropyrgos, Thessaloniki, Corfu and Heraklion		√			
EKO Lubricants Factory	<b>√</b>	<b>√</b>	<b>√</b>		
EKO liquid fuels and chemicals storage facility at Scaramanga & liquid fuels storage facilities at Elefsina & Aspropyrgos		✓	√		
EKO aviation fuel filling stations at 18 airports	√	√	√		
EKO CALYPSO Service Stations (Aspropyrgos Service Station)	✓				
Group's HQs (certification of the Hydrocarbon Exploration and Production activity)		V	✓		
ASPROFOS	<b>✓</b>	<b>✓</b>	<b>√</b>		<b>√</b>
HP CYPRUS	<b>✓</b>	<b>✓</b>	<b>√</b>		
OKTA	<b>√</b> *	<b>√</b> *		<b>√</b>	

#### Notes:

- \* In the certification process
- \*\* Refineries' laboratories

In this context, DIAXON adopted and applied the standard BRC/IOP Issue 4: Global Standard for Packaging and Packaging Materials.

During 2013, the Group was distinguished for its performance in sustainable development. The awards and prizes presented in Table 5.6 signify the recognition of the policy and strategy that have been followed built on the three axes of sustainable development: financial performance – environmental management – respect towards society.

Table 5.6: The Group's Awards in 2013

2nd Prize in 2013 CSR Awards	Aegean University				
Golden Award in the CR Index for CSR performance	Institute of Corporate Responsibility in cooperation with the Business in the Community Organisation (BITC				
CR Index Prize for environmental care					
2nd Business Award in the CSR category	"Georgios Ouzounis" Business Awards				
The Group occupied the 216th place overall amongst 250 top global energy companies, showing an improvement of 9 places compared to the previous year	International Platts organisation				
European "Good Practice" award in the area of occupational health and safety	The European Organisation for Occupational Safety and Health (EU-OSHA)				
Honorary Distinction for the contribution to the Union's social activity	"Together for Children" Union				
Honorary Distinction for participation in he Corporate Relay Run 2013					
Honorary Commendation for sponsoring the participation of 5 athletes at the World Winter Games Special Olympics 2013	Special Olympics Hellas				
Honorary Distinction for supporting the actions of the Association	Association of Social Responsibility for Children and Youth – SKEP				
Honorary Distinction for sponsoring the Ultra-Marathon 2013	Hellenic Long Distance Running Association				
Grand Award Climate Protection (Environmental Awards)	Plant Management Boussias Communications				
Gold Award Environmental CSR					
Silver Award Resource Recovery (Environmental Awards)					
Greek Value - Northern Greece" award in recognition of the significant contribution made to environmental protection	The Federation of Industries of Northern Greece, in cooperation with the financia newspaper EXPRESS				

#### **GUINNESS WORLD RECORD**

From the 16th until the 18th of October 2013, three Greek companies (EKO, Kosmocar-Volkswagen & Driving Academy) cooperated and subsequently achieved the lowest consumption world record in real driving conditions, across nine districts in Greece and over 1,577 km of national and provincial roads.

The vehicles that were made available to the Driving Academy's driving instructors—skilled in low fuel consumption driving—were from Kosmocar-Volkswagen (2 cars with active cylinder management system (ACT)). The cars were fuelled with conventional fuels from EKO (petrol & diesel) available at all of EKO's service stations to everyday customers.

The result was the breaking of two Guinness world records, as follows:

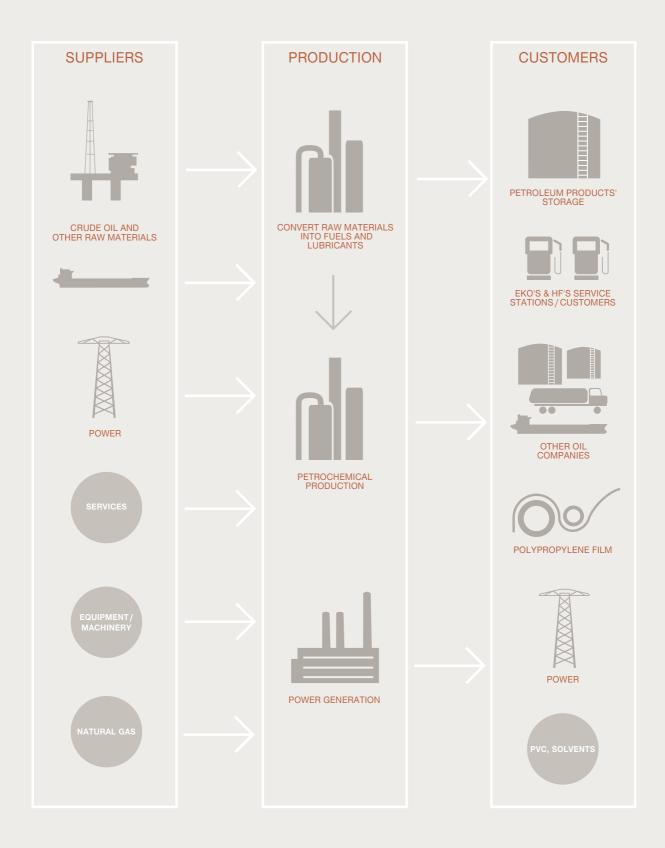
- The Guinness World Record for the lowest fuel consumption for a diesel fuelled car (the tour of Greece: 2.96 lt /100 km)
- The Guinness World Record for the lowest fuel consumption for a gasoline fuelled car (the tour of Greece: 3.42 lt /100 km)





At the end of the route, measurements concerning the refuelling of the cars, distance covered by each car and data accuracy were validated through the Guinness World Records Organisation's strict guidelines and standards. The Organisation, after evaluating all of the data, the available measurements, the testimonies of the official bodies, the video of the route and the GPS data, confirmed that both records had indeed been broken and awarded the two prestigious prizes.

### **Supply Chain**



#### 5.5 Supplies & Supply Chain

The Group possesses a wide and diverse supplier base that is revised in the context of a sustainable supply chain strategy, tailored to the Group's values, which includes multinational companies as well as small local businesses for the purposes of purchasing materials and equipment or services hiring. Today, the suppliers base has about 4,500 active suppliers and the Group seeks cooperation with the aim of environmental awareness, responsible labor practices implementation and human rights respect.

An indicative example of one such cooperation was the organization of a training program on occupational Health & Safety which was attended (mandatory) by potential subcontractors.

The Group's suppliers are essential partners for achieving the business objectives that will ensure competitiveness and sustainable development, affecting not only our financial performance, but also our relationships with other social partners.

The development and maintenance of a supply chain with added value for the Group, with economic, environmental and socially responsible methods and practices is an ongoing challenge, in line with the Group's vision.

For the above reasons, our associates are selected and evaluated with the objective of improving the Group's overall performance and sustainable growth. Asides from our evaluation being based on business criteria, in 2014 relevant questionnaires were enriched with questions concerning environmental performance and the impact of their operations on society. Emphasis is also placed on supporting local communities whereby local suppliers are given preference, where possible, and always in accordance with the Procurement Manual. In 2013, their percentage exceeded 15% of the total (Table 6.1).

On the other hand, the Group aims to be the preferred partner of suppliers and service providers, adopting common values and principles, through a defined framework of cooperation from our Procurement Manual and Code of Conduct; fostering synergies and long-term relationships, with transparency and respect for competitiveness, meritocracy and equal opportunities.



## 6. OUR COMMITMENT TO SOCIETY



Our communication and cooperation with our social partners is multidimensional, from the determination of our strategy and policies all the way through to our understanding of our stakeholders' needs and expectations; and the consequent adjustment of the relevant Group's programs and activities.

Illustrative examples include materiality assessment surveys, periodic customer and employee satisfaction surveys, annual opinion surveys, public debates and other forms of communication.

The results of the above actions are evaluated and redefined in order to take into account and meet our stakeholders' requirements, as they are reflected, in the above surveys and evaluations.

#### POSITIVE FINANCIAL CONTRIBUTION

Our goal in all of the locations in which we are privileged to operate, is to have a positive overall contribution, in terms of economic value and contributing to the development of living communities.

The presence of the Group's industrial complexes assures economic benefits for the local communities as it creates direct/indirect employment opportunities, boosts local businesses in their capacity as suppliers and contributes significant resources through taxes and local investments.

Material aspects: Economic performance/indirect economic impacts disclosures G4-EC1 and G4-EC8 in the GRI content index, Table 7.6c

#### 6.1 Ethical Management

The Group is committed to creating a uniform corporate culture that upholds initiative and responsibility. This in turn, we believe, cultivates ethical, creative and talented employees within an environment based on trust and respect. To this end, policies have been established which are consistent with the strategy for sustainable development.

Ethics are not only the core of the Group's sustainable development and competitiveness but comprise a reference point for employees' social and financial activities.

The Group's Code of Conduct identifies regulatory and ethical compliance requirements as well as behaviours expected from all of its employees.

An awareness program, initiated in 2012 and implemented and completed in 2013, ensures for the dissemination of the Code of Conduct at all levels within the Group further ensuring the trust of our stakeholders through transparency in all actions.

HELLENIC PETROLEUEM's Internal Labour Code places a great emphasis on employees' "moral awareness" and contains procedures for complying with the rules and principles governing the company.

All of our employees have been informed and trained with regards to the Internal Labour Code (available on the Intranet) which references matters concerning ethics, corruption, behaviour towards employees, colleagues and third parties, etc.

#### **CORPORATE GOVERNANCE**

Our aim is to be transparent and to apply the strictest corporate governance rules. The BoD is committed to integrating CSR into the Group's strategy and to adopting responsible corporate citizen behaviours

For further information regarding the Group's corporate governance structure, including its Board Committees, please see our website:

http://www.helpe.gr/en/investor-relations/corporate-governance/helpe-board-of-directors/ and http://www.helpe.gr/en/investor-relations/corporate-governance/board-committees/

#### 6.2 Human Rights & Labour Relations

The Group monitors and has adopted the relevant labour legislation (national, EU, ILO), including the prohibition of child labour, provisions for human rights and working conditions and is in full agreement with the collective and relevant international conventions.

HELLENIC PETROLEUM's employees possess the right to be involved in trade unions and professional associations, without any limitations. Currently, eight employee unions exist (in Greece) with a 94-100% participation rate (the indicator G4-11, Table 7.6a, analytically presents the employees' unions operating in the Group's companies as well as employees' participation rates).

HELLENIC PETROLEUM's representative union signs a one or two year collective bargaining agreement which defines the terms for employees' (with permanent contracts) remuneration. A corresponding agreement is also in place with regard to EKO's & DIAXON's employees. The percentage of workers (inside and outside of Greece) employed on fixed term contracts constitutes less than 5% of the Group's manpower. On average, 92.3% of employees are covered by collective bargaining agreements.

#### 6.3 Supporting Local Communities

We currently employ over 439 permanent employees, who live in the Thriassion region's neighbouring municipalities and a further 116 employees who live in from the Western Thessaloniki region.

We spend around €3 mil. annually on municipal duties and support the local economy through buying goods and services from the various businesses in the neighbouring areas where we operate (Table 6.1).

Purchases from local suppliers account for more than 15% of the total Group's spend (not taking into account spending such as purchase, storage and transportation of crude oil and petroleum products, natural resources, fixed telephony services).

Table 6.1: Expenses on purchases made from local suppliers (\*\*\*)

Suppliers	Value (**) of invoices (€)	value (%)	No of suppliers(*)	Suppliers (%)
SOUTH	19,553,825	9.9%	144	5.7%
NORTH	10,737,680	5.4%	172	6.9%
LOCAL TOTAL	30,291,504	15.3%	316	12.6%
REMAINDER TOTAL	167,073,379 <b>197,364,883</b>	84.7% <b>100.0%</b>	2,191 <b>2,507</b>	87.4% <b>100.0</b> %

<sup>\*</sup> Number of suppliers that match the invoices

#### PUBLIC OPINION SURVEYS

At the end of 2013, we conducted two public opinion surveys: a materiality analysis and a stakeholders' engagement survey. Their results confirm the belief that supporting the communities where we live creates conditions for open communication and trust along with the inherent business operation (social license to operate). Our involvement and contribution plays an important role in securing and maintaining that "social license" function which adds to improving relationships, reducing risk, contributing to employee recruitment and retention and creating synergies with the state, local agencies as well as NGOs.

Through participating in working groups and sector association committees, as well as national and international organizations, the Group and its staff actively promote public dialogue concerning sustainable development; both are also actively involved in initiatives inducing dialogue and communication with local communities.

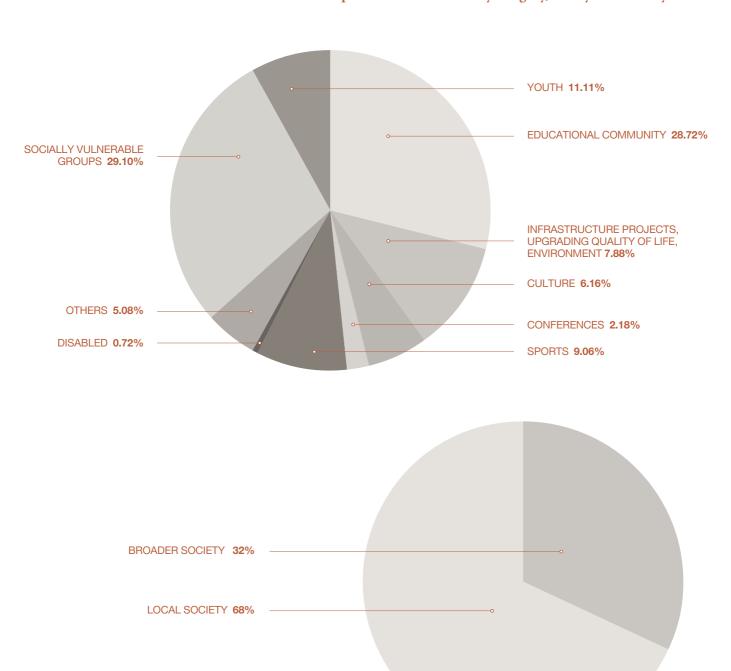
In 2013, we designed and implemented a broad CSR program having set the priorities presented in Charts 6.2a & 6.2b.The Group's investments in CSR initiatives both within Greece and abroad, amounted to approximately  $\in$  3.5 mil.

<sup>\*\*</sup> The values refer to registered invoices (not commitments or provisions)

<sup>\*\*\*</sup> Local suppliers are defined as those operating in municipalities adjacent to the Group's industrial facilities. As a result the data relates only to HELPE & DIAXON

In the immediate future, we will be focusing our attention on areas where there is greater social demand, and improving both our endeavours and contribution in relation to CSR issues. This will in turn contribute to sustainable development, improved relations with employees and enhanced social solidarity as well as safeguarding relationships that are built on trust with both the local and wider society.

Charts 6.2a & 6.2b: CSR expenditures breakdown by category, locally & nationally



# 6.3.1 The Group's Social Contribution in Greece

The act of giving and maintaining a responsible attitude towards society are both integral elements of the Group's culture and strategy. Through our specific initiatives, we place an emphasis on social solidarity, socially vulnerable groups, youth, education, health, the environment, culture and sport.

These actions (amounting to € 3.13 mil.) are addressed mainly to the local communities where the Group's business takes place. A number of these actions are presented in more detail below:

#### SOCIALLY VULNERABLE GROUPS

- Donation of heating oil to unemployed residents in neighbouring municipalities.
- "Let's go Camping", a program hosting children from economically vulnerable families in the neighbouring municipalities.
- A program providing primary care services -with the cooperation of MDM
- Supporting the "social groceries" program through the donation of vouchers to purchase food.
- Donation of food vouchers to families with financial difficulties during the Easter and Christmas festivity periods.
- Supporting the "This summer is ours" program for the provision of creative activities for children with special needs in collaboration with the NGO ELIX.
- Supporting NGOs in lieu of corporate gifts and events during the Christmas period.





# YOUTH

• Awarding individuals residing in neighbouring municipalities for their success in gaining places on courses at Universities and Colleges.





- Provision of free Skills Development Seminar Program, organised by ALBA, providing young people with the opportunity to be updated in fields such as entrepreneurship, strategy, negotiation techniques and emotional intelligence.
- Provision of a Scholarship Program for overseas postgraduate studies in fields of study related to the Group's activities.

### **EDUCATIONAL INSTITUTIONS**

- Donation of heating oil to schools and institutions in neighbouring municipalities as well as to municipalities all over Greece such as Nestorio, Deskati, Voio, Eordea, Servion-Velevento, Prespa, Doxato, Paranestio, Prosotsani, Kozani.
- Donation of heating oil to foundations and NGOs all over Greece.
- Donation of educational material to schools in neighbouring municipalities and supporting school events.
- Supporting the "The Energy for Life...is travelling" program, in collaboration with the NGO "Agoni Grami Gonimi", under the auspices of the Ministry of Education and with the support of the European Parliament, which "travels" to 7 islands in the Aegean (Sikinos, Serifos, Skiathos, Skopelos, Kasos, Kastelorizo, Karpathos), with the objective of disseminating ideas, thoughts and opinions about environmental issues with students and all residents living on the islands (www.energyforlife.gr).
- Supporting "The climate is changing...do the monuments mind?" program, an environmental education program for schools.





### INFRASTRUCTURES - ENVIRONMENT - UPGRADING QUALITY OF LIFE

- Donation of fuel to municipalities and voluntary organizations in local communities for fire protection purposes.
- Installation of photovoltaic systems in schools in Western Thessaloniki and the Municipality of Elefsina.





- Monitoring and promoting the Lake Koumoundouros area, in cooperation with the HCMR.
- Covering maintenance expenses for the atmospheric pollution measurement station in the Aspropyrgos municipality.
- Planting trees along the roads and in areas in the Municipality of Aspropyrgos.
- Supporting municipal libraries in the municipalities of Thriasio and Western Thessaloniki.
- Donation of specific type vehicles (one aerial, one tow vehicle) for the needs of the municipality of Mandra-Edillia.

#### **ATHLETICS - CULTURE**

- Annual sponsorship of local sports clubs and athletic clubs for people with special needs.
- Purchase of sports materials and equipment for social and athletic organizations.
- Financial aid and support of events organised by local cultural associations.
- Sponsorship and financial support for museums, cultural institutions and cultural associations.

#### **VOLUNTEERING - SOCIAL SOLIDARITY**

Organization of activities and events for strengthening volunteerism included:

- collecting food & books.
- · museum visits.
- employees mentoring students.
- blood donation program.
- participation in the Marathon.



### **EDUCATIONAL VISITS TO GROUP FACILITIES**

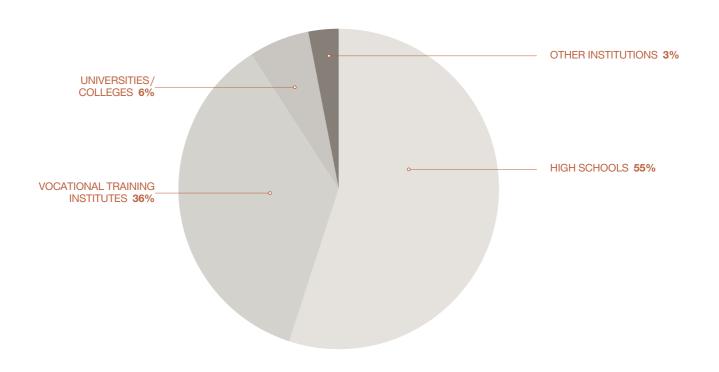
In 2013, the Group's industrial facilities, in Aspropyrgos and Thessaloniki, welcomed 2,954 schoolchildren and students from educational institutions and took them on tours around the facilities.

An additional 80 undergraduate and postgraduate students (from Polytechnic and Finance Schools) were hosted at the headquarters of the Aspropyrgos industrial complex and were given a tour of the industrial facilities (Entrepreneurship Panorama - Business Day).









# FOR 2014 WE ARE PLANNING ON:

- Creating educational opportunities for young people from neighbouring municipalities.
- Conducting a study concerning the establishment of a historical archive/museum in the New HQs building at the Aspropyrgos industrial complex in order to preserve history and educate school children and students.
- Expanding the "Energy for Life...travels" program which concerns the environmental education of schoolchildren, to more areas in Greece with the participation of EKO's and HF's networks.
- The preparation of the program "this summer is ours" in Thessaloniki, in cooperation with the NGO ELIX.
- Supporting municipal libraries in neighbouring municipalities.
- Strengthening volunteerism through participating in joint actions.

# 6.3.2 The Group's Social Contribution abroad

In 2013, the total expenditure incurred with regards to socially responsible activities abroad was approximately € 300,000. Indicative examples in corporate social responsibility initiatives in each country, reflecting the breadth of our commitment to society in general, are presented below.

#### IN FYROM

- Sponsoring and supporting cultural events (such as the "Ohrid Summer Fest 2013" International Music Festival, the "Zlatnoslavejce 2013" Children's Song Festival, children's events in the Municipality of Ilinden and the "Rade Jovchevski Korchagin" nursery in Skopje).
- Voluntary donation of food vouchers by 460 employees for the "world day against hunger" supporting socially vulnerable groups (Red Cross Skopje).





- Donations in kind, to bodies such as the Zlatan Sremac and Idnina schools for children with special needs (winter clothing), the elementary school in the Ilinden Municipality (18 PCs & server) and a training centre for individuals with reduced vision (informatics equipment).
- Continued financial support for surface and rainwater drainage works pertaining to environmental improvement in the Municipality of Ilinden.

### IN CYPRUS

- Donations and support provided to various social institutions and vulnerable
  groups (such as the Municipalities of Livadia and Larnaca for a grocery store, the
  Halcyon Association for helping those in need, the Pancyprian Organization of
  Families, the Cathedrals of Limassol, Famagusta and Konstantias for feeding the
  needy, Noah and St. Christopher foundations).
- Funding for the organization of informative and training events (such as the Global Seminar on Road Safety and the Youth event on Road Safety).
- Sponsoring cultural associations and social institutions (such as the Lions Care Youth Foundation, the Welfare Association for Patients & Deprived Children, the

Neokleous Lyceum Alumni Association, the MKM sailing centre, the Geroskipou tennis club and the Alumni Association of Secondary Technical Education).





### IN MONTENEGRO

- Financial support provided to organizations (such as the Kotor School for Music Education, the Municipality of Tivat, the Municipality of Kotor, the Greek Embassy - Economic Chamber) for the organisation of cultural events and conferences.
- Sponsoring the Marine Biology Institute for Environmental Research on marine protection.
- Donation of equipment to the Kotor Paraplegic Association and the Montenegro Clinical Centre.



# IN SERBIA

- Fuel donation to support the work of charitable and humanitarian organizations (such as the HRH Crown Princess Katherine Foundation, the mali Velikiljudi Organisation and the Rajnovac Monastery).
- Donation to the Ana i Vlade Divac Foundation in order to support the homeless.





- Sponsorship given in support of athletic and cultural events (such as car races, the national football team, the Serbian Olympic team, the Nis Film festival).
- Fuel donation given to the Olympic team.

#### IN BULGARIA

- Sponsoring issues concerning road safety and pedestrian crossings (to organisations such as: Space lab, Bulgarian Motorcycling Federation).
- Financial support given to sports associations for conducting events (such as the Brimabuild Racing Team, Autotzar, Olympia football club).
- Sponsorship given to the National Team for the "Homeless World Soccer Cup" to motivate the homeless to change their way of life.
- Cultural Sponsorship given to the Hellenic Business Council

# 6.4 Memberships & Participations in Common Actions

As a Group, HELLENIC PETROLEUM has been a member of the Hellenic Network for Corporate Social Responsibility (member of CSR Europe) since 2005 and a member of CSR Europe since 2012.

HELLENIC PETROLEUM actively participated in the establishment of the Council for Sustainable Development which has been created to serve businesses that are willing and able to play a leading role among the SEV's (Hellenic Federation of Enterprises) members. N.B. The Group's CEO serves as vice president on the Council for Sustainable Development.

In the context of the optimization of its operation and the implementation of its sustainability strategy, the Group is a member of the organizations presented below:

Pan-Hellenic Exporters Association (PEA)

Association of SAs and LTDs

Athens Chamber of Commerce and Industry (ACCI)

Hellenic Federation of Enterprises (SEV)

Federation of Industries of Northern Greece

Hellenic Petroleum Marketing Companies Association (SEEPE)

Federation of Industries of Northern Greece

Hellenic Management Association

**EUROCHLOR** 

FRI (Fractionation Research Institute)

MTI (Material Technology Institute)

IVEPE

Thessaloniki Chamber of Commerce and Industry

**FUELS EUROPE** 

**CONCAWE** 

CYPRUS Chamber of Commerce and Industry (CCCI)

CYPRUS Employers & Industrialists Federation (OEB)

KODAP (CYPRUS strategic stocks)

CYMEPA (CYPRUS Marine Environment Protection Association)

The Bulgarian Fuels and LPG Association The Hellenic Business Council The Bulgarian Business Leaders Forum The Bulgarian Fuels and LPG Association The Hellenic Business Council Bulgarian Fuel and Gas Association

OKTA is a member of the following organisations: European Business Association, ACI-Financial Markets Association, Patron member of the Economic Chamber, Patron member of the American Chamber of Commerce, Association of Energetic - ZEMAK, the only national member of the Partnership for clean fuels and vehicles, MANU (Country's Academy of Science and Art) in WEC (World Energy Council, Vocational Education and Training Centre (VET).

EKO SERBIA is one of the founding members of UNKS (Association of Oil Companies in SERBIA) amongst other key fuel retail chains and competitors. It has also been a member of the FIC (Foreign Investors Council) since 2002.

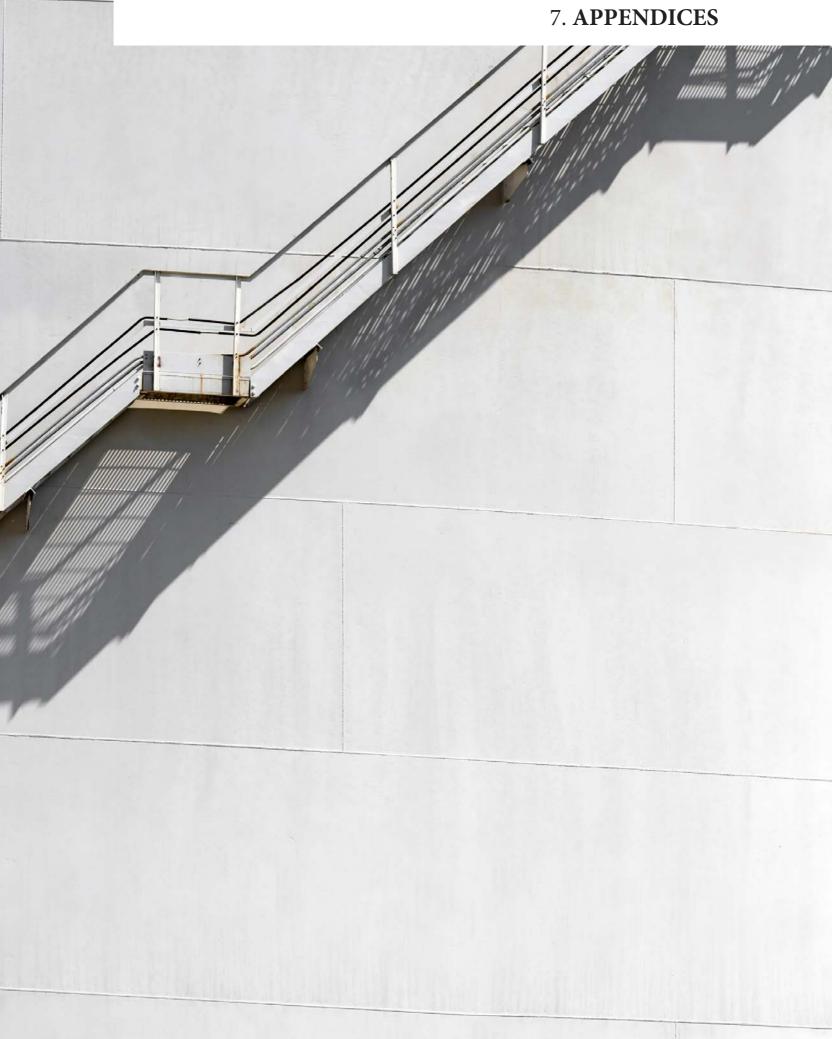
JPK MONTENEGRO is a member of: the MNE State Energy Council, Institute of Standardization MNE and is also a member of the executive board of the MNE Economy Chamber.

EKO participates on the Executive Board of the MNE Economy Chamber, the American Chamber & the MNE Institute of Standardization.

#### FURTHERMORE, THE GROUP:

- Promotes company and country interests in important issues, such as the REACH
  European Regulation and in Carbon Trading etc, through its participations in the
  European Petroleum Industry Association (FUELS EUROPE) work groups, in
  which HELLENIC PETROLEUM is also a member.
- Participates in all national level audits, made by the relevant UN's committee on climate change and air emissions. It is also involved in the relevant Working Groups on Best Available Techniques (BATs) and the revision of the relevant reference documents (BREFs - Refinery and Large Combustion Plants) and the Interministerial Committee for the carbon dioxide and the relevant European Directive.
- Participates on the BoD of the Network for Corporate Social Responsibility.





# 7.1 Methodology - Report's Boundaries - Stakeholders

This Report was prepared taking into account the Global Reporting Initiative guidelines (GRI - G4), the principles of the United Nations Global Compact (UNGC's 24 criteria) and the GRI's-G4 Oil & Gas Sector Disclosures.

Our Group is committed towards implementing and promoting these two complementary initiatives thereby ensuring for a consistent platform of values for the implementation of sustainable development policies in strategic and business practices.

During the preparation of the report, we took into account the following: the dialogue with our stakeholders, conclusions drawn from surveys conducted in local communities and with our customers, suppliers and employees, requirements for disclosure from financial analysts and the wider public, as well as observations made by inspection and auditing bodies.

This year, as part of the process of preparing this Report, we undertook a thorough review of our material impacts (Materiality Assessment) through engaging in dialogue with both our internal and external stakeholders.

The project was conducted in four phases, (see Figure 7.1):

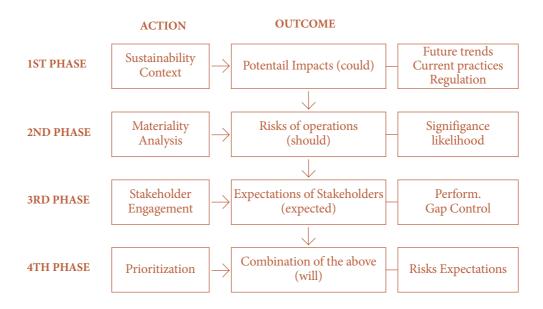
- In the Sustainability Context phase, potential Issues were identified by reviewing future trends, current industry practices and the regulatory environment.
- In the Materiality Analysis phase, these issues were analysed in terms of associated Risk (relevant to economic, environmental and social impacts of activities), based on (a) the potential significance of each Issue and (b) the potential likelihood of the Issue occurring.
- In the Stakeholder Engagement phase, Stakeholders' Expectations were identified by combining (a) the gap between how well HELPE handles each issue today, versus how well it should handle it in the future and (b) the expressed degree of HELPE's own control in handling these Issues.
- In the Prioritization phase, the outcomes of the above phases were combined in terms of (a) Risk and (b) Expectations, the outcome of which defines the main Issues that HELPE should focus on.

# MORE SPECIFICALLY:

The purpose of Phase 1 was to identify issues, which could potentially be addressed by HELPE, in relation to sustainable development and corporate responsibility. The potential issues were identified by reviewing future trends, current practices and the regulatory environment.

The purpose of Phase 2 was to identify, in a structured manner, the most material issues whilst covering the requirements of the GRI G4 Guidelines. In order to conduct this phase, the Risk associated with each of the potential issues was identified, relevant to the economic, environmental and social impacts of HELPE's activities, products and relationships. The criteria utilized to define the risks were as follows: the potential significance (i.e. the severity of something "going wrong" on a 10-point

Figure 7.1: The 4 phases of the «Materiality Analysis 2013» project



scale), the potential likelihood (i.e. the probability of something "going wrong" on a 5-point scale) and the combination of significance and likelihood reflecting the level of Risk.

# The potential risk probability

Rating	Descriptor	Description
5	Certain	The event is expected to occur in most circumstances
4	Likely	The event will probably occur in many circumstances
3	Moderate	The event should occur at some time
2	Unlikely	The event could occur at some time
1	Rare	The event may occur in exceptional circumstances

# Combination of significance & likelihood reflecting the risk level

LIKELYHOOD	INSIGNIFICAN	NT MINOR	MODERATE	MAJOR	CATASTROPHIC
	1-2	3-4	5-6	7-8	9-10
5 (Certain)	S (5-10)	S (15-20)	H (25-30)	H (35-40)	H (45-50)
4 (Likely)	M (4-8)	S (12-16)	S (20-24)	H (28-32)	H (36-40)
3 (Moderate)	L (3-6)	M (9-12)	S (15-18)	H (21-24)	H (27-30)
2 (Unlikely)	L (2-4)		M (10-16)	S (14-16)	H (18-20)
1 (Rare)	L (1-2)			S (7-8)	S (9-10)

● H=high risk ● S=significant risk ● M=moderate risk ● L=low risk

The purpose of the Stakeholder Engagement (Phase 3) was to identify the main expectations of our stakeholders, in relation to sustainable development and corporate responsibility, as they can potentially influence stakeholders' assessment and decisions. To conduct direct engagement, the Group workshops' approach was chosen, as it was considered the most effective and efficient (compared to methodologies such as face to face interviews). The workshops themselves were conducted in a spirit of active participation and constructive feedback.

The purpose of Prioritisation (Phase 4) was to combine the outcomes of the materiality analysis (what HELPE should do) and Stakeholder Engagement (what HELPE is expected to do) in order to define the material aspects HELPE will focus on the long term.

#### REPORT'S BOUNDARIES

The data that is reported is consolidated at a Group level, unless presented differently in certain areas. Particular environmental indicators are presented in detail for each of the Group's business units.

In terms of the selection of the Group's companies included in this Report, we took into account (a) the list of companies included in the Group's consolidated financial statement (http://www.helpe.gr/userfiles/09deccd3-a8a9-4ae2-b7da-a27a010c9bf8/ 2013\_12m\_Group\_GR.pdf, page 72) and (b) the relevant materiality assessment complemented with a set of selection criteria (such as participation and control, impacts and risks, sales, number of employees). The results are presented in Table 7.2; the information and data contained in this Report refers only to these 10 companies of the Group. Our target, for the next report, is that this number increases to 15 companies.

### Table 7.2: **Group's companies presented in the Report**

- 1. HELLENIC PETROLEUM S.A.
- EKO A.B.E.E.
   HELLENIC FUELS S.A.
- OKTA AD SKOPJE
- 5. HELLENIC PETROLEUM CYPRUS LTD
- 6. JUGOPETROL AD KOTOR
- 7. EKO BULGARIA EAD
- 8. EKO SERBIA AD
- 9. DIAXON A.B.E.E.
- 10. ASPROFOS S.A.

Table 7.3 presents the most significant issues (material aspects) that emerged from the materiality assessment, as well as their characterization "in accordance with" their limits, within, or outside the Group (Aspect Boundaries), the relevant paragraph of the Report and the relevant GRI indicator, for each one of the 18 material aspects.

Table 7.3: **Aspect Boundaries** 

Material Aspects	Boundaries within outside		Report's section	GRI Indicator
ENVIRONMENT			3	
Material Consumption (1.1.1)	X		3.1	Table 7.6b, DMA: Material Consumption Table 7.6c: G4-EN1-2
Energy Use (1.2)	X		3.1	Table 7.6b, DMA: Energy Use Table 7.6c: G4-EN3-7
CO <sub>2</sub> Emissions (1.3.1)	X	X	3.1	Table 7.6b, DMA: GHG Emissions Table 7.6c: G4-EN15-19
NOx Emissions (1.3.3)	X	X	3.2	Table 7.6b, DMA: GHG Emissions Table 7.6c: G4-EN15-21
VOC Emissions (1.3.4)	X	X	3.2	Table 7.6b, DMA: GHG Emissions Table 7.6c: G4-EN15-21
Oil Spills & Leakages (1.5.1)	X	X	3.5	Table 7.6b, DMA: Oil Spills & Leakages Table 7.6c: G4-EN24
Product Impact (1.8)	X	X	5.1, 5.2, 5.3, 5.4	Table 7.6b, DMA: Product Impact Table 7.6c: G4-EN11-14, EN26, PR1-3
SHAREHOLDERS - INVESTORS				
Supply Security (2.5.2)	X		5.5	Table 7.6b, DMA: Supply Security Table 7.6a: G4-12
Operational Continuity (2.5.3)	X	X	2.4	Table 7.6b, DMA: Operational Continuity
SUPPLIERS				
Supplier Assessment (4.4)	X		5.5	Table 7.6b, DMA: Supplier Assessment, Table 7.6c: G4-EN32-33, LA14-15, HR4-6, HR10-11, SO9-10
Responsible Buying (4.1)	X		6.1, 6.3	Table 7.6b, DMA: Procurement Practices Table 7.6c: G4-EC9
Operational Support (4.2)	X			Table 7.6b, DMA: Procurement Practices
EMPLOYEES			4	
Job Position Security (3.1)	X	X	4, 4.1	Table 7.6b, DMA: Job Position Security Table 7.6c: G4- LA1
Occupational Health & Safety (3.4.2)	X		4.2, 4.2.1, 4.2.2, 4.2.3	Table 7.6b, DMA: Occupational Health & Safety, Table 7.6c: G4- LA5-8
CUSTOMERS			5	
Anti-competitive Behaviour (5.7)	X		6.1	Table 7.6b, DMA: Anti-competitive Behaviour Table 7.6c: G4-SO3-5, SO7
SOCIETY			6	
Accident Impact (6.2.2)	X	X	4.2	Table 7.6b, DMA: Accident Impact Table 7.6c: G4-EN11-14, EN26
Health Screening (6.2.4)	X	X	6.3	Table 7.6b, DMA: Health Screening
Acoustic Impact (6.2.3)	X	X	4.2	Table 7.6b, DMA: Acoustic Impact

All of the indicators, measurement units, quantities and sizes — referred to in the report — correspond to measurements and data that have been recorded using the best available practices, internationally accepted standards and international oil industry codes.

No changes in measurement methods in relation to either previous reports or any revisions of information included in previous publications, have been made.

Additionally, unless otherwise stated, no further limitations, exceptions, reviews or changes exist. Financial information is summarized whilst there is detailed presentation of the Group's sustainable development strategy with particular emphasis on topics and aspects that emerged from the Materiality Analysis.

#### **OUR STAKEHOLDERS**

At HELLENIC PETROLEUM, we have determined who our social partners (stake-holders) are, with whom we engage, communicate, collaborate, whom we affect, and who in turn, affect us.

The Group's strategy and all of its actions aim to establish relationships with these stake-holders; so that the Group can respond to their needs, minimize reputational and operational risks and exploit the competitive advantages that these synergies create.

Our Group re-identifies its social partners (stakeholders), on an annual basis, based on its principles and values, strategy, activities, proximity and the community. Stakeholders who are affected by the Group's business activities can be summarized as follows:

# Our People

Our goal is to be a "preferred employer". We want to ensure that we offer an attractive environment to our employees as well as opportunities for them to improve their professional and personal development without discrimination (see sections 4, 6.1 & 6.2).

# Our Neighbours

The ongoing forms of consultation, communication and collaboration - with society as a whole and the local communities where we practice our business activities - help us to create an atmosphere of trust and meet their needs in the best possible manner (see sections 6 & 6.3).

### Our Shareholders / Investors

We seek to ensure high levels of competitiveness and efficiency through a combination of transparent processes and continuously updating the investment community.

### Our Partners

Our goal is to be in a position where our business partners, customers and suppliers actually prefer to work with us through cultivating synergies which create value for all of our stakeholders (see sections 5, 5.5 & 6.1).

### Our Environment

We behave like a responsible corporate-citizen. Through our wide range of activities in S.E. Europe, we contribute towards international efforts aimed at managing "complex globalized challenges" such as climate change, increasing RES and reducing environmental impacts in general (see section 3).

The materiality assessment was an additional tool with which to investigate our stake-holders' opinions and expectations in addition to following conventional modes of continuous two-way communication and dialogue with our stakeholders, as presented in Table 7.4.

Table 7.4: Stakeholder Engagement

Stakeholder Group	Our Engagement Methods
Employees	Satisfaction surveys
	Dialogue / Debates
	Scheduled meetings
	Events / Speeches
	Intranet
	Periodical publications
Local communities	Dialogue / Debates
	Public discussions, debates
	Focus group surveys
	Public opinion surveys
	Reports / announcements in the press
Shareholders/Investors	Road shows
	Meetings
	Publications, reports
Suppliers	Questionnaire survey
	Dialogue
Customers	Satisfaction Surveys
	Loyalty surveys
	Performance survey at petrol stations
	Custom surveys through questionnaire
	Acceptability survey of a new product/service
	Focus-Group surveys

Our goal is to seek the views of our social partners and to try and broaden the manner in which we communicate with them.

# 7.2 UNGC & GRI Content Index

This Report covers the requirements of the "Communication on Progress" (advanced level) report, presenting the integration of the principles of the UNGC in the strategy, activities and programs that the Group supports and participates in.

Table 7.5 shows the respective UNGC principles & GRI indicators with corresponding references to relevant sections of the Report. Similarly, in Tables 7.6 the GRI-G4 indicators are associated with the relevant references in the Report. Where it is deemed as necessary, additional comments are provided as a supplement to the indicators.

**Table 7.5:** UNGC, Advanced Level, COP Self-Assessment in accordance with the 21 criteria with reference to GRI-G4 indices of Tables 7.6 and relevant sections of this Report



	Criteria Summary	Best Practices	Self- Assessment	GRI Indices, Tables 7.6 and/or report's sections	
	Strategies & Operations				
1	The COP describes main- streaming into corporate functions and business units	Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives	✓	G4-1, G4-34, G4-38, G4-41 Moreover, sustainability responsi- bilities are assigned to Direc- torates of Procurement, HR, Environment, H & S.	
		Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	<b>√</b>	G4-34, G4-38, G4-51, G4-56, DMAs (Table 7.6b)	
		Ensure that different corporate functions co- ordinate closely to maximize performance and avoid unintended negative impacts	✓	G4-34, G4-37G4-41, G4-44, G4-45, G4-47, G4-49, G4-51, G4-53	
2	The COP describes value chain implementation	Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	√	G4-2, G4-16, G4-24, G4-25, G4-26	
		Communicate policies and expectations to suppliers and other relevant business partners	<b>√</b>	G4-26 (sections 5.3, 5.4, 5.5)	
		Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<b>√</b>	G4-15, G4-45, G4-47, G4-56 (section 2.4)	
		Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	✓	Sections 4.2.1, 5.5	
	Robust Human Rights Management Policies & Procedures	Our Commitment We respect human rights within our area of influence and operate our businesses in such a way as to make us an exemplary employer.	Systems	I & S Policy our Regulation	
		We aim to be the preferred employer with a respectful corporate culture and support for our employees' well-being.	<ul> <li>Actions</li> <li>Integrated relevant parts of our Codes, Policy or Regulations into new supply contracts</li> <li>Corporate Health Policy (campaign and expanded measurement)</li> <li>Group wide awareness and training programs on Corporate Values / Human Rights / Code of Conduct</li> </ul>		
			Performance • Relevant GR	I indicators	

3	The COP describes robust commitments, strategies or policies in the area of human rights	Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates	<b>√</b>	HR DMA, Sections 6.1-6.2
		Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company	✓	G4-14, G4-15, G4-16, G4-45, G4-47, G4-56,
		Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services	✓	G4-14, G4-15, G4-16, G4-45, G4-47, G4-56,
		Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties	✓	The annual edition of this Sustainability Report
4	The COP describes effective management systems to integrate the human rights	Process to ensure that internationally recognized human rights are respected	✓	G4-15, G4-56 (sections 6.1, 6.2)
	principles	On-going due diligence process that includes an assessment of actual and potential human rights impacts	<b>√</b>	G4-HR1, G4-HR10, G4-HR3-6, G4-HR8, G4-SO1
		Internal awareness-raising and training on human rights for management and employees	<b>√</b>	G4-HR2, G4-HR7, HR DMA
		Operational-level grievance mechanisms for those potentially impacted by the company's activities	<b>√</b>	G4-HR8, G4-SO1
		Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action	<b>√</b>	HR DMA, G4-HR1 till G4-HR12, G4-SO1, G4-SO2
5	The COP describes effective monitoring and evaluation mechanisms of human rights integration	System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain	<b>✓</b>	G4-37, G4-49, G4-53, G4-HR1-10
		Monitoring drawn from internal and external feedback, including affected stakeholders	<b>✓</b>	G4-27
		Leadership review of monitoring and improvement results	<b>√</b>	G4-34, G4-38, G4-37, G4-49, G4-53, G4-45, G4-47
		Process to deal with incidents the company has caused or contributed to for internal and external stakeholders	<b>√</b>	Section 2.4, G4-HR812, G4-SO1
		Outcomes of integration of the human rights principles	✓	G4-HR9, G4-HR10, G4-HR12

Robust Labour Management Policies & Procedures	Our Commitment We respect the Declaration on Fundamental Principles and Rights at Work of the ILO, in accordance with national & European legislation.  Systems Code of Conduct Internal Labour Regulation Procurements' Regulation Corporate Governance Code Embedding a common corporate culture Working with employee representatives UNGC & CSR networks	Actions  • Maintained an ongoing dialogue with the concerned parties  • Reached wage agreements in Greece  • A competitive edge through diversity  • Employees development  • Vocational training  • Code of Conduct presentation and awareness program  • Regular dialogue with Unions  Performance  • Group wide presentation and awareness program of the Code of Conduct (including reference to ILO core labor standards)  • Scheduled conduct of Employee Opinion Surveys	
The COP describes robust commitments, strategies or policies in the area of labour	Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	/	G4-1, G4-2, G4-56, G4-15, G4-16, G4-27
	Reflection on the relevance of the labour principles for the company	<b>√</b>	G4-27
	Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	✓	G4-15, G4-16, G4-56, see also Group's Internal Labor Code, http://www.helpe.gr/userfiles/8a5 3b155-76e9-4d45-9773- a27000e44a36/Corporate-HSE- NEW-policy.pdf
	Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	✓	G4-LA1-13, G4-10, G4-11
The COP describes robust commitments, strategies or	Risk and impact assessments in the area     of labour	<b>√</b>	G4-2, G4-27
policies in the area of labour The COP describes effective management systems to in-	Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<b>√</b>	G4-11, see sections 6.1, 6.2
tegrate the labour principles	<ul> <li>Allocation of responsibilities and accountability within the organization</li> <li>Internal awareness-raising and training on the labour principles for management</li> </ul>	✓ ✓	G4-34, G4-38, G4-41, G4-45, G4-47, G4-56 G4-LA9-12
	and employees  Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers	✓	G4-37, G4-49, G4-53

8	The COP describes effective monitoring and evaluation mechanisms of labour principles integration	System to track and measure performance based on standardized performance metrics	√	G4-11, G4-34, G4-38, G4-45, G4-47, G4-LA2, G4-LA4-7, G4-LA10-11, G4-LA13
		Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future	✓	
		Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	<b>√</b>	G4-HR1, G4-HR10 (section 2.4)
		Outcomes of integration of the Labour principles	√	G4-11, G4-34, G4-38, G4-45, G4-47, G4-HR3-6
	Robust Environmental	Our Commitment	Actions	
	Management Policies & Procedures	We recognize that our production, transport and storage activities have an impact on the environment.	<ul> <li>Efficiency of buildings, te tive technolo</li> <li>Network and</li> </ul>	otimization within our fleet and sts and implementation of alterna- ogies and fuels I capacity optimization
		We are constantly minimizing our business' impact on the environment, focusing on emissions, carbon efficiency and climate protection.	campaigns, a • Target to inc working unc	of employees with awareness activities and rewards rease the percentage of employees ler ISO 14001 audited systems the green product portfolio in-
		Systems Group-wide Environmental Policy and dedicated guidelines to improve environmental performance (ISO 14001)	cluding effici neutral shipp services with	ient logistics solutions and carbon-
		Emissions measuring systems		
		Carbon accounting and controlling system	_	ission Intensity Index value: 0.27
		Member of relevant organizations for Sustainable Development and climate protection	(G4-EN18) • Percentage of ISO 14001 coverage increased 91 % (previous year: 88 %) • relevant GRI environmental indicators	
9	The COP describes robust commitments, strategies or policies in the area of environmental stewardship	Reference to relevant international conventions and other international instruments	✓	G4-56, G4-15-16 (section 5.4)
		Reflection on the relevance of environmental stewardship for the company	<b>√</b>	G4-1, G4-2, G4-27,
		Written company policy on environmental stewardship	<b>√</b>	G4-56, Environmental Policy http://www.helpe.gr/en/health- and-safety/environmental-protec- tion/
		Specific commitments and goals for specified years	✓	G4-EN1-31

10	The COP describes effective management systems to in-	Environmental risk and impact assessments	✓	G4-14, G4-PR1, EN DMA	
	tegrate the environmental principles	Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<b>√</b>	G4-PR1	
		Allocation of responsibilities and accountability within the organisation	<b>✓</b>	EN DMA, G4-34, G4-38, G4-41, G4-45, G4-47, G4-56	
		Internal awareness-raising and training on environmental stewardship for management and employees	✓	G4-LA9	
		Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts	✓	G4-37, G4-49, G4-53, G4-SO1	
11	The COP describes effective monitoring and evaluation mechanisms for environ- mental stewardship	System to track and measure performance based on standardized performance metrics	<b>√</b>	G4-34, G4-38, G4-45, G4-47,	
	•	Leadership review of monitoring and improvement results	<b>√</b>	G4-EN1-3, G4-EN6-8,	
		Process to deal with incidents	<b>√</b>	G4-EN10, G4-EN12-13, G4-EN15-16, G4-EN19-21,	
		Outcomes of integration of the environmental principles	<b>✓</b>	G4-EN26-28	
	Robust Anti-Corruption Management Policies & Procedures	Our Commitment We do not tolerate corruption and are committed to compliance with interna-		ctivities to intensify Anti-Corrup- i-bribery policies.	
		tional antibribery standards, as stated in			
		the Global Compact and regional anti-corruption and bribery legislation.	Performance • Internal Auditing investigates concerns and concludes them		
		Systems	Relevant GRI indicators		
		• Code of Conduct	• Third-party		
		<ul><li>Corporate Governance Code</li><li>Internal Labour Regulation</li></ul>		e existing compliance processes as isk management project	
		Procurements' Regulation     Third-party compliance standards	part or and r	est management project	
12	The COP describes robust commitments, strategies or policies in the area of anti-corruption	Support by the organization's leadership for anti-corruption	√	Code of Conduct http://www.helpe.gr/uploads/coc _2013_EN/index.html	
		Publicly stated formal policy of zero-tolerance of corruption	<b>✓</b>	G4-56, G4-15, Code of Conduct	
		Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes	1	Corporate Governance, Code of Conduct	

13	The COP describes effective management systems to integrate the anti-corruption principle	Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees	✓	Code of Conduct, G4-SO3-5
		Internal checks and balances to ensure consistency with the anti-corruption commitment	<b>√</b>	Corporate Governance (section 6.1), G4-SO3, G4- SO5
		Management responsibility and accountability for implementation of the anti-corruption commitment or policy	<b>✓</b>	G4-34, G4-38, G4-41, G4-56, G4-14, Code of Conduct
		Internal accounting and auditing procedures related to anticorruption	<b>√</b>	G4-SO5, Corporate Governance
14	The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	Leadership review of monitoring and improvement results	<b>√</b>	G4-34, G4-38, G4-56, G4-SO3, G4-SO5
	tion of anti-corruption	Process to deal with incidents	<b>✓</b>	G4-SO3-5
		Public legal cases regarding corruption	<b>✓</b>	G4-SO7-8
		Use of independent external assurance of anti-corruption programmes	<b>√</b>	G4-SO3
		Outcomes of integration of the anti-corruption principle	✓	G4-SO3-5
	Taking Action in Support of Broader UN Goals and Issues			
15	The COP describes core business contributions to UN goals and issues	Align core business strategy with one or more relevant UN goals/issues	✓	The following initiatives are embedded in the Group's business strategy & implemented in daily operations:
		Develop relevant products and services or design business models that contribute to UN goals/issues	<b>✓</b>	<ul><li> Human Rights</li><li> Children's Rights</li><li> Gender Equality</li></ul>
		Adopt and modify operating procedures to maximize contribution to UN goals/issues	✓	<ul> <li>Health</li> <li>Education</li> <li>Humanitarian Assistance</li> <li>Employment &amp; Decent Working Conditions</li> <li>Anti-Corruption</li> <li>Biodiversity</li> </ul>
16	The COP describes strategic social investments and philanthropy	Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy	<b>√</b>	G4-SO1, Sections 2.2 & 6.3
		Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors	<b>✓</b>	Section 6.4

		Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	<b>√</b>	Deemed immaterial, taking into account the locations of the Group's facilities
		Other established or emerging best practices	<b>✓</b>	Sections 6.3.1, 6.3.2
17	The COP describes advocacy and public policy engagement	Publicly advocate the importance of action in relation to one or more UN goals/issues	✓	CEO's message at section 1
		Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues	<b>√</b>	section 6.4
18	The COP describes partner- ships and collective action	Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy	✓	G4-SO1
		Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain	✓	G4-16, see also section 6.4
	Corporate Sustainability Governance and Leadership			
19	The COP describes CEO commitment and leadership	CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	√	CEO's message section 1
		CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	✓	G4-51
		Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team	<b>√</b>	
20	The COP describes Board adoption and oversight	Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	<b>√</b>	G4-45, G4-47
		Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)	✓	This report is approved & signed by the CEO

21	The COP describes stake- holder engagement	Publicly recognize responsibility for the company's impacts on internal and external stakeholders	✓	G4-2, see also sections 2.3, 7.1
		Define sustainability strategies, goals and policies in consultation with key stakeholders	<b>✓</b>	G4-26, G4-27
		Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	<b>✓</b>	G4-37, G4-49, G4-53, G4-26
		Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'	<b>√</b>	G4-37, G4-49, G4-53, G4-24, G4-25
	ANNEX: Business & Peace			
22	The COP describes policies and practices related to the company's core business op- erations in high-risk or con- flict-affected areas			
23	The COP describes policies and practices related to the company's government rela- tions in high-risk or con- flict-affected areas	Neither HELLENIC PETROLEUM nor its subsidiaries are operating in high-risk or conflict-affected areas.		
24	The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas			

# Tables' 7.6 Reference Symbols

☐ the Annual Report 2013, at: http://www.helpe.gr/userfiles/8ea1f0cb-9e62-48e4-b947-a27b00fb14bb/AR-2013-ENG-2706146.pdf

the Annual Financial Report for fiscal year 2013, at: http://www.helpe.gr/userfiles/8ea1f0cb-9e62-48e4-b947-a27b00fb14bb/ANNUAL\_FINANCIAL\_REPORT\_BoD-2013.pdf

- his Corporate Social Responsibility Report 2013
- in the Group's Code of Conduct, at: http://www.helpe.gr/uploads/coc\_2013\_EN/index.html
- \* the Group's Internal Labor Regulations (available only at intranet)

Table 7.6a: GRI Indicators Content Index, external assurance, comments and additional references

	Brief description	Ext. Assurance	Reference at / Additional comments
	General Standard Disclosure		
	STRATEGY AND ANALYSIS		
G4-1	Provide a statement from the most senior decision-maker of the organization about the relevance of sustainability to the organization and the organization's strategy for addressing sustainability.	<b>√</b>	₽ p. 13–17 □ p. 5–7
G4-2	Provide a description of key impacts, risks, and opportunities.		p. 17-19 p. 153-156, 161-163 p. 24-31, 79-83  Opportunities & Challenges:  1. Economy-Strategy 1.1 Optimization of the new refining model, maximising the full potential of the refineries and the synergies between them1.2 Further development of export marketing activities in the Mediterranean and the Balkans2. Business Activity2.1 DESFA: completion of sale 2.2 Optimisation of operating levels and costs in relation to the safest and most competitive European refineries2.3 Maintainance and further development of vertical integration in International Marketing and Petrochemicals with Refining2.4 Realisation of the full benefit of participation in DEPA in partnership with the HRADF (Hellenic Republic Asset Development Fund) 2.5 Enhance transformation programs and accelerating their implementation (DIAS-Refining Excellence, BEST 80-Procurement, "KORYFI"-Marketing Competitiveness) 2.6 Develop Renewable Energy Sources 2.7 Maximise profitability and cash flows with the aim of balance sheet deleveraging, funding sources diversification and finance costs reduction.3. Employees3.1 Formation of culture of excellence and rewards

- 3. Employees
- 3.1 Configuration of culture of excellence and rewards
- 3.2 Focus on the development of employees through investing in continuous training and developing expertise

Furthermore, the Group companies, locally, assess opportunities and risks

#### **HP CYPRUS**

In 3Q 2014 two new fuels storage facilities are expected to be operational in the Vasilico Area. It is already evident that the operation of these two storage facilities will increase government's pressure to the oil companies, which have such storage facilities at Larnaca, to close them down and relocate to Vasilico. Furthermore, the possible storage of oil products by other international companies at Vitol's storage facilities, may pose a threat to HPC and the other existing marketing companies. In addition, government is stepping up the pressure for the relocation of the LPG storage facilities from Larnaca.

OKTA supplies approximately 60% of it's domestic market's fuel needs. In addition, its significant storage capacity serves as a safety mechanism for the uninterrupted supply of fuel in the markets where it operates. OKTA's sustainable profitability depends on its ability to remain competitive in a market where barriers to entry are low, while at the same time it manages its facilities and installations as efficiently as possible, in order to maintain its role as a confident supplier. OKTA has the opportunity to increase its market share by exploiting its logistics infrastructure and the competitive terms it maintains with its supplier. Additionally, OKTA seeks to increase its profitability by completing a number of transformation projects already launched, affecting its operations and its organizational structure.

### EKO BULGARIA

No significant changes in the legal and economic environment that could lead to influence over the company's sustainability and stakeholders. Political environment is stable, macroeconomic indexes remained within the frame of the projections.

The main challenges are:

- 1. Customers' concerns on fuel prices and
- 2. Increased competition.

The main opportunities are related with network development strategy as a main driver of market share increase. In terms of increasing competitiveness, tactical and strategic measures were taken to sustain volumes and market share, including promotional activities, communication and improved service. Moreover, a strategy plan was developed in order to further develop the network.

The overall company's performance in 2013 was improved compared to 2012, including volume, margins and profitability.

Significant risks are not expected. Opportunities are related mainly with network development.

### **EKO SERBIA**

EKO retail network is among the 4 strongest in oil industry in SERBIA, considered as innovative and fast reacting to market needs. High level of service, good location of EKO petrol stations, trained employees, efficient operating procedures and new differentiated products are

	ORGANISATIONAL PROFILE		EKO SERBIA's main strengths. On the other side, EKO weakness is smaller network compared to main competitors.  One of the weaknesses of the market, affecting EKO SERBIA and companies, is dependence on NIS and depot holding importers. In addition, the largest network on market NIS is improving in image (completely new RVI was launched) and promotional offers.  One of the main threats is the risk of direct imports by trucks, or a wholesale trading without Depot ownership/rent due to a different interpretation of new legislation.			
G4-3	Report the name of the organization	<b>√</b>	HELLENIC PETROLEUM Group			
			<ul><li>p. 20−21</li><li>p. 3</li></ul>			
G4-4	Report the primary brands, products, and services.	√	□ p. 54–56 □ p. 59–68			
G4-5	Report the location of the organization's headquarters.	<b>√</b>	8A Chimarras str., 151 25 Maroussi, Greece p. 160			
G4-6	Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	✓	p. 12, 54–56, 84			
G4-7	Report the nature of ownership and legal form.	√	HELLENIC PETROLEUM Group, HELLENIC PETROLEUM SA  □ p. 38-41  Major shareholders (>5%)			
			(on 31.12.2013)	%		
			Hellenic Republic Asset Development Fund	35.4770		
			Paneuropean Oil and Industrial Holdings S.A.	42.5744		
			Institutional & retail investors	21.9486		
			total	100 %		
G4-8	Report the markets served (including geo- graphic breakdown, sectors served, and types of customers and beneficiaries).	<b>√</b>	₱ p. 60 ■ p. 10, 12, 54–56			

G4-9	Report the scale of the organization, including:  • Total number of employees  • Total number of operations	✓	p. 23–24, 49–52, 55, 101–109 p. 12, 36, 48 (table 4.9), 54–56					
	<ul> <li>Net sales</li> <li>Total capitalization broken down in terms of debt and equity</li> <li>Quantity of products or services provided</li> </ul>			Employees as of 31.12.2013	Net sales	Total capitalization (net debt and equity)	Quantity of products sold	
	Provide		OKTA	645	€422.2 m	equity €74.9 m net debt €10 m	567,000 MT	
			HP CYPRUS	59	€324.7 m	equity €65.2 m net debt - €6.9 m	379,000 MT	
			EKO BUL- GARIA	64	€367 m	equity €21.7 m net debt €62.1 m	367,000 MT	
			EKO SERBIA	HQs: 39+9 contracted	€159.6 m	equity -€8.7 m net debt €53.7 m	115,000 MT	
			JPK MON- TENE- GRO	212	€183.1 mil	equity €85.1 mil net debt - €6.2 mil	211,000 MT	
			HELPE	1905	€8,946 mil.	equity €1,606 mil. debt €2,372 mil.	13,464 mil MT	
			ЕКО	274	€185 mil.	equity €185 mil. debt €213 mil.	2,269 mil MT	
			HF	166	€129 mil.	equity €129 mil. debt €100 mil.	0.750 mil MT	
G4-10	a. Report the total number of employees by employment contract and gender.	<b>√</b>	p. 12, 35	-39				
	b. Report the total number of permanent employees by employment type and		Normally there are no seasonal workers. EKO is an exception because of staff seasonal changes at the premises of airports.					
	gender. c. Report the total workforce by employees and supervised workers and by gender.		Cases of sur	ervised work	ers are noted	in the following tal	bles.	
	<ul> <li>d. Report the total workforce by region and gender.</li> <li>e. Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised</li> </ul>							

workers, including employees and supervised employees of contractors.

f. Report any significant variations in employment numbers (such as seasonal variations in employment).

### **HELPE**

Breakdown by gender, contract and age group:

Contract type	M	F	Total
Indefinite	1682	223	1905
Fixed time	42	17	59
Supervised workers	0	7	7

### **ASPROFOS**

workforce breakdown by gender & employment contract:

Contract type	M	F
Indefinite contract	104	75
Fixed time	2	3
Part timers	1	1

#### **DIAXON**

breakdown by gender & employment contract:

Contract type	$\mathbf{M}$	F
Indefinite contract	81	15
Fixed time	0	0
Supervised workers	34	1

### **EKO BULGARIA**

Workforce breakdown by gender & employment contract:

Contract type	M	F
Indefinite	37	26

# JPK MONTENEGRO

Breakdown of workforce by gender & type of contract (all full timers):

Contract type	$\mathbf{M}$	F
Indefinite	125	40
Fixed time	21	26
Supervised workers	10	2

# **EKO SERBIA**

Breakdown of workforce by gender & type of contract:

Contract type	M	F
Indefinite contract	16	22
Fixed time	2	8

### **HP CYPRUS**

Breakdown of workforce by gender & type of contract:

Contract type	M	F
Indefinite contract	36	17
Fixed time	4	2

			OKTA Breakdown of workforce (all full timers):	by gender	& type of	contract	
			Contract type	M	F		
			Indefinite	498	110		
			Fixed time	32	5		
			Supervised workers	3	1		
			HF Breakdown of workforce	by gender	& type of	contract :	
			Contract type	M	F	Total	
			Indefinite contract	116	47	163	
			Fixed time	6	1	7	
			<b>EKO</b> Breakdown of workforce	bv gender	& type of	contract:	
			Contract type Indefinite contract	M	F 000	<u>Total</u>	
			Fixed time	176 1	98	274 3	
			Supervised workers	1	2 2	3	
			Supervised workers	1			
G4-11	Report the percentage of total employees covered by collective bargaining	<b>√</b>	<b>p</b> . 69				
	agreements.		Number of employee unide ees covered by collective by		of employ-		
			HELPE	3		94%	
			ЕКО	1		94%	
			EK	2		100%	
			ASPROFOS	1		89.9%	
			DIAXON	1		100%	
			JPK MONTENEGRO	1		94%	
			OKTA	1		97%	
			HP CYPRUS	3		58%	
G4- 12	Describe the organization's supply chain.	<b>√</b>	P p. 20, 57 □ p. 64-65				
			We are an energy Group a thousands of suppliers of industrial facilities & serv environment. We maintai services, transportation as support systems.	products a re our custo in a comple	nd service omers in co ex inflow	es required to cour diverse ope of materials, eco	pperate our ration quipment,
			We try to extend our suppin 2013), see Table 6.1.	plies from l	ocal supp	liers (> 10% 20	12, > 15%
			Typical partners of our su (crude oil, chemicals), in equipment and services, , services, land/sea transpo	dustrial ec industrial	uipment services, į	and materials,	IT

		l	0 1 6 11 (0)	2011	0015	2015
			Supply of crude by source (%)	2011	2012	2013
			Russia	32	32	54
			Iran	32	32 5	-
			Iraq	1		12
			Caspian Pipeline Consortium (CPC)	9 7	12 7	11
			Libya Other	19	12	9
			Other	19	12	14
			total	100	100	100
G4-13	Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain	<b>✓</b>	There have been no significant changes in ownership.	size, structu	ire or	
			On 21 December 2013 a contract was signed the share capital of DESFA (from HELPE ar and gas company of Azerbaijan SOCAR, whe whilst the corresponding 35%, which belong € 212mil. The competition of the transaction OKTA:  Refining operation was stopped in January operating as importer and trader of fuel. To fyrom fixed exchange (MSE). Pucko Plansack of OKTA's shares in January 2013, and additional 0.03 % of OKTA's shares in EKO BULGARIA:  no significant changes apart from coopera supplier in December 2013.  EKO SERBIA:  opening of 3 new COMO petrol stations	nd HRADF) nich amount gs to the Gro n is expected 7 2013. The he company etrol-v. Plas previously of	to the stated to €400 pup amoud in 2014.  company y is listed nica acquowned by 2013.	te oil Omil, onted to  is on ired PIOM
	COMMITMENTS TO EXTERNAL INITIATIVES					
G4-14	Report whether and how the precautionary approach or principle is addressed by the organization.	✓	The proactive approach and the precaution assured by the risk assessment, the implems tandards and the resulting inspections, 1s Depts of Q.E.H.S. & Internal Auditing, reg  Regarding the use of chemicals, the require Measures are recorded for each identified a corresponding exposure scenarios that are reduce or avoid direct and indirect exposure consumers) and the different environment Risk management measures are implement HELLENIC PETROLEUM and communication through extensive safety data sheets of process.	nentation of t party auditular externated Risk Manuse, based of developed it re of humanular systems. ted within thated to dow	internation to planned the planned and the control of the premise that the premise the premise that the premise t	onal d by ons.  ors and es of

The scheduled public opinion surveys (sections 2.3,6, 7.1), the employees' – partners' –customers' satisfaction surveys (sections 4, 5.1), the risk assessment (section 2.4) and the quality, environmental, health and safety policies confirm a proactive approach.

By recording the targeted number of near misses and taking preventive measures, DIAXON avoids potential accidents.

Moreover at-

### **HP CYPRUS:**

With the adoption of standards/management systems HPC ensures the safe and professional conduct of its operations. Risk assessments are conducted for all the main operations at the storage facilities and petrol stations.

#### OKTA:

- Implementation of Best Available Techniques (BATs)
- IPPC Permit negotiations (in progress)
- Continuous monitoring of flue gases emission and ambient air quality
- Monitoring of drinking water, waste water quality and underground water quality
- Steady organization adaptation and education of the personnel in order to attain maximum effect in HSE

#### **EKO BULGARIA:**

Ongoing approaches (such as training, competitive pricing and promotional activities) ensure that our partners comply with corporate policy and regulations, confirm the loyalty of our customers and improve sales methods. Regular test of fuel samples, in independent laboratories, confirm the quality of the products.

G4-15 List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.

🔲 p. 18

The application of the standards listed in Table 5.5 is voluntary.

p. 86

Corporate Governance Code of HFE at: http://www.sev.org.gr/Uploads/pdf/KED\_SEV\_InternetVersion\_up-datednew2132011.pdf

Furthermore, the subsidiaries follow national or local standards and initiatives; eg

**EKO SERBIA** follows the "State Rules Book" about technical and other requests for liquid fuels 64/2011 (31.08.2011) and standards as SRPS EN 228, SRPS EN 589 & SRPS B.H2.134.

**HP CYPRUS** follows the regulations Road Safety campaigns (Voluntary), LCA Seveso studies (Obligation), LCA Oil Spill Response (Obligation). Moreover, the cooperation with CYPRUS Employers & Industrialists Federation (OEB), is ongoing.

**EKO's BULGARIA** initiatives are included in the Group's Procurement manual which includes procedures which ensure free and fair competition conditions in selection of suppliers. Non-binding initiatives are focused on Company's social responsibility improvement.

C4 16	List mambarships of consciptions		The Crown in the context of entired encertion and implementation of
G4-10	List memberships of associations (such as industry associations) and national or international advocacy organizations	√ 	The Group, in the context of optimal operation and implementation of its strategy for sustainable development, funds and /or participates in administrative bodies of the associations and organisations listed in section 6.4.
	IDENTIFIED MATERIAL ASPECTS & BOUNDARIES		
G4-17	a. List all entities included in the organization's consolidated financial statements or equivalent documents.  b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.	√	Group's participations are presented at http://www.helpe.gr/userfiles/09deccd3-a8a9-4ae2-b7da-a27a010c9bf8/2013_12m_Group_GR.pdf (page 72)  p. 84–86 (Report's Boundaries)
G4-18	a. Explain the process for defining the report content and the Aspect Boundaries. b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.	√	p. 14–15, 82–85
G4-19	List all the material Aspects identified in the process for defining report content.	<b>√</b>	p. 14–15 (chart 2.2, table 2.3), 82–86
G4-20	For each material Aspect, report the Aspect Boundary within the organization	✓	p. 85 (Table 7.3), 116–122 (Table 7.6b DMAs)  All Material Aspects presented in Table 7.3 apply equally to all of our operations and entities as shown in Table 7.2.  Moreover, Table 7.3 presents whether the selected material aspects are material within and/or outside the Group.
G4-21	For each material Aspect, report the Aspect Boundary outside the organization	√	p. 85 (Table 7.3), 116–122 (Table 7.6b DMAs)  All Material Aspects presented in Table 7.3 apply equally to all of our operations and entities as shown in Table 7.2.  Moreover, Table 7.3 presents whether the selected material aspects are material within and/or outside the Group.

G4-22	Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.	V	p. 82–86 no information restatements
G4-23	Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.	<b>√</b>	P. 82–86  No significant changes, the guidelines GRI G4 are applied for the first time, the previous report was with reference to G3.1.
	STAKEHOLDER ENGAGEMENT	<b>√</b>	
G4-24	Provide a list of stakeholder groups engaged by the organization.	<b>√</b>	Furthermore, Chart 2.2 presents the stakeholders involved in the "Materiality Analysis 2013", while Table 7.4 presents approaches to interface with stakeholder groups.
G4-25	Report the basis for identification and selection of stakeholders with whom to engage.	√	p. 14 (chart 2.2), 86–87
G4-26	Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.		Furthermore, Chart 2.2 presents the stakeholders involved in the "Materiality Analysis 2013", while Table 7.4 presents approaches to interface with stakeholder groups.  These approaches are consistently integrated into the Group's strategy for sustainable development.  Moreover indicative approaches of Group companies are:  OKTA:  With suppliers: Regular communication through personal contacts and discussions are part of the Procurement Department's operation aiming to enhance cooperation through a constructive dialogue and exchange of information and experience from the existing cooperation.  With customers/fuel stations owners: Scheduled communication through the sales consultants at least once a month. During the visit, potential deficiencies are identified or corrective actions noticed at previous audits are monitored. On an annual basis especially in areas concerning image, safety, products promotion etc., station owners are rewarded.  With employees: Through the OKTA's web page the employees are daily updated with business news related to the activities of the company and Group, (information, announcements, articles). Also, the most important news & announcements are posted on bulletin boards on specific landmarks in all buildings of the company. The employees' approach is mainly through electronic invitations/ information; individual or group invitation depending on the audience and the type of event.

			HP CYPRUS  1. Written communication to all employees is performed through email as well as with posting on notice board.  2. As per purchasing procedures every year all suppliers / vendors are reevaluated  EKO BULGARIA: Customers' communication takes place through qualitative and quantitative surveys (such as Brand Vitality Tracking, Loyalty Driving Assessment).  JPK MONTENEGRO: Customers' communication takes place through qualitative and quantitative surveys (such as Brand Vitality Tracking).  EKO SERBIA:  Press conferences Direct contact with media answering questions about fuels, products and services Focus group with different discussion topics Events organizing On line, on site and phone customer service (24/7) Stakeholders communication channels include Corporate Web site, Loyalty Portal, android application, newsletters, sms, memo letters, customer service line and petrol stations employees
G4-27	Report key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns.	V	p. 85 (Table 7.3)  The key topics that stakeholders raised are reflected in the material issues we have chosen to report this year, (see § 2.3, 7.1).
	REPORT PROFILE		
G4-28	Reporting period for information provided.	✓	Calendar year January – December.  p. 3
G4-29	Date of most recent previous report.	√	Posted on Group's web site in Jul. 2013, concerning the period Jan-Dec 2012.  p. 3
G4-30	Reporting cycle.	<b>√</b>	Annual (01.01 – 31.12)  p. 3
G4-31	Provide the contact point for questions regarding the report or its contents.	√	Ms Rania Soulaki, Group CSR Director Mail: rsoulaki@helpe.gr Tel: +30 210 6302894, Fax: +30 210 6302573  p. 160

	GRI CONTENT INDEX		
G4- 32	a. Report the 'in accordance' option the organization has chosen. b. Report the GRI Content Index for the chosen option c. Report the reference to the External Assurance Report.	<b>√</b>	• in accordance with the G4 COMPREHENSIVE option  •   p. 96-116 (Table 7.6a), 123–150 (Table 7.6c), 151–152 (Table 7.6d), 153–157
	ASSURANCE		
G4- 33	Report the organization's policy and current practice with regard to seeking external assurance for the report.	1	This Report was checked and assured - as a whole and every index - from an independent external certification body, prior to its publication.  The certification process involved all Departments / Companies that provided information and senior executives of the Group.  The Report has been signed by the Group's CEO.  p. 153–157 & Tables 7.6a, c, d.
	GOVERNANCE		
G4-34	Report the governance structure of the organization, including committees of the highest governance body.	<b>✓</b>	http://www.helpe.gr/en/the-group/group-management/  p. 35, 85–91  p. 153, 156–160  The Executive Committee has responsibilities on sustainable development issues.
G4-35	Report the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.	✓	The management of the Group's companies reports directly to the Group's BoD.  The Group's Corporate Affairs & CSR Dept reports directly to the Group's CEO.  CFO reports directly to the Group's CEO and is an executive member of the BoD.  The Corporate HSEQ Director reports directly to the Group's CEO.  The Executive Committee has responsibilities on sustainable development issues.  Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.  Sustainability is part of how managers and employees do their day-to-day jobs. It is addressed, for example, at regular work discussions and performance reviews. In this way, implementing sustainability is shared across all levels of the Group, from BoD to local level.

G4-36	Report whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.	✓	The submission of sustainability issues to the Board is made in 2 steps:  (a) the responsible General Director submits a memorandum to the CEO, (b) the CEO recommends to the Board accordingly.  The issue is discussed in the relevant Committee, which also makes recommendations to the Board.  The posts of Group CSR Director and Corporate HSEQ Director are positions with responsibilities on planning, recommendations and implementation.  CFO Director is an executive member of the BoD.  The Group's Corporate Affairs & CSR Dept reports directly to the Group's CEO.  The Corporate HSEQ Director reports directly to the Group's CEO.
G4-37	Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.		There are many mechanisms that facilitate two-way communication between management and shareholders - employees. Such mechanisms are the General Assembly, employee representatives and representatives of minority shareholders in the Board, the investors & shareholders information office and the unions.  In chapter K' of the Internal Labor Code, the Committees on Personnel Issues (Hiring Committee, Loans Committee, Personnel Committee, Health & Safety and Industrial Affairs Committee) are defined.  At each facility Committees for Occupational Health and Safety (E.Y.A.E.) are established.  In chapter IB' of the Internal Labor Code (participatory processes, Articles 45 and 46) the Council of Employees Representatives and the Labour Affairs Committee are defined.  Health & Safety Committees have been operating at all Group's facilities. All these committees contribute to the exchange of views between employees and management.  Employee Suggestion Program is a particularly useful tool for the Group through which information, experiences and ideas can be shared and heard. The main objective of the Program is to inform management on issues / concerns of employees.  During 2013, a significant number of proposals were received concerning a variety of topics including: promotion of Group's subsidiaries, technical and administrative services, corporate social responsibility, internal network (intranet), human resources, financial management, recycling, informatics and internet, safety, transformation and new departments.  All proposals, depending on goal and simplicity of implementation and in conjunction with the approved budget, the targets and strategy, were thoroughly examined and 33.4% of them were implemented while a further 7.5% is in the process of implementation.  Only a 3% is still pending.

			<ul> <li>Other Actions:</li> <li>Quarterly meetings of the Group executives (from department head level and above) for presentation, analysis and discussion on the financial and operating results of the Group.</li> <li>Roadshows / participation in conferences (5-6 times per year), quarterly meetings with analysts, meetings with institutional investors, refineries' field trips with financial analysts &amp; institutional investors ensure 2-way communication with the investment community.</li> <li>Information meetings - discussions with the engineers of industrial plants.</li> <li>Regular meetings with the elected union representatives.</li> </ul>
G4-38	Report the composition of the highest governance body and its committees	***	Pi p. 87–91, 91–95  ⇒ 153, 156–160  The statutes of the company provide for a 2 Board Members representing the employees and 2 Board Members representing the minority shareholders. The BoD has 13 members and 4 of them are executive members.  The breakdown of the BoD members - of the Group's companies included in this report – is as follows:  Breakdown of the 50 BoD members, 10 companies, by gender and age group  Gender Age group  <30 30-50 > 50  M 0 19 29  F 0 2 0  Percentage of women in senior management depends on company: HELPE 17%, EKO 12%, HF 12%, DIAXON 0%  ASPROFOS 1,3%, OKTA 12,5%, EKO SERBIA 0%, HP CYPRUS 0%, EKO BULGARIA 0%, JUGOPETROL 23%.
G4-39	Report whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement).	✓	The Chairman of the Board was an executive member.  Page 188  page 186-157  Also the role, functions and related responsibilities of the President of the Board are outlined in the Bylaws of the Company, which are approved by the Board, within the frame and in full coherency with the applicable provisions of company law 2190/1920, as amended, apply today.
G4-40	Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	✓	For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders.

			For the not elected and not appointed members of the BoD there is not a documented procedure today but their competences, qualifications and expertise are taken into consideration. The independent Board members selected based on experience and qualifications.  The GA audits and approves the BoD's performance.
G4-41	Report processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders.	✓	p. 11 p. 150–153 p. 82, 88–89  The current ratio 4 executive and 9 non-executive board members (2013) assures avoidance of "conflicting interests".  The BoD subscribed to the principles and best practice provisions of the "Corporate Governance Code of HFE"  (http://www.sev.org.gr/Uploads/pdf/KED_SEV_InternetVersion_updatednew2132011.pdf).  Also, in the Code of Conduct there is specific provision to prevent conflicts of interest, with reference to indicative cases which constitute such a conflict and establishment of an obligatory reference, to the Compliance Office, of financial transactions concerning the spouses or relatives up to second degree of the BoD members.  Moreover indicative "tools" to ensure conflicts of interest are avoided and managed are: the list of approved suppliers and their relationship with the officials, and the corporate governance statement.
G4-42	Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.	✓	To support Group's Strategic Agenda, Key Performance Indicators (KPIs) for Sustainable Development issues have been developed and implemented.  The Executive Committee defines the Group's Sustainability Policy. The Corporate Affairs & HSEQ Depts recommend the approval of sustainable development issues and are responsible for their implementation.  Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.
G4-43	Report the measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics.	<b>\( \)</b>	P. 92–99 □ p. 17–19  The risk management system provides a platform for sharing knowledge and expertise among the operating companies BoD members in a structured manner, making risk management a key enabler in achieving the strategic objectives.  The Group's CEO has the position of Vice President in the Council for Sustainable Development of HFE.  The Executive Committee defines the Group's Sustainability Policy. The CSR & HSEQ Depts recommend the approval of sustainable development issues and are responsible for their implementation.

		Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.
G4-44	a. Report the processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.  b. Report actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics, including, as a minimum, changes in membership and organizational practice.	For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders.  For the not elected and not appointed members of the BoD there is not a documented procedure today but their competences, qualifications and expertise are taken into consideration. The independent Board members selected based on experience and qualifications.  Apart from the BOD's evaluation, through the Annual Report, from the Annual General Assembly, the Board monitors and reviews the implementation of its decisions on an annual basis.  Moreover, the introduction of an evaluation system for the members of the BoD and its committees is under consideration, in the context of the aforementioned Code of Corporate Governance of the HFE  (at:http://www.sev.org.gr/Uploads/pdf/KED_TELIKO_JAN2011.pdf).
G4-45	a. Report the highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes.  b. Report whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental and social impacts, risks, and opportunities.	p. 17–19, 153–157 p. 81 p. 156–160, 161–163  Supporting the BoD the following relevant Committees operate:  1. Audit Committee (Article 37 Law 3693/2008)  2. Committee on Finance and Economic Planning, which, among other things, "informed by the CEO, the General Directorate of Finance and auditors about significant risks or exposures and assess the measures taken or to be taken to minimize the risk about ".  3. Executive Committee, for information see at: http://www.helpe.gr/en/investor-relations/corporate-governance/board-committees/  The Crisis Management Manual is in the process of final approval.  2 members of the Board elected by employees and 2 members appointed by the Special General Meeting of minority shareholders.  The BoD approves reports & budgets of the Companies and the Group, as well as the 3-month, 6-month and annual reports and announcements of the Group. The Executive Committee approves reports & budgets of the Divisions and Departments.

G4-46	Report the highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics.	✓	□ p. 17–19 □ p. 79–83
G4-47	Report the frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities.	✓	The BoD approves reports & budgets of the Companies and the Group, as well as the 3-month, 6-month and annual reports and announcements of the Group.  The Executive Committee approves reports & budgets of the Divisions and Departments.  The Group's Department of Health, Safety, Environment and Sustainability reports, to the BoD, on environmental, health and safety issues at least two times a year.
G4-48	Report the highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered.	✓	The CEO approves and signs this Sustainability Report.  The Corporate Affairs/Group CSR Director is authorized to ensure that all material issues are presented with clarity and objectivity.
G4-49	Report the process for communicating critical concerns to the highest governance body.	✓	The Executive Committee defines the Group's Sustainability Policy. The Corporate Affairs CSR & HSEQ Depts recommend the approval of sustainable development issues and are responsible for their implementation.  Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.  The Departments, as appropriate, inform the CEO on critical issues as soon as they are identified. He, in turn, recommends to the BoD.  Moreover, critical issues communicated through consultation of the BoD with stakeholders (during General Assemblies).  See also index G4-37 above.
G4-50	Report the nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them.	✓	The critical issues presented to the Board are the material aspects that were recorded and evaluated through "Materiality Analysis 2013", § 2.3 & 7.1, Table 7.3.
G4-51	<ul> <li>a. Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration:</li> <li>• Fixed pay and variable pay</li> <li>• Sign-on bonuses or recruitment incentive payments</li> <li>• Termination payments</li> <li>• Clawbacks</li> </ul>	✓	Pop. 152, 168 BoD's annual report to the shareholders.  For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders.

	<ul> <li>Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees</li> <li>B. Report how performance criteria in the remuneration policy relate to the highest governance body's and senior executives' economic, environmental and social objectives.</li> </ul>		For non-elective and non-appointed members of the Board there is currently no statutory assessment process, but the assignment of tasks is based on ability, qualifications and experience.  For senior and top management, the evaluation is made annually based on KPIs, while the performance of the Company is associated with the objectives of the staff on issues such as sustainable development (safety, environment, etc.) with a weighting factor of 20%.  Furthermore, a percentage of the employees' goals concerns health, safety and environmental issues. This weighting factor varies depending on company / department mission.  In DIAXON, for Director's remuneration, KPIs related to, inter alia, energy consumption and safety of employees are taken into account.  In HP CYPRUS, the individual goals of executives have a certain percentage related to health, safety and environmental issues. This percentage varies depending on the Department.
G4-52	Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organization.	✓	No consultants are involved in the process of determining employee compensation.  Remuneration is set based on the Collective Agreement and annual employee evaluation, as agreed between management and unions. For executives' pay salary surveys are also used whereas their remuneration depends on targets achievement.
G4-53	Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable.	✓	Through recommendation, voting and approval by a majority in the General Assembly, for the remuneration and allowances of members of the Board. In determining the remuneration of the company's employees, two social partners, the management and the employees' unions, play a key role. Usually, before the expiration of the existing Collective Agreement, the Union submits proposals for changes, increases, amendments, etc., and negotiations are following until mutual consensus is reached.
G4-54	Report the ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.	✓	Countries where there is significant activity are shown in Table 7.2 of this Report.  Company/Country and Ratio  ASPROFOS 2.0% DIAXON 1.56% JPK MONTENEGRO 3.86% OKTA 5.2% EKO SERBIA 4.95% HP CYPRUS 2.7%

G4-55	Report the ratio of percentage increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country  ETHICS & INTEGRITY	Countries where there is significant activity are shown in Table 7.2 of this Report.  In 2013 there were no percentage increases in annual compensations.
G4-56	Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.	□ p. 11–12 □ p. 10–11 * Internal Labour Regulation.  The Code of Conduct was approved and notified in 2011 (in Greek and English) with full implementation throughout the Group. A special awareness program is implemented (2012-2013) for all employees in Greece and abroad.  The Competition Policy and Compliance Program, as to the competition legislation, are in the process of approval.  List of procedures for Health, Safety, Quality and Environment — according to international standards and corresponding policies are available on the corporate network, intranet and internet. These apply across the Group.  Group's values address all the Group's subsidiaries in Greece and abroad.  The statements, codes or policies concerning procurement activities fall under the existing Purchasing Regulations, paying special attention to cooperation with suppliers.  All of the aforementioned apply across the Group and the relevant continuous training ensures knowledge and application. Deviations from their application have not been detected.  In addition, the companies develop, ad hoc, local policies depending on the nature of activity and the place.  For example:  At ASPROFOS: Policy for Quality, Health & Safety, Internal Labour Regulation, Policy for the proper use of interconnected IT systems.  At EKO SERBIA: The company supports the vision "To be customer's number one choice, offering value for money services and products, caring for our people and respecting the environment". This vision is inspiring all employees for innovations implementation, network operations, environment friendly projects and CSR activities.

			At HP CYPRUS:  • Policy for box for suggestions / comments / complaints  • Policy for clean workspace (offices only)  • Policy for non intrusive work environment (offices only)  • Policy for Casual Friday (offices only)  At EKO BULGARIA:  • Communication Procedure  • Authorities manual  • DIMA Investment Divestment Procedure  • Internal Labor and Ethics code  • Procurement manual  • Public and Media Relations  • Risk Assessment Procedure
G4-57	Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as help-lines or advice lines.		We are committed to be a responsible Group. This means that we conduct our activities in accordance with relevant ethical, professional, and legal standards.  We consider corruption, bribery, and unfair competition to be unacceptable.  Risks related to sustainability such as personnel, safety, environment, business conduct, and supply chain management form an intrinsic part of Group's Risk Management.  For each of the risk categories within all operating companies as well as on group level an assessment of the risk is done together with determining improvement potential. This improvement potential is input for the execution agendas and on operating and functional level.  In the Code of Conduct, HELLENIC PETROLEUM stipulates that every employee must behave honestly, transparently, and responsibly towards customers, business partners, shareholders, and colleagues.  The Code also provides the opportunity for ethical and lawful conduct counselling; as well as for anonymous reports towards the Compliance Office.
G4-58	Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistle-blowing mechanisms or hotlines.	✓	In order to further ensure that our business integrity policy is properly designed and implemented, the Corporate Compliance Office operates in the context of the Code of Conduct. Employees may submit to this office any questions about integrity or reports of suspected violations. These will be made in the context of confidentiality and discretion.  OKTA:  We implement mechanism for protection of employees' rights in accordance with the Law.  We established measures and procedures for protection from harassment at work place.  Existence of an independent internal audit department.  HP CYPRUS  The Code of Conduct was launched in 2012. The code manages all these aspects and has been communicated to all employees, suppliers and customers and, moreover, forms part of our contracts.

# **EKO BULGARIA:**Reporting mechanisms and

Reporting mechanisms and the overall reporting responsibility procedures are established by the Group's Code of Conduct provisions. Obligation for observance of Group's Code of Conduct is included in each partner's agreement. Concerns are treated confidentially. The Company has a non-retaliation policy. Cases of concerns have not been raised for the reporting period.

## **EKO SERBIA**

Cooperation with outsourced agency in order to operate open line (email and free of charge phone number) 24/7.

Depending on the communication issue, staff in charge is making investigation and preparing final answer.

According to law all forms of communication (concerns, questions, thanks, congratulations or complaints) officially received have to be resolved in 15 days.

Table 7.6b: DMAs – Management Approach Disclosures on Material Aspects	Ext. Certifica tion - Report section & GR indicators
ENVIRONMENT	√
Material Consumption	§ 3.1
This refers to the total amount of basic and auxiliary material resources directly used by HELPE to conduct operations and activities (such as crude oil, chemicals and water).  To reduce material losses the refineries have appropriate collecting and recovery systems. Where technically feasible Best Available Techniques are applied for the recovery of raw materials from various waste streams. The recovery rates for 2013 are presented in Table 3.2.	G4-EN2 G4-EN8-
Considerable measures are taken and on the reuse of the water consumed. Part of the production process of the refinery is the pre-treatment of polluted water-streams and their reuse within the process. Among the benefits is the significant reduction of fresh water consumption and the reduction of effluents. The reuse of water for 2013 is presented in Table 3.3.	
The Group cooperates with other European companies participating in consortia for the implementation of REACH Regulation. The requirements of the European Chemicals Agency (European Chemicals Agency-ECHA, http://echa.europa.eu/) in the evaluation phase are kept and the registration dossiers of chemical substances are updated, as provided in the Regulation or the ECHA. Emphasis is given to interactive and effective communication in the supply chain with primary tool the updated products' Safety Data Sheets. Where possible, the use of auxiliary materials identified as substances of very high concern is avoided in all processes.	b-
The subsidiaries of the Group receive expert guidance on their obligations concerning REACH Regulation.	
Finally, initiatives are taken for the efficient use of natural resources, renewable energy and recycled materia throughout the spectrum of activities and processes.	ıls

#### **Energy Use (i.e. non-renewable)**

This refers to the use of non-renewable energy sources, such as fossil fuels and electricity consumption from the Hellenic Public Power Corporation.

Our energy consumption contributes to a significant amount of our costs and is an indicator of the efficiency of our processes. As a large player in an industry sector with relatively high energy consumption, our energy usage has a great impact on society. We have set targets for relative reduction in energy usage; and we monitor and benchmark progress on these targets.

All the Group's refineries are energy optimized and feature cogeneration CHP units, which cover about 35% of the electric energy needs of the Group. Due to the operation of these units the emission of 330 thousand tonnes of CO<sub>2</sub> in 2013 was avoided (based on PPC's weighted average emission factor of 1.19 kg CO<sub>2</sub>/kWh for 2012), significantly contributing to the reduction of nation-wide levels of greenhouse gases emissions.

#### **GHG Emissions**

This refers to the overall GHG emissions (both direct and indirect) due to Group's operations.

All the Group's refineries are energy optimized and feature cogeneration CHP units, which cover about 35% of the electric energy needs of the Group. Due to the operation of these units the emission of 330 thousand tonnes of CO<sub>2</sub> in 2013 was avoided, significantly contributing to the reduction of nation-wide levels of greenhouse gases emissions.

The three refineries' "total direct" CO<sub>2</sub> emissions constitute less than 2% of total greenhouse gas emissions (GHG) nationwide.

In the context of the opening of the third phase of the ETS (2013-2020), HELLENIC PETROLEUM's refineries submitted the revised emissions' monitoring plans to the competent authorities (Ministry of Environment, Energy and Climate Change). Moreover, all necessary verified data, for the introduction of the modernized Elefsina refinery in ETS as a newcomer, were properly submitted. These contributed to the smooth integration of the refineries in the third phase of ETS and the completion of the procedure for allocating allowances for the year 2013 (completed in the first quarter of 2014).

## **Biodiversity (Oil Spills & Leakages)**

This refers to local oil releases to the environment and leakages due to ELPE's operations or during product transportation and the main direct impact is an environmental pollution. Leakage, and therefore limited or large pollution can occur at sea and / or land.

Maritime transport fuels are made with modern technology ships inspected regularly by shipping registers in accordance with international standards. The Group's privately-owned and chartered vessels meet all of the applicable MARPOL regulations and conventions (International Convention for the Prevention of Pollution from Ships), EU regulations and ISGOTT & ISM (International Safety Guide for Oil Tankers and Terminals and International Safety Management Code) international standards. The vessels are also covered (by P & I clubs) for pollution incidents. In the unloading / loading areas are means of protection and restriction of pollution whereas frequent drills (in collaboration with authorities like the Fire Department, Port Police & Hellenic Police) ensure the readiness of human resources.

Oil leakages to the ground may occur within the premises of the Group or during transport of fuel. The implementation of the LDAR system minimizes the likelihood of leakages within the premises whereas actions such as training on defensive driving for tank drivers minimizes the risks of road accidents. Furthermore, to minimize accidents, the transportation of fuel to customers such as airport Eleftherios Venizelos is done by pipelines rather than tanks.

In recent years there has not been recorded a significant fuel spill.

§ 3.1

G4-EN3

G4-EN4 G4-EN5

G4-EN6 G4-EN7

§ 3.2

**G4-EN15** 

G4-EN16

G4-EN17

G4-EN18

G4-EN19

G4-EN20

G4-EN21

#### Product Impact (i.e. use by end consumer)

This refers to product consumption by the end consumer and its impact on the environment mainly in terms of air emissions.

The innovative process (with only 5 applications worldwide) of thermal cracking of heavy oil (Flexicoking Conversion Technology) has been implemented. Flexicoking technology is a sufficiently flexible conversion process, which results in the production of clean middle distillates (diesel) and clean fuel gas for own consumption, contributing significantly to the reduction of emissions and positive energy balance of the industrial complex.

In the context of our Quality Policy and care for our customers, the Group is committed to supply products and services which fully comply and / or are better than the agreed specifications, to provide complete technical data on the quality of products / services to all concerned and to offer its customers, partners and staff the opportunity to evaluate and contribute to the further improvement of the quality of products and services. Increasingly stringent fuel specifications (zero sulphur fuels), for the fuel supplied to the final consumer, contribute to the reduction of gaseous emissions such as sulphur dioxide (SO2) and particulate matter.

Best available techniques, such as the LDAR program, are also applied to the storage and distribution of products in order to reduce VOC emissions. These include: installation of secondary barriers in the floating roof tanks, painting tanks storing volatile products in white (high reflectivity), bottom-loading of tank-trucks and vapour recovery systems at the fuel loading facilities.

Moreover, all of the Group's installations use vapour recovery systems when loading gasoline, according to the relevant legislation.

EKO's and HF's petrol stations are also equipped with vapour recovery systems, used when receiving gasoline from tank-trucks (stage I).

EKO has progressed with the gradual introduction of vapour recovery systems when cars are fuelled with gasoline (stage II) at EKO's fuel stations (company owned and renovated company controlled stations).

## SHAREHOLDERS-INVESTORS

#### Raw Materials Supply Security (e.g. future oil & gas availability)

This refers to the future oil & gas availability and the potential impact this could have in the long term business model, strategy and operations of HELPE.

The crude oil supplies are coordinated centrally by the Group and are covered by frame agreements (term-contracts) and with spot-contracts. The Group procures crude oil primarily from Russia, the Middle East and North Africa. Political instability in the Middle East and North Africa varies the last 50 years and depends on various factors, such as frequent change of governments, military regimes, social disruptions, sanctions from other states or terrorist actions. The political unrest in these areas are able to disrupt the smooth supply of the Group with crude oil. Also, in Russia, possible structural changes in the oil sector, tax and legislative changes, political unrest and problems of transporting crude from Russian terminals can affect crude supply. The conditions in the crude oil market in 2013 were very unfavorable, mainly due to the continued, since 2012, EU's embargo on trade with Iran and the political unrest in Libya and Iraq; which affected the smooth supply of refineries. The Group has adjusted accordingly the mixture of oil supplies adding supplies from Russia (54%) and Kazakhstan (15%). Despite the political developments in these countries and reduced exports, HELPE purchased crude oil from Iraq and Libya (12% and 9% respectively).

The accessibility and flexibility of the Group's refineries to process a wide variety of crude, are key competitive advantages, which are particularly important for both profitability and responsiveness at steep supply reductions of specific crude types, thus ensuring smooth supply of markets where the Group operates. Operational Continuity (e.g. plans to ensure continuation of operations).

## **Operational Continuity**

This refers to planning and establishing procedures which are intended to ensure that critical business functions will either continue to operate in case of serious incidents or disasters or will be recovered to an operational state within a reasonably short period, such as accident plans to ensure continuation of operations.

The activities and results of the Group may be affected by supply disruptions, a variety of external or internal factors (such as political turmoil in supplying countries), emergency downtime into production units, shutdowns for maintenance etc. The number of Group's facilities and their geographic dispersion impart considerable flexibility in emergency situations. In addition, the Group has developed considerable expertise and experience from successfully handling of crude oil supply issues, driven by political developments in Libya and imposed sanctions on Iran as well as from optimisation of refineries' operation, based on efficient scheduling and execution of the necessary maintenance shutdowns. In all cases, alternative supply plans were prepared and immediately carried, thus minimizing any operational impact.

Further information in section 2.4, Risk Management, and 4.2.1 training and safety drills.

#### **Supplier Assessment**

The Group's Procurement Division, has the primary responsibility for the evaluation of suppliers (for products and services) in accordance with the procedures of the Group and the Procurement Manual.

To develop our supply chain and incorporate our values and principles we seek added value, long term, mutually preferred relationships with partners who can help us to improve the total performance and sustainable development of the Group . In addition, labour practices of our suppliers affect not only our financial performance, but also our relationships with other social partners.

For the above reasons, their evaluation is based on business criteria (safety issues, performance, compliance with contractual agreements etc) and also criteria for sustainable development.

The assurance that Group's suppliers properly manage issues such as human rights and labour practices is among the suppliers evaluation criteria. The evaluation of suppliers (and new suppliers) is complimented by questionnaires which include relevant questions. The completed questionnaires were assessed by the Procurement Division. No significant findings in 2013.

Moreover, starting on 05/2014, active suppliers are evaluated using questionnaires which also include criteria on impact on society and environmental performance (based on ISO 14001). During the second phase (2015) the potential impacts shall be identified and action shall be planned.

In several cases of selection of suppliers of equipment the sustainable solution offers a lower Total Cost of Ownership (TCO) due to, for instance, lower energy consumption during operation or waste efficiency.

# Procurement Practices (Responsible Buying & Operational Support)

The Group's procurement procedures are included in the Procurement Manual and describe the following points:

- Who buys: roles and responsibilities of buyers are documented.
- Selecting suppliers: continuous training of buyers on procurement techniques and their application. The introduction and assessment of criteria for selecting suppliers (including sustainable development criteria) takes place in cooperation with relevant Departments
- Responsible procurement policy: Purchases from local suppliers (products and services) represent more than 15% of Group's purchases. As local suppliers are defined those operating in municipalities adjacent to industrial facilities of the Group. The Code of Conduct of the Group covers topics such as conflicts of interest, gifts, working relationship with a supplier, etc.
- Environmentally friendly procurement: Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on impact on society and environmental performance. During the second phase (2015) the potential impacts shall be identified and action shall be planned.

Interaction with suppliers, ie activities and procedures that include issues such as compliance with payment terms, purchase order cancellation, support for SMEs, etc, are described in Procurement Manual, Code of Conduct and Internal Labour Regulation. The relevant suppliers' information is provided with clarity, transparency, respect of competitiveness and equal opportunities.

G4-12

G4-EN32

G4- EN33

**G4-LA14** 

G4- LA15 G4-

HR4-6

G4- HR10

G4- HR11

G4- SO9

G4-SO10

§ 6.3 (table 6.1)

G4-EC9

Group's Code of Conduct, at: http://www.hel pe.gr/uploads/ coc\_2013\_EN/i ndex.html Noted that the implementation of Procurement Manual in commercial, construction and transportation contracts, as well as the relevant contractual obligations were among the issues audited by the Internal Audit Department.

In 2013 there was one finding of high risk in "operation support", for which all necessary measures for full and immediate compliance were taken.

## **EMPLOYEES**

#### **Job Position Security**

**G4-LA1** 

This refers to past practices, the level of security of present and the estimation of future job positions within HELPE (due to the volatile economic situations).

The Group designs and implements strategies and adopts modern policies of Human Resources. In this way it seeks to be "an employer of choice and employees the competitive advantage", to achieve the business objectives and confirm the values & principles.

The Group places particular attention in shaping a dynamic policy framework, for the management of human resources, in order to best meet business objectives while meeting the goals and expectations of employees.

#### Occupational Health & Safety

§ 4, 4.2, 4.2.1,

This refers to utilising policies, practices and initiatives on behalf of the Group, to ensure the health, safety and welfare of employees.

HELLENIC PETROLEUM feels responsible for all people involved in or affected by the activities of the Group. This includes our employees, customers, partners, suppliers, trainees, subcontractors and the general public.

Health and safety performance is a true reflection of operational excellence. Occupational health and safety contributes to the satisfaction of our employees and our reputation.

The continuous care for the health and safety of employees and the concern for their families as well as the residents of neighbouring municipalities, is a prime consideration for the Group. For this policies, actions and programs have been adopted that contribute to this direction.

Section 4.2 presents policies and practices used to ensure occupational health and safety. In section 4.2.1 the specific training in health & safety is presented. Section 4.2.2 presents the relevant investments. In § 4.2.3, the systematically monitored (among others) indices AIF (total accidents index), PSER (process safety index) are presented as well as other targets set.

The Group's occupational health & safety services aim to identify, prevent, and ultimately eliminate all work-related occupational diseases or accidents at work.

To further raise awareness of employees in accident prevention and safe plant operation, the implementation of the Rewarding Policy for Safety Performance is continued, among other practices. In this context, employees' teams that achieve safety objectives, based on working hours without lost workday accident, are rewarded.

It is our aim to provide a safe, inspiring, and flexible work environment.

Asset integrity and process safety

- To ensure the reliability of the equipment as a key element in the safe operation of facilities several procedures have instituted and implemented by the companies' staff. These are:
  - Management of Change
  - Safe Design Committees
  - HAZOP studies

4.2.2, 4.2.3

G4-LA5 G4-LA6 G4-LA7

http://www.hel pe.gr/healthand-safety/industrial-health -and-safety/

http://www.help e.gr/health-andsafety/personnel-training/

**OG13** 

- Equipment inspection and checks are made periodically by the Equipment Inspection Departments of the facilities, in accordance with their respective programs.
- Also, inspections focused on process safety are carried out weekly by a team of two employees in order to identify and correct unsafe behaviors of employees and contractors' staff.
- As mentioned in section 4.2.1, the monthly CCPS bulletin (Beacon), concerning process safety, is distributed to all staff.
- Procedures, especially in safety issues, exist for the prequalification of contractors and their safety performance assessment after completion of the work.
- Any unplanned or uncontrolled leakage of substances is measured as process safety incident (process safety event), in accordance with the definition and criteria of CONCAWE.

#### CUSTOMERS

#### **Anti-competitive Behaviour**

(i.e. monopoly conditions, price agreements with competitors).

This refers to business practices and policies that potentially prevent or reduce competition within the market such as monopoly conditions and price agreements with competitors.

Our reputation and license to operate are strongly related to anti-corruption, anti-competitive behaviour, and compliance.

Anti-corruption strengthens efficiency by reducing transactions and transaction costs for us and for our stakeholders. We believe that doing business honestly is vital to increasing competitiveness for us and for our partners. Competitive behaviour contributes to innovation and mutual cooperation. It creates an environment where the best products will win, and where our stakeholders will get the best products for the best price.

We are committed to being a responsible company. This means that we conduct our activities in accordance with relevant ethical, professional, and legal standards. Corruption, bribery and unfair competition are unacceptable in our organisation.

Our business integrity policy is based on our Code of Conduct, which all employees are aware of. In the Code of Conduct, we stipulate that every employee must behave honestly, transparently, and responsibly towards customers, business partners, shareholders, colleagues and other stakeholders.

In 2013 no legal actions were taken for anti-competitive behaviour, anti-trust, and monopoly practices. In addition, there have been no known instances of corruption or of non-compliance with laws and regulations.

Regarding competitive practices in the market, both EKO and HF (BP) follow their own marketing strategy and don't make price wars or conciliations for their control. It is also clear from the course and their presence in the market that although EKO is a company that has built its brand not based on price but high quality of fuel (which is assured through continuous on-site inspections at the pump) and on the excellent level of service, offering its customers value for money products and services.

On the other hand, HF (ex BP) is a company which is clearly placed by consumers as a premium brand, timeless, inspiring confidence and enjoying high acceptance and recognition for the superior quality of its products; without need of price wars or price controls to sell.

# LOCAL SOCIETY

## Accident Impact

This refers to actions or practices for early detecting the impact of potential accidents (e.g. explosions) near communities, which is key to encounter them successfully.

Impact assessment is carried out in accordance with the requirements of European and Greek legislation

**§6.1** 

Code of Conduct

http://www.hel pe.gr/uploads/ coc\_2013\_EN/i ndex.html Seveso, and reported to the authorities as a safety assessment. Based on this assessment, contingency plans for the protection of local residents and employees are implemented.

Techniques and measures, above and beyond those that are imposed by the regulations and legislation, are implemented at all Group's facilities, in order to ensure for Occupational Health and Safety. In this context, a study to analyze operational risks (HAZOP or Hazard & Operability Study) is a prerequisite for any new facility or for the extensive modifications of existing units. The operation and maintenance of the facilities rely on well-trained and experienced personnel that comply with safe operating procedures.

Particularly important for the prevention and addressing of accidents are:

- 1. Issuing of work permits for all maintenance works at production facilities.
- 2. Safety training and successful exams are prerequisite for the personnel of contractors performing maintenance works.
- 3. Managing changes safely.
- 4. Scheduled training of employees, in theory and practice, in order to be able to respond at an emergency (power failure, loss of utilities, steam, air, etc.).
- 5. Reporting and investigating accidents. All accidents or near misses are reported and investigated in order to plan corrective actions to prevent their reoccurrence. Accidents that are monitored include personal injury including first aid explosions, spills, property damage, road accidents etc. All events are statistically analyzed in order to improve safety.
- 6. Planned drills for different types of accidents, often in collaboration with relevant bodies such as General Secretariat for Civil Protection, Fire Brigade, Police etc.

#### **Health Screening**

(i.e. proactive monitoring of residence around facilities)

This refers to actions or practices for early detecting potential health issues problems in communities, such as proactive monitoring of residence around facilities, which is key to encounter them successfully.

In this context, the Group sponsors programs providing primary care services (in collaboration with bodies such as Medecins du Monde and local authorities), particularly in communities neighbouring industrial facilities. The 2012-13 program covered more than 2000 residents providing general services for diagnosis and counselling, as well as more specialized paediatric and gynaecological tests.

Furthermore, in collaboration with Médecins du Monde, a preventive medical examinations program was implemented concerning 21 students of the first Lyceum of Aspropyrgos, who participated in school volleyball and basketball games.

#### **Acoustic Impact**

This refers to actions or practices for early detecting potential health issues problems in communities, such as proactive monitoring of residence around facilities, which is key to encounter them successfully.

Scheduled noise measurements are carried out at all Group's installations to ensure that employees are not exposed to noise and vibration levels higher than the acceptable limits of the law. In addition, all industrial complexes monitor the noise level within the limits of the facility, so as to be in accordance with relevant legislation, with specific noise levels and vibration limits.

Consequently, it is considered that there is no noise pollution as far as local residents are concerned.

Table 7.6c: Specific Standard Disclosures - INDICATORS

	ECONOMIC	Ext.		
		Assur-		
		ance		
G4-	Direct economic value generated and	/	₽ p. 103	
EC1	distributed.	<b>V</b>	p. 103	
LOI			p. 13, Chart 2.1	
			Group's payroll	€ 215,335,080
			Payroll taxes	€ 44,574,049
			Employees' insurance plan	€ 4,543,886
			Employees' pension plan	€ 6,588,269
			Staff transportation	€ 3,356,423
			School allowance	€ 328,082
			Employees' university studies allowance Support to employees' family members	€ 206,694
			with special needs	€ 75,443
			Wedding/birth/death allowance	€ 120,151
			Crèche allowance	€ 956,920
			Employees' children camping	€ 359,678
			M 22 25 21 22	
G4- EC2	Financial implications and other risks and opportunities for the organization's activi-	<b>✓</b>	p. 22–25, 31–33	
	ties due to climate change.		The potential risks and related financial-eco	nomic impacts are an
			integral part of the feasibility report for each	
			investment. Participation in committees & a	ctions with other
			companies in the sector (see section 6.4) fac	
			monitoring of the forthcoming regulatory ch	nanges.
			The Group's commitment to sustainability is	ocuse is confirmed by
			the participation of Group's CEO to the Boar	
			Sustainable Development, the commitment	
			cooperation with Networks for Corporate So	
			Financial implications and other risks and p	otential
			opportunities for operational activities due t	
			within the scope of any feasibility study cond	_
			operations of the Group.	Ü
			The company's strategic choice for tackling climaters	ate change is the energy
			saving, both in production activity and administ	
			The sherious financial insects have to describ	th the execte
			The obvious financial impacts have to do wi associated with the projected deficit of the ri	
			emissions of greenhouse gases (GHG), as the	
			Greece participate in the European Emission	
			Scheme. The developments concerning the i	
			2003/87/EC are monitored, at European leve	
			(participation in a EUROPIA group) and the	e impacts are
			evaluated at country and company level.	
			For the first two trading phases (2005-2007)	and 2008-2012)
			almost all of the rights allocated for free to it	
			mainly on past emissions. Especially for Gre	
			done without taking into account the investi	ment for the
			environmental improvement of fuel, which l	
			energy consumption, and ignoring their early	ly action to save
			energy, resulting in a deficit.	
	•			

For the period 2013-2020 (third trading phase), during which the rules of rights allocation are changing and only 50% of total allowances will be free distributed while the remaining 50% will be auctioned—because of the exposure of the refining industry at the significant risk of "carbon leakage"—the refineries will receive 100% free allocation of allowances to be derived on the basis of the price benchmark resulting from the average of the 10% most efficient installations of the oil sector (in the years 2007-2008), which is 29.5 kg CO<sub>2</sub>/CWT. This leads the industry benchmark at European level reductions of 23%, a higher percentage than the EU target of 21% applicable to other industry sectors. It had been estimated that HELLENIC PETROLEUM, for the period 2013–2020 would have a deficit of around 25% of emissions, taking into account the modernization of the Elefsina refinery. Recent decision of the European Community deemed necessary to implement a cross-sectoral correction factor (CSCF), which resulted in a significant increase in the rights deficit (about 30%) and consequently the associated operating costs. Given that the technical options available for effective reduction of CO<sub>2</sub> emissions are limited at existing facilities; because refineries have a high degree of energy optimization by implementing for many years energy saving projects, there will be costs to purchase the required emission allowances from 2013. It is also noted that because power generation activities are not allocated free allowances (since 2013), refineries incur additional increased cost concerning electricity purchases; as the cost of buying allowances for electricity is partially passed on to consumers. Other potential risks include increased costs for fuel and raw materials, reduced demand for energy-intensive products as well as additional measures to control and reduce GHG, which are related for the sector at European level. The evaluation of potential opportunities for natural gas & advanced biofuels is continuous. Moreover, investments are implemented for the improvement of the energy efficiency and in the field of RES. G4-Coverage of the organization's defined / **p.** 36 EC<sub>3</sub> benefit plan obligations. The Group does not use defined benefit plan, but defined contribution plan. This plan covers: HELLENIC PETROLEUM 97.69% of employees, ASPROFOS 65%, DIAXON 96%, HP CYPRUS, JPK MONTENEGRO & EKO BULGARIA 100% of permanent staff. The employees participate in meeting the cost, and more specifically the health and pension plan. Indicative examples are following: at DIAXON & HELPE are: "Newly insured employee": 2.5%

			employer contribution and 0.5% to 5% employee contribution.  "Already insured employee": 6.5% employer contribution and 1.5% to 5% employee contribution.  At ASPROFOS: the employee participation is 2% and the company participation is 1.5%.  At HP CYPRUS: 100% participation, Define Benefit Plan 12.4% Employer, Define Contribution 5% Employer, Define Contributions 5%-15% Employee.  At JPK MONTENEGRO: 15% employee / 5.5% employer  EKO BULGARIA: a standard, obligatory scheme, which is predefined by the national law.  At EKO SERBIA: All contributions for pension and health are covered by the company (22%+12.3% of gross salary).
G4- EC4	Financial assistance received from government.	✓	No direct financial support from the State.
G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.		With the assumption that "local minimum" are the national collective bargaining agreements, then, HELPE's employees are compensated over and above them; without any discrimination or differentiation.  No permanent employee is remunerated at the minimum / basic salary in HELPE, EKO, DIAXON, EKO BULGARIA, EKO SERBIA and JPK Montenegro.  The typical average employee's wage in the Group is significantly higher than the equivalent salary in Greece; respectively abroad is up to 300% higher than the corresponding national average.  Significant locations of HELPE's operations are the industrial sites Aspropyrgos, Elefsina & Thessaloniki. Indicative examples of salaries are:  Operator earns 32% higher than the "local minimum" and Engineer earns 62% higher than the "local minimum".  ASPROFOS: (based on 100 sector's collective agreement) the deviation from the standard minimum wage is: 96% engineers, accountants, 98%, office workers 114%, technicians 105%. There is no minimum wage differentiation by gender, but by location of operation (eg employees at construction sites receiving worksite allowance).  EKO: The minimum wage in force at local level is approximately 79% of basic salary for a typical newly recruited by the company.  EKO BULGARIA: Minimum wage - EUR 135. Entry level wage EUR 450. The entry level (new hires with no experience) is higher than the local by 284% for engineers, accountants & technicians.

			EKO SERBIA: newly recruited with no experience receive 444% (engineers), 166% (accountants), 277% (sales representatives) higher than the local minimum.  JPK MONTENEGRO: the lower company's salary is 2.28-2.65 times higher than the local minimum.  OKTA: the lower company's salary is 2.4-3.8 times higher than the local minimum.  HP CYPRUS: There is a collective bargaining agreement, which regulates the wage scale in relation to the respective job. On the basis of these standards the payroll of new recruits is adjusted. The collective agreement is common to the 3 major oil companies (HELPE, BP, Exxon Mobil) operating in CYPRUS.  The permanent staff is paid based on levels of collective agreement. The seasonal staff is paid based on the minimum wage defined by law.
G4- EC6	Proportion of senior management hired from the local community at significant locations of operation.	✓	In the category 'senior management' executives with rank higher than the Assistant Director are included. This proportion of executives from local communities varies from 50% to 100%.  HELPE: in the process of recruitment there is a provision to award points to residents of neighbouring, to the refineries, municipalities.  HELPE, HF, EKO: 100% DIAXON: 100% EKO BULGARIA: 50% EKO SERBIA: 67% HP CYPRUS: 100% JPK MONTENEGRO: 62% OKTA: 50%
G4- EC7	Development and impact of infrastructure investments and services supported.	✓	A survey on Materiality analysis & Stakeholders engagement was conducted in 2013 (see section 7.1), based on a questionnaire and interviews in local communities. Such approaches are used to determine investments in infrastructure and other activities for the benefit of local communities.  All projects are made in consultation with local communities. Indicative examples are:  • Support the operation of municipal libraries - in local communities - by equipping them with modern equipment, while creating updated databases and enhancing their functionality. In parallel with the voluntary participation of employees of the Group, we enrich the libraries' content and increase the educational opportunities of the public offering books, (12,000€).

			• As part of our CSR program, we sponsored eight photovoltaic installations, of a capacity of 10 KW each, in 8 schools of neighbouring municipalities. This sponsorship covers a significant proportion of the schools' energy consumption contributing to systematic saving of energy and protecting the environment while saves in operational the costs. These photovoltaic systems will annually produce approximately 120 MWh of green energy, while avoiding the emission of about 120 tons of carbon dioxide. These same beneficial effects are equivalent to those that would result from a 120 acres forest park with 6,000 trees (60,000€).
			• Support of the continuation of works for the drainage of surface water and groundwater level adjustment in the municipality Ilinden, fYROM, (10,000€).
			<ul> <li>Donation of 18 PCs &amp; server to elementary school at the municipality of Ilinden, fYROM (10,000 €).</li> <li>Design and construction of two pedestrian crossings in Sofia, Bulgaria (1,900 €), http://www.eko.bg/NewsDetails.aspx?lan=2&amp;id=446</li> </ul>
			• Donation, to the municipality of Mandra-Idillia, of eight independent prefabricated units in order to be placed in municipal area and used for permanent housing of Roma families, (25,000 €).
			• Donation of bitumen (60,000 €) for road construction projects in the Municipality of Elefsina.
G4- EC8	Significant indirect economic impacts, including the extent of impacts.	<b>✓</b>	p. 14–15, 82–87
ECO	cruding the extent of impacts.		1. Economic development in areas of high poverty: See indicator EC7 for projects in W. Attica and § 6.3 for social activities.
			2. Economic impact of improving or deteriorating social or environmental conditions:  See § 3 for actions aiming at improving environmental conditions.

- **3.** Availability of products and services for those on low incomes: See § 6.3.1 & 6.3.2 for fuel donations and prepaid cards provision for fuel purchases.
- **4.** Enhancing skills and knowledge amongst a professional community or in a geographical region:

A modern skills development program was implemented at Elefsina, in collaboration with ALBA Graduate Business School. The program offered an opportunity for young people from Thriasio to learn and "draw" valuable knowledge in areas such as entrepreneurship, strategy, techniques of negotiation and emotional intelligence. A common finding is the need of young people to get answers to critical questions, through access to modern ways of thinking and information in order to acquire the right skills, enrich their CV and claim a place in the highly competitive work environment. The program, which was available at no charge, provided a certificate of attendance.

At HP CYPRUS, training of university students at the terminal or Head Office. **5.** Jobs supported in the supply chain or distribution chain See Table 6.1 for purchases from local suppliers. **6.** Economic impact of change in location of operations or In the process of staff recruitment, at HELPE, there a procedure in favour of the permanent residents of the municipalities neighbouring to our refineries. During OKTA's reorganization process an increase for new job positions locally was noted. We increased road transportation, thereby supporting truck transportation sector. We outsourced product quality control and certification to the specialized independent company Saybolt. Such activity did not exist in the country; a new company was created for this purpose. 7. Significance of the impacts in the context of stakeholder priorities, such as national and international standards, protocols, and policy agendas: In 2013, an opinion survey was conducted, on materiality analysis and stakeholder engagement (see § 2.3, 7.1) based on questionnaire and interviews with stakeholders at local communities (the last public opinion survey took place in 2011). Such surveys, regular communication and consultation are used to determine the investment in infrastructure and other actions for the benefit of local communities and to understand the significant indirect effects locally. Assessing the findings will lead in planning activities for 2014. It has been recorded that local communities anticipate actions with a focus on supporting the unemployed, health services, in support of elderly and vulnerable groups in general. Moreover, during the planning phase of new investment care is taken of the direct and indirect impacts. G4-Proportion of spending on local suppliers 🕮 p. 70 EC9 at significant locations of operation. The spending proportion on locally-based suppliers at significant locations of operation is more than 15% of total spending and is presented in Table 6.1 As local suppliers are defined those based in municipalities adjacent to industrial facilities of the Group. As significant locations are defined the municipalities at Thriassio and Thessaloniki that neighbour to the refineries and Diaxon site. Group policy is to support the local market and local contractors, always in accordance with suppliers' selection criteria, such as safety, quality standards, competitiveness etc. In this context the Group (along with other large companies) is investing in proper training of subcontractors to ensure their ability to participate in Group's projects.

EN	Ext. As- sura nce	Environmental Indicators per Facility		BEA	BEE	ВЕΘ	Subsidiaries (OKTA = A, EKO=B, HF=C, DI- AXON=D, HPC = E, EKO SERBIA =F, EKO BUL- GARIA=H, JU-	Units / Comments
					1.00==		GOPETROL=G)	
G4- EN1	<b>/</b>	Materials used by weight or	Crude oil	6,397.2	4,285.0	1,204.3	n.a	ktn
		volume	Throughput ( crude oil + other supplying streams )	8,605.7	4,752.2	3,028.8	n.a	ktn
			Throughput	8,985.2	4,763.7	3,085.2	2,511.1 (A,B,C,D)	ktn
			Bio-diesel	59,567	3,039	38,663	n.a	ktn
			Catalysts	0	37.24	0	0	tn
			Lubricants	2,25	45.49	39,07	9.41 (A,B,C,D)	tn
			Additives	2,228.4	0	1,112.5	1,570.3 (A,B,C,D)	tn
			Solvents	0	0	0	1.09 (A,B)	tn
			Packing materials	0	0	0	2,177.9 (B,C,D)	tn
			Hydraulic fluids, anti- corrosive agents, acids, surfactants, scale in- hibitors, gelling agents, friction reducers	0	0	1,024	128.94 (A,D)	tn
			Other material	0	3,610.7	0	216,533.9(A,B,D,G)	ktn
			Total of non renewable material	8,987.5	4,767.4	3,087.3	2,731.5	m3
			Renewable material (biodiesel)	59,567	3,039	38,663	n.a	%
G4- EN2	✓	Percentage of materials used that are recycled input materials	For the refineries Slop oil/throughput	0.11	2,40	1.57	7.79 (D)	TJ The purchased electricity derived from the suppli- ers' accounts,
G4- EN3	1	Energy consumption within the	Energy from non re- newable fossil fuels	22,930.1	13,046.8	4,182.8	487.6 (A,B,C,D,G)	while the self-pro- duced by power meters on site.
		organization	Consumed energy from renewable fuels	0	0	0	0	The source for the calorific value of the fuel is Na-
			Self-produced electricity	1,102.2	357.5	0	0.01 (B,C)	tional Inventor Report. The pur-

			Consumed energy from non-RES  Consumed energy from RES  Total electricity consumption within the organisation	638.3 112.4 24,783.0	957.4 168.6 14,530.3	616.6 108.6 4,907.9	226.9 (A,B,C,D,E,F,G,H) 40.1 (A,B,C,D,H) 754.6 (A,B,C,D,E,F,G,H)	chased electricity is concerned primarily in engines. Heat, steam & cooling are neither imported nor sold.
G4- EN4		Energy consumption outside of the organization	Transportation and distribution (Upstream)  Business Travel (Upstream) 30% of all business trips  Employee Commuting		2,236		4.4 (B,C) 0.24 (B,C)	TJ  The source for the calorific value of the fuel is National Inventory Report. The methodology for calculating the transport / distribution of products
			(Upstream)  Total Upstream  Downstream transportation and distribution	2,237.24 744			(B,C) 5.4 (B,C) 451.9 (B,C)	results from the EU ETS regulation for monitoring and reporting of greenhouse gas emissions. Business travels were estimated using the small emitters tool https://www.eurocontrol.int/articles/small-emitter s-tool.
G4- EN5	√	Energy Intensity		2.76	3.05	1.57	0.30	GJ/tn of transported products. The index concerns total energy (fuel and electricity) within the organization.
G4- EN6	<b>√</b>	Energy savings in 2013	Fuel	0	0	0	1,781 (C, D)	GJ
			Electricity	30.2	31,647	0	6.8 (B, C)	The electricity savings refers to
			total	60,030.2	31,647	50,300	5,590	engines. Fuel savings refer to combustion. The base year is 2012.

G4- EN7	✓	Reductions in energy requirements of products and services			The finally available fuels from the Group's commercial companies EKO & HF, significantly contribute to reduced emission of pollutants and reduced fuel consumption. The use of EKO 95 Economy assures up to 2% less fuel consumption and the EKO Diesel Economy assures up to 4% less fuel consumption. Moreover, the new BP Ultimate 95 provides an average of 12 extra km, compared to conventional fuel, per fuel filling. Finally, the new BP Ultimate Diesel provides an average of 42 extra km, compared to conventional fuel, per filling.  More information on the standards, assumptions and calculation methodologies are at the sites of marketing companies EKO & HF at: http://www.eko.gr & http://www.hellenicfuels.gr						
G4-	<b>√</b>	Total water	Total		5,070,814	9,890,792	2,092,35	66 1,477,807	1,477,807		
EN8		withdrawal by source Water utility		3,309,435	4,980,659	2,092,35			m <sup>3</sup>		
							(A, B, C, D, E, F, G, H)				
			Sea wate	r	1,761,379	3,679,938	0	5,077 (B, C	(, E)	$m^3$	
			Drilling		0	1,230,195	0	47,278 (B,	C, H)	m <sup>3</sup>	
G4- EN9	<b>√</b>	Water sources significantly affected by withdrawal of water			Not such	Not such significantly affected water sources					
G4- EN10	<b>√</b>	Percentage and to	10.58	1.09	1.12	0.44	%				
		volume of water recycled and reused volume			536,509 107,523 23,443 6,577 (A, E) m <sup>3</sup> (mainly water strumn", reused in desalination un					nter stripper col- rused in	
G4- EN11	<b>√</b>	Operational sites or adjacent to, protect biodiversity value or	ed areas and	l areas of high	None of the Group's refineries is near protected areas (NATURA, RAM-SAR). All installations are in established industrial areas.						
G4- EN12	√	Description of signities, products, are in protected area areas of high biod protected areas	nd services s and	on biodiversity	ronment at with the with the with mental progresulting in based on the	nd the ecosystider application. The rection. The rection impact the Guideline	stem. The reston of the Born anagement on living of some strong and some strong of the	efineries, in Gree est Available Tec ent of liquid and organisms while	ece, are the chniques for solid wast air emission re the effec	e is based on BAT	
G4- EN13	<b>√</b>	Habitats protecte	d or restor	ed	Not such	habitats. See	e also G4-F	EN11 and section	on 3.4.		
G4- EN14	<b>√</b>	Total number of and national conhabitats in areas a operations, by lev	servation la affected by	ist species with	0	0	0	0	0		
G4- EN15	<b>√</b>	Direct green- house gas (GHG) emissions (Scope 1). Base year – adoption of EU ETS 2005	(for the 3	CO <sub>2</sub> emissions 3 refineries par- g in EU ETS	1,499,799	1,664,347	240,443	35,115 estimated va (A, B, C, D)	lue) Mo em acc reg	CO <sub>2</sub> . onitoring and issions validation ording to ulations 601 & 0/2012.	

		(see EN17 for indirect emissions due to personnel commuting and product transport).	Direct GHG emissions except CO <sub>2</sub> . Emissions of HCFCs, CH4, N2O	8,804	10,537	2,393	0 (A, B, C, D, E, F, G, H)	There are no emissions of biogenic CO <sub>2</sub> tn CO <sub>2</sub> eq (GWP factors from EPA). The financial implications of participation in the EU ETS referred to G4-EC2.
			Total	1,508,603	1,674,884	242,836	35,115 (not verified)	tn CO <sub>2</sub> eq
G4- EN16	✓	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Electricity consumption at facilities (PPC factor: 1.19 kg CO <sub>2</sub> /kWh για το 2012 και FYROM factor 0.764 kg CO <sub>2</sub> /kWh)	248,159	372,201	239,690	48,005 (A, B, C, D, E)	tn CO <sub>2</sub> eq It does not include other GHG emissions except CO <sub>2</sub> . No heat or steam is introduced
			Electricity consumption at HQs offices (Elpedi- son factor: 0.376 kg CO <sub>2</sub> /kWh)	1,427 tn (			as str, Marousi): ssions for the group	tn CO <sub>2</sub> eq (Baseline year 2011)
G4- EN17	✓	Other indirect greenhouse gas (GHG) emissions (Scope 3)	Total amount of indirect CO <sub>2</sub> emissions, from all activities (air trips, private transportation) at the administration building (HQs), Aspropyrgos, Elefsina & Thessaloniki)	2,613				tn CO <sub>2</sub> eq It does not include other GHG emissions except CO <sub>2</sub> . There are no emissions of biogenic CO <sub>2</sub> . The emission factors are from EPA for employees' transportation, while emissions for air travels come as such by the travel agency.
			Estimate for other indirect emissions (with respect to crude & raw materials / products deliveries, intermediate transport & export).	280,425				tn CO <sub>2</sub> eq. Emission factors from Second IMO GHG Study 2009
			Total of other indirect GHG emissions	283,038				tn CO <sub>2</sub> eq

G4- EN18	✓	Greenhouse gas (GHG) emissions intensity	Emissions Intensity Index	0.20	0.43	0.16	n.a	tn CO <sub>2</sub> eq per tonne of transported products. Besides CO <sub>2</sub> emissions, emissions of CH <sub>4</sub> , N <sub>2</sub> O, HFCs are included. Regards direct, indirect and other indirect emissions
G4- EN19	√	Reduction of greenhouse gas (GHG) emis- sion (in 2013)	Due to fuel saving (Scope 1)	0	0	0	98.4 (C, D)	tn $CO_2$ -eq. It does not include other GHG emissions except $CO_2$ . It involves reduction of direct emissions.
			Due to electricity saving (Scope 2)	257,986	96,867	0	2,254 (B, C)	tn CO <sub>2</sub> -eq. It does not include other GHG emissions except CO <sub>2</sub> . It involves reduction of indirect emissions.
G4- EN20	✓	Emissions of ozone-depleting substances (ODS)	HCFCs	0.007	0.00	0.0004	n.a	tnCFC-11eq (Substance R22) No imported or exported emissions. Emission factors are from EPA.
G4- EN21	<b>√</b>	NOx, SOX, and other sig- nificant air emissions	NOx	3,185	507	386	73 (A, D)	tn Emission factors from re- port 01/9 του CONCAWE
			NOx Emissions Intensity Index	0.37	0.11	0.13	n.a	Kg NOx / tn throughput
			SO2	4,432	1,277	1,393	177 (A, D)	tn Emissions resulting from sulphur in fuels
			SO2 Emissions Intensity Index	0.52	0.27	0.46	n.a	Kg SO <sub>2</sub> / tn throughput
			VOCs	862	1,072	231	12 (B, C, D)	tn Emission factors from re- port 01/9 του CONCAWE
			VOCs Emissions Intensity Index	0.10	0.23	0.07	n.a	Kg VOCs / tn throughput
			PMs	241	36	49	6.8 (B, C, D)	tn Emission factors from re- port 01/9 του CONCAWE
			PMs Emissions Intensity Index	0.03	0.01	0.02	0.003	Kg PMs / tn throughput

G4- EN22	<b>√</b>	Total water dis- charge by desti- nation	Volume	1,530,376	4,478,181	1,365,600	738,830 (A,B,C,D)	m3 There were no unplanned discharges. There were no
			Destination	Σαρωνικός	Σαρωνι- κός	Θερμαϊ- κός	n.a	exports of liquid waste to third parties. The amounts resulting from flow meters.
			Treatment process	The Group' units include casionally,	de treatmer			Effluent treatment unit
			H/C index	1.11	5.26	1.7	n.a	gr HC/ tn throughput
G4- EN23	<b>√</b>	Total weight of waste by type	Total	4,604	3,606	6,768	3,566	tn There is no reporting limit;
EN23		and disposal method	Hazardous	1,523	1,186	36	601 (A, B, C, D, F, H)	all quantities are reported.
			Non-Hazardous	3,081	2,420	6,732	2,965 (A,B,C,D, F,H)	-
			Re-use	2.25	0	46.1	0 (A,B,C,D, F,H)	
			Recycle	542.5	1,696.6	962.4	1,431.1 (A,B,C,D, F,H)	
			Incineration	556.8	0	7.5	890.9 (A,B,C,D, F,H)	
			Recovery	3,502.9	1,760.9	3.6	0.8 (A,B,C,D, F,H)	
			Landfill	0	137.1	5,748.2	1,243.5 (A,B,C,D, F,H)	
G4- EN24	√	Total number and volume of significant spills	No of significant spills H/C >100bbls, spills of other substances > 1 boe (barrel of oil equiv- alent)	0	0	0	0 (A,B,C,E)	
G4- EN25	<b>√</b>	Weight of trans- ported, im- ported, exported,	quantity	54.7	137.1	27.2	4.3	tn (no imports of transported or treated wastes from
		or treated waste deemed hazardous	%	1.19	3.81	0.40	0.12 (A, B, C)	abroad)
G4- EN26	✓	sity value of water	ected status, and biodiver- bodies and related habitats ed by the organization's r and runoff	No affected See also EN			4.	

EN27 mental impacts of products and services tion of bit consump	f "cleaner" fuels (zero sulphur), addi- o-diesel to fuels, use of cleaner self- tion fuels, as following (actual values much less << than the specs):	
less < or .	much less << than the specs):	
Gasoline <0.001% Air fuel 0 Gas oil (h (2012)	n of fuels sulphur content & diesel 0.005%w/w (2006), w/w (2012). .30%w/w (2006), <<0.30%w/w (2012) neating) 0.2%w/w (2006), <0.1%w/w self-consumption) 2.7%w/w (2006), w (2012).	
Group's c significar	r, the finally available fuels from the commercial companies EKO & HF, and the contribute to reduced emission and reduced fuel consumption.	
less fuel d Economy tion. Mor vides an a convention new BP U	of EKO 95 Economy assures up to 2% consumption and the EKO Diesel vassures up to 4% less fuel consumption are over, the new BP Ultimate 95 proparerage of 12 extra km, compared to conal fuel, per fuel filling. Finally, the Ultimate Diesel provides an average ra km, compared to conventional filling.	
	g materials are not in use since fuels ported via pipelines, tank trucks and	
G4- EN29  Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	of	nere was no case non-monetary nctions.
EN30 transporting products and other goods personne	pany, in order to quantify the environmental impel commuting, in 2013, studied the commuting appersonnel working at the administrations building E(\text{\text{\text{\text{\text{\text{\$}}}}}).	pproaches con-
ployees u	v showed that approximately 33% of the above measures either public transportation or company's buses (total emissions from road travel 2,089 tCO $_2$ -eq).	
	Euro 5 specifications, emissions of other pollutan nmuting approaches (other than public transport)	
CO: PM: NOx: Total H/O	6,63 tn 0,03 tn 0,44 tn 0,65 tn	

G4- EN31	<b>√</b>	Total environmental protection ex-	Total	932.706	1.475.725	921.336	814,011	€		
LAGI		penditures and investments by type	Waste treatment and disposal	473.605	614.323	838.035	364,386 (A,B,C,E,F,G)	€		
			Treatment of emissions	17.800	97.968	0	0 (A,B,C,E,F,G)	€		
			Fees for certification of environmental management sys- tem, preventive cost	23.162	30.000	5.200	7,000 (A,B,C,E,F,G)	€		
			Equipment maintenance cost	23.537	310.255	78.101	385,125 (A,B,C,E,F,G)	€		
			Clean up and remediation cost, cost of emissions management	394.602	423.179	0	57,500 (A,B,C,E,F,G)	€		
G4- EN32	<b>√</b>	Percentage of new s screened using envi		No screening in 2013. Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on environmental performance. During the second phase (2015) the potential impacts shall be identified and action shall be planned.						
G4- EN33	<b>√</b>	Significant actual a tive environmental ply chain and action	impacts in the sup-	No impacts analysis in 2013. Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on impact on society and environment performance. During the second phase (2015) the potential impacts shall be identified and action shall be planned.						
G4- EN34	Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms		7	5	0	0 (A,B,C)	All complaints were reported in 2013 and resolved within the same year			

NB: The OKTA refinery is listed in the column "SUBSIDIARIES" because its main activity, in 2013, were storage and transportation of fuels.

	LABOR PRACTICES &	ext.					
	DECENT WORK	assu-					
		rance					
ļ-	Total number and rates of new	/	p. 35-41				
\1	employee hires and employee	V	p. 33-41				
	turnover by age group, gender,		New hires by age group	and gend	er		
	and region						
					<30	30-50	>50
			HELPE	M	25	7	1
				F	1	3	0
			ASPROFOS	M	0	1	0
				F	3	1	0
			EKO BOULGARIA	M	1	2	1
			EKO SERBIA	F	1	1	0
			EKO SEKBIA	M F	1 1	1 1	0
			DIAXON	Г	1	1	0
			JPK MONTENEGRO	M	3	1	0
			JI K WION ILINEUKO	F	0	0	0
			OKTA	M	1	5	0
				F	1	0	0
			HP CYPRUS	F	1	0	0
			HF	M	3	9	1
				F	3	3	0
			EKO	M	0	0	0
			ERO	171	U	O	U
			Zero new hires turnover.	F	0	0	0
			Zero new hires turnover.	F	0	0	
				F	0 • and gende	0 er	0
			Zero new hires turnover.  Employees turnover by a	F age group	o and gender	0 er 30-50	>50
			Zero new hires turnover.	F age group	0 and gender <30 8	0 er 30–50 5	>50 5
			Zero new hires turnover.  Employees turnover by a	F age group M F	0 and gendo <30 8 11	0 er 30–50 5 2	>50 5 0
			Zero new hires turnover.  Employees turnover by a	F  M F M	0 and gender <30 8 11 0	30-50 5 2	>50 5 0 6
			Zero new hires turnover.  Employees turnover by a	F age group M F	0 and gendo <30 8 11	0 er 30–50 5 2	>50 5 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS	F  M F  M F	0 and gender <30 8 11 0 3	30-50 5 2	>50 5 0 6 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS	F  M F M F M	0 and gender <30 8 11 0 3 0	30-50 5 2 1 0	>50 5 0 6 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA	F  M F  M F  M F	0 and gender <30 8 11 0 3 0 2	30-50 5 2 1 0 0	>50 5 0 6 0 1
			Employees turnover by a  HELPE ASPROFOS EKO BULGARIA EKO SERBIA DIAXON	F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1	30-50 5 2 1 0 0 1 1	>50 5 0 6 0 1 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA	M F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 3	30-50 5 2 1 0 0 1 1 1 0	>50 5 0 6 0 0 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO	M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 3 3 3 3	30-50 5 2 1 0 0 1 1 1 0 3	>50 5 0 6 0 0 0 0 1 0 0
			Employees turnover by a  HELPE ASPROFOS EKO BULGARIA EKO SERBIA DIAXON	M F M F M F M F M F M F	0 and gender 30 8 11 0 3 0 2 1 1 1 3 3 0 0	30-50 5 2 1 0 0 1 1 0 3 3 3	>50 5 0 6 0 1 0 0 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO  OKTA	F M F M F M F M F M F	0 and gender 30 8 11 0 3 0 2 1 1 1 3 3 0 0 0 0	0  30-50  5  2  1  0  1  1  0  3  3  0	>50 5 0 6 0 0 0 10 0 0 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO	M F M F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 3 3 0 0 0 0 0 0	0  30-50  5 2  1 0 0 1 1 0 3 3 0 1	>50 5 0 6 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO  OKTA  HP CYPRUS	M F M F M F M F M F M F	0 and gender 30 8 11 0 3 3 0 2 1 1 1 3 3 3 0 0 0 0 0 0 0 0	0  2  1 0  10 3 3 0 1 0 0	>50 5 0 6 0 1 0 0 0 0 0 0 0 2 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO  OKTA	M F M F M F M F M F M F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	30-50 5 2 1 0 0 1 1 0 3 3 0 1 0 3	>50 5 0 6 0 0 0 0 0 0 0 0 0 0 0 0 0
			Employees turnover by a  HELPE ASPROFOS EKO BULGARIA EKO SERBIA DIAXON JPK MONTENEGRO OKTA HP CYPRUS HF	M F M F M F M F M F M F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 3 3 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	30-50 5 2 1 0 0 1 1 0 3 3 0 1 0 3 0 0	>50 5 0 6 0 0 0 0 0 0 0 0 2 0 0
			Zero new hires turnover.  Employees turnover by a  HELPE  ASPROFOS  EKO BULGARIA  EKO SERBIA  DIAXON JPK MONTENEGRO  OKTA  HP CYPRUS	M F M F M F M F M F M F M F M F M F M F	0 and gender <30 8 11 0 3 0 2 1 1 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	30-50 5 2 1 0 0 1 1 0 3 3 0 1 0 3	>50 5 0 6 0 0 0 0 0 0 0 0 0 0 0 0 0

			Percentage of employees that stay in the Group (loyalty indicator 96.1%). The voluntarily leaving employees are not included.  HELPE 98.4%  EKO 97.5%  HF 97.64%  DIAXON 100%  ASPROFOS 94.6%  HP CYPRUS 100%  EKO BULGARIA 94%  EKO SERBIA 94%  JPK MONTENEGRO 86%  OKTA 99.5%
<u></u>	D C. 4		TIPLE 1
G4- LA2	Benefits provided to full-time employees that are not	<b>√</b>	<b>HELPE:</b> loans, supplementary insurance schemes, students/pupils awards and allowances for employees' children.
	provided to temporary or part-time employees, by significant locations of		ASPROFOS: Company's benefits are provided to all employees.
	operation		<b>DIAXON:</b> Benefits to indefinite contract employees (discount vouchers provided to temporary employees):
			summer camps, childcare allowance, loans, school allowance, students' allowance, award to employees' children for excel school or university performance, financial
			support to learn foreign languages, monetary allowances (marriage, child, spouse or child death), financial support to employees with children with special needs.
			<b>JPK MONTENEGRO:</b> Full time and part time employees have equal rights according to law.
			<b>EKO BULGARIA:</b> To all employees, additional health insurance, food vouchers, mobile phones.
			<b>EKO SERBIA:</b> Lap top, mobile, private health insurance to indefinite contract employees
			HP CYPRUS: Medical and life insurance program.
			<b>OKTA:</b> Long service allowance, financial help for children of employees who are pupils/students, financial help for employees (sickness, death, disaster), awards for children of employees with excel at high school, severance pay for retirement, Xmas gifts to employees.
			<b>EKO &amp; HF:</b> Benefits for fixed-term workers
			Preventive medical tests
			Marriage/birth allowance
			Discount vouchers Crèche allowance
			Gifts on safety goals achievements
			Children summer camps
G4- LA3	Return to work and retention rates after parental leave, by	<b>√</b>	Complying with the relevant legislation all employees are entitled to maternity / paternity leave.
	gender		During 2013, 41F+0M employees took parental leave (21 HELPE + 2 EKO + 7 HF + 5 JPK MONTENEGRO +5 ASPROFOS + 1 EKO SERBIA).
			Moreover, in 2013, 7 employees who took parental leave in 2012 returned to work (1MA+1F at DIAXON, 3F at JPK MONTENEGRO & 2F at EKO SERBIA).

			Return to work rate = 100% (80% for JPK MONTENEGRO) Retention Rate = 100%								
G4- LA4	Minimum notice periods regarding operational changes, including whether these are specified in collective agreements	✓	The minimum notice period of one month applies to all major changes.  As long as changes concern large portion of employees' the notification is made by the Administration. It can be done by emails, personal appeal, personal letter notes, or notification of decisions or Administrative Service Board.  Any change in conditions of individual contracts is disclosed to interested part under the provisions of PD 156/94 within one month of the upcoming change.  Depending on the local/national legislation, the minimum notice period might vary, eg in BULGARIA, SERBIA, Skopje the minimum period is 30 days, in Mottenegro is 30 days, in CYPRUS is 2-3 months.								
G4- LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	V	All staff (100%) is represented. The committees participate in regular meetings with the facility management and make recommendations for improvement in the workplace with regard to Health and Safety.   p. 43								
G4- LA6	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work related fatalities, by region and by gender		M/F LWIF AIF IR LWIS ODR Absenteeism rate (own staff)  Clarifications: • The used system of rules is in accannd "Recordkeeping guidelines" • The Absenteeism rate (AR) is matic documentation at all facilitie • Not all facilities keep statistics condicators include employees and For lost work days incidents (LWI) absence is considered the day after cidents took place in accordance we MTC, PSE). According to CONCA were further analyzed in the follow	of OSHA. entioned in table 4. s. ncerning accidents I non-employees. the days of absendent the accident. In 20 with the definitions WE, fatal accident	9, but there is residual sides of calendar. 013, the categor of CONCAWE	riest day of ization of ac- (LWI, RWI,					

			HELPE, EKO, HF	Injury type	No of LWIs			
			Staff		17			
			Contractor		12			
			Road accident	Road accident	0			
			Height / Falls	Falls from height	1			
				Staff hit by falling objects	3			
			Draw /alaatui aal	Slips & trips (same height)	12			
			Burn /electrical	Explosion or burns	6			
			Confined Space	Exposure electrical	0			
			Confined Space Other causes	Confined Space Assault or violent act	0			
			Other causes	Water related, drowning	0			
				Cut, puncture, scrape	2			
				Struck by	1			
				Exposure, noise, chemical, biological,				
				Caught in, under or between	2			
				Overexertion, strain	2			
				Pressure release	0			
				Other	0			
G4- LA7	Workers with high incidence or high risk of diseases related to their occupation.	<b>√</b>	occupation.	with high incidence or high risk of diseas				
				ness or loss of a family member of employan psychologist or social worker.	yee, the company			
			At the facilities' infirmaries, the physicians train the shift working employees on First Aid provision, handling of respirators (recovery from major accidents), means of rescue from enclosed workplaces, etc.					
				es, ad hoc, inform their employees in case ral outbreak is observed, (by emails, bulle ice boards, etc).				
G4- LA8	Report whether formal agree- ments (either local or global) with trade unions cover health	<b>√</b>	p. 61 (Table 5.5), 18001/ΕΛΟΤ 1801.	facilities certification in accordance with	OHSAS			
	and safety.		Labour Regulations,	in collective agreements with unions, refewhich is accessible on the corporate network Group's companies and the relevant labou	ork. An agreement			
				vention Services (ESYPP) operates under ne occupational health and safety and imp idents.				
		consisting of elected participate in the electron committees participate	and Safety Committees (EYAE) operating representatives of employees. Any employetions for EYAE at the facility where he/sh te in periodic meetings with the facility maprovements in their workplace, as far as ned.	ree (100%) may e is working. The nanagement mak-				
				e 28				
	1		I .					

			Outsourced Safety & Prev AXON, EKO SERBIA) the outsourced to a properly sponsible for the implement of the agreements.  There are formal agreements.  There are formal agreements of employed to the management of the agreements.  There are formal agreements of employed to the management of employed to the participation of employed to the employed to the participation of complaints. Right to refuse dangerous of the employed to the participation of the participation of workers in and accident investigation.	e monitoring qualified exterentation of the facility. The Heart covering is personal protes representation on H & S ts as work  Safety Comment legislation. The members of the members of the cover issue epresentatives.	of the occupation rnal partner (EXY e relevant labour I H & S issues are consistent as: ection equipment ives in inspection for the fithe two safety contact the employees for such as: es such as: Personals in health and safe	al H & S activities are (PP). This partner is reegislation and reports overed 100% by local system of the committees of	
G4- Average hours of training per year per employee by gender, and by employee category	<b>√</b>	Periodic inspections.  p. 12 (environmental training), p. 39–41, 44–45 (H&S training).  Statistical information concerning training expenses, training hours and break-					
			down by gender and training issue are presented in Tables 4.4 – 4.6.  The Group's education investment was 788,805€ and the total training he 75.000.  In-house seminars on Health, Safety and Fire Safety were conducted with ticipation of 2,737 employees (26,731 training hours).				
			Average hours of trainin	g per employ	ee by gender		
			Company				
			HELPE	30	217		
			EKO	21	38		
			HF	28	71		
			DIAXON ASPROFOS	2 47	9		
			OKTA	47 14	64 66		
			EKO SERBIA	27	16		
			HP CYPRUS	6	13		
			EKO BULGARIA	24	35		
			JPK MONTENEGRO	10	21		
			)I R MOTTE TECH	10			
G4- LA10	Programs for skills manage- ment and lifelong learning that support the continued employ- ability of employees and assist them in managing career endings	<b>√</b>	The HR Department, sup ment of skills of employed programs to ensure the "c these programs are: learn non-legal persons, princip niques of effective present	es by impleme ontinuous em ing English, ed bles of manage	enting long in-hou aployment". Indica conomics for non ement, basic man	use education & training ative topics covered by -economics, legal for	
			In case of employee resign • a compensation paymen			nt the age and experience.	

			• a supporting pro available.	gram aimed	l at helpi	ng former	employees	to find anoth	ner job is
			The Group brings conditions for full			ntracts, us	ually, when	employees	meet the
		<b>√</b>	As part of the early tation program, in personnel who volution of the coaching and in the coaching are counseling for a career Counseling on a counseling or counseling on a counseling or counseling	collaboratio untary left the f professiona ough social a transitiona ing or Opportune entrepreneu- networking	on with a the comparate profile media al periodinities rial initi	specialized any. This fr	l company, ee program	was designed included the	d for the e following:
G4- LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee		For senior and top links the performa as sustainable deve	nce of the co	ompany	with the ol	jectives of t	the staff, on i	ssues such
	category.		% of employees re per company	ceiving regu	ılar perf	ormance a	nd career d	levelopment	review,
			HELPE		100%				
			EKO HF		100% 97%				
			ASPROFOS DIAXON		100% 99%				
			EKO SERBIA		100%				
			JPK MONTENEG OKTA	RO	100% 97,5%				
			EKO BULGARIA HP CYPRUS		100% 39%				
G4-	Composition of governance		P. 88–89			1 6.1	P. D.: 4/	(0 : 0012)	
LA12	bodies and breakdown of em- ployees per employee category	<b>√</b>	(ratio of executive						
	according to gender, age group, minority group membership, and other		At the BoDs of the of the 50 board me				d in this re <sub>l</sub>	port — the b	oreakdown
	indicators of diversity.		Gender	Age Gr					
			M	<30 0		30-50 19	>50		
			F	0		2	0		
			On average, 13% of by women.	of the senior	· manage	ement posi	tions at a g	roup level ai	re held
			HELPE		17%				
			EKO HF		12% 12%				
			ASPROFOS		1.3%				
			OKTA JPK MONTENEG		12.5% 23%				
	I		1						

111 1 26 27(000'	Tables 4.1 4.2	for omenlarross	huaaledarum)
D. 36–37(see	1ables 4.1-4.5	ior employees	breakdown)

At the end of 2013, the Group employed, as permanent employees, 152 people with special needs.

# Employees breakdown per gender, age group, nationality:

Gender	Age Group		
	<30	30-50	>50
M	12%	63%	26%
F	11%	73%	15%

## ASPROFOS

Gender	Age Grou	ıp	
	<30	30-50	>50
M	0%	42%	58%
F	4%	65%	31%

# DIAXON

Gender	Age Grou	ıp	
	<30	30-50	>50
M	0%	95%	5%
F	0%	100%	0%

## EKO BULGARIA

Gender	Age Grou	p	
	< 30	30-50	>50
M	11%	68%	21%
F	38%	46%	16%

## JPK MONTENEGRO

Gender	Age Grou	ıp	
	< 30	30-50	>50
M	3%	43%	53%
F	9%	67%	24%

# Employees breakdown per country of origin and gender:

COUNTRY	MNG	SERBIA	GRC	BOSN
M	98%	1%	1%	0%
F	94%	1%	0%	5%

## EKO SERBIA

Gender	Age Group		
	<30	30-50	>50
M	19%	69%	12%
F	19%	72%	9%

	l I		HP CYPRUS				
			Gender	Age Grou	p		
				<30	30-50	>50	
			M	5%	50%	45%	
			F	21%	74%	5%	
			OKTA				
			Gender	Age Grou	_	. 50	
			N	<30	30-50	>50	
			M	7% 10%	15%	77%	
			F	10%	23%	67%	
			HF				
			Gender	Age Grou	n		
			Gender	<30	30-50	>50	
			$\overline{M}$	3%	89%	8%	
			F	8%	77%	15%	
			-		7770	1070	
			EKO				
			Gender	Age Grou	n		
			Gender	<30	Р 30-50	>50	
			${M}$	1%	65%	34%	
			F	3%	80%	17%	
G4- LA13	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	✓		romen on the p ed on annual ev . Based on the p lifferentiations	ayroll.  valuations and forinciple of equa in any company	ollows the Grality there is r	eek and EU legisla- no discrimination or
G4- LA14	Percentage of new suppliers that were screened using labor practices criteria.	√	The evaluation of criteria for workp No significant fin	lace practices.	ers is based on q	uestionnaires	s that also include
G4- LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken.	✓		Group tenders.	The evaluation (		eted from suppliers eted questionnaires
G4- LA16	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms	✓	None in 2013				

	HUMAN RIGHTS		
G4- HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.	✓	The Code of Conduct (sections 7.2 & 7.3) and the Internal Labour Regulations (article 2.3) provide guidance on the protection of human rights throughout the supply chain.  Both documents make clear references to the respect of the human rights. Furthermore, all employees have been trained on both documents, which are accessible by all employees in the corporate network. Copies of them have been distributed throughout the Group.  There is a target, in next revision of Procurement Manual to include an article related to sustainable development terms, which shall be incorporated in every new contract.  In 2013, the screening percentage was zero.  The Group's companies, where appropriate, use evaluation questionnaires, covering topics such as child labour, respect to human rights, labour rights, equal opportunities, H & S, etc.
G4- HR2	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	✓	100% of employees were trained to HR issues through the company's Internal Labour Regulation and the Code of Ethics, which is available at the intranet, (ILR articles 22, 23, 26, 38 & 39, CoE chapter 7).  Moreover, in 2012-2013 a wide CSR training program, including issues on human rights, has been developed and implemented. In 2013, 135 employees attended 17 training hours on CSR issues and human rights.  The following actions are indirect ways of training on human rights:  Employee participation in awareness workshops on CSR, Sustainability Reporting, GRI certification  Educational Seminars for CSR (Edge & Edge-Commercial in Athens and Thessaloniki) to groups of employees  Recommendation Working Group on issues of Sustainability Report
G4- HR3	Total number of incidents of discrimination and corrective actions taken.	<b>√</b>	The HR Department monitors such phenomena and acts accordingly in cooperation with the union of employees.  No relevant reports in 2013.
G4- HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	√	The HR & Procurement Division (in cooperation with the union of employees) monitor such phenomena and act accordingly. In 2013 there were no reports on violations of the right to freedom of association.  The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2013.  The HR & Procurement Division (in cooperation with the union of employees, where appropriate) monitor such phenomena and act accordingly. In 2013 there were no relevant reports.
G4- HR5	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to		The recruitment policy of the Group has a lower limit for recruitment the age of 18 years.

	the effective abolition of child labor.	<b>√</b>	The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2013.
G4- HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	✓	The HR & Procurement Division monitor such phenomena and act accordingly (in cooperation with the union of employees and the work councils, where appropriate). In 2013 there were no relevant reports.  The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2013.
G4- HR7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations.	✓	All Group's security personnel is properly trained.  The permanent personnel (60) are trained, immediately after its recruitment, on HR through the Internal Labour Regulation and the Code of Ethics.  The security personnel provided by the companies we work with, have a formal certification and license to practice. To acquire certification & license they are trained to procedures related to the protection of human rights.  The preparation phase, for the permanent staff of the Group's Security Services Dept, to acquire certification of vocational qualifications has started. The certification shall be issued by the National Organisation for the Certification of Qualifications and Vocational Guidance and the Centre for Security Studies.  There are no armed guards at the premises of the Group.
G4- HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken.	√	Not material issue. There are no such cases.
G4- HR9	Total number and percentage of operations that have been subject to human rights reviews or impact assessments.	<b>√</b>	There were no reviews or assessments as there has been no reported or related problem.
G4- HR10	Percentage of new suppliers that were screened using human rights criteria.		All new suppliers are evaluated via questionnaires which also include criteria on respect for human rights.  No significant findings in 2013.
G4- HR11	Significant actual and potential negative human rights impacts in the supply chain and actions taken.		The evaluation of the received questionnaires did not reveal any significant findings for 2013.
G4- HR12	Number of grievances about human rights impacts filed, ad- dressed, and resolved through formal grievance mechanisms.		The Group HR Division monitors phenomena of human rights violation and acts accordingly.  None in 2013.

	SOCIETY INDICATORS	Ext. Assur- ance	
G4- SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs	/	Materiality evaluation and stakeholder engagement surveys took place in 2013, based on structured questionnaire and interviews involving stakeholder groups and selected individuals from local communities. Such surveys are repeated every 1-2 years. The surveys, the regular communication and consultation are used in one hand to determine the investment in infrastructure and other actions for the benefit of local communities and, on the other hand, to understand the significant indirect effects locally. Assessing the findings will lead in planning activities. It was recorded that local communities anticipate actions with a focus on supporting the unemployed, health services, support of elderly and vulnerable groups in general.
			p. 70–78: actions taken in the framework of surveys, consultation and communication with local communities. Analytical presentation, by country (100% operations).
			Furthermore, during the design phase of a new investment, provision is made for direct and indirect impacts. Moreover, the operational planning of any investment pays attention to the study of direct and indirect impacts on the local community.
G4- SO2	Operations with significant actual or potential negative impacts on local communities	✓	By its very nature, our work has an impact on the local community and society as a whole. Community engagement affects our social license to operate. Our impact on our surroundings immediately affects our employees and local suppliers. And our community engagement improves jobs and education in our environment – it contributes to society as well. This requires a constant focus on everything we do to minimise our negative impact and create value for local communities.  Significant impacts may occur in the stages of: entry of a new activity, running or exit from it. Based on the strategy of the Group only the second stage (operation) considered as significant, for the next 5 years. The operation of the facilities may have environmental impacts (analytically presented at Section 3: emissions, climate change, pollutants, education, investments, protection of biodiversity), impacts on health and safety (section 4.2) or to the local communities (section 6).
G4- SO3	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified.	✓	All business units are audited for risks associated with corruption; following standard internal auditing procedure. The procedure is consistent with the Group's Code of Conduct.  No relevant report or complaint in 2013.
			In 2012, the Department of Internal Auditing was audited by a third party. The results and recommendations for improvement were issued in early 2013 and the Department is already taking measures to improve the operation based on the recommendations.
G4- SO4	Communication and training on anti-corruption policies and procedures.	√	100% of the employees (5% management employees, with minor differentiation per company) are trained on anticorruption policies and procedures through the Internal Labour Regulation and the Code of Ethics (copies of the documents are distributed to all employees).
			For 2012-2013 a training program has been designed and is implemented with special presentation of the Code of Conduct, including issues of corruption, CSR and protection of human rights.
			Moreover, all employees (100%) are aware of Group's commitment on UNGC principles, the corporate policy and values; through the annual Group's Corporate Responsibility & Sustainability Report (all reports are posted at the Group's site and intranet).

			Procurement personnel attend relevant seminars and are the guardians of the Procurement Manual.
G4- SO5	Confirmed incidents of corruption and actions taken.	√	No actions addressing incidents of corruption took place in 2013, as there were not reported incidents in the relevant committee, the companies' BoDs or the union representatives. However, there is provision for administrative and legal measures in accordance with the Internal Labour Regulations. Moreover, regular audits are planned by the relevant auditing departments.
G4- SO6	Total value of political contributions by country and recipient/beneficiary.	√	Zero contribution, (such contribution is prohibited by the Code of Conduct).
for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.  the fine (about 5 million €) imposed by the Greek Co ing was held on 22.6.2011 and the decision is pending will not have a negative impact on the company, since has been paid since 2008.		Pending before the Supreme Administrative Court (Conseil d'Etat) procedure to cancel the fine (about 5 million €) imposed by the Greek Competition Commission. The hearing was held on 22.6.2011 and the decision is pending. Possible dismissal of the action will not have a negative impact on the company, since the respective fine (€ 5.8 million) has been paid since 2008.  There was a legal action, in 2011, on the dominance of JPK (fuel storage services in our	
			geographic area, Bar). No fine was imposed, but only command for implementation - with clarity and transparency – of commercial terms with potential users of the fuel storage services.
			CYPRUS: A) The Competition Commission decided to reopen the investigation against the oil companies. In an earlier decision dated 24.5.2009, a fine of € 14.629.000 was imposed against the company. This decision was overturned by the Supreme Court of Cyprus on 25.5.2011. The case is reviewed by the newly formed Commission based on documents obtained under the previous investigation. The investigation is still ongoing. B) The Ginis Petrol Station Ltd had filed a complaint with the Competition Commission against the company for abuse of dominance associated with denial of services provision. The Commission unanimously decided on 07.11.2013 that there is no violation of law by the Company and closed the case.  MONTENEGRO: In October 2012 the Competition Authority initiated proceedings against JPK based on a complaint filed by the Union of Free Trade Unions of Montenegro, in connection with the scheme applicable to petrol stations network (COMO).
			On 28 January 2013, JPK received conclusion of the Competition Authority to complete the process started with the above request. This conclusion is still subject to appeal.
G4- SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	√	No irrevocable fines in 2013.
G4- SO9	Percentage of new suppliers that were screened using criteria for impacts on society.	√	No such a screening in 2013. Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on impact on society. During the second phase (2015) the potential impacts shall be identified and action shall be planned.
G4- SO10	Significant actual and potential negative impacts on society in the supply chain and actions taken.	<b>√</b>	No impacts study in 2013. Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on impact on society. During the second phase (2015) the potential impacts shall be identified and action shall be planned.
G4- SO11	Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms.	V	p. 60 OKTA: none HP CYPRUS: none EKO BULGARIA: There is a few number of client's grievances (21) filed in the Company through formal Company's mechanisms for the reporting period. All of them addressed and resolved during the reporting period. There are no grievances about impacts on society during the reporting period. EKO SERBIA: none

	PRODUCT RESPONSIBILITY						
G4- PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	✓	Risk assessment for safety, human health and environment has been conductor all the products of the Refineries and Chemical Plants. This assessment been done for all phases (production, storage, transport, distribution, uses).  Scope is the evaluation of the permissible level of dose/concentration to who humans and environment may be exposed in order to conclude the proper Management Measures (RMMs).  The assessment has been conducted for the whole life cycle of each substantincludes the exposure scenarios for every use. For this purpose, as REACH lation requires, there is continuous communication throughout the entire chain.  Products are properly classified and labelled for hazards, in accordance with European CLP Regulation. The users are provided with guidance on safe us through the extended Safety Data Sheets (e-SDSs).				
G4- PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes	√	No incidents of non-compliance.  EKO Bulgaria  One incident for the reporting period related to the regulatory provided periodical technical test of a gas station. No incidents of non-compliance with regulations concerning health and safety.				
G4- PR3	Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements.	✓	products such as l  The material safet	ubricants. The y data sheets (N	ta Sheets (MSDS) ar products breakdow MSDS) for lubricant through the websit through the websit with regard to substances that might produce an environmental or social impact	n is presented as and fuels are	in Table 5.2.
			HPC EKO BULGARIA EKO SERBIA	YES YES NO NO	YES YES NO NO	YES YES YES YES	YES YES NO NO

G4-	Total number of incidents of	<b>√</b>	No incidents of non compliance.
PR4 non-compliance with regula- tions and voluntary codes con- cerning product and service information and labeling, by			Sections 5.1 – 5.4 analytically present the auditing and inspection processes at petrol stations.
	type of outcomes.		EKO BULGARIA: one registered incident concerning incomplete labeling by supplier of a mini-market product.
G4- PR5	Results of surveys measuring customer satisfaction	<b>√</b>	p. 57–59  Moreover, key findings of "Brand Vitality Tracking", an annual customer satisfac-
			tion survey, per country:
			<b>EKO CYPRUS:</b> EKO remains the leader in the fuel market with more or less the same rate of brand usage (market penetration). The company achieved the highest rate in "1st spontaneous mention of fuel company (Top of Mind) with an increase vs previous year. Strong points are: fuel quality, level of service and customers loyalty.
			<b>EKO BULGARIA:</b> Brand has improved at "Spontaneous and prompt awareness of fuel brand" (Total Awareness); however penetration was rated slightly weaker vs previous year. Service level and fuel quality are still considered brand strengths, while promotional activities and loyalty scheme remain strong.
			<b>EKO SERBIA:</b> EKO appears strengthened especially at "Top of Mind". Fuel quality and promotional activities / loyalty card are considered its main strengths.
			<b>OKTA:</b> OKTA achieved low market penetration rate. Convenience of access to service stations seems to be its main weakness.
			JPK MONTENEGRO: EKO remains the leader in the fuel market. Brand was evaluated high in all aspects, but convenience of access to service station is considered as the main strength. Promotional activities are also an advantage over competition. Customers are extremely loyal to the brand.
G4- PR6	Sale of banned or disputed products.	<b>√</b>	No such cases
<del>G4-</del>	Total number of incidents of		No incidents of non compliance.
PR7	non-compliance with regula- tions and voluntary codes concerning marketing commu- nications, including advertising, promotion, and sponsorship, by type of outcomes.		Full compliance with relevant regulations/codes (eg unfair competition and consumer protection).
G4- PR8	Total number of substantiated		No complaints.
1 1/0	complaints regarding breaches of customer privacy and losses of customer data.		Records of personal customer data fully comply with relevant legislation and are fully harmonized with EU law.
G4- PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.		No such fines

OG	Table 7.6d: SECTOR SPECIFIC	INDICATORS (OIL & GAS G4 SECTOR DISCLOSURES)	Ext. Assurance
OG1	Volume and type of estimated proved reserves and production.	p. 84–86 (REPORTING BOUNDARIES)  Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.	✓
OG2	Total amount invested in renewable energy	In November 2013 completed the acquisition of Energiaki Pylos-Methonis SA, owner of an operating wind farm of 6.8 MW. The wind farm consists of 8 turbines while the annual electricity production is estimated at 15,000 MWh.  The investments in 2013 were around €6.5 mil.  See also Government Press, 2nd edition, serial number 2432, 02.11.11, tables 1–5.	
OG3	Total amount of renewable energy generated by source	Electricity produced by P/V: 2,000 MWh . Electricity produced by wind farm: 4,000 MWh	✓ /
OG4	Number and percentage of significant operating sites in which biodiversity risk has been assessed and monitored.	There are no such areas near industrial facilities of the Group. The Group undertakes voluntary initiatives to protect biodiversity in consultation with local communities and within its annual program of CSR activities. None of the Group's refineries is near protected areas (NATURA, RAMSAR). All installations are in established industrial areas.	✓
OG5	Volume of formation or produced water	p. 84–86 (REPORTING BOUNDARIES)  Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.	✓
OG6	Volume of flared and vented hydrocarbon	Air fuel (hydrocarbons) flared at the refineries, based to the verified ETS reports: Aspropyrgos refinery: 7,833,634 Nm3 Elefsina refinery: 76,648,353 Nm3 Thessaloniki refinery: 4,970,666 Nm3  Based on the GRI's definition for vented hydrocarbon (ie intentional controlled release of uncombusted gas) there was no such release in 2013.	✓ ✓
0G7	Amount of drilling waste (drill mud and cuttings) and strategies for treatment and disposal.	p. 84–86 (REPORTING BOUNDARIES)  Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.	✓
OG8	Benzene, lead and sulphur content in fuels.	indicator GR-EN27, table 7.6c	<b>√</b>

OG9	Operations where indigenous communities are present or affected by activities and where specific engagement strategies are in place.	No Group's operations in/adjacent to indigenous peoples' communities.	✓
OG10	Number and description of significant disputes with local communities and indigenous peoples.	None.	<b>✓</b>
OG11	Number of sites that have been decommissioned and sites that are in the process of being.	No sites that have been decommissioned and no sites in decommission proccess.	<b>√</b>
OG12	Operations where involuntary resettlement took place.	None.	<b>√</b>
OG13	Number of process safety events, by business activity.	See section 4.2.3, table 4.11, p. 51  The major PSE events were due to sudden unplugging of drain valves (of small diameter) which contained heavy vacuum residue. The corrective actions taken to address them and avoid their reoccurrence were: supply of bleeder cleaners for safe and controlled drainage; issuing of the procedure "Safe unplugging of drains" for the proper use of these instruments; training of operators.	<b>√</b>
OG14	Volume of biofuels produced and purchased meeting sustainability criteria.	p. 32, Table 3.16 See also Government Press, 2nd edition, serial number 2432, 02.11.11, tables 1-5.	<b>✓</b>

# 7.3 Certification of the Report

To ensure accuracy, completeness and reliability, this Report has been audited and validated — as a whole and every material issue — from an independent external certification body prior to publication.

We inform our stakeholders that the documentation and certification of this Report was made in order to assure its compliance with the requirements of the guidelines GRI-G4 (in accordance with/Comprehensive Option). The independent body, that reviewed the Report, certified also that the indicators of the Oil & Gas Sector Supplement are covered. The result of this external assurance is presented in Tables 7.6a, 7.6b, 7.6c & 7.6d, while the report of the certification body is shown below.

Also, this Report is satisfying the requirements of CoP of the UNGC (Advanced Level).

Furthermore, the accuracy of the data is assured through internal validation procedures and annual audits from accredited certification bodies. These inspections and audits ensure that the Report is reliable, adequately balanced and relevant to the expectations and interests of the Group's stakeholders.



# **TÜV AUSTRIA Hellas**

## **Assurance Statement**

## for Hellenic Petroleum's Corporate Responsibility Report 2013

#### Information on the Assurance Statement

The Assurance Provider TÜV AUSTRIA Hellas ('the Provider') has been engaged to provide external assurance on the disclosures published in the Corporate Responsibility Report 2013 ('the Report') of Hellenic Petroleum Group ('the Company'). The Company is exclusively responsible for the data and information within the Report. The assurance process was conducted by the Provider in terms of sample-based audits of data and information as well as audits of data collection systems and procedures.

The Provider has not offered any consulting services to the Company.

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2013 annual report and financial statement which have been audited by other third parties.

## **Scope of Assurance**

The Provider undertook the following tasks during June 2014:

- Reviewed the Report and the contained in the Report annual "Communication on Progress (COP)", against the principles and goals of the UN Global Compact (GC).
- 2. Confirmation of the application level of the Report / COP, according to the requirements of the GC Advanced Level.
- 3. Visited the Company's Head Offices in Athens and its refineries located in Aspropyrgos, Eleusina and Thessaloniki in order to evaluate the systems for generating, gathering and managing information included in the Report.
- 4. Performed checks of the reliability and accuracy of performance information disclosed in the entire Report and the processes for capturing and reporting such data.



## Conclusions

During the assurance engagement, it was confirmed that the data and information are reliable. The accuracy of the disclosed statements and assertions was found to be within acceptable limits. The Company provided a comprehensive and proper presentation of performance on the basis of reasonably documented information as well as that there is an effective data gathering, management and reporting system in place for issues which pertain to sustainable development.

The Provider concurs that the criteria of the GC Advanced Level have been met.

## **Opportunities for Improvement**

Based on the observations and concluding remarks derived from the assurance engagement, the Provider's recommendations for the improvement of the Company's future Sustainability Reports are as follows:

- Harmonize the procedures and data collection systems of all subsidiaries within the boundaries of the Report.
- On site visit in more installations of the Hellenic Petroleum Group within the boundaries of the Report.

Note: This Independent Assurance Report has been prepared as a translation of the original Greek version

On behalf of TÜV AUSTRIA Hellas,

Athens, 27<sup>th</sup> of June 2014

Sifakis Nikolaos

Lead Auditor



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General Manager

TÜV AUSTRIA Hellas

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Branch Offices in Greece: THESSALONIKI-CRETE-MYTILENE

Abroad: CYPRUS-TURKEY-JORDAN-EGYPT-ALBANIA-ISRAEL-YEMEN-PAKISTAN-QATAR



# **TÜV AUSTRIA Hellas**

## **Assurance Statement**

## for Hellenic Petroleum's Corporate Responsibility Report 2013

#### Information on the Assurance Statement

The Assurance Provider TÜV AUSTRIA Hellas ('the Provider') has been engaged to provide external assurance on the disclosures published in the Corporate Responsibility Report 2013 ('the Report') of Hellenic Petroleum Group ('the Company'). The Company is exclusively responsible for the data and information within the Report. The assurance process was conducted by the Provider in terms of sample-based audits of data and information as well as audits of data collection systems and procedures.

The Provider has not offered any consulting services to the Company.

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2013 annual report and financial statement which have been audited by other third parties.

#### Scope of Assurance

The Provider undertook the following tasks during June 2014:

- Reviewed the Report against the requirements of Global Reporting Initiative (GRI) Sustainability Reporting Guidelines G4 and confirmation that the GRI-G4 "Comprehensive option" requirements are fulfilled.
- 2. Visited the Company's Head Offices in Athens and its refineries located in Aspropyrgos, Eleusina and Thessaloniki in order to evaluate the systems for generating, gathering and managing information included in the Report.
- 3. Performed checks of the reliability and accuracy of performance information disclosed in the entire Report and the processes for capturing and reporting such data.

## Conclusions

During the assurance engagement, it was confirmed that the data and information are reliable. The accuracy of the disclosed statements and assertions was found to be within acceptable limits.



The Company provided a comprehensive and proper presentation of performance on the basis of reasonably documented information as well as that there is an effective data gathering, management and reporting system in place for issues which pertain to sustainable development.

The Provider concurs that the GRI-G4 "Comprehensive option" requirements have been met, including the Oil and Gas Sector Supplement.

# Opportunities for Improvement

Based on the observations and concluding remarks derived from the assurance engagement, the Provider's recommendations for the improvement of the Company's future Sustainability Reports are as follows:

- Harmonize the procedures and data collection systems of all companies within the boundaries of the Report.
- Extend the boundaries of the Report to include more companies of the Hellenic Petroleum Group.
- On site visit in more installations of the Hellenic Petroleum Group within the boundaries of the Report.

Note: This Independent Assurance Report has been prepared as a translation of the original Greek version

On behalf of TÜV AUSTRIA Hellas,

Athens, 27<sup>th</sup> of June 2014

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Lead Auditor

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Abroad: CYPRUS-TURKEY-JORDAN-EGYPT-ALBANIA-ISRAEL-YEMEN-PAKISTAN-QATAR

# 7.4 Abbreviations - Glossary

The following abbreviation explanations are given for the convenience of the reader who is not familiar with technical names and acronyms referred in this report.

**AIF** All Injury Frequency, is calculated from the sum of fatalities, LWIs, Restricted Workdays Injuries and Medical Treatment Cases divided by the number of hours worked expressed in millions.

**API** American Petroleum Institute

**BAT** Stands for best available techniques.

**BEA** These initials stand for the Aspropyrgos refinery.

**BEE** These initials stand for the Elefsina refinery.

**BEO** These initials stand for the Thessaloniki refinery/Thessaloniki industrial complex

**CCPS** Center for Chemical Process Safety

**COMO** Company owned - Manager operated

**CONCAWE** Conservation of Clean Air and Water in Europe, the oil companies' European Organisation for the environment, health and safety

**CoP** Communication on Progress, an annual report proving the company's commitment towards UNGC principles, see at www.unglobalcompact.org/Communicating-Progress/

**CSR** Corporate Social Responsibility.

**DODO** Dealer Owned - Dealer Operated petrol station

**EKO** Stands for the Group's subsidiary EKO ABEE.

**EK** Stands for the Group's subsidiary HELLENIC FUEL (ex BP).

**EATLE** Stands for HELLENIC PETROLEUM.

**ELOT** The Greek Standardization Organization.

**ESYPP** Stands for Internal Safety & Prevention Services, an operational unit, within an organisation, operating under PD95/1999, and aiming at monitoring the occupational health and safety and implementing measures to minimize accidents.

**EMAS** The EU Eco-Management and Audit Scheme (EMAS) is a management tool for companies and other organisations to evaluate, report and improve their environmental performance.

**EUROPIA** The European Petroleum Industry Association.

**EU - ETS** European Union's GHG Emission Trading Scheme

**Executive/non-executive Board Member** The BoD defines as executive members the members which are responsible with everyday business management; whereas non-executive are the members which are responsible for the promotion of corporate issues. The number of non-executive BoD members should be, at least, one third of the total number of BoD members.

**EXYPP** stands for Outsourced occupational health and safety & Prevention Services. Where appropriate an organisation instead of having ESYPP may outsource the monitoring of the occupational H & S activities to a properly qualified external partner

(EXYPP). This partner (EXYPP) is responsible for the implementation of the relevant labour legislation and reports to the management of the facility.

**EYAE** stands for employee committee for occupational health & safety.

**GHG** Green House Gases

**GRI** Global Reporting Initiative, Sustainability Reporting Guidelines. While this Report endeavours to address many of the GRI's key performance indicators, it is a summary of progress against priorities we ourselves set.

**GROUP** Stands for the HELLENIC PETROLEUM Group, unless it is otherwise stated.

**HELLENIC PETROLEUM** Refers to the HELLENIC PETROLEUM Group, unless it is otherwise stated.

**HELPE** stands for HELLENIC PETROLEUM.

HF stands for the Group's subsidiary HELLENIC FUEL (ex BP).

HFE stands for the Hellenic Federation of Enterprises.

**HMA** Hellenic Management Association.

HR stands for either human rights or human resources.

**HSE** stands for Health – Safety – Environment

**ISGOTT** Internal Safety Guide for Oil Tankers and Terminals.

**ISM** Institute of Supply Management.

LDAR eak detection and repair system.

MARPOL Marine Polution.

**MTC** Medical Treatment Cases

**OHSAS** Occupational Health and Safety Accreditation System

**PSE** Process Safety Event

**PSER** Process Safety Event Rate

**REACH** the European regulation for "Registration, Evaluation and Authorization of Chemicals"

**RES** Stands for renewable energy sources

**RWI** Restricted Workday Injuries

**Sustainable Development** A development that meets the needs of the present without compromising the ability of future generations to meet their own needs

**Stakeholders** While the term "stakeholders" holds multiple meanings, the Group defines its stakeholders as its employees, shareholders, suppliers, service providers, and those communities, indigenous groups, investors, debt holders, governments, regulators and Non-Governmental Organizations (NGOs) affected by, or that can affect, HELLENIC PETROLEUM's operations.

**VOC** volatile organic compounds

**UNGC** HELLENIC PETROLEUM is a signatory to the United Nations-led Global Compact, a network of companies, governments, non-governmental and labour organizations who have agreed to work with the UN to support 10 principles in the areas of human rights, labour, the environment and anticorruption.

## 7.5 Contact details

This Corporate Responsibility Report is part of the annual Group's reporting and is approved by the Group's CEO.

The Group Corporate Affairs & CSR Division had the coordination and responsibility for the preparation of this Report. However, for the implementation of the Report contributed the Divisions of Human Resources, Health, Safety & Environment, Internal Audit, Finance, Marketing, Purchasing, Legal Services and the Group's subsidiaries. Both qualitative and quantitative information is consolidated and validated at Group level, unless is indicated otherwise.

The Report is addressed to our stakeholders who wish to keep track of all of our advancements in all areas of Sustainable Development.

We welcome any suggestions or comments that may help us improve this two way form of communication. Any comments that you may have can be sent to the address below:

# GROUP CONTACT DETAILS AND HEADQUARTERS:

Group Corporate Affairs Division Group CSR Department 8A Chimarras St., GR 15125 – Maroussi

Tel.: +30 210 630 2241, +30 210 630 2894,

Fax: +30 210 630 2573 e-mail: info@helpe.gr rsoulaki@helpe.gr

Readers who would like more information or clarification may contact the Group's CSR Department at the above address or visit the Group's website: www.helpe.gr, www.hellenic-petroleum.gr

# 7.6 Readers' Survey Questionnaire

Please, take a few minutes to fill out the questionnaire as we are asking for your opinion on the 2013 HELLENIC PETROLEUM's Corporate Responsibility Report. We value your opinion as it helps us to improve.

1. Which of the (please mark	e following interest you the most? with an X)					
Corpora	ate Governance & Transparency					
O Social R	esponsibility & CSR Actions					
○ The Env	vironment					
O Health &	& Safety					
Our Pec	pple					
	lders' information (shareholders, employed tomers, suppliers, NGOs etc)	es, neighb	ouring	g mun	icipal	i-
(1) Complete	tements (with an X) as to how much you agreed by disagree, (2) Disagree, (3) Neither agreed Completely agree			_	ateme	ents.
		1	2	3	4	5
	es and issues are sufficiently covered in with the company's sustainable developy.	$\bigcirc$	$\bigcirc$			
The content	is complete and clear.		$\bigcirc$	$\bigcirc$	$\bigcirc$	$\bigcirc$
The Report's	structure is functional and sufficient.	$\bigcirc$	$\bigcirc$	$\bigcirc$	$\bigcirc$	
The presente	ed information is reliable and accurate.				$\bigcirc$	
	nd charts are easily understood and de- atisfactory manner.		$\bigcirc$	$\bigcirc$		
	raphs and images positively enhance the ng it easier to read and more attractive.	$\bigcirc$	$\bigcirc$		$\bigcirc$	
I would prefe	er a printed version of the Report.				$\bigcirc$	$\bigcirc$
I prefer the e	electronic version of the Report.				$\bigcirc$	
I will recomm	mend the Report to other readers.		$\bigcirc$			

3.		ess in the order of priority eloped significant initiativ			_	eas which the company has pinion.
	$\bigcirc$	Safety				
		Working environment				
	$\bigcirc$	Protecting the environm	ent			
	$\bigcirc$	Caring for society and th	ne en	vironment		
	$\bigcirc$	Programs supporting loc	cal co	ommunities		
	$\bigcirc$	Transparency				
	$\bigcirc$	Human Rights				
4.	sibil	use specify any issues which lity Report which you word improving.				ne 2013 Corporate Responnext issue or areas that
5.		er reading the 2013 Corpo NIC PETROLEUM been i Positively influenced Has not been influenced Negatively influenced	nflu			as your opinion of HEL- one of the below with an X)
6.	Wh	ich of the following group	os of	stakeholders do you	ı belo	ong to?
	$\bigcirc$	Employee organization		Local community	$\bigcirc$	NGO
	$\bigcirc$	Media	$\bigcirc$	Supplier	$\bigcirc$	Customer
	$\bigcirc$	Citizen	$\bigcirc$	Authorities	$\bigcirc$	Other
	Tha	nk you for your cooperat	ion.			
	Repo	above data will be collected an ort as well as actions and initia oonsibility.				Corporate Responsibility ETROLEUM Group's Corporate

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