

# Social Responsibility Report



1. Responsibility in action.....	1
2. A message from the CEO.....	2
3. Report Parameters.....	3
4. The fuel market in Greece.....	5
5. Company profile.....	7
6. Financial results.....	12
7. Corporate governance.....	13
8. The environment – responsibility in action.....	15
9. Responsible employment.....	19
10. Consumer protection.....	21
11. Active participation in social initiatives .....	23
12. Objectives.....	25
13. Glossary.....	26
14. GRI requirements Coverage.....	27

# 1. Responsibility in action

## Strategic priorities

Elinoil's vision is based on integrity, contributing to the success of our country with major initiatives in the areas of social responsibility and sustainable development. Guided by our vision and always operating within the framework set by our principles:

We are reducing the environmental risks of our activities  
 We are promoting the principles of sustainable development • We take care of consumer's interests, in practice  
 We are reducing our environmental footprint • We are operating with transparency  
 We are contributing to efforts to improve living standards in the local communities where we operate  
 We offer an excellent work environment • We are contributing to a safer society




Dear friends,

Serious issues such as environmental pollution, climate change and the depletion of natural resources, which have for some years been major problems for our society, have now been joined by yet another factor which makes the outlook for the future uncertain: the financial crisis. In this pessimistic atmosphere, how can we help reverse the above phenomena and what can be done to help society recover a positive outlook for the future?

As we have said, our vision is to contribute to Greece's prosperity with major initiatives in the areas of social responsibility and sustainable development. Our objective is growth based on criteria that exceed legislative requirements and seek to balance the expectations and demands of all the company's various stakeholders, maintaining prospects for development which will be sustainable.

The next three years will be a crucial period for Elinoil, during which our main targets will be to maintain healthy financial results and achieve selective growth. At the same time, however, we will also be looking for solutions that gradually modify the mix of products and services we offer, thereby reducing our total carbon footprint, while we will also be strengthening our environmental policy with initiatives that minimize the environmental impact and the environmental risk of our activities. During this period, we will also expand our initiatives to protect consumers and support local communities, and will continue to improve and overhaul our human resources policies in order to maintain an excellent work environment for Elinoil employees.

This is the first social responsibility report published by Elinoil and is the basis for systematically measuring and recording where we are situated in relation to the clear duty we have to society. At the same time, the report is proof of our commitment and a compass to guide us towards a sustainable future.



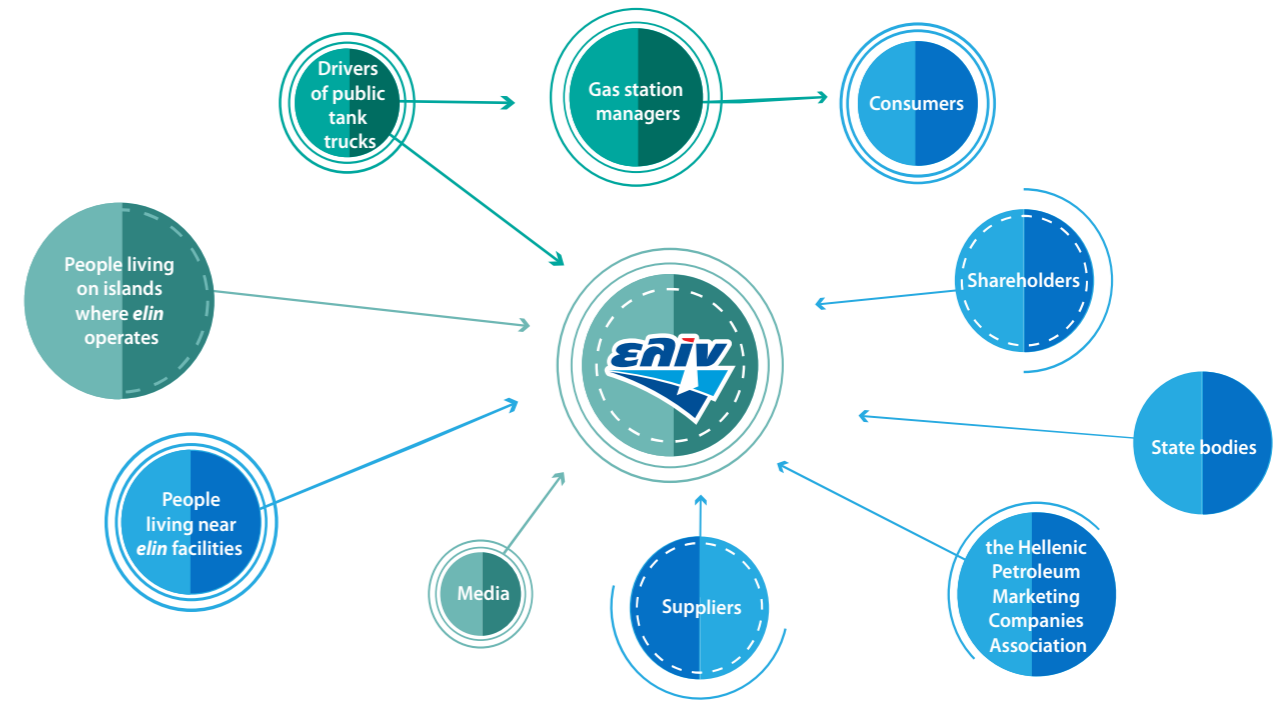
Yiannis Aligizakis

### 3. Report parameters

#### Report profile

This is the first social responsibility report published by Elinoil. Its aim is to record the current state of the company, to collate results and set targets. In the compiling of this report an effort has been made to follow GRI3 guidelines. This report is also a commitment to acting more systematically in matters of social responsibility, guided by the principle of achieving sustainable growth.

### Stakeholders



#### Main effects, risks and opportunities

The company has systematically evaluated risks where required to do so by law. Nevertheless, it is recognized that there is a need for wider risk assessment of all the company's activities and their parameters.

#### Data measurement techniques

Data have been measured in-house by the Total Quality & Public Relations Department and no form of external assurance has been applied. The company aims to systematize measurement methodologies in the next report and to have them examined by an external assurance provider.

#### Period, scope and limits of the report

The report covers the period from 1 January 2011 to 31 December 2011. The baseline year is 2011, for which measurement data are available. Nevertheless, in some measurements, data for three years have been used, with the aim of using the three-year average as a benchmark.

The report concerns and covers the activities of Elinoil and not affiliates or companies associated with it.

#### Contact

The person responsible for compiling the report is the company's Public Relations and Total Quality Manager, Dimitris Bilmezis. To comment on the report, send an email to [pr@elin.gr](mailto:pr@elin.gr). The report is also available on-line at [www.elin.gr](http://www.elin.gr). The company's head office is situated at Pigon 33, Kifisia, 145 64

**Objective 01** To systematically analyze all *elin* stakeholders with the aim of identifying those with whom there should be more systematic dialogue.

**Objective 02** For quality assurance to be delivered by an external provider.



## 4. The fuels market in Greece

The Greek oil market is regulated by Law 3054/2002 (as amended by Law 3335/2005) and the relevant licensing rules.

In the market they are:

- Two refining companies with four refineries
- Nineteen marketing companies holding type A licenses, with storage and distribution facilities throughout Greece
- Twenty-five companies with type B1 and/or type B2 licenses for shipping and/or aviation fuel with easy refueling of ships at ports and with aircraft refueling stations at approximately 25 airports. Twelve of these companies also hold Type A licenses
- Twenty-five companies with type C licenses – i.e. for LPG marketing with facilities and/or bottling plants. Three of these companies also hold Type A licenses
- Twenty companies with type D licenses – i.e. for bitumen marketing. Six of these companies also hold Type A licenses
- One company with a pipeline license transporting Jet fuels from refineries to Athens International Airport
- Approximately 8200 gas stations (most of them with company branding)
- Approximately 2000 heating oil dealers

To distribute fuel, elin uses:

- pipelines
- approximately 1300 public tank trucks
- approximately 500 private tank trucks belonging to marketing companies
- approximately 8600 small private tank trucks distributing heating oil

(Figures from the Hellenic Petroleum Marketing Companies Association – [www.seepe.gr](http://www.seepe.gr))

## 5. Company profile

### ELINOIL S.A.

Elinoil, also known as elin, was founded in 1954 and is one of the largest liquid and solid fuel marketing companies in Greece. Greece's oldest fuel company operates in the field of gas stations, supplies yachts, industrial units and shipping (with solid and liquid fuel and lubricants), and provides heating services for homes and buildings. Elinoil has three affiliates and holds a 37% share of one other company.

### elin Technical

elin Technical is a modern, dynamic construction company founded in 2000 as a wholly owned subsidiary of Elinoil, from which it drew an experienced team, as well as significant infrastructure in terms of equipment and know-how in challenging projects.

### elin Naftiki

elin Naftiki was founded in September 2005 to manage the chartered tankers used by Elinoil to deliver fuel to its island network of **elin** gas stations and to supply the company's fuel facilities in Volos and Porto Lagos.

### elin Stations

elin Stations was founded in July 2005 to operate liquid fuel stations, yacht refueling stations and run retail sales in general.

### elin Biofuels

elin Biofuels was founded in August 2005 to produce and market biofuels.

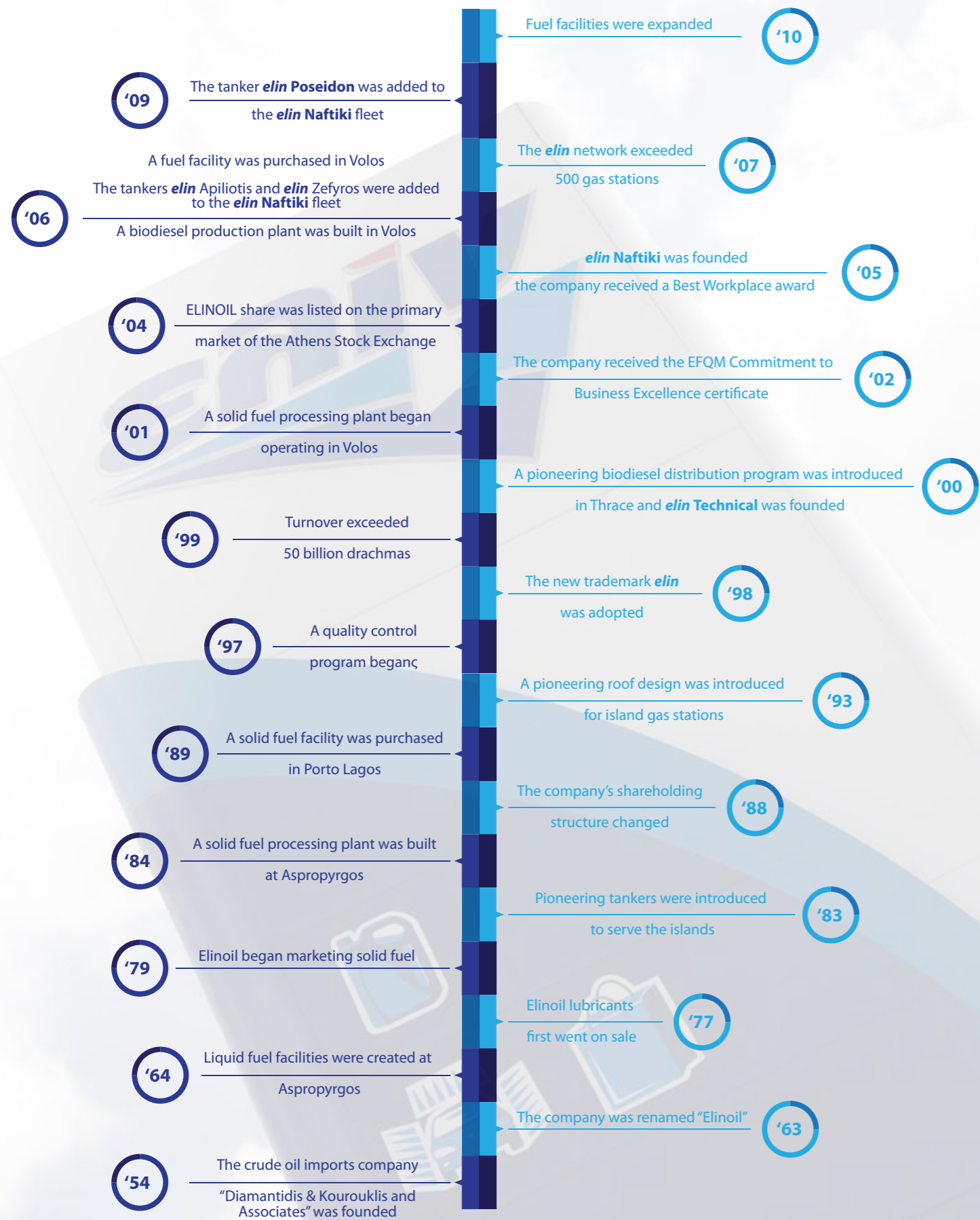


## VISION


- To constantly strengthen our position and claim a leading role in the Greek energy market
- To be a reference point in terms of innovative solutions, top quality and impeccable service of our customers' actual requirements
- To hold one of the top positions among sector companies in terms of profitability
- To contribute to the prosperity of Greece with honesty and through substantive actions of social responsibility and sustainable development
- To enhance our reputation beyond the business limits of our activities

## PRINCIPLES

- We conduct business in an ethical, integral and honest manner
- We rely on team spirit and cooperation
- We support creativity, productivity and continuous improvement
- We place great emphasis on the result
- We judge impartially and meritoriously
- Our growth is based on our responsible and sensible approach to society and the environment





The company has:

 three fuel storage facilities in Aspropyrgos, Porto Lagos and Volos



a state-of-the-art fleet comprising two ships to serve the island network of 150 elin gas stations and one to supply fuel to the fuel storage facilities in P. Lagos and Volos

 two solid fuel processing facilities in Volos and Aspropyrgos

 more than 30 private tank trucks



Elinoil's associate company elin Biofuels has a state-of-the-art biodiesel production plant in Volos

**Main products**

Elinoil's products are:

- gas (95RON, 100RON, SUPER LRP)
- Diesel
- Heating oil
- Lubricants
- Special vehicle products (antifreeze etc)
- Solid fuel (coke , anthracite)

**Location of head office**

The company's head office is located in Kifisia at Pigon 33, 145 64.  
Telephone: 201 6241500

**Countries of operation**

Elinoil mostly operates in Greece but also serves its customers with marine lubricants abroad

**Nature of ownership / legal form**

Elinoil is a public limited company listed on the Athens Stock Exchange

## Markets served

Every day, more than 560 *elin* gas stations throughout Greece provide friendly, reliable service to their customers. Whatever the consumer's fuel needs, Elinoil is committed not simply to meeting them but to exceeding expectations with the quality of its products.

At the same time, Elinoil plays an important role in meeting the energy needs of Greek industry with liquid fuels (diesel, crude oil), solid fuels (pet coke and anthracite), lubricants and bitumen.

Elinoil is also a leading presence in the area of marine tourism, an industry it supplies with fuels and lubricants through a coastal network of more than 150 *elin* gas stations and through the state-of-the-art yacht refueling stations which the company has built and operates at seven of the country's most important marinas.

Elinoil's activities also extend to supplying the shipping industry with lubricants, serving customers' needs all over the world any time on time, while at ports in Greece, China, Singapore, the Persian Gulf and Europe, it supplies its customers with *elin* marine lubricants.

Elinoil is also a successful supplier of heating oil for homes and buildings, serving customers throughout Attica, and a pioneer in terms of service and ensuring correct deliveries.

The company's strong involvement with the sea and its state-of-the-art fleet allow it to operate marine transportation services through its affiliate *elin* Naftiki.

Finally, through its affiliate *elin* Technical, Elinoil also operates in the field of construction, specializing in large shops and industrial units.

## 6. Financial results

Below are the financial results for Elinoil Group in thousands of euro, as per international accounting standards.

	2011	2010	2009
<b>Turnover (sales)</b>	<b>802.177</b>	<b>832.075</b>	<b>659.488</b>
Cost of goods sold	-761.927	-785.430	-608.514
<b>Gross profit</b>	<b>40.250</b>	<b>46.645</b>	<b>50.974</b>
Other operating income	3.095	3.157	4.019
Administrative expenses	-3.896	-4.644	-4.626
Marketing expenses	-35.731	-40.397	-41.966
Other operating expenses	-984	-1.645	-1.362
<b>Earnings before interest and taxes (EBIT)</b>	<b>2.734</b>	<b>3.116</b>	<b>7.039</b>
Finance cost (net)	-3.213	-1.344	-1.411
Gain on sale of subsidiaries			
Profit/(loss) of associates	-356	730	637
<b>Earnings before tax (EBT)</b>	<b>-835</b>	<b>2.502</b>	<b>6.265</b>
Income tax	-209	-1.055	-1.556
<b>Earnings after tax (EAT)</b>	<b>-1.044</b>	<b>1.447</b>	<b>4.709</b>
To shareholders of the parent company	-1.044	1.447	4.709
Minority interest	0	0	0
Basic earnings per share	-0,04	0,06	0,2
<b>EBITDA</b>	<b>7.027</b>	<b>7.634</b>	<b>11.507</b>
<b>EBIT</b>	<b>2.734</b>	<b>3.116</b>	<b>7.039</b>
<b>EBT</b>	<b>-835</b>	<b>2.502</b>	<b>6.265</b>
<b>EAT</b>	<b>-1.044</b>	<b>1.447</b>	<b>4.709</b>



## 7. Corporate governance

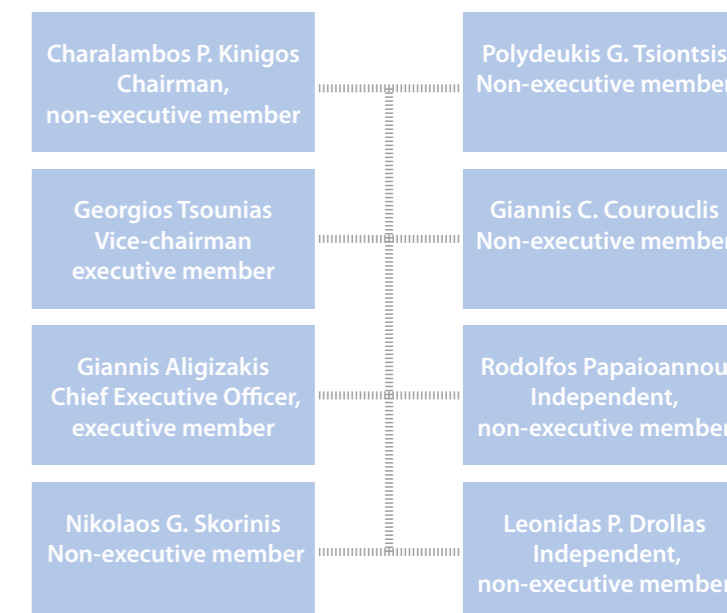
Corporate governance is a system of rules which aims to facilitate the company's management and appraisal with a view to maximizing profitability and the long-term value of the investment made by shareholders and other stakeholders. Stakeholders include persons with an interest in the company such as employees, creditors, suppliers, the State and the community.

The main element of ELINOIL's organizational scheme lies in the decentralization of decision making within the context of its shared corporate strategy. The company's corporate structure has been established so as to segregate the responsibilities of management executives and ensure optimum monitoring of corporate activities.

### Board of Directors

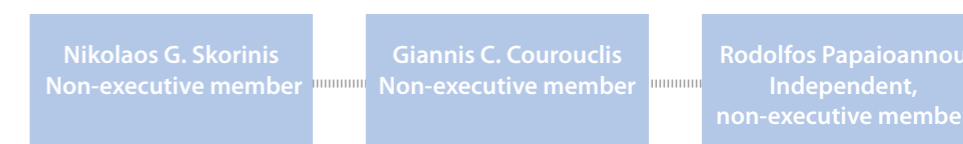
Elinoil's Board of Directors is responsible for making decisions about long-term strategy and corporate policy. To the extent of its authority, the Board also supervises the company's Management team in the exercising of its administrative and managerial responsibilities and powers.

Elinoil's Board comprises eight members, its composition ensuring the combination of skills, knowledge and experience that are necessary to further the company's objectives.



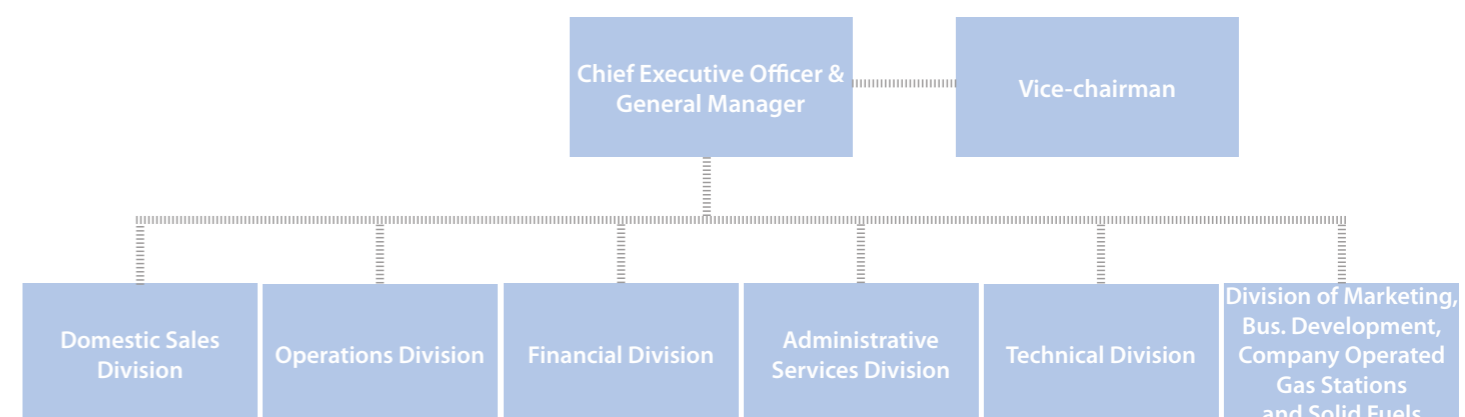
### Audit Committee of the Internal Audit Department

The members of the three-member Audit Committee, which evaluates the findings and reports drawn up by the company's Internal Audit Department, are:



### Management Team

The members of the three-member Audit Committee, which evaluates the findings and reports drawn up by the company's Internal Audit Department, are:



## 8. The environment – responsibility in action

Elinoil shows in practice how an energy company can make productive use of the resources it needs to operate, driving business development, and at the same time modify its operations so that natural resources are used modestly in order to ensure a sustainable environment for future generations.

Realizing early on that there can be no development without respect for the environment, Elinoil adopted business practices that soon were proved to be effective and also added significantly to the company's profile. Special tanker ships to serve the islands and production of biofuels are just some of the bold and innovative steps that provoked surprise rather than admiration when they were first taken, but which have since become a model for others to imitate. Even in the midst of a financial crisis, Elinoil's example shows a way towards sustainable development in a world in which consumers are increasingly adopting stricter criteria when choosing which companies to purchase products and services from.

## Environmental protection in marine transport

In 2011, Elinoil carried 650,000 m<sup>3</sup> fuel, much of it by sea. Transport by ship took place using three vessels. Two of them, the MT Apiliotis and the MT Zefyros, which are used to refuel **elin** gas stations on the islands, are essentially a combination of tanker, car ferry and fuel facility. These two double hull tankers, each with a capacity of 2200 m<sup>3</sup>, are equipped with state-of-the-art systems. In the stern is a special area with a latest generation bottom loading system that allows up to three tank trucks to be loaded at sea with 5 products simultaneously, as well as a vapor recovery system to protect the environment. In this way, safe and speedy refueling is achieved since fuels are loaded on the tank track, while it is on board and not on the jetties.

The globally innovative design of the ships and their contribution to protecting the marine environment has already been recognized and rewarded by Lloyds List at the 2006 Lloyds Greek Shipping Awards; by Ecocity, with its environmental awareness award in 2007; and by the Greek Association of Environmental Protection Companies (Paseppe), with its 2010 Clean Technology award.

The company's third ship, the **elin** Poseidon, was built in 2005 and has a capacity of 4000 cubic meters. Notably, it is a double hull vessel and it also meets all the technical standards for safe and environmentally friendly operation. The state-of-the-art tanker ship is used by the company to supply fuel to its facilities at Porto Lagos and Volos and to provide fuel transportation services to third parties always with the highest possible levels of quality and safety.



## Biofuels

**elin** accepts its responsibility to future generations and therefore is gradually making its operation more environmentally friendly with a series of major investments. The company has been a pioneer in Greece, paving the way for biofuels with the introduction of biodiesel in 1999 and then, in 2006, building a biodiesel production plant. Its strategy is to keep developing its business model so as to operate in a greener and safer way. Since 1999, Elinoil has made biodiesel available at a large number of **elin** gas stations in Thrace, as part of a special pilot program. Today, the Elinoil associate company, **elin** Biofuels produces its own biodiesel at a state-of-the-art plant which it has built in Volos, true to the decision made in 1999 to expand the use of environmentally friendly fuels.

At the biodiesel production plant in Volos, waste cooking oil is used as a raw material. Every liter of used cooking oil collected and converted to biodiesel saves 3.3 kilos of CO<sub>2</sub> emissions. If we collect from all the different sources of waste cooking oil available (e.g. household use, restaurants, fast food outlets etc) it is clear to see the potential that exists for reducing CO<sub>2</sub> emissions in Greece. All that has to be done is for this used cooking oil to be collected and channeled into the production of biodiesel. **elin** Biofuels has begun to operate in the collection of waste cooking oil, maximizing the potential we have as a country to exploit a by-product of cooking for renewable biodiesel.

Elinoil is already showing practical support for this effort, organizing the collection of waste cooking oil at its offices in Athens, Volos, Thessaloniki and Porto Lagos.



## Recycling

Since 2006, Elinoil has organized the collection of batteries for recycling and has since extended its recycling program to include mobile phones and ink cartridges.

Since 2009, **elin** has worked with Vodafone to enable its employees to recycle old mobile phones, chargers and accessories at special collection bins located at the head office in Kifisia.

### Objective 03

To extend recycling to include separate collection of paper, glass, metal, electrical appliances and light bulbs

### Objective 04

To investigate and implement techniques to reduce consumption of energy and other resources at **elin's** central buildings

### Objective 05

To measure CO<sub>2</sub> emissions from the company's fleet of vehicles and from the operation of our buildings



	2009-2011	
	PC	Average
Batteries	235	78
Mobile phones	111	37
Printers inks	136	45

## Carbon Footprint Measurement

To contribute to the international effort to reduce greenhouse gases, Elinoil has begun to measure its carbon footprint. The main measurement effort involve measuring Scope1 gas emissions, including emissions from tank trucks, tankers and the company's own vehicles.

The company has also begun investigating methods to measure Scope2 gas emissions from electricity consumption at its offices and facilities.

Finally, it will begin to identify Scope3 gas emissions, including emissions from associates (e.g. gas stations), from the use of **elin** products and from journeys, etc, in order to set a measurement mechanism in the future.

## 9. Responsible employment

*elin*'s employees are an invaluable asset, and with their wealth of experience, know-how and enthusiasm, are the key to the company's development. *elin*'s employees have the capability to develop initiatives and implement innovative ideas, successfully meeting the real needs of the company's customers. Team spirit, camaraderie and love for their work and for the company, combined with *elin*'s decentralized and highly efficient style of management, create an unrivalled work environment.

*elin* implements a range of policies that exceed its obligations as an employer, with the aim of maintaining an ideal work environment and ensuring working conditions that distinguish it as an employer, something which is apparent from the Bestworkplace2005 study that ranked the company among the ten best in Greece.

## Integrated management of human resources

*elin* takes an integrated approach to the management of human resources:

- Recruiting systematically and ensuring the smooth integration of new employees and creating job descriptions for every post, detailing specific areas of responsibility, as well as duties, powers, tasks and formal qualifications and skills.
- Implementing employee training and education programs with the aim of developing and improving their performance.
- Implementing performance evaluation systems for the entire workforce, which aims at accurate appraisal and the constant improvement of employees' efficiency and skills.

### Objective 06

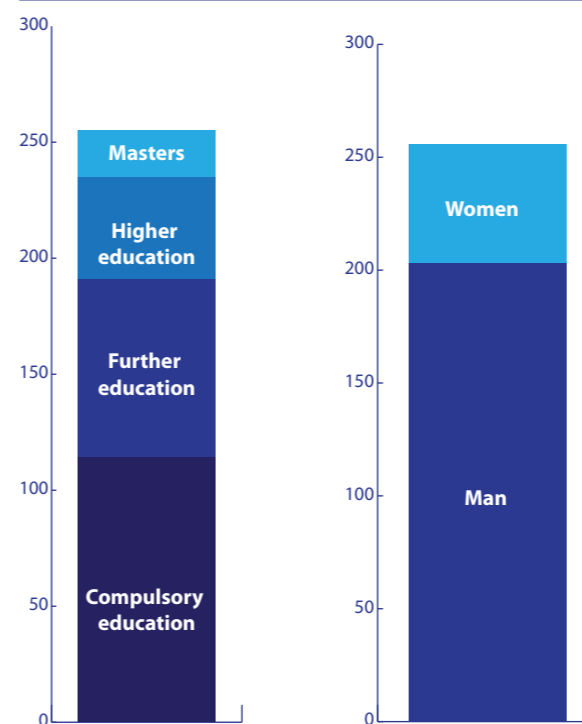
To develop the concept of voluntary activities within the company and to contribute to good causes through voluntary work

*elin* offers its employees a range of additional benefits:

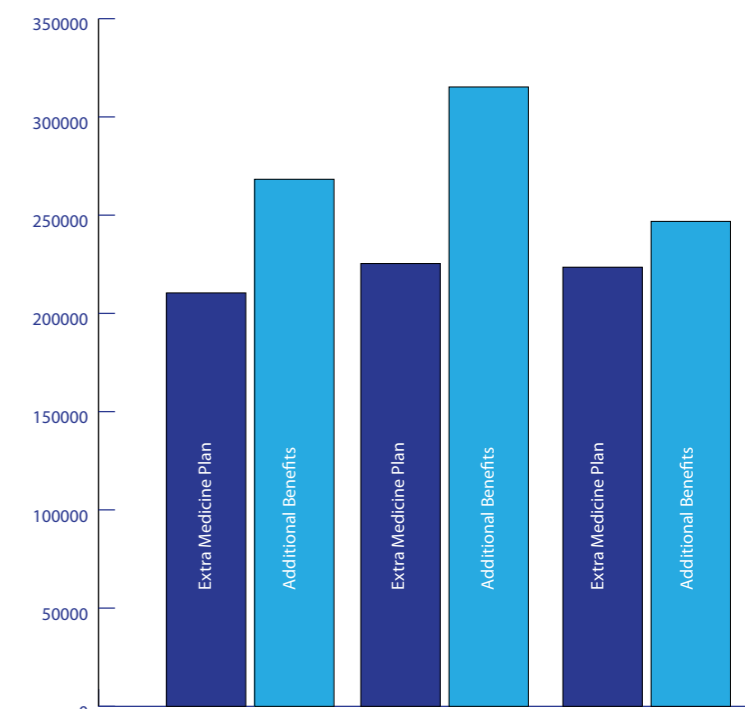
- A group medical plan for all employees and family dependents.
- A group pension plan allowing employees to make extra voluntary contributions.
- A company car and mobile phone for a specific level of seniority and above, or where necessary for work.
- Additional compensation at retirement, exceeding that laid down by law.
- An annual performance bonus awarded at the discretion of the management, depending on the company's financial results and the employee's performance.



Level of knowledge      Male/female distribution



3495 training hours in 2009-2011



2009      2010      2011

## 10. Consumer protection

### Fuel quality control program

It is difficult to control adulteration in the Greek fuels market. However, with its quality control program, implemented at all elin gas stations since 1999 in partnership with the Fuels and Lubricants Technology Laboratory of the National Technical University of Athens (NTUA), and with a strict policy of removing adulterating gas stations from its network, Elinoil is showing in practice that it is committed to ensuring high quality fuel for Greek consumers. With this program, which received an Ecocity award in 2006, Elinoil has succeeded in drastically reducing non-conforming samples at elin gas stations, so that they are between 5 and 10 times less than the market average, levels that could be accounted for by statistical error.



Results from the Fuels and Lubricants Technology Laboratory at the NTUA		
Year	2010	2011
Active gas stations	525	529
Samples	3201	3061
Non-conforming samples	37 (1,16%)	24 (0,78%)

### Results of NTUA inspections

The company's goal for high-quality fuel is constant. Nevertheless, inspections carried out by the competent state body (ΚΕΔΑΚ) from 2003 to 2009 established 3 cases of elin gas stations selling fuel of non-conforming specifications. In each of these cases, Elinoil acted quickly and after examining the evidence, took the appropriate measures.

Of 200 cases of non-conforming fuel, 3 were at elin gas stations, proving the effectiveness of the quality control program.

In detail:

- In 2003, non-conforming fuel was found at an **elin** gas station in Halkidona, Thessaloniki. Elinoil immediately stopped working with it.
- In 2003, non-conforming fuel was found at an **elin** gas station in Aspropyrgos. Elinoil immediately stopped working with it.
- In 2004, non-conforming fuel was found at an **elin** gas station in Athens. Elinoil did not remove its brand name from the gas station because it had come under new management.

### Quantity control program

Since 2008, Elinoil has extended the inspections it makes in collaboration with the NTUA, so that it now checks the accuracy of fuel quantities at **elin** gas stations.

### Consumer information

**elin** takes initiatives to inform the public of how best to take delivery of heating oil, another area in which evidence suggests that Greek consumers are unprotected. Using material such as leaflets and DVDs, the company provides consumers with valuable advice on how to check the oil delivery procedure.

### Protection of heating oil consumers

In 1995, Elinoil created a special inspection service which operates separately from the distribution system, carrying out spot checks in different ways and at different times in order to ensure that the correct quantities of heating oil are delivered.

## 11. Active participation in social initiatives

*elin* provides long-term support to bodies and organizations whose work is of direct social benefit, and also sponsors sport, cultural events and associated activities.

### Blood donation

Every year, Elinoil organizes an employee blood drive at its head-offices in Kifissia. From 2009 to 2011, 53 bottles of blood were collected.

In addition, Elinoil supports the efforts of the Xanthi Volunteer Blood Donors Association, and since 2010 has sponsored the Association's annual blood drive and at the same time encouraged employees at its Porto Lagos facility and local gas station managers to take part by donating blood. The Xanthi Volunteer Blood Donors Association has long promoted the effectiveness of blood donation as a way of giving practical support to people in need.



### Sponsorship of Aspropyrgos Ikaros

Aspropyrgos Ikaros football team was founded in 1970 and in the 2011-12 season played in the First Division of the Amateur League. The club's success is due to the efforts made by its team, with the support of its fans, while special mention must be made of the emphasis placed by the club on fair play and good behavior on the pitch. Elinoil supports Ikaros by providing clothing.



### Sponsorship of Marizet Chouri

Marizet began fencing at the age of 10, and immediately showed great promise, competing in the saber category for AEK Athens. With her speed, precise movements and patience, she managed to defeat older fencers and achieved several notable successes.

Despite her youth, she won a silver medal at the National Junior Girls Cup in 2009, a gold medal at the 2010 National Junior Girls Championship, another gold at the Istanbul Cup in 2011, and also competed successfully in Eurofencing tournaments in Poland (73rd place) and Hungary (63rd place), competing against fencers four or five years older than herself. In 2012, at the Senior Girls Championship (under 20 years of age) she put in a superb performance and finished sixth. In March, at the Istanbul Cup, competing in her own under-13s category, she won the gold medal, while in the cadets category she won bronze, once again proving that she has a great future ahead of her.

Elinoil is an enthusiastic supporter of Marizet endeavors, and helps fund her travel expenses.



**Objective 01**

To systematically analyze all *elin* stakeholders with the aim of identifying those with whom there should be more systematic dialogue.

**Objective 04**

To investigate and implement techniques to reduce consumption of energy and other resources at *elin*'s central buildings

**Objective 02**

For quality assurance to be delivered by an external provider.

**Objective 05**

To measure CO2 emissions from the company's fleet of vehicles and from the operation of our buildings

**Objective 03**

To extend recycling to include separate collection of paper, glass, metal, electrical appliances and light bulbs

**Objective 06**

To develop the concept of voluntary activities within the company and to contribute to good causes through voluntary work

**Sustainable development:** Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (Source: The Brundtland Report, UN World Commission on Environment and Development, 1987)

**Corporate Governance:** The system by which business corporations are directed and controlled. The corporate governance structure specifies the distribution of rights and responsibilities among different participants in the corporation, such as the board, managers, shareholders and other stakeholders, and spells out the rules and procedures for making decisions on corporate affairs. By doing this, it also provides the structure through which the company objectives are set, and the means of attaining those objectives and monitoring performance. (Source: OECD, 1999)

**Corporate Social Responsibility:** "CSR is the voluntary commitment of companies to also include in their business practices social and environmental activities beyond their legal obligations and are related to all those that directly or indirectly are affected by their operations" (definition from the Hellenic Network for Corporate Social Responsibility)

**Social report:** Non-financial data covering staff issues, community economic developments, stakeholder involvement and can include volunteer activities and environmental performance. (Source: MHC International)

**Code of conduct:** A formal statement of the values and business practices of a company and sometimes its suppliers. It is a statement of minimum standards together with a pledge by the company to observe them and to require its contractors, subcontractors and suppliers to observe them. (Source: European Commission, 2001)

**Stakeholders:** All those who are directly or indirectly affected by a company's activities but can at the same time influence them. They include: employees, customers, shareholders, business associates, governments, local communities, non-governmental organizations etc.

**Triple Bottom Line (TBL):** The idea that the overall performance of a company should be measured based on its combined contribution to economic prosperity, environmental quality and social capital. (Source: European Commission, 2001)

## 14. Performance Indicators GRI – G3.1

○ Not reported   ◐ Partially reported   ● Fully reported

Economic Performance		
EC1	◐	Chapter 6
EC2	○	
EC3	◐	Chapter 6
EC4	○	
Market Presence		
EC5	○	
EC6	○	
EC7	○	
Indirect Economic Impacts		
EC8	○	
EC9	○	

Environmental		
Materials		
EN1	◐	Chapter 8
EN2	○	
Energy		
EN3	○	
EN4	○	
EN5	○	
EN6	◐	Chapter 8
EN7	○	
Water		
EN8	Not applicable	
EN9	Not applicable	
EN10	Not applicable	
Biodiversity		
EN11	○	
EN12	○	
EN13	Not applicable	
EN14	○	
EN15	○	
Emissions, Effluents and Waste		
EN16	◐	Chapter 8
EN17	◐	Chapter 8
EN18	◐	Chapter 8
EN19	◐	Chapter 8
EN20	○	
EN21	Not applicable	
EN22	Not applicable	
EN23	○	
EN24	○	
EN25	Not applicable	
Products and Services		
EN26	◐	Chapter 8
EN27	◐	Chapter 8
Compliance		
EN28	○	
Transport		
EN29	◐	Chapter 8
Overall		
EN30	○	

Labor Practices and Decent Work		
Employment		
LA1	◐	Chapter 9
LA2	◐	Chapter 9
LA3	◐	Chapter 9
Labor / Management Relations		
LA4	○	
LA5	○	
Occupational Health and Safety		
LA6	○	
LA7	○	
LA8	◐	Chapter 9
LA9	○	
Training and Education		
LA10	◐	Chapter 9
LA11	○	
LA12	○	
Diversity and Equal Opportunity		
LA13	◐	Chapter 9
LA14	○	
Human Rights		
Investment and Procurement Practices		
HR1	Not applicable	
HR2	○	
HR3	○	
Non - Discrimination		
HR4	Not applicable	
Freedom of Association and Collective Bargaining		
HR5	○	
Child Labor		
HR6	Not applicable	
Forced and Compulsory Labor		
HR7	Not applicable	
Security Practices		
HR8	Not applicable	
Indigenous Rights		
HR9	Not applicable	

Society		
Local Community		
SO1	○	
Corruption		
SO2	○	
SO3	○	
SO4	○	
Public Policy		
SO5	○	
SO6	Not applicable	
Anti - competitive Behavior		
SO7	○	
Compliance		
SO8	○	
Product Responsibility		
Customer Health and Safety		
PR1	○	
PR2	◐	Chapter 10
Product and Service Labeling		
PR3	◐	Chapter 10
PR4	○	
PR5	○	
Marketing Communications		
PR6	○	
PR7	○	
Customer Privacy		
PR8	○	
Compliance		
PR9	○	





**Responsibility  
in action**



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