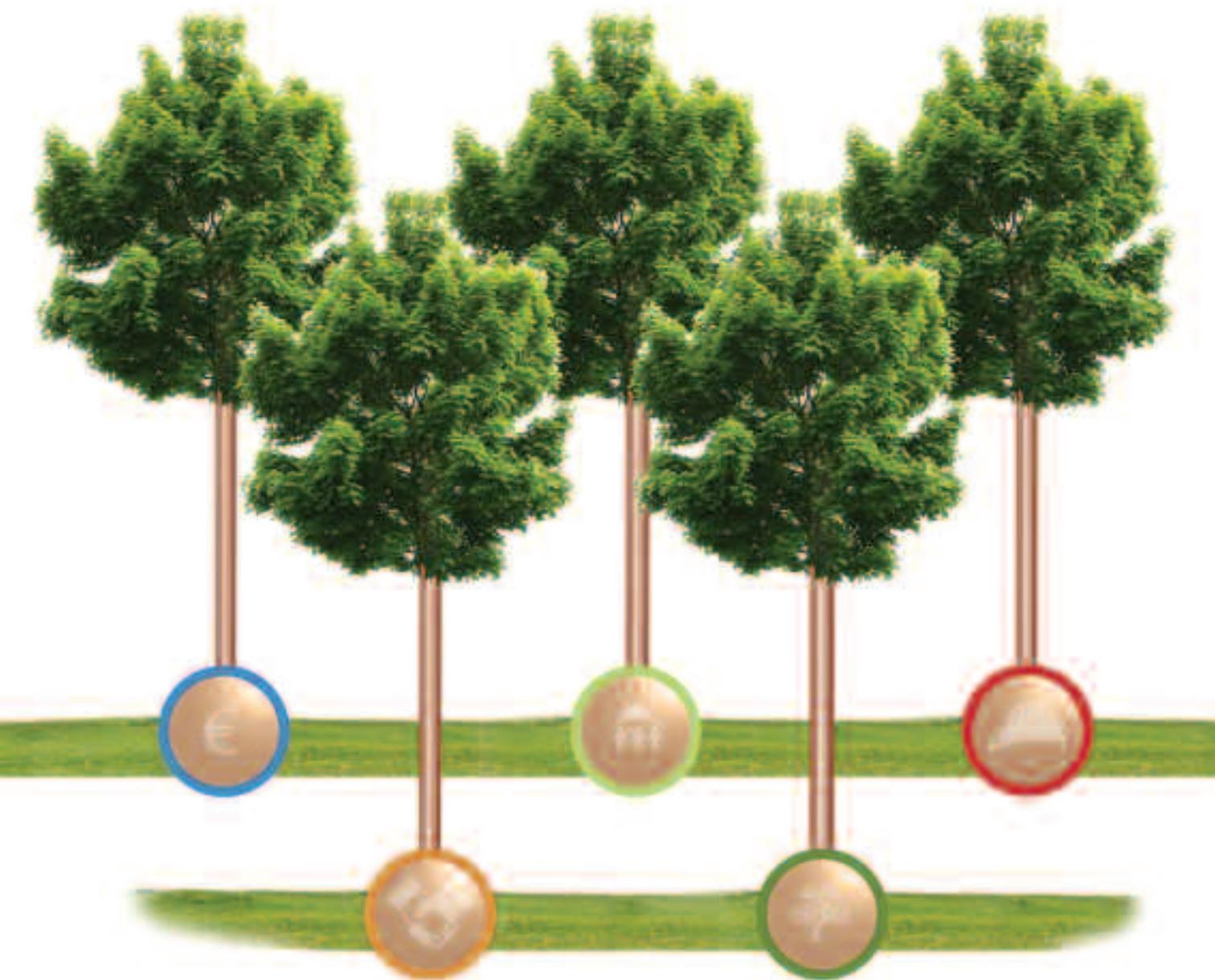


# Corporate Responsibility and Sustainable Development Report





**HALCOR**  
METAL WORKS S.A.

**CORPORATE RESPONSIBILITY AND SUSTAINABLE  
DEVELOPMENT REPORT  
2013**

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## Message from the Chairman of the Board of Directors

Our vision for Sustainable Development entails a constant effort to ensure responsible business practices and a dedicated endeavour to create added value for all stakeholders. Our goal is for HALCOR to be among the leading firms in its sector. We are striving for a target of zero accidents by constantly improving our working environment while also making sure that we minimise our environmental footprint.

We are building relationships founded on trust with our customers and associates and are always there supporting the needs of the local communities in which we operate. HALCOR is firmly dedicated to the principles of Sustainable Development, economic prosperity, environmental protection and social cohesion, and is a responsible, active business partner whose operations have a net positive effect on society as a whole.

We evaluate our success by looking at economic growth, environmental protection, how we care for our people and support the local community, and by looking at how sound our corporate government practices are for all our business activities.

Despite the adverse economic conditions both nationally and internationally in 2013, and despite the not so encouraging financial results reported by the Company, we continued to further extend our efforts at self-improvement in the Corporate Responsibility sector. It is noteworthy that even though results worsened this year, HALCOR continued its long-term capital expenditure plan, making total investments of Euro 1.3 million, generated a 'social product' of Euro 80 million, managed to increase its volume of sales of copper tubes by 3% and won higher market shares for itself in key European markets. Against a difficult business environment like that, HALCOR remained firmly committed to its principles and priorities and achieved the targets it had set for itself in the previous period.

We recognise that the Company's most important contribution to Sustainable Development occurs through its products and services. Offering top quality products and reliable solutions is a strategic choice we have made, as well as a competitive advantage and a matter of responsible business. At HALCOR we are systematically investing in research and technology, to promote innovation and generate new cutting edge products and services. Proof of the importance we place upon improving our customer services is that at the end of 2013 we began installing an innovative, new platform / lab for testing the performance of inner grooved tubes (IGT) under heat. We expect it to be completed and operational during 2014.

A key factor in the Company's business development and success has been its staff. For that reason, top priority for us is to ensure a healthy, safe working environment. We are also committed to providing training and encouraging staff development in an equal opportunities, discrimination-free workplace. During a difficult year like 2013, it is worth noting that we offered a total of 1,781 man-hours of training at a total cost of over Euro 45,000. At the same time, total health and safety expenditure in 2013 was Euro 127,000 while over the last 6-year period (2008-2013) more than Euro 1.5 million has been spent on health and safety programmes and improving HALCOR's infrastructure in this area. This sector is vitally important for us and our endeavours are continuing at a renewed pace. We are improving our health and safety performance ratings by vigorously implementing the Health and Safety System, by making investments and running programmes, and thanks to the contribution and involvement of all employees who have shown themselves to be responsible when it comes to these matters. Despite all the measures taken to eliminate all likelihood of accidents occurring, unfortunately at the start of 2013 there was a tragic incident which shocked all of us at HALCOR. The loss of a human life was a painful reminder that no preventative measures in the occupational safety sector should ever be considered enough.

We are committed to constantly reducing our environmental footprint and remain dedicated to the long-term targets we set in 2012 by focusing on actions and implementing programmes that seek to further improve the Company's performance when it comes to its key environmental issues, such as efficient energy use, water savings, proper management of raw materials and waste, and minimising emissions. To comprehensively monitor and man-

age environmental issues, from 2009 to the present day we have been implementing a certified Environmental Management System at all our production plants. Reviewing our Environmental Management performance in 2013 it is interesting to note that:

- We implemented another large capital expenditure plan for environmental protection and prevention works at a cost of over Euro 1 million.
- We reduced water consumption per ton of product by 6% compared to the previous year.
- We reduced thermal energy consumption by 10% compared to 2012.
- We significantly reduced gas emissions.
- We increased the use of recycled metal per ton of product by 3%.

Since the Company is the largest recycler of copper, zinc and their alloys in Greece, every year we strive to increase the percentage of scrap metal we recycle and use as a raw material. In 2013 scrap metal for recycling accounted for 51% of the quantity of metal we procured and this hat is an exceptionally high figure.

For us, this report has become an important tool of communication to all of HALCOR's stakeholders since it outlines our performance ratings for Corporate Responsibility priorities for 2013, our strategic priorities and the actions we have planned for the years to come. Our progress so far is something that encourages us to continue the efforts we have been making to ensure that the Company is a sustainable enterprise.

In 2014 we are stepping up our responsible corporate societal activities by focusing on supporting the Greek economy by increasing exports, by implementing coordinated measures to protect the environment and by developing and supporting our staff and the community in which we operate. We are optimistic about the future, and all the challenges it will bring as ready, to responsibly rise to those challenges.

**Theodosios Papageorgopoulos**  
**Chairman of the Board of Directors**

## The HALCOR Group

The HALCOR Group is involved in the copper, copper alloy, zinc and cables production and trading sector.

Capitalising on its size, know-how, infrastructure and experience, we utilise metals in the interests of man and man's needs.



- INDUSTRIAL FACILITIES
- SALES NETWORK



HALCOR – tube works,  
Oinofyta, Greece



HALCOR – Foundry,  
Oinofyta, Greece



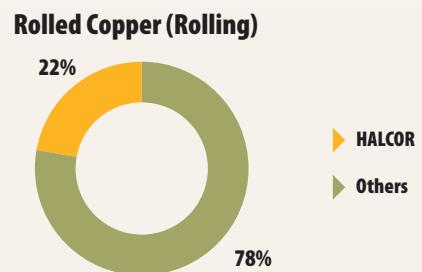
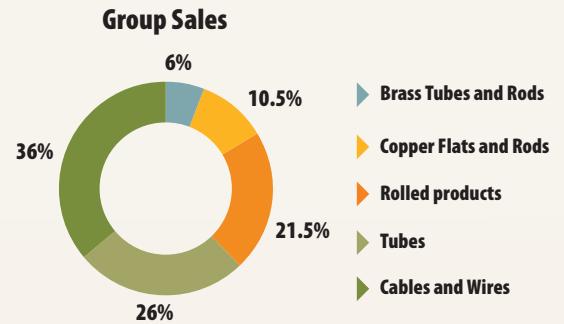
SOFIA MED,  
Sofia, Bulgaria



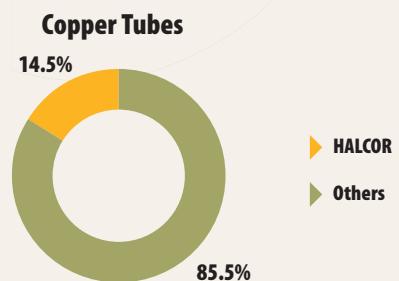
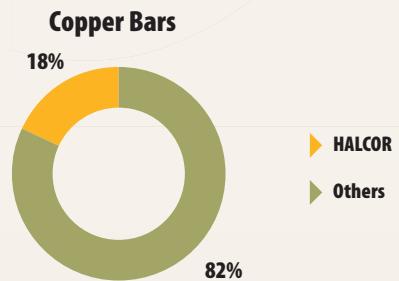
FITCO,  
Oinofyta, Greece

With our goal in mind, of constant innovation at national and global level, we are systematically investing in research and development, attainment of know-how and to create new, innovative products.

- 19** Subsidiaries
- 9** Production plants
- 2,440** Employees
- 205** Volume of sales (Thousands of tons)
- 985.4** Total Exports (million Euro)



HALCOR Group European Market Shares



All the above are based on the company's data and on studies carried out by international organizations related to copper.



HELLENIC CABLES, Thiva, Greece



FULGOR, Soussaki, Corinth, Greece

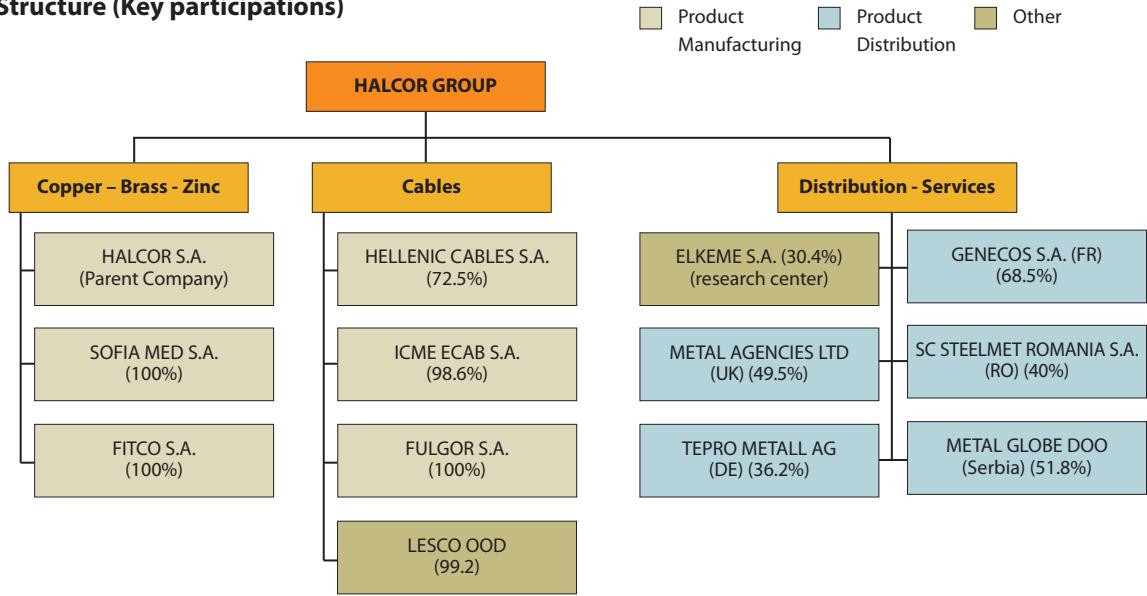


ICME ECAB, Bucharest, Romania



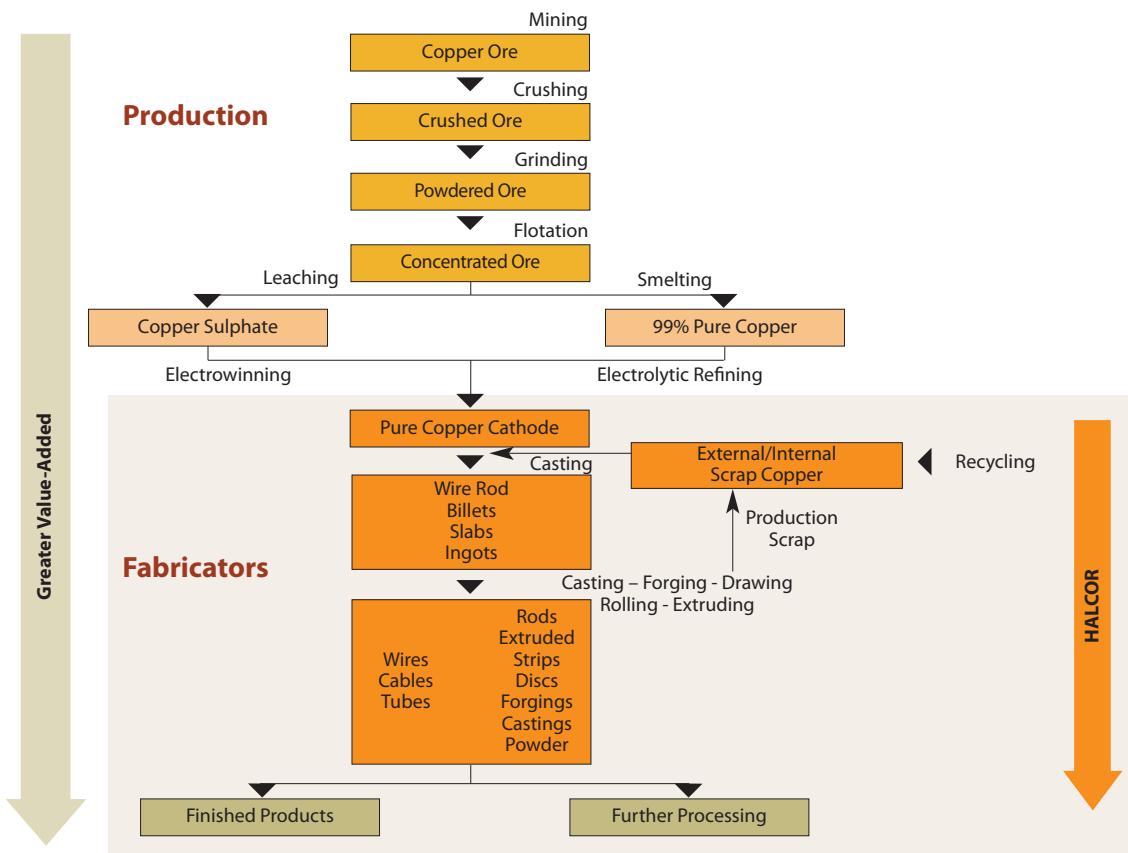
HELLENIC CABLES, Livadia, Greece

**Group Structure (Key participations)**



**Copper value chain**

The diagram below shows the various stages in the copper production process from mining to processing of the end product.



**HALCOR Group products**

<p>HALCOR S.A.</p>	<p><b>Manufactures</b></p> <ul style="list-style-type: none"> <li>- Copper Tubes (TALOS and CUSMART)</li> </ul> <p><b>Trades in</b></p> <ul style="list-style-type: none"> <li>- Copper and Titan Zinc Gutters (DOMA)</li> </ul>
<p>SOFIA MED S.A.</p>	<p><b>Manufactures</b></p> <ul style="list-style-type: none"> <li>- Copper Products: Sheets and strips (DOMA), disks and bars</li> <li>- Brass Products: Sheets and strips (DOMA) and disks</li> <li>- Titan Zinc Products: Sheets and strips DOMAZINC</li> <li>- Special Alloy Products: Cups and coins</li> </ul> <p><b>Trades in</b></p> <ul style="list-style-type: none"> <li>- Copper Tubes (TALOS and CUSMART)</li> </ul>
<p>HELLENIC CABLES S.A.</p>	<p><b>Manufactures</b></p> <ul style="list-style-type: none"> <li>- Power Cables, Telecommunications and Data Transmission Cables</li> <li>- Copper Enamelled Wires</li> <li>- Submarine Cables</li> <li>- Plastic and Rubber Compounds</li> <li>- Copper and Aluminium Conductors</li> </ul>
<p>FITCO S.A.</p>	<p><b>Manufactures</b></p> <ul style="list-style-type: none"> <li>- Brass products: Tubes, bars and rods</li> <li>- Brass Fish Farm Gases</li> </ul> <p><b>Trades in</b></p> <ul style="list-style-type: none"> <li>- Copper Products: Sheets and strips (DOMA), disks and bars</li> <li>- Brass Products: sheets and strips (DOMA) and disks</li> <li>- Titan Zinc Products: sheets and strips DOMAZINC</li> </ul>



## 2013 data



**414**  
employees



Euro  
**446**  
million  
revenue



Investments  
of Euro  
**1.3**  
million



**3%**  
increase in the  
volume of sales  
(for tubes)



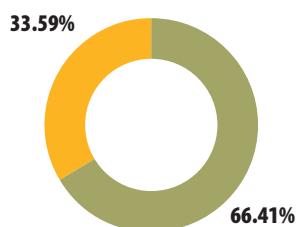
HALCOR is Greece's only copper tube manufacturer, and is involved in manufacturing a large range of copper products for use in heating, cooling, water supply and natural gas transmission networks and for a wide range of industrial applications.

The company was founded in 1976 and its registered offices are in Athens, Greece at 2-4 Mesogeion Ave., Athens Tower, Building B, GR-11527. HALCOR is a public limited company and its shares have been listed on the Athens Exchange since 1996.

More information on HALCOR's shares is available in the 2013 Financial Report, and on the Company's website, [www.halcor.gr/en/](http://www.halcor.gr/en/) (Investor Relations/Shares).



### HALCOR Shareholder Structure (31.12.2013)



▶ Other Shareholders

▶ VIOHALCO S.A.

The Company's production facilities are in Oinofyta in the prefecture of Viotia. As a result of strategic investments made over recent years in the R&D sector, HALCOR has managed to position itself as one of the leading companies in its sector worldwide, having set new standards when it comes to copper processing.

HALCOR is a company with a strong export orientation, competing on a global level with major multinational corporations.

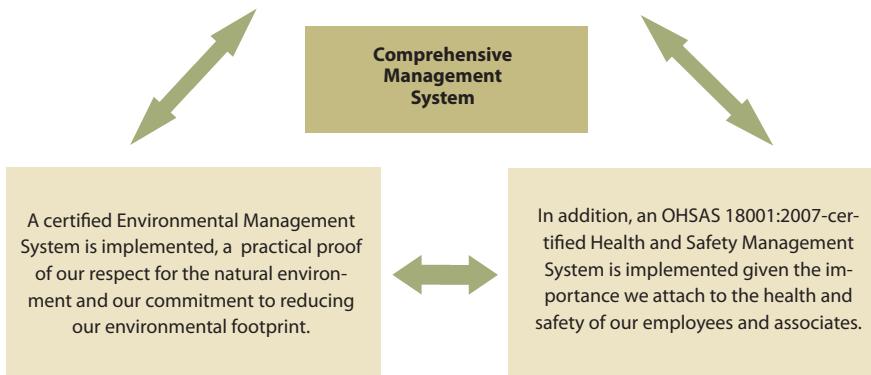
## Strategic Priorities

The Company's general strategy encompasses specific, core priorities and areas of activity such as:

- Protecting and respecting the natural environment (proper environmental management)
- Ensuring a safe, efficient working environment (occupational health and safety management)
- Expanding the range of existing products and developing new products and services
- Penetrating into new markets and increasing market shares in existing markets
- Maintaining high levels of customer satisfaction (by managing the quality of products and services).

## Management for Responsible Business

As a Company firmly focused on providing top quality products and on constantly improving ourselves and offering customer satisfaction, we implement a certified Quality Management System.



## Products

HALCOR offers an extensive range of products that save energy and respect the environment. The Company is one of the few companies in Europe that is able to manufacture ACR inner grooved copper tubes with a minimum wall thickness of 0.25 mm. The specific tubes are high-tech, highly efficient products which are extensively used in the a/c industry.

**“Seeking to ensure maximum customer satisfaction, we place particular emphasis on reliability, the speed of response to demand and the comprehensiveness of our product support services.”**

More information about HALCOR's products is available in the 2013 Annual Report (p. 13) and on the Company website [www.halcor.gr/en/](http://www.halcor.gr/en/).



### Modern production facilities:

- 2 plants (Greece)



### Foundry:

- Production capacity: 235,000 tons a year
- Manufacture of semi-finished products (bars and slabs)



### Copper tube plant:

- Production capacity: 75,000 tons a year
- Production of copper tubes for use in heating, water supply, cooling, natural gas transmission and a/c networks as well as tubes for various industrial applications.

We hold certificates for all HALCOR facilities in line with the following standards:

- ISO 9001:2008
- ISO 14001:2004
- OHSAS 18001:2007

## 1.1 Financial Performance

HALCOR's operations generate major direct and indirect benefits for society as a whole thanks to:

- Its contribution to the national economy.
- Its support for local communities and economies.
- The fact that it retains jobs.
- Improvement in the level of its staff's skills and technical and other types of knowledge.
- The value generated for shareholders and investors.
- Presenting the 'very best' of the Greek industry to international markets.

To develop its business activities the Company also makes major investments and contributes to an improvement in Greece's overall financial results due to the inflow of capital from abroad, the creation of indirect jobs, improvements in staff skill sets, its involvement in reducing the deficit of social security providers and its contribution to increase public revenues in general. These investments not only increase the Company's production base but also improve income levels for contractors and subcontractors, thereby stimulating the national economy overall.

Euro  
**80**  
million  
Our Social  
Product

Annual contribution to social development – Social Product (thousand Euro)	2011	2012	2013
Payments to suppliers (apart from those for materials and intragroup transactions)	35,386	45,620	43,776
Employee salaries and benefits (including Social security contributions)	22,147	20,118	17,671
Taxes paid	-	-	-
Payments to capital providers	15,875	16,230	17,138
Company investments	2,537	2,379	1,325
<b>Total</b>	<b>75,945</b>	<b>84,347</b>	<b>79,910</b>

In the macroeconomic environment, volatility and challenges were the key features of 2013, with the Euro Area economies reporting a further slowdown (with the exception of Germany) and Greece remaining in deep recession. Demand for our products declined since the construction sector continues to be hard hit by the recession. Despite the fact that demand for industrial products declined in key European markets, HALCOR increased the volume of sales of copper tubes by 3% and managed to achieve higher market shares for itself.

HALCOR S.A.'s Financials	2011	2012	2013
Net sales (thousand Euro)	585,705	545,522	446,045
Other operating expenses (thousand Euro)	5,177	5,275	3,626
Income from financial investments (thousand Euro)	42	258	103
Total revenue (thousand Euro)	590,924	550,755	449,335
Operating cost (thousand Euro)	(564,182)	(524,466)	(434,910)
Employee salaries and benefits (thousand Euro)	(22,147)	(20,119)	(17,671)
Payments to capital providers (thousand Euro)	(15,875)	(16,271)	(17,166)
Net losses before tax (thousand Euro)	(11,281)	(10,134)	(20,309)
Net losses net of tax (thousand Euro)	(13,728)	(11,023)	(28,487)

HALCOR S.A.'s Financials	2011	2012	2013
Net earnings per share (Euro)	(0.1355)	(0.1088)	(0.2813)
Company investments (thousand Euro)	2,537	2,379	1,325
Total capitalisation (thousand Euro)	50,639	88,315	83,454
Equity (thousand Euro)	134,497	123,157	94,769
Total liabilities (thousand Euro)	288,110	271,141	305,099
Total assets (million Euro)	422,607	394,297	399,868

Note: The use of brackets in this table indicates that the numbers are negative.

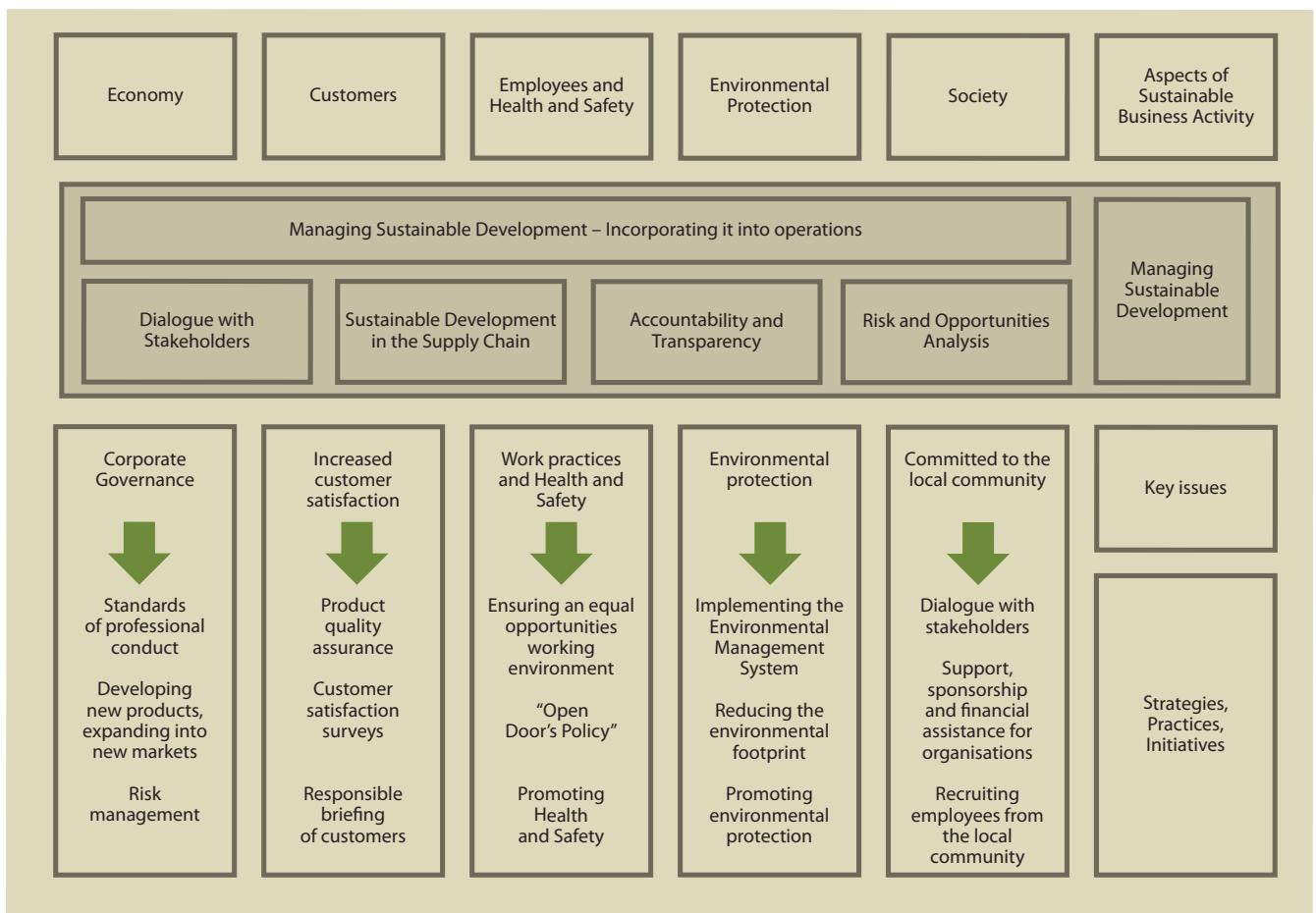
More information on HALCOR's financials is available in the 2013 Financial Report, the 2013 Annual Report and on the Company's website, [www.halcor.gr/en/](http://www.halcor.gr/en/). (Investors Relations).



## 1.2 Corporate Strategy and Sustainable Development

Corporate Responsibility is interwoven into HALCOR's philosophy, strategy and corporate values.

### Sustainable Development is an integral part of HALCOR's corporate strategy



### 1.3 Corporate Governance Structure

Proper corporate governance, compliance and transparency in all sectors are a key building block for ensuring responsible business operations. In order to bolster corporate transparency and the auditing mechanism, the Company has adopted bylaws which have been approved by the Board of Directors. All employees are obliged to apply these across the entire spectrum of Company operations

In March 2011 HALCOR adopted the Hellenic Code of Corporate Governance (for more information about the Code see the Company's 2013 Annual Financial Report, p. 19).



### Our Commitment We are focusing on key issues:

- By implementing good corporate governance practices that go beyond the requirements laid down by law, while acting with integrity and ethos at all times.
- By promoting transparency in all business activities, to ensure proper, two-way partnership with shareholders, customers, staff and all stakeholders.
- By ensuring compliance with the legislative and regulatory framework and the relevant standards.

### Corporate Responsibility Organisational Structure



Given the points above, the Company management team ensures that it has the best information available to it and checks and responsibly manages issues relating to the financial, economic and social aspects of its operations.

### The Company's main corporate governance bodies are as follows:

- General Meeting**
  - The General Meeting also serves as a means of communication between shareholders and Company Management.
- Board of Directors**
  - The Board consists of 11 members in total (5 executive, 4 non-executive and 2 independent members) as required by Law 3016/2002 as a public limited company whose shares are listed on the Athens Stock Exchange.
- Audit Committee**
  - The Committee is elected and operates in accordance with Law 3693/2008 and supports the Board of Directors in its work.
- Internal Audit Department**
  - This Department briefs the Board of Directors at regular intervals about how the Company's bylaws are being implemented.

More information about HALCOR's corporate governance and about the line-up and competences of the Board of Directors, the powers of the Chairman of the Board, BoD committees (line-up, competences, and scope) is available in the 2013 Annual Report, the 2013 Annual Financial Report (Corporate Governance Statement – Line-up and operation of the Board of Directors, Company supervisory bodies and committees, pp. 16-17) and on the Company's website ([www.halcor.gr/en/](http://www.halcor.gr/en/)).



## 1.4 Avoiding Conflict of Interests

The Company has implemented specific policies and procedures to ensure that any likelihood of the conditions for conflict of interests arising is avoided. These procedures include:

- The existence of independent and non-executive members of the Board of Directors, which ensures that factors that could lead to conflict of interests are being avoided.
- Constant supervision and briefings about the need to avoid such situations arising and to identify them in good time, if they do arise.
- Regular audits by the Internal Audit Department which cover the likelihood of any conflict of interests that breach Company policy existing in the area being audited.
- A policy that prohibits hiring a person whose spouse or first / second degree relative (by blood or by marriage) already works for HALCOR, to safeguard the principle of independence in decision-making by its executives in the various sectors in which it operates.

## 1.5 Risk and Opportunity Management

HALCOR operates in an economic and social environment which is characterised by various risks and opportunities. Against this background it has put in place and implements structures and procedures to identify, manage and protect itself against risks that could arise that it is called upon to face. The main categories of risk the Company faces are as follows:

Risk category	Risk management
<b>Industrial risk</b>	<ul style="list-style-type: none"> <li>• Implementation of strict operating and safety criteria (in full compliance with Greek and European law).</li> <li>• Preparing and implementing a detailed contingency plan (covering all possible eventualities) and working closely with the local authorities and the fire brigade to rapidly and effectively deal with potential incidents.</li> </ul>
<b>Environmental risk</b>	<ul style="list-style-type: none"> <li>• Implementing a certified Environmental Management System (in line with the requirements of the ISO 14001:2004 standard)</li> </ul>
<b>Occupational risk</b>	<ul style="list-style-type: none"> <li>• Implementing an Occupational Health and Safety System certified in line with the requirements of the OHSAS 18001:2007 standard.</li> </ul>
<b>Financial risks and uncertainties</b>	<ul style="list-style-type: none"> <li>• More information about how financial risks are managed is contained on pages 6 to 8 of HALCOR's 2013 Annual Financial Report (Annual BOD Report – section 4: Main risks and uncertainties) which is available on the Company's website, <a href="http://www.halcor.gr">www.halcor.gr</a> (Investor Relations section).</li> </ul>

*HALCOR's Board of Directors monitors and checks issues relating to the Company's Sustainable Development and the risk identification and management process.*

HALCOR takes a preventative approach in the risk management procedure it implements. In addition to entailing risks, the business sector in which HALCOR operates also presents opportunities which the Company identifies and manages.

More information about management of HALCOR's impacts and the risks the Company faces and the opportunities which arise is presented in the 2012 Corporate Responsibility and Sustainable Development Report on pp. 49-50.

### 1.6 Awards - Distinctions

The awards and distinctions the Company has received so far confirm the constant effort being made by HALCOR's staff in all sectors of company operations to ensure that it operates as a responsible company. They also oblige HALCOR to continue to operate as a responsible company that invests in modern business practices to achieve the overriding objective of Sustainable Development.



- HALCOR received an honorary distinction for its "2009 Corporate Responsibility and Sustainable Development Report" from the University of the Aegean.

2008

Honorary distinction by TUV HELLAS for HALCOR's contribution to society as a whole and to consumers.

2009

- The Company was chosen as Export Leader in the "2009 Export Turnover" category by HELEXPO and STATBANK in September 2009.
- HALCOR came 22nd in the Corporate Social Responsibility rating by Accountability Rating Greece.

2010

- The ICAP Group rated HALCOR as one of the "Strongest Companies in Greece", which includes companies with a high credit rating.

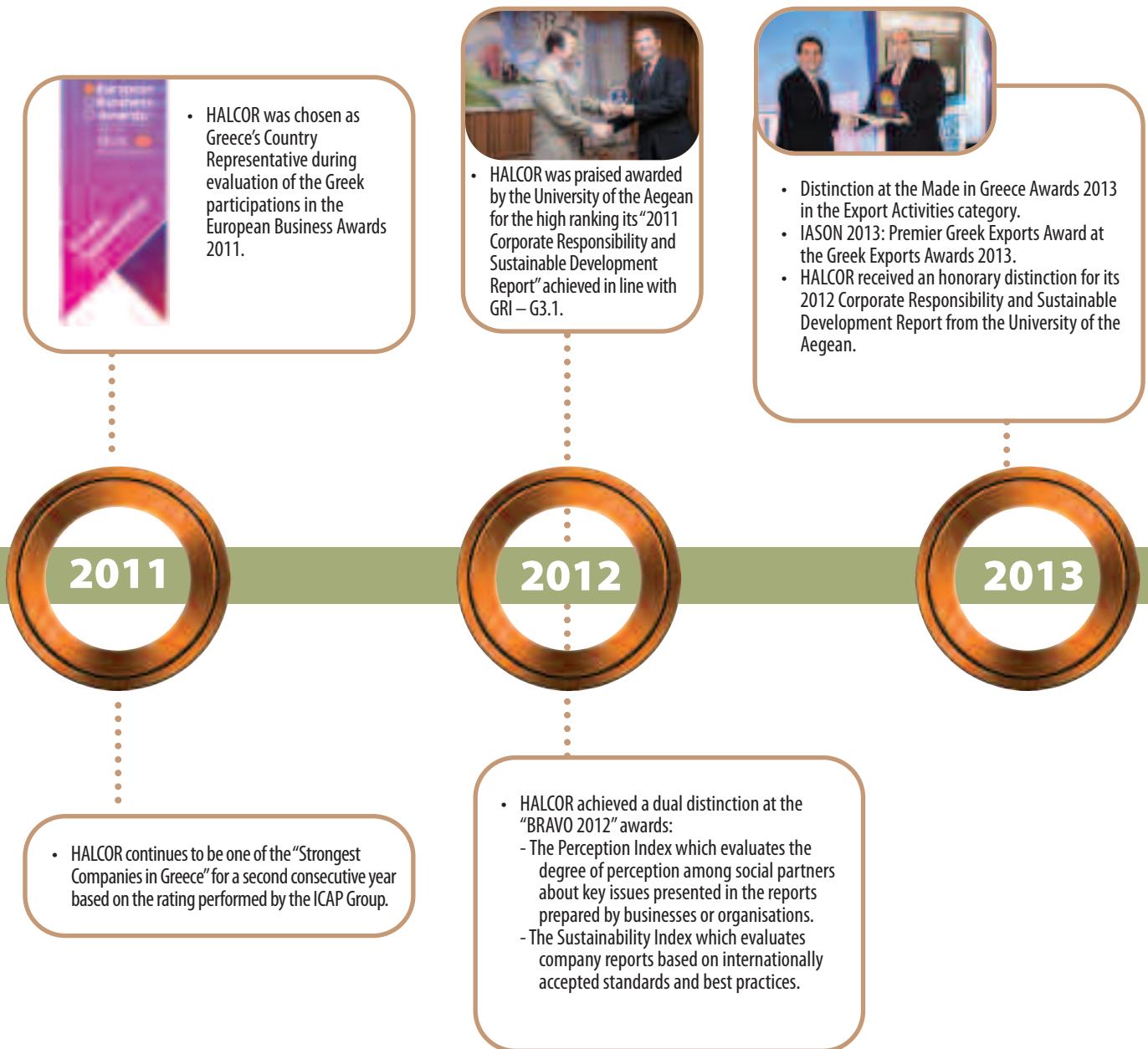


#### Distinction at the Made in Greece Awards 2013

HALCOR is constantly innovating, making investments all the time in research and development of know-how in order to offer new, innovative products. HALCOR's exports activities resulted in 93% of company revenue for 2013 coming from sales to more than 50 countries worldwide. As part of the Made in Greece Awards 2013 HALCOR received an honorary distinction in the Export Excellence category as a manufacturing firm which develops and exports innovative, value-added, quality products.

*"This distinction is confirmation of the Company's endeavours to increase exports and support the Greek economy, by offering innovative products that are chosen by leading firms and organisations worldwide because of their quality and reliability".*

**HALCOR's General Manager**



### Distinction at the Greek Export Awards 2013

HALCOR received the IASON 2013: Premier Greek Exports Award at the Greek Exports Awards 2013. The goal of the Greek Exports Awards is to showcase and reward Greek businesses whose activities contribute to increased productivity, competitiveness and employment in the Greek marketplace, while also highlighting best practices that can be utilised by Greek businesses.

*"We are particularly honoured by this prize and filled with satisfaction since it is a reward for the Company's strategic choice to improve its operations outside of Greece by developing high added-value products that have earned the trust of customers worldwide. HALCOR will continue in that vein to improve exports and to make a continuing contribution to the Greek economy".*

**HALCOR's Commercial Manager**

## 1.7 Participation in Networks and Organisations

To a large extent promoting Sustainable Development and Corporate Responsibility depends on collective organisation and cooperation with social partners, to jointly identify and promote solutions relating to important issues for the sector or issues of relevance to the country overall. Bearing that in mind, to implement its corporate strategy on Sustainable Development and to develop responsible practices, HALCOR is actively involved in a series of network, organisations and bodies.



### Hellenic Network for Corporate Social Responsibility (CSR Hellas)

CSR Hellas's mission is to promote the concept of Sustainable Development, Corporate Social Responsibility and Social Cohesion in Greece, as well as to develop communication, synergies and co-ordination mechanisms between the companies which are members of the network, for the joined implementation of programs and the exchange of good practices. HALCOR is one of the main members of this network since 2009, participating in actions, working groups and network events.



### Hellenic Federation of Enterprises (SEV)

Halcor has incorporated the SEV Principles Code concerning the Sustainable Development, while the company has been an active member of SEV since 1997. The Hellenic Federation of Enterprises mission is to contribute towards the modernization and development of Greek enterprises, creating a competitive national asset within the European and global economic competition.



### Federation of Sterea Ellada Industries (SBSE)

The Federation of Sterea Ellada Industries (SBSE) (former Viotia Industries Association – SBB) was founded in 1982 and its primary objective is to promote the needs of the industries and to ensure the creation of the appropriate means to achieve sustainable development responsibly, within a competitive business environment. SBSE aims at supporting its members by promoting entrepreneurship, competitiveness, Sustainable Development and the environmental protection of Viotia. HALCOR is a founding member of the Federation and has sat on its BoD since 1982.



### Federation of Hellenic Recycling and Energy Recovery Industries (SEVIAN)

SEVIAN's formation was completed in early 2010. HALCOR has been a member of SEVIAN since 2010 and helped in its foundation. The companies participating in SEVIAN operate in Greece and are active in waste recycling and recovery of by-products and secondary raw materials, according to regulations applied to the private sector. SEVIAN's mission is to strengthen Sustainable Development through a series of actions related to recycling and energy recovery.



### European Copper Institute (ECI)

ECI is a non-profit organization that aims to promote the responsible application and offer updates on the uses of copper. HALCOR has been a member of ECI since 1996.



### International Wrought Copper Council (IWCC)

The IWCC, which was founded in 1953, is an industrial council whose goal is to promote the copper industry and its interests (HALCOR participates as a member of the IWCC). It operates in a large number of countries in Europe, as well as in Japan, Australia, China, Iran, India, Mexico, Malaysia, South Africa, South Korea, Taiwan and USA.



### Hellenic Copper Development Institute (HCDI)

HCDI was founded in 1996 and is a non-profit organization that aims to promote the responsible application and offer updates on the uses of copper and its alloys, to specialized users and the general public. HALCOR is a founding member of the Hellenic Copper Development Institute. Together, they participate in the programs of the European Copper Institute (ECI), which is a non-profit organization and belongs to the International Copper Association (ICA). As a result, HCDI belongs to a global network of 27 copper centers, funded and supported by the global non-profit organization ICA.

The Company is also a member of the associations and chambers listed below:

- Athens Chamber of Commerce & Industry (ACCI): The chamber was founded in 1914 to protect and promote commercial and industrial enterprises.
- ATHEX Union of Listed Companies (ULC): ULC represents more than 150 companies that account for around 80% of capitalisation on the Athens Exchange (ATHEX). HALCOR has been a member of ULC since 1996.
- European Committee for Standardisation (CEN): The company participates in CEN's standard drafting committees.
- Hellenic Marine Environment Protection Association (HELMEPA).
- Hellenic Recovery Recycling Corporation (HERRC): The corporation was founded in December 2001. In response to the provisions of Law 2939/2001, HERRC has developed the RECYCLE Collective Alternative Management System in Greece in its endeavour to discharge its obligations in an efficient, cost-effective manner.
- Hellenic Union of Industrial Consumers of Energy (UNICEN): UNICEN represents Greek industries for which energy accounts for a major proportion of their production costs and consequently a key factor in their competitiveness at international level.

Thanks to its membership of various organisations and associations, the Company actively participates in public consultations on specific draft laws and draft decisions and regulations. The Company also makes a substantive contribution to important public policy issues in the fields of recycling and waste management (primarily through its membership of SEVIAN and SEV) and the energy sector (primarily through its membership of UNICEN) that are directly related to its business activities, such as energy costs in Greece for energy-intensive industries.

HALCOR has published its views about energy costs for Greek industry, stating that they need to be reduced immediately to around the same levels applicable in other European countries. Energy costs in Greece today are around 30-40% higher than those in other European countries. There are numerous advantages to reducing energy costs such as those listed below:

- Greek industry could become the driving force of growth and development.
- Incentives for starting up old product lines and industrial units would improve.
- Competitiveness would improve and exports would increase.
- The negative climate would be reversed.
- Thousands of new jobs would be created, offering support to the social security funds, and increasing public revenues.
- An attractive climate for productive investments in Greece would be generated.

## 1.8 Key Facts about Copper

### Copper and Health

The latest scientific developments show that copper has strong antimicrobial properties. This makes copper and copper alloy products suitable and ideal for use in the healthcare, heating, water supply, ventilation and a/c sectors and in food processing. Developing new technologies and applications generates important benefits for man, especially given copper's antimicrobial properties. That is why HALCOR is actively encouraging research in this sector, and is participating in and supporting programmes being run by various research foundations.

HALCOR is a member of the Hellenic Copper Development Institute (HCDI) and collaborates with it to support scientific research into the applications of antimicrobial copper in Greece. Antimicrobial copper applications are already being used in Greece and Cyprus and up to date an innovative technique for applying antimicrobial copper to contact surfaces has been developed at the:

- Attikon General University Hospital Intensive Care Unit (ICU).

- The Peiraikos Hospital's ICU in Piraeus
- The Newborn ICU at the Agia Sofia Children's Hospital
- The Nicosia General Hospital ICU
- The Apollonio Clinic ICU in Nicosia,

and at various schools in Attica such as the Arsakeion School in Psychiko and the Tositseion School in Ekali.

New research at the University of Southampton showed that antimicrobial copper can prevent the horizontal transmission of genes that contribute to higher numbers of antibiotic-resistant infections worldwide. The new study shows that the horizontal transmission of genes can happen in the hospital environment on surfaces we regularly touch such as door handles, wheelchairs, and stainless steel tables. Using copper prevents this from happening and rapidly neutralises the bacteria involved.

**The new study presents how to limit the global spread of antibiotic-resistant infections.**

More information is available on the website [www.copperalliance.eu/gr](http://www.copperalliance.eu/gr)



### **Copper and Public Transport**

Surfaces that can be touched on public transport are the most suitable means for developing microbial bacteria. The fact that people are in a confined space and packed together makes it much easier for bacteria to be spread to the millions of users of public transport worldwide, with major impacts on public health and safety.

Research has shown that the use of Antimicrobial Copper on the surfaces people touch, such as handles and seats or other surfaces in public transport, significantly limits the spread and transmission of microbial bacteria or even viruses when public transport is used daily. The results of the research indicate that the use of Antimicrobial Copper for surfaces that the public can touch can neutralise 99.9% of harmful bacteria within two hours of exposure, thereby significantly reducing the likelihood of dangerous bacteria being transferred from those surfaces to the skin.

### **Copper and Recycling**

Recent studies report that almost 45% of all copper used in Europe comes from recycling. Recycling copper helps ensure that the constantly increasing demand for the metal (up 250% since 1960) can be met, while also reducing the environmental impacts of primary production and ensuring that copper remains available for future generations. A computer, for example, contains around 1.5 kg of copper, a normal house around 100 kg and a wind turbine 5 tons. Given that copper is completely recyclable and can be used over and over again, without losing any of its properties, one can argue that copper products are fully workable even when they reach the end of their useful life. That's why recycling copper is particularly important.

**Recycling saves energy and reduces CO<sub>2</sub> emissions**

Recycling copper is a highly effective way to bring a precious material back into the economy. Recycling needs up to 85% less energy than primary production. Worldwide, it saves 100 million MWh of electricity and 40 million tons of CO<sub>2</sub> a year.

**The Copper Flow Model**

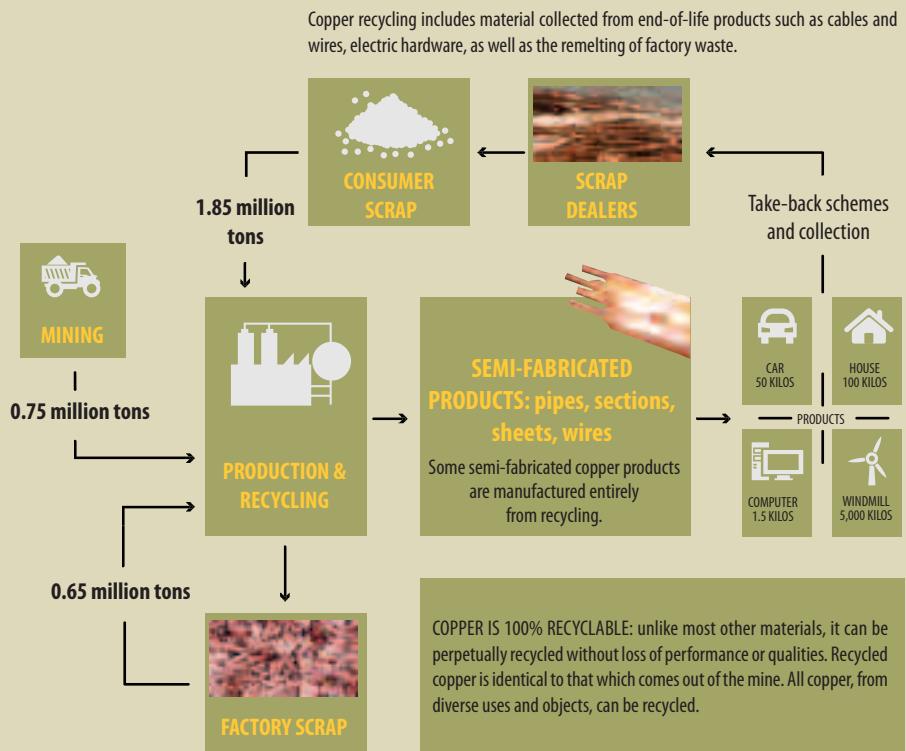
The Fraunhofer Institute has prepared a comprehensive study on copper reserves, flows and the amounts of the material being recycled. This complex, three-year study reached the best possible conclusions about how copper is being used and re-used in society. According to the International Copper Study Group (ICSG) and the report published recently, 44.8% of the copper used in Europe comes from recycling. That is not just a record figure, but a sign that the need for copper is increasingly being met by recycling the metal.

More information is available on the website [www.copperalliance.eu/gr](http://www.copperalliance.eu/gr).



**COPPER**  
THE RECYCLING CHAMPION

Approx. **3.5** million tons of copper were used in EU27, more than half of which were sourced through recycling.



### 1.9 Key facts about the Corporate Responsibility of Subsidiaries

Brief facts about the Corporate Responsibility activities of HALCOR's two main subsidiaries are set out below.

#### FITCO S.A.

FITCO, (a 100% subsidiary of HALCOR) specialises in producing copper alloys and has had a commercial presence around the world for more than 60 years. Its production plant is located in Oinofyta, Viotia, and using scrap brass in the form of bars as its raw material it uses hot or cold extrusion to manufacture a series of products such as:

- Solid and perforated brass bars (round, squared or hexagonal)
- Solid and perforated brass profiles
- Brass wire
- Brass sheets
- Brass tubes with a variety of cross-sections
- Brass fencing for fish farm cages



Plant surface area: 58,000 m<sup>2</sup>

Production capacity:  
40,000 tons a year

FITCO's products conform to the main European and US quality standards (EN, DIN, BS, NF, SITAC and ASTM).



FITCO exports 72% of its production and is constantly investing in research and know-how to generate innovative products. It is also committed to promoting technological development, protecting the environment and providing a healthy and safe working environment. To achieve this, the Company has put in place the following certified systems:

- Quality Management System (ISO 9001:2008)
- Environmental Management System (ISO 14001:2004)
- Occupational Health and Safety Management System (OHSAS 18001:2007).

For more information about the Company's profile and its products, visit its website, [www.fitco.gr](http://www.fitco.gr).



#### Customer satisfaction and product quality

As a result of its investments in research and technology, FITCO can offer a large range of high quality products. FITCO also ensures maximum customer satisfaction and has put in place communication channels to allow it to record and evaluate customer suggestions and ideas. The Company's strategy for Sustainable Development is clear from the major investments it has made in cutting-edge technology and equipment, the expansion in its product range and its quality assurance certificates.

Corporate KPI's	2012	2013
Investment plan (million Euro)	0.8	0.3
Revenue (million Euro)	53.4	50.6
EBT (million Euro)	(1.7)	(2.4)
Earnings after taxes (million Euro)	(1.3)	(2.5)
Volume of sales (tons)	14,034	15,237
Customers in Greece (number)	190	184
Customers abroad (number)	90	86

Note: Figures in brackets in the table above represent negative numbers.

### Brass fish farm cages

In partnership with scientific and research bodies, FITCO began manufacturing brass wire for fish farm cages. It has developed a partnership with the Japanese firm Mitsubishi Shindoh in this sector to manufacture wire for fish cages. The wire is made using copper UR30 alloy. UR30 wire, which has a copper content of over 60%, has all the properties of copper in that it is environmentally-friendly, highly durable, rust-resistant and 100% recyclable.

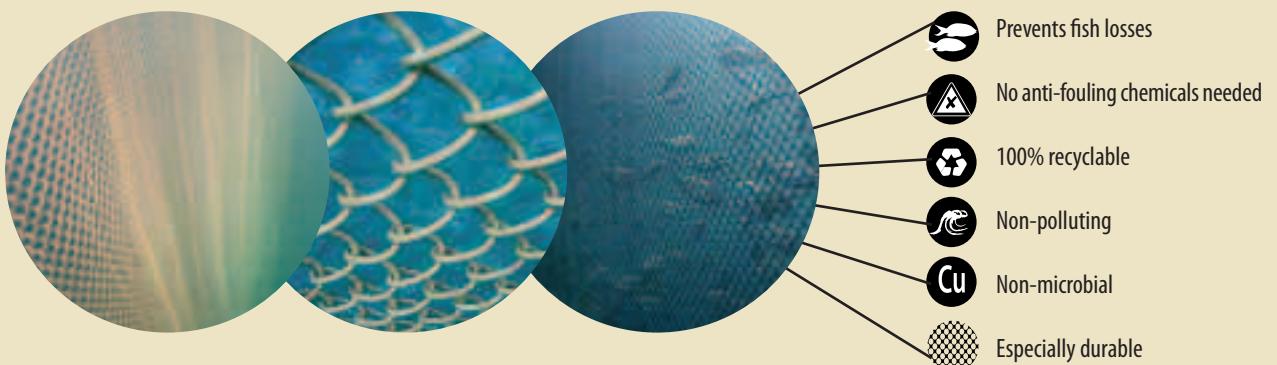


#### ENVIRONMENTAL BENEFITS OF BRASS CAGES

- Prevent fish losses
- 100% recyclable material
- No anti-fouling chemicals needed
- Preserves ecosystem balance

UR30 wire is specially designed for use at fish farms. So far it has already been used to manufacture fish cages for fish farms in the USA, South America, Australia, Asia and Japan.

Moreover, in partnership with PROTEAS, the Hellenic Centre for Marine Research, and the Hellenic Copper Development Institute, FITCO installed the first brass cage at Palero in the prefecture of Etolo-Akarnania to fully record data about the fish and the environment.



### Care for our People

FITCO recognises the major contribution of its people towards a successful performance. That is why it systematically invests in its people, placing emphasis on continuing education and growth. The Company ensures that employees are rightly rewarded for their contribution, and provides equal opportunities for advancement, while respecting diversity and internationally enshrined human rights.

Human Resources Data (31/12)	2012	2013
Men	66	68
Women	9	10
Total Workforce	75	78
Employees drawn from the local community	10	14
Departures	6	4
Recruitments	5	8
Hours of training	62	68
People trained	9	4

### Occupational Health and Safety Management

The Company's commitment in the occupational health and safety arena focuses on building a working environment free of risks, injuries, accidents and occupational diseases. FITCO's priority is to design measures to forecast and prevent accidents and its overriding, long-standing goal is to achieve the highest possible level of health and safety for its employees, associates and visitors. FITCO's performance in this sector can be demonstrated in practical terms by its certified Occupational Health and Safety Management System (OHSAS 18001:2007). In 2013 the Company continued to implement its programme to ensure continuous improvements in the health and safety sector. The actions taken included:

- Installing protective barriers around machinery to prevent access
- Carrying out blood tests on employees
- Measuring noise in production facilities and outdoors at Company facilities
- Measuring harmful agents at production plants
- Carrying out safety inspections at production plants
- Certifying bridge cranes and winches
- Installing a CO<sub>2</sub> fire-extinguishing system at substations and transformers
- Manufacturing and certifying a work platform for work at heights
- Manufacturing ladders, etc. for safer access.



Occupational Health and Safety Performance	2012	2013
Spent on Health and Safety issues (Euro)	93,000	40,000
Hours of training of Health and Safety issues	83	44
Accidents	2	2
Man-days lost due to accident	75	20
Accident Frequency Index	11.3	11.2
Accident Severity Index	424	112

### Environmental Protection

Environmental protection at FITCO is a management commitment and is achieved by comprehensively managing the environmental impact of its operations and by implementing an Environmental Management System certified in line with ISO 14001:2004 at all the Company's production plants. As practical proof of this commitment to constantly reduce its environmental footprint, FITCO monitors its environmental ratings and implements environmental management programmes and responsible environmental practices such as:

- Using an oil-solvent solution to reduce emissions
- Neutralising acid solutions at the physicochemical production plant
- Using equipment to contain potential leaks (oil and chemical leak collectors).
- Collaborating with licensed waste management firms
- Optimising production processes using Best Available Techniques (BAT) adopted by the European Union
- Constantly training staff about environmental management issues and distributing the training booklet "Guidelines for Proper Environmental Behaviour" to all employees.

Environment Performance	2012	2013
Environmental Protection Investments and Expenditure (Euro)	275,800	295,163
Electricity consumption (kWh)	3,569,799	4,136,000
Thermal energy consumption (kWh)	5,874,672	5,639,140
Water consumption (m <sup>3</sup> )	28,894	38,782
Specific CO <sub>2</sub> Emissions (kg CO <sub>2</sub> / tn products)	86.9	79.1

### Supporting the local community

The Company recognises the importance of giving something back to society, especially the local communities in which it operates. Making a contribution to and taking a responsible approach towards society as a whole has been identified as one of the key issues in FITCO's Corporate Responsibility and Sustainable Development. Despite the difficult economic situation at national and global level, in 2013 FITCO made concerted efforts to meet the needs of society and to give something back to society as a whole. The Company's most important societal action in the past year was to support architectural events held at the Benaki Museum in 2013. FITCO's employees also demonstrated their social awareness in practical terms, not only by making a contribution but also by participating in volunteer programmes organised by HALCOR to support vulnerable social groups (by collecting items for poor families in the local area) and to protect the environment (reforestation and beach cleaning activities).

### SOFIA MED S.A.

SOFIA MED produces a wide range of rolled and extruded copper, copper alloys and zinc products such as sheets, strips, plates, disks, rods, bus bars, profiles, components and wires, used in a diverse range of building and industrial applications. SOFIA MED is part of the HALCOR Group. The company facilities are located in Sofia - Bulgaria on an area covering 250,000 m<sup>2</sup>. It has three production units for casting, rolling and extrusion.

As a company that seeks to ensure high levels of customer and employee satisfaction, and a company that respects the environment, SOFIA MED implements comprehensive quality, environment and occupational Health and Safety Management Systems that meet the requirements of the ISO 9001, ISO 14001 and OHSAS 18001 standards. Its extensive range of products meet the requirements of the European Norms (EN) and the BS, DIN, ASTM, AFNOR, JIS standards, but can also be tailored to meet specific customer requirements.



For more information about the company profile and its products, please visit [www.sofiamed.bg](http://www.sofiamed.bg).



Between 2001-2013 the company implemented a major investment plan worth Euro 155 million. This included major works such as:

- New smelting and casting facilities at the foundry to produce top quality copper, brass, special alloy and zinc products
- A new rolling plant to produce wider and thinner strips and sheets
- Better equipment at the extrusion plant
- Improvements to and automation of the entire production process and quality procedures
- Energy performance projects
- Fire refining line for scrap
- Tin-plating line for bus bars.

Key Financials	2012	2013
Investments (million Euro)	6.3	6.8
Gross profit/(loss) (million Euro)	5.3	(2)
Sales revenue (million Euro)	341.3	346
EBITDA (million Euro)	9.2	2
EBIT (million Euro)	0.2	(7)
Working Capital (million Euro)	34.5	53
Debt / Equity	1.32	1.05
Customers (number)	388	423

Note: The use of brackets in this table indicates that the numbers are negative.

The Company's business development is based on transparency in all its activities, emphasizing employee Health and Safety and the continuous improvement of its environmental footprint. Sofia Med implements a series of actions and programs in all the company's Corporate Responsibility sectors, such as:

- protection of the environment and continuous improvement of its environmental impact.
- continuous improvement of the working conditions and creation of a safe and efficient working environment (Management of Occupational Health and Safety).
- maintaining customers' satisfaction at high levels and managing product and services quality.
- advancing and developing employees and providing equal opportunities at the workplace.
- investment in technology that will allow not only an increasing use of recycled materials, but further reduction of direct emissions as well.

### **Enhanced Customer Service**

Customer satisfaction is a top priority for SOFIA MED which has a comprehensive Quality Management System. Systematically implementing it, the company can guarantee the very high quality standards are met and the specific customer requirements are achieved. Implementation of the company ISO 9001:2008-compliant Quality Management System is based on its Quality Policy. The company business is the manufacturing of copper, copper alloys and zinc products. The Quality Policy states the following objectives:

- Continuous improvement in the level of customer satisfaction
- High quality products to meet customer requirements and remain highly effective
- Maintaining the company reputation for quality, customer service and reliability, as further improving it
- Constantly adapting to new market needs
- Collaborating with customers to develop tailor-made products and solutions that match their needs.

In its efforts to improve its customer experience and speed up the development of new applications, SOFIA MED created the Product and Process Department. The department will focus on the improvement on existing processes and products, as well as on creating new ones. It will also help customers get individual technical support, while focusing on their specific needs.

### ***Development of High Performance alloys***

SOFIA MED aims at the development of production capabilities in the area of two high performance alloy groups:

- Copper Nickel Silicon alloys – CuNiSi alloys, which are utilized almost exclusively in the automotive industrial sector for the construction of electrical connectors
- Copper Iron alloys – CuFe alloys, which are used both in the automotive industry for electrical connectors, as well in the sector of electronics for the manufacture of lead frames.

### ***Downstream operation of the components***

In 2013 SOFIA MED added to its portfolio the production of copper components. Due to the specific requirements of every customer, SOFIA MED provides individual technical support and know-how, as well as tailor-made solutions for the copper components. The company made significant investments in state-of-the-art machinery and production lines for drawing, punching, bending, CNC-machining and plaiting. The precise final quality inspecting guarantees their high quality.

### ***Preweathered Titan Zinc***

Another product focus has been added to the company portfolio with the introduction of the preweathered Titan Zinc.

This material varies in its colour tints, ensuring building solutions that can perfectly match to the customers' local preferences, to every extravagant architectural idea, as well as to any exquisite building construction design.



### Employees

The Company invests in its people and offers training and career opportunities to all employees equally. SOFIA MED also ensures that it offers a rewarding working environment, respecting human rights, diversity and equal opportunities for all employees. Every year the company involves the employees and their families in a series of social events and educational campaigns. Some of these are:

- May – The Month of Health, Safety and Environment
- Open Doors Day - annual event for the employees and their families including a tour around the production facilities
- Annual summer children's camp
- Annual children's Christmas party
- Annual medical check for all employees.

Employees Data (31/12)	2012	2013
Men	443	476
Women	105	109
Total Workforce	548	585
Exits	64	68
Hires	91	122
Training hours per employee	11	8

SOFIA MED also offers its employees additional healthcare insurance as part of its social policy, as well as a medical center, located on the territory of the company.

### Occupational Health and Safety

The continuous improvement in occupational Health and Safety conditions is a major focus for the company management. The company commitment in this regard is clearly stated in its Health and Safety Policy. To achieve this, the company implements a BS OHSAS 18001:2007-certified Health and Safety Management System. For SOFIA MED occupational Health and Safety is a priority of outstanding importance, and a guiding factor in its operations and in the decisions it takes when investing in new technologies and in growth and development in general.



Occupational Health and Safety Performance	2012	2013
Investments for health and safety (million Euro)	0.5	0.5
Training hours for health and safety	371*	4,536**
Training hours per employee	4.2	7.6
Accidents	10	6
Lost time accidents frequency rate	8.3	4.6
Incident severity rate	264	195
Lost days	318	256

\* It refers to total training hours

\*\* It refers to man-hours training

### Environment

The environmental protection is a high priority of the company management which means that it has a primary importance among the industrial and other public needs and cannot be a subject of compromises. SOFIA MED has an Environmental Management System, certified according to the international standard ISO 14001:2004. In the recent years, a number of investments in various technologies have allowed the company to increase further the use of recycled materials.

Environmental Performance	2012	2013
Investments (million Euro)	0.5	0.4
Energy consumption (MWh)	53,285	56,008
Water consumption (m <sup>3</sup> )	655,563	652,151
CO <sub>2</sub> Emissions (Kg CO <sub>2</sub> per 1tn product)	225	223

Management's strategic objective is to reduce SOFIA MED's environmental footprint, increase the environmentally-friendly initiatives and actions implemented by the company, and to expand environmental awareness among employees.

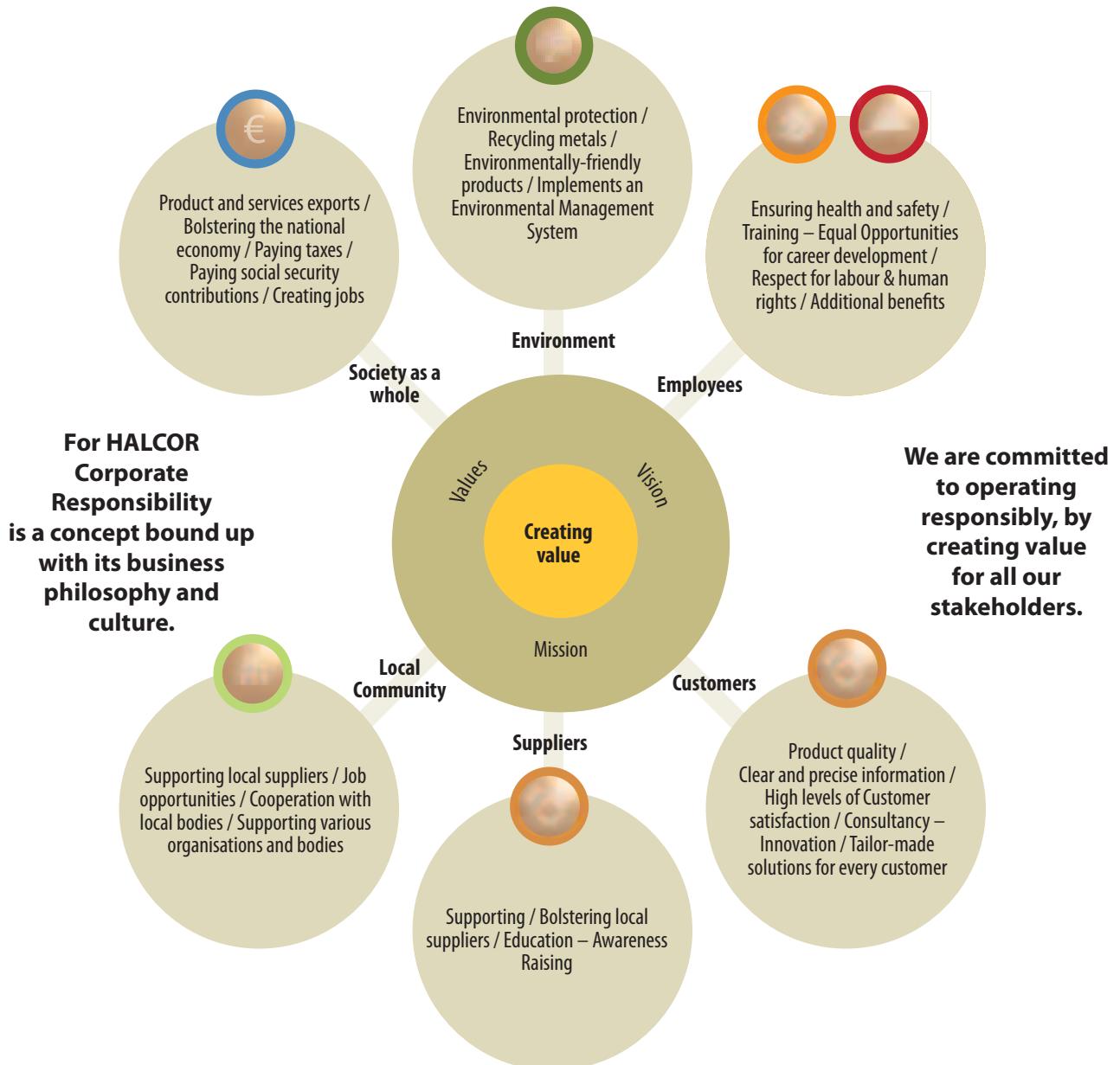
### Society

As a responsible company SOFIA MED seeks to be there for the local communities in which it operates and to communicate with all stakeholders. The company supports local communities, building a spirit of cooperation with local bodies and attempts to meet different needs that arise by providing sponsorship and support for social programs. It also collaborates with various public sector bodies, technical schools and universities and provides vocational training to university students and graduates.



## 2. Creating Value

As a responsible business, HALCOR creates value for its people, customers, suppliers, the local community, and society as a whole, and also ensures that it minimises its environmental footprint. HALCOR is firmly dedicated to the principles of Sustainable Development (economic prosperity, environmental protection and social cohesion) and is a responsible, active business partner whose operations have a net positive effect on society as a whole.



HALCOR has put in place a specific Corporate Responsibility & Sustainable Development Policy under which Company Management has committed itself to:

- strict compliance to the legislation in force and full implementation of standards, policies, internal guidelines and procedures applied by the Company as well as other commitments, arising from voluntary agreements, countersigned and accepted by HALCOR
- two-way and on-going communication with all stakeholders in order to identify and record their needs and expectations. Development of mutual trust relations with the stakeholders makes a significant contribution to meeting the Sustainable Development objectives.
- providing safe and healthy working environment for our people, collaborators and any third party involved.

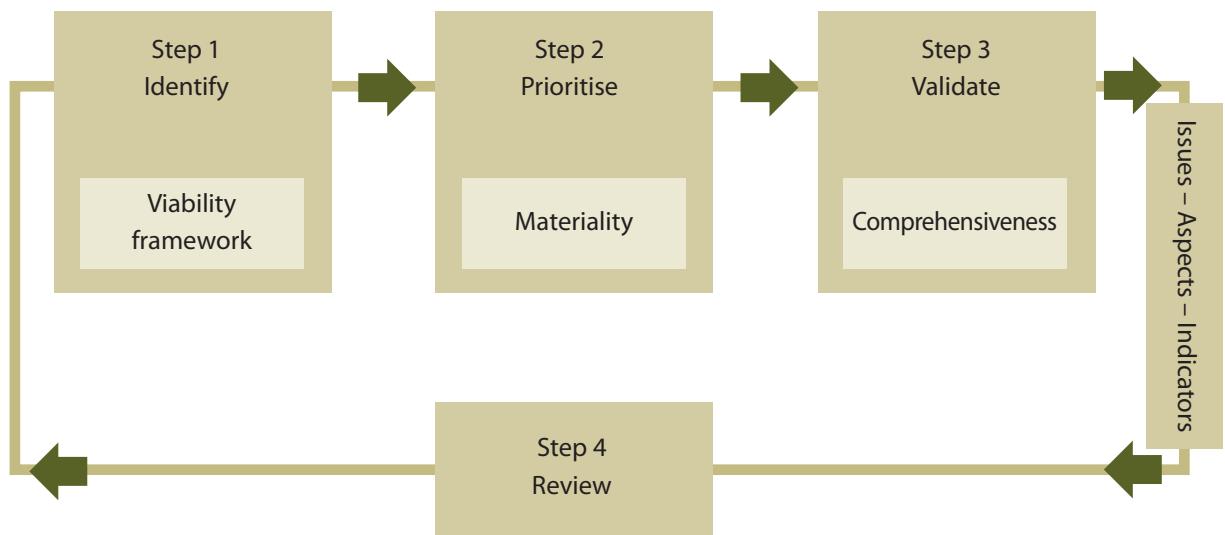
- protection of human rights and provision of a work environment of equal opportunities, free from any discrimination.
- open communication, based on transparency, with all the Company's stakeholders.
- continuing efforts to reduce the environmental footprint, though implementing responsible actions and preventive measures in accordance with Best Available Techniques, in order to reduce and minimize the impact of the Company's operations on the environment.
- continual pursuit of creating added value for the stakeholders.

The full text of the Company's Corporate Social Responsibility Policy can be found on the website [www.halcor.gr/en](http://www.halcor.gr/en)



## 2.1 Materiality Analysis

To identify and prioritise the most important Corporate Responsibility issues related to its operations, HALCOR uses a specific materiality analysis procedure to identify key Corporate Social Responsibility and Sustainable Development issues.



In the procedure implemented, the key criterion for prioritising important issues was the fact that the opinion of Company stakeholders was obtained and taken into consideration, coupled with the degree of risk associated with each issue. To precisely capture the views of stakeholders about key issues and their priority, in early 2014 HALCOR held a 'materiality workshop' for stakeholders as part of the BRAVO event. The methodology and procedure used in that workshop are summarised below. The process of prioritising key issues is repeated each year to capture any changes and to incorporate any new trends (details about the procedure the Company follows are contained in the 2012 Corporate Responsibility and Sustainable Development Report, p. 40-41).



## 2. Creating Value

The diagram below shows how the most important issues for HALCOR were prioritised in the process which was used.



The following issues emerged from the materiality analysis carried out by HALCOR as the most important issues for each aspect of its CSR policy:

No.	CSR ASPECT	MATERIAL/IMPORTANT ISSUES
1	<b>Corporate Governance</b> 	4 HALCOR's organisational chart
		14 Fair and ethical corporate governance and transparency practices
		16 Preventing corruption
		17 Legal and regulatory compliance
		19 Personal data protection
		29 CSR in the Company's organisational chart
2	<b>Human Resources</b> 	1 Employee and third party health and safety
		2 Accident prevention
		15 Readiness and emergency response
		20 Respect for / protection of human rights and prevention of child labour
		23 Job retention
		24 Employee training
3	<b>Environment</b> 	3 Proper waste management
		7 Proper water management
		8 Proper energy management
		9 Proper management of raw materials – supplier of recycled materials and scrap
4	<b>Marketplace</b> 	11 Addressing climate change and management of atmospheric pollutants
		13 Product environmental footprint
		26 Promoting recycling
		5 Maintaining high levels of customer satisfaction
5	<b>Society</b> 	6 Product and service quality
		10 Responsible Procurement
		18 New product development
		12 New markets and investments
		22 Expanding exports
		30 Training third parties of CSR issues (customers / associates)
5	<b>Society</b> 	21 Dialogue with local communities
		25 Recruiting employees from the local community
		27 Actions to support the local community and evaluate the impact of actions
		28 Cooperation with NGOs and support for them

HALCOR utilises the results of prioritising key Corporate Responsibility and Sustainable Development issues to plan its actions and set targets to achieve continuous improvements.





## 2.2 International Standards and Initiatives

### International Standard ISO 26000 for Social Responsibility

The ISO 26000:2010 standard is considered to be the most comprehensive standard / set of guidelines on Corporate Responsibility issues (but no certificate can be obtained for it). It is an important, key tool because it clearly guides businesses on how to evaluate and constantly improve all actions and impacts (at an economic, social and environmental level) and how to brief all stakeholders.



#### Environment

The Company is committed to fully complying with the applicable legislation and its commitment to environmental protection is demonstrated in practical terms by its certified Environmental Management System. HALCOR is making continuous efforts to reduce the Company's environmental footprint which is achieved through investment projects and schemes the Company implements every year. The Company's long-standing goal is to use raw direct and ancillary materials which are as efficient as possible. In this regard, it's worth noting that HALCOR is the largest recycler of copper and its alloys in Greece.



#### Corporate Governance

Transparency in all our business activities, constitutes a non-negotiable principle for HALCOR's management team. The Company operates:

- transparently in all of its business activities, to ensure proper, two-way partnerships with its shareholders, customers, staff and all stakeholders.
- by ensuring compliance with the legislative and regulatory framework and the relevant standards.
- by implementing practices that go beyond the requirements laid down by the law, while acting with integrity and ethos at all times.



#### Consumer Issues

HALCOR implements a certified Quality Management System and its products meet top specifications and have suitable certification. The Company regularly communicates with customers to identify and record any complaints they may have and take appropriate corrective and preventative steps. In addition, HALCOR complies in full with all requirements as regards the information it must provide on its products and services. As in previous years, during 2013 there were no incidences of non-compliance with legislation and regulations related to the advertising and marketing of products, the information given to customers by the Company and the labelling that must accompany its products. The Company also safeguards the health and safety of consumers and there were no incidences of customer privacy being infringed.



#### Human Rights

HALCOR is firmly committed to respecting human rights and ensuring compliance with fundamental freedoms and human rights, as outlined in the principles enshrined in the HALCOR Code of Conduct.

For HALCOR, Corporate Responsibility is a way of being, and a means for achieving Sustainable Development. The Company has incorporated the principles of Corporate Responsibility espoused in the ISO 26000 standards in its business philosophy and seeks to operate within a specific ethical framework, in cooperation with the wider community which it operates in. At the same time, HALCOR also aims for its business operations to generate value for all stakeholders it cooperates and interacts with.



### Employment Practices

HALCOR recognises and fully respects the labour rights of its staff. It provides an equal opportunities, rewarding working environment free of discrimination. At the same time, protecting employee health and safety is a top priority for HALCOR and for that reason it implements an OHSAS 18001:2007-certified Occupational Health and Safety Management System.



### Fair Operating Practices

The principles of prudent management and corporate responsibility have been integrated into all of HALCOR's activities. For HALCOR, responsibility in its operations is a strategic choice. Although the risk for incidences of corruption is low, the Company has taken all the necessary measures to control and identify potential occurrences. To date there have been no incidences of corruption within the Company. HALCOR fully respects the right of ownership (proprietary or intellectual rights) and strives to promote social responsibility.



### Cooperation with Local Communities

Recognising the importance of making a societal contribution, especially in the local community in which the Company operates, HALCOR supports:

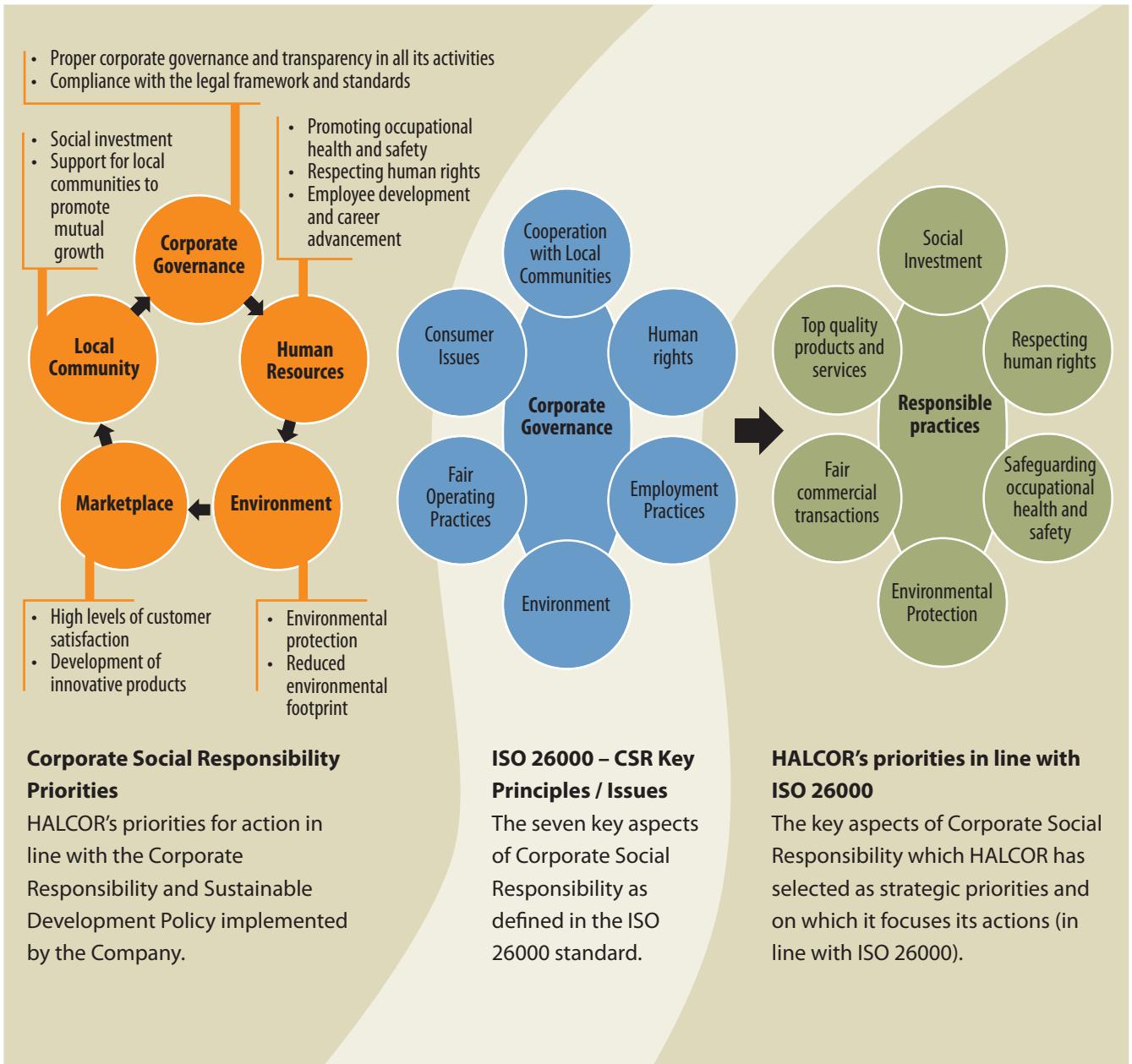
- local entrepreneurialism by selecting suppliers from the local community wherever that is feasible.
- employment, by having a large part of its staff from the local community.

In addition, each year HALCOR supports a series of bodies, organisations and associations confirming its social awareness.

*HALCOR's performance in relation to each principle and section of the ISO 26000 standard is presented in the GRI table at the end of this Report by matching the GRI indicators to the sections of the ISO 26000 standard.*



**Application of ISO 26000 to HALCOR**



**2.3 The Global Compact**

The Company supports the UN Global Compact, the largest international voluntary Corporate Social Responsibility initiative in the world and follows the 10 global principles in the fields of human rights, employment practices, the environment and combating corruption. HALCOR has incorporated these 10 principles into its policies, procedures and systems.

**Supporting the Global Compact principles**

- Implement an ISO 14001:2004–certified Environmental Management System
- Take actions and measures to reduce our environmental footprint.
- Invest in new infrastructure and environmental protection and prevention technologies.
- Ensure we do the least possible harm to the natural environment.
- Adhere to the principle of prevention in managing environmental issues.
- Promote recycling.

**No environmental fines were imposed**

**Environment**  
(Principles 7,8,9)

- Act with integrity, respect and transparency in all our business activities.
- The Company is opposed to all forms of corruption and is committed to operating ethically and responsibly.
- Provide training to our executives about transparency and corruption in order to prevent and avoid such phenomena.
- Implement in-house procedures to ensure that cases of corruption are combated.
- Adopt mechanisms to promote transparent, responsible business conduct.

**No cases of corruption were recorded**

**Anti-corruption**  
(Principles 10)

- Implement an equal opportunities, no discrimination policy.
- All the Company's employees are over the age of 18.
- The Company is utterly opposed to child, forced or mandatory labour.
- Carry out checks on subcontractors to prevent child labour.
- In 2013, as in previous years, there were no incidences of discrimination in recruitment and employment within the Company.

**No cases of discrimination were recorded**

**Employment conditions**  
(Principles 3,4,5,6)

**Human rights**  
(Principles 1,2)

- Fully respecting internationally agreed human rights, we ensure that they are fully safeguarded in the context of our business activities.
- Adhere to policies that promote human rights.
- Gradually provide training about human rights to all company staff.
- All of HALCOR's security staff has attended a special training seminar about human rights.

**No incidences of human rights violations were recorded**



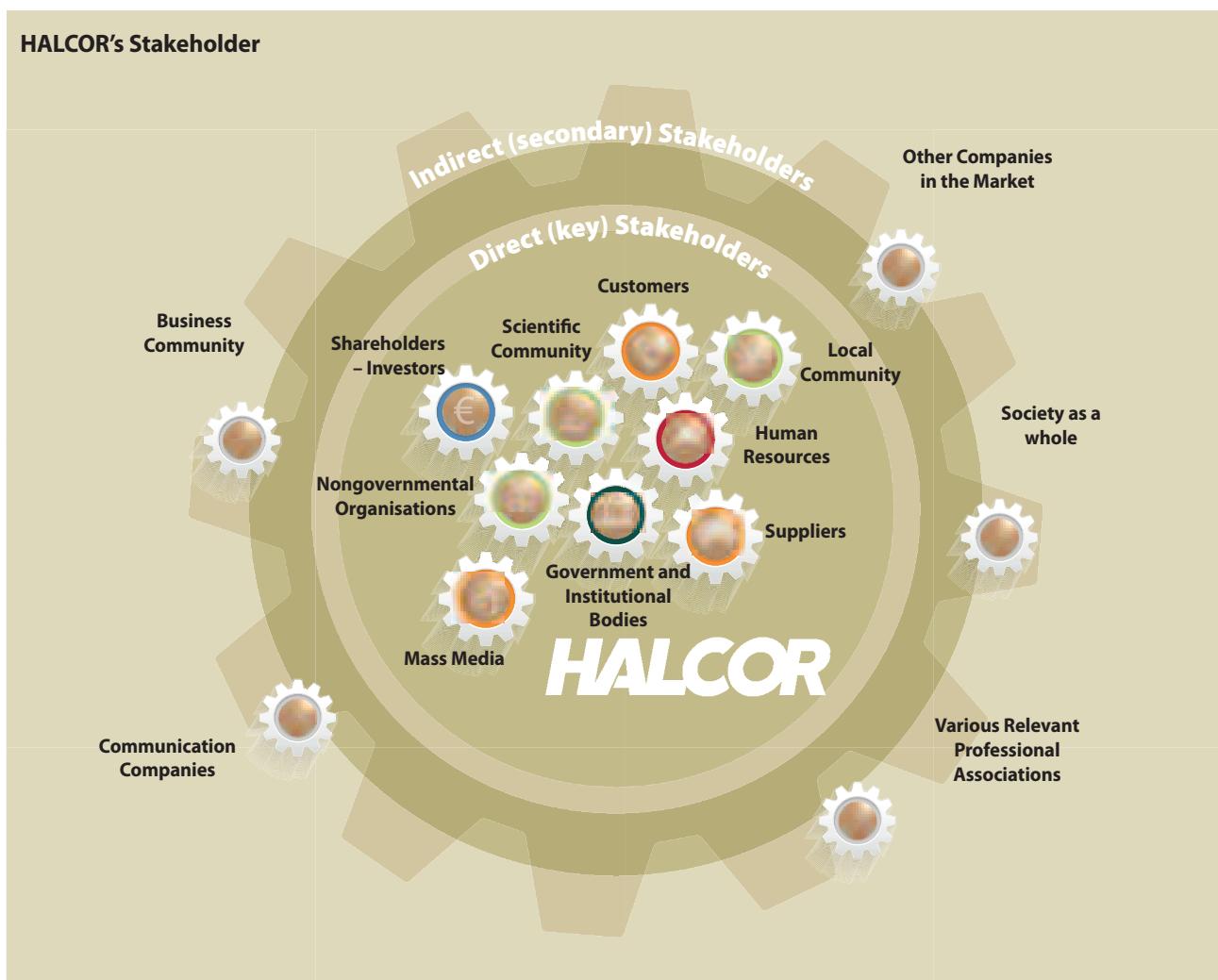
HALCOR S.A.'s Corporate Responsibility Team

Category	The Global Compact's 10 Principles	GRI indicators	CSR Report Section
	<p><b>Human Rights</b></p> <p><b>Principle 1:</b> Businesses should support and respect the protection of internationally proclaimed human rights.</p> <p><b>Principle 2:</b> Businesses should make sure that they are not complicit in human rights abuses.</p>	<p>EC5, LA4, LA6-9, LA13, LA14, HR1-11, S05, PR1, PR2, PR8</p> <p>HR1-11, S05</p>	Care for our People
	<p><b>Labour Conditions</b></p> <p><b>Principle 3:</b> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p> <p><b>Principle 4:</b> Businesses should uphold the elimination of all forms of forced and compulsory labour.</p> <p><b>Principle 5:</b> Businesses should uphold the effective abolition of child labour.</p> <p><b>Principle 6:</b> Businesses should uphold the elimination of discrimination in respect of employment and recruitment.</p>	<p>LA4, LA5, HR1-3, HR5, S05</p> <p>HR1-3, HR7, S05</p> <p>HR1-3, HR6, S05</p> <p>EC7, LA2, LA13, LA14-15, HR1-4, S05</p>	Care for our People
	<p><b>Environment</b></p> <p><b>Principle 7:</b> Businesses should support a precautionary approach to environmental challenges.</p> <p><b>Principle 8:</b> Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p><b>Principle 9:</b> Businesses should encourage the development and diffusion of environmentally friendly technologies.</p>	<p>EC2, EN18, EN26, EN30, S05</p> <p>EN1-30, S05, PR3, PR4</p> <p>EN2, EN5-7, EN10, EN18, EN26, EN27, EN30, S05</p>	Environment
	<p><b>Anti-corruption</b></p> <p><b>Principle 10:</b> Businesses should work against corruption in all its forms, including extortion and bribery.</p>	S02-6	Presentation of HALCOR S.A.

### 3. Stakeholder Engagement

For HALCOR it is particularly important to communicate and collaborate with stakeholders. Dialogue with stakeholders and exchanging views with them is a key issue and a condition for strategically managing the Company's Sustainable Development issues.

HALCOR recognises the importance of engaging in dialogue with its various stakeholder groups (comprised of natural persons and legal entities that affect or are affected directly or indirectly by how the Company operates). To identify the Company's stakeholder groups, a specific internal procedure was followed (consultation between members of the Corporate Social Responsibility team and prioritisation of stakeholders). Using the stakeholder identification procedure, the Company's main stakeholder groups who were identified are as follows:



### 3.1 Relationship-Interaction Framework with Direct - Key Stakeholders



#### SHAREHOLDERS - INVESTORS

- They invest capital in HALCOR
- They receive dividends from its profits
- They participate in the decision-making process



#### CUSTOMERS

- They select HALCOR for its products and services
- Cooperation for the development of new customized solutions.



#### HUMAN RESOURCES

- They provide their labour and expertise
- They are rewarded with salaries, benefits and opportunities for professional and personal development



#### SUPPLIERS

- They provide their services / products to HALCOR and receive remuneration
- They are assured of impartial/merit-based evaluation and selection
- The company supports local suppliers thereby bolstering local communities



#### LOCAL COMMUNITY

- HALCOR supports local communities by selecting its human resources and suppliers locally
- The Company participates in the Federation of Sterea Ellada Industries (SBSE)
- The Company participates in measures organised by local government agencies
- HALCOR supports the local community via sponsorship and a range of activities



#### NGO's (Not-for-Profit Organisations)

- They represent civic society
- They actively participate in shaping public opinion
- They connect society, government and business
- HALCOR works with NGOs to raise public awareness and take action



#### GOVERNMENT AND INSTITUTIONAL BODIES

- They define the institutional and regulatory framework of the Company's business operation through legislation and regulations
- They regulate matters relating to business and taxation Scientific Community



#### SCIENTIFIC COMMUNITY

- HALCOR supports the research being done at universities
- HALCOR participates in research programmes



#### MASS MEDIA

- They key the public and society in general briefed
- Corporate and product advertising

### 3. Stakeholder Engagement

Communicating with stakeholders means that the Company can identify the key issues of concern to each group. HALCOR records those issues and plans how it will act in order to ensure an optimal response and to achieve continuing improvements in those specific sectors. The table below presents the key issues of concern to stakeholders based on Company contacts with them and HALCOR's response / actions.

Stakeholders	HALCOR's commitment	Channels of Communication	Stakeholder expectations	HALCOR's response
Human Resources 	<b>A safe working environment</b> <b>Employee development and career advancement</b>	<ul style="list-style-type: none"> <li>Ongoing communication between Management and staff</li> <li>Communication and briefings using the Company's intranet</li> <li>Briefings via email and info sheets on notice boards</li> <li>Information on the Company's website</li> </ul>	<ul style="list-style-type: none"> <li>Employment and insurance issues</li> <li>Staff appraisal issues</li> <li>Staff development and career advancement</li> <li>Briefings about Company goals and the rate of achieving them</li> <li>Communication with Management</li> </ul>	<ul style="list-style-type: none"> <li>Staff evaluation systems were put in place</li> <li>Training courses were held</li> <li>Additional benefits provided to all employees</li> <li>The general manager provides monthly briefings to all staff</li> <li>An "Open Door" policy was put in place to ensure constant dialogue between employees and Company Management</li> </ul>
Shareholders – Investors 	<b>Proper corporate governance and transparency in all its activities</b> <b>Compliance with the legal framework and standards</b>	<ul style="list-style-type: none"> <li>Annual General Meeting of Shareholders</li> <li>Investor Relations Department</li> <li>Briefings from the Board of Directors to shareholders about all company developments</li> <li>Regular press releases, announcements and reports are published</li> <li>Q1, Q2, Q3 and annual results are presented to the Board of Directors</li> <li>Constant communication between Company executives and financial analysts and investors</li> <li>Investor relations officer</li> <li>Shareholder Relations Officer</li> <li>Presentation at Association of Institutional Investors</li> <li>Annual Financial Report</li> <li>Annual Corporate Responsibility &amp; Sustainable Development Report</li> </ul>	<ul style="list-style-type: none"> <li>Supporting Company competitiveness</li> <li>Company profitability</li> <li>Keeping operating costs down</li> <li>Transparent relations with stakeholders</li> <li>Proper corporate governance</li> <li>Regulatory compliance</li> <li>Avoidance of incidents that slur the Company's name</li> <li>Reduction / elimination of risks/hazards</li> </ul>	<ul style="list-style-type: none"> <li>Penetration into new markets</li> <li>Improved profitability for the Company and better financial results</li> <li>Briefings are provided regularly</li> <li>Annual reporting (Annual Report and Corporate Responsibility and Sustainable Development Report)</li> <li>Opportunities and risks are evaluated and managed</li> </ul>
Suppliers 	<b>Supporting local suppliers and responsible practices when it comes to selecting and evaluating suppliers</b>	<ul style="list-style-type: none"> <li>HALCOR's Procurement Department</li> <li>Constant contact face-to-face and by phone</li> <li>Attendance at trade fairs and events</li> </ul>	<ul style="list-style-type: none"> <li>Merit-based / objective evaluation</li> <li>Supporting local suppliers</li> <li>Suppliers are briefed about market developments</li> </ul>	<ul style="list-style-type: none"> <li>The Company implements a supplier selection and evaluation procedure for critical materials.</li> <li>When selecting suppliers, priority is given to the local community wherever that is feasible.</li> </ul>

The key issues for dialogue with each group of stakeholders are what HALCOR focuses its actions and energies on, to improve its performance. Publication of the annual Corporate Responsibility & Sustainable Development Report is a commitment the Company has made, and a move which promotes transparency and provides information to all stakeholders about its actions and the measures it takes, and about how it responds to important issues and to stakeholder expectations.

Stakeholders	HALCOR's commitment	Channels of Communication	Stakeholder expectations	HALCOR's response
 <p>Customers</p>	<p><b>High levels of customer satisfaction</b>  <b>Development of innovative products</b></p>	<ul style="list-style-type: none"> <li>• Sales Department</li> <li>• Constant contact face-to-face, over the phone or by email</li> <li>• Company website</li> <li>• Customer Satisfaction Survey</li> <li>• Attendance at trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>• Top spec, high quality products</li> <li>• High levels of service</li> <li>• After sales support</li> <li>• Customers are briefed about market developments and about Company products</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Satisfaction Survey conducted</li> <li>• Survey results are evaluated and corrective measures taken</li> <li>• Special after sales support department exists</li> </ul>
 <p>Local Community</p>	<p><b>Support for local communities to promote mutual growth</b></p>	<ul style="list-style-type: none"> <li>• Constant contact with local bodies and associations</li> <li>• Participation in local community organisation events and activities</li> </ul>	<ul style="list-style-type: none"> <li>• Company response to local community issues</li> <li>• Staff recruited from the local community</li> <li>• Support for local entrepreneurialism by supporting local suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Priority is given to recruiting employees from local areas.</li> <li>• 40% of the Company's staff is drawn from the local community</li> <li>• Selection of local suppliers</li> <li>• Support for local bodies / sponsorship</li> <li>• Employee volunteer initiatives</li> </ul>
 <p>NGOs and not-for-profit organisations</p>	<p><b>Transparency in all Company activities</b></p>	<ul style="list-style-type: none"> <li>• Membership of NGOs</li> <li>• Events / conferences</li> </ul>	<ul style="list-style-type: none"> <li>• Support for NGO activities</li> <li>• Partnership with NGOs</li> </ul>	<ul style="list-style-type: none"> <li>• Support for the NGOs PNOE and Transparency International Greece</li> <li>• HALCOR's membership of HELMEPA</li> <li>• HALCOR's membership of the Hellenic Network for Corporate Social Responsibility (main member).</li> </ul>
 <p>Government &amp; Institutional Bodies</p>	<p><b>Proper corporate governance and transparency in all its activities</b>  <b>Compliance with the legal framework and standards</b></p>	<ul style="list-style-type: none"> <li>• Attendance at conferences and sectoral events or other ones of general business interest</li> <li>• Consultation with representatives of the government and statutory authorities at national and/or regional level</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with the applicable legislative framework and regulations</li> <li>• Compliance with the applicable legislative framework and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Legislative compliance in all sectors of activity</li> </ul>
 <p>Scientific Community</p>	<p><b>Investments in R&amp;D</b></p>	<ul style="list-style-type: none"> <li>• Involvement in institutes and research centres of sectoral interest</li> <li>• Conferences / events of sectoral interest</li> <li>• Studies / Surveys</li> </ul>	<ul style="list-style-type: none"> <li>• Exchanges of views on issues of joint interest</li> <li>• Extended applications of copper</li> <li>• Effects of copper and other metals on the human body and the environment</li> </ul>	<ul style="list-style-type: none"> <li>• HALCOR is a founding member of the Hellenic Copper Development Institute (HC DI)</li> </ul>
 <p>Mass Media</p>	<p><b>Transparency in all Company activities</b></p>	<ul style="list-style-type: none"> <li>• Direct contacts and continuous cooperation</li> <li>• Briefings</li> <li>• Advertising</li> <li>• Press releases</li> </ul>	<ul style="list-style-type: none"> <li>• Support via advertisements and publications</li> <li>• Development of communication and information dissemination</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising and publications</li> <li>• Constant contact and provision of information about all major Company developments</li> </ul>

### 3.2 Targets per Corporate Responsibility Priority

In response to stakeholder expectations, each year the Company monitors and measures its Corporate Responsibility performance and sets targets for each priority. HALCOR strives to achieve constant improvements across the board and to respond to its stakeholders' expectations. The targets set for 2013 and the performance levels achieved are set out in summary form below. All but one of the targets set were achieved in 2013, and 37% of the targets set are long-term. The rate of achievement for these is also shown.

TARGETS PER CSR PRIORITY														
	PERFORMANCE 2013	Relevant information												
 <b>CORPORATE GOVERNANCE</b>														
To provide training on transparency and Corporate Governance to the Company's administrative staff (over the 2-year period 2013-2014).		During 2013 a special training event on transparency and corporate governance issues was held, attended by all 31 administrative staff (25 men and 6 women). The Company's remaining administrative staff will complete this training in 2014.												
To support the activities of the NGO, Transparency International Greece.		For another year the Company also supported the activities of the NGO Transparency International Greece.												
 <b>MARKETPLACE (Customers, Suppliers, Partners)</b>														
To maintain the ratio of scrap to all metal procured at the same high levels as in 2012.		In 2013 scrap accounted for 51% of all metal procured, but the very high figure achieved in the previous year (61%) could not be attained.												
To maintain the high degree of domestic and foreign customer satisfaction at 2012 levels.		The degree of domestic customer satisfaction was 86% (compared to 85% in 2012) while the degree of foreign customer satisfaction was 77% (compared to 74% in 2012).												
To develop new products and expand into new markets.		In 2013 the Company launched the new TALOS FORM product.												
To increase shares in existing markets.		In 2013 HALCOR increased its market shares.												
		<table border="1"> <thead> <tr> <th>HALCOR's European Market Shares</th> <th>2012</th> <th>2013</th> </tr> </thead> <tbody> <tr> <td>Copper rolling (roofing)</td> <td>13%</td> <td>22%</td> </tr> <tr> <td>Copper sheets</td> <td>15%</td> <td>18%</td> </tr> <tr> <td>Copper tubes</td> <td>14%</td> <td>14.5%</td> </tr> </tbody> </table>	HALCOR's European Market Shares	2012	2013	Copper rolling (roofing)	13%	22%	Copper sheets	15%	18%	Copper tubes	14%	14.5%
HALCOR's European Market Shares	2012	2013												
Copper rolling (roofing)	13%	22%												
Copper sheets	15%	18%												
Copper tubes	14%	14.5%												

TARGETS PER CSR PRIORITY

PERFORMANCE Relevant information 2013

To expand the range of products which are certified.



Certification was obtained from ATA (Holland), SZU (Czech Republic) and VIK (Croatia).

HUMAN RESOURCES - HEALTH AND SAFETY

To brief employees about health issues (by cooperating with an NGO to brief female employees about health issues, for example).



A special info-programme was run in cooperation with the NGO 'Angaliazo' (Embrace) about breast cancer prevention among HALCOR's female employees.

To continue the internship scheme to help students acquire work experience.



The internship scheme continued in 2013. A total of 4 students obtained work experience at the Company.

To carry out 11 occupational health and safety inspections by each supervisor at all plants.



11 occupational health and safety inspections were carried out by each supervisor at all plants.

To carry out monthly health and safety meetings at each plant.



11 monthly health and safety meetings were held at each plant.

To ensure every employee involved in the production process attends at least 1 ½ hours of training.



Employees in the production process received 1 ½ hours of training.

To ensure an additional 25% employees in the production process are involved in drills compared to the previous year.



There was a 25% increase in employees in the production process who took part in drills compared to the previous year.

To ensure that at least 70% of HALCOR employees in the production process and contractor staff takes part in occupational health and safety training.



91% of employees in HALCOR's production process and 90% of contractor employees attended occupational health and safety training.

LOCAL COMMUNITY

To provide support for the NGOs activities and the local school community.



HALCOR continuous to support the local school community and respond to its needs. More information about the actions taken in 2013 can be found in the section HUMAN RESOURCES under 'Societal Actions'.

**TARGETS PER CSR PRIORITY**

	PERFORMANCE	Relevant information
<b>ENVIRONMENT</b>		
To achieve a 45% reduction in the use of solvents in the production process by 2015.		A 26% reduction was achieved.
To replace all conventional light bulbs with energy-saving ones indoors at the Copper Tube Production Plant by 2015.		71% of bulbs had been replaced by the end of 2013.
To install the closed circuit copper tube de-greasing system by 2014.		Installation is currently under way.
To achieve a 50% increase in the hours of training (compared to 2012) by 2014.		There was 155% increase in the number of hours of training.
To carry out a HALCOR product life cycle assessment by 2017.		The study is currently being prepared.
To commence the process of recording the environmental impact from transporting employees and products by 2015.		Calculations to determine the environmental footprint for employees have been made and are currently being made for HALCOR's products.
To further reduce waste per ton of product by 5% compared to the average for the 3-year period 2010-2012 for the recycling plant - foundry and the copper tubes plant.		Recycling - Smelting Plant: A 12.3% reduction Copper pipe plant: A 9.3% reduction
To complete the new sewerage network and procure suitable equipment to manage wastewater by 2014.		The project is currently in the planning phase.



Target successfully achieved



working towards achieving the target



Target not achieved .

The Company's new targets for 2014 are shown at the end of each chapter of the Report.





Our people are the cornerstone  
of our business success.



 414 employees

 7.2% of staff are women

## Our approach



## We are focusing on key issues:

- Protecting employee health and safety
- Supporting and bolstering local employment
- Systematically investing in our people
- Providing equal opportunities for all employees and allow them to advance and develop
- Implementing a fair performance appraisal system
- Respecting diversity and internationally enshrined human rights
- Protecting and encouraging employee volunteer initiatives.

## Our Commitment

We are focused on developing a uniform culture of responsibility among our staff.

As a company firmly focused on human values, we ensure that we offer a working environment where pay is fair, where human rights and diversity are respected and where all employees are given equal opportunities.

## 2013 IN SUMMARY



**384**  
Men



**5**  
New recruitments  
(2 individuals from the local community)



**93**  
Employee training seminars



**30**  
Women



**40%**  
Of employees from the local community



A total of  
**1,781**  
hours of training



**17.6** Euro million  
in employee pay



**45,645** Euro total  
cost of training



### 4.1 Human Resources Data

At the end of 2013 HALCOR had a total staff complement of 414. 40% of them came from the local area (the wider area of Viotia and Evia) and 60% from Attica and the rest of Greece.

#### HALCOR Human Resources Data (31/12)

Employees	2011	2012	2013
Men	429	398	384
Women	38	36	30
<b>Total Workforce</b>	<b>467</b>	<b>434</b>	<b>414</b>
Employee Departures (p.e. retirement, contract termination)	35	36	25
Employee Hires	8	3	5
Third-party employees (e.g. contractors)	57	62	63
Ethnic minority (and different nationalities) employees	31	22	22

Around 76% of employees are middle-aged (36 to 55 years old) while 53% are aged under 45. The average age for an HALCOR employee is 44.

Distribution of Workforce by Age and Gender group	20-25	26-35	36-45	46-55	55+
Men	1	56	144	149	34
Women	-	8	10	10	2
<b>Total</b>	<b>1</b>	<b>64</b>	<b>154</b>	<b>159</b>	<b>36</b>

The Company is opposed to child and forced labour and fully complies with the relevant national laws. There were no incidents of child or forced labour in 2013 as in previous years. In addition, recruitment procedures guarantee that no one aged under 18 can be hired by the Company.

#### Internships

To allow young people to enter the labour market, the Company offers students and young high school graduates the chance to obtain work experience and on-the-job experience at its facilities. For another year, the company was in systematic contact with universities and higher schools in Greece and ran an internship scheme. In 2013 as part of its work experience scheme, 4 final year students from universities and technological educational institutes were given internships at the Company.

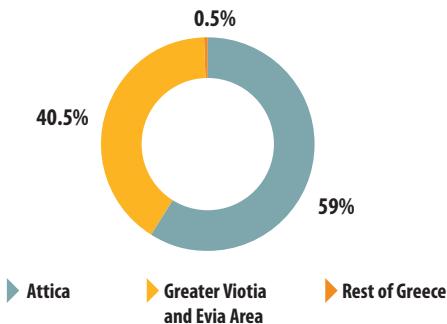
The Company's overall staff levels dropped slightly by 4.8% compared to the previous year (434 employees). In 2013 a total of 25 people left the Company due to resignation, dismissal or retirement, and there were 5 recruitments in total.

Breakdown of Departures - Category	2011	2012	2013
Dismissals	23	27	14
Contract termination	-	-	-
Resignations	4	2	1
Retirements	8	7	8
Other	-	-	2*
<b>Total</b>	<b>35</b>	<b>36</b>	<b>25</b>

\* It refers to death due to the incident and death of natural causes.

Employee Mobility Percentage	2011	2012	2013
Employee Hires (total new hires / total employees 31.12)	1.71%	0.70%	1.21%
Employee Departures (total departures / total employees 31.12)	7.49%	8.30%	6.04%

**Breakdown of HALCOR Human Resources by Geographical Sector**



**Drawing employees from the local community**

In order to bolster local employment levels, the Company draws a significant part of its staff from members of the local community. 14% of managers and senior executives also come from the local community.



**166**  
employees out of 414  
(40% of the total number  
of staff) comes from  
the local area



## 4.2 Employee Assessment

Implementing staff appraisal schemes has a positive impact on how the Company is organised, by rewarding good professional performance among employees and encouraging efforts to further improve performance levels.

The staff performance appraisal system HALCOR runs:

- is based on objective, transparent appraisals
- utilises procedures that take into account the post, duties and job description of each employee
- applies to all company staff and executives, and there is a similar system in place for labourers.
- revolves around procedures based on dialogue, cooperation and participation.

All employees who are appraised are notified about their appraisal and are actively involved in it, exchanging views during a face-to-face meeting with their supervisor identifying strong and weak points in their performance, and also ways to improve as well as how training needs can be met.

HALCOR's appraisal system seeks to:

Reward strong professional performance

Encourage efforts to improve performance

Utilise the skills of employees by bringing personal goals into line with company targets

Develop human resources

Promote health professional rivalry between employees

Improve employee performance

Employee Assessment	2011	2012	2013
No. of employees assessed	41	57	50
Men	35	41	33
Women	6	16	17
Employees assessed who had access to assessment results	100%	100%	100%

## 4.3 Equal Opportunities and Respect for Human Rights

Ensuring a working environment where there is fair pay, where human rights and diversity are respected and where all employees have equal opportunities, is a key priority for HALCOR.

HALCOR is committed to respecting human rights and ensuring compliance with fundamental freedoms and human rights, as outlined in the principles enshrined in the HALCOR Code of Conduct. That Code includes special provisions which ban all forms of discrimination due to gender, colour, religion, national origin, citizenship, age, special abilities, marital status, sexual orientation, socio-economic position or any other characteristics protected by internationally-recognized human rights.

**“Respecting diversity and internationally enshrined human rights, we offer all employees equal opportunities for development and career advancement”.**

**There has never been an incidence of discrimination or related complaint at HALCOR.**

**7.2%**  
of staff is  
women

**22**  
employees  
are of other  
nationalities

HALCOR encourages women to join its workforce. However, the percentage of women in the overall workforce is low because of:

- The nature of the job (industry)
- The distance between its production plants and major urban centres.

At HALCOR all employees have equal opportunities when it comes to pay, development and career advancement. An important criterion in recruiting employees is their skill set. The Company also condemns all forms of harassment or violence, and there are procedures, guidelines and mechanisms in place to ensure that such cases are prevented in the workplace.

### Employee Distribution per Hierarchical Level and Gender Group

Hierarchical Level	Number of Employees		Total
	Men	Women	
Board of Directors	11	0	11
Managers	12	0	12
Senior Executives	31	1	32
Office staff	64	27	91
Εργατικό προσωπικό	277	2	279
<b>Total*</b>	<b>384</b>	<b>30</b>	<b>414</b>

\* The Board of Directors members are not included in the Company's total Human Resources.

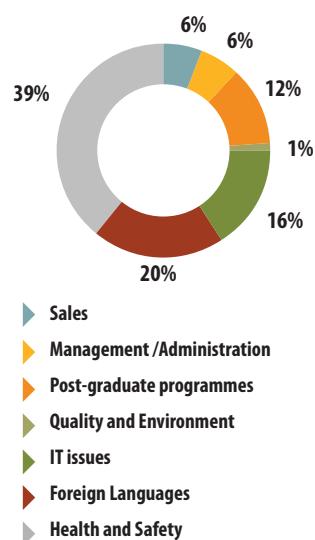


#### 4.4 Employee Training and Development

Employees at HALCOR undergo continuous professional development and career advancement integrated in their daily working activities. As a company which supports constant, systematic improvements in employee skills, each year HALCOR designs and runs a range of training courses depending on the training needs of its various departments and the specific needs of particular job positions. Particular emphasis is placed on training employees about health and safety issues.

In 2013, 336 of HALCOR's employees attended at least one training course (81% of all employees).

Distribution of training man-hours by subject (2013)



#### Training indicators per employee category/hierarchy

Position/Rank	Total training hours			Average hours of training per category		
	Men	Women	Total	Men	Women	Total
Managers	170	0	170	14.2	0.0	14.2
Senior Executives	176	2	178	5.7	2.0	5.6
Office staff	482	301	783	7.5	11.1	8.6
Other staff (Warehouse staff and workers)	0	0	0	0,0	0,0	0,0
<b>Total</b>	<b>828</b>	<b>303</b>	<b>1,131</b>	<b>2.2</b>	<b>10.1</b>	<b>2.7</b>

The Company also provides its staff with the option to attend postgraduate courses and foreign language courses.

Lifelong Learning Programmes (number of employees)	2011	2012	2013
Employee Foreign Languages Programmes	n/a	n/a	7
Employee Postgraduate Programmes	3	2	3

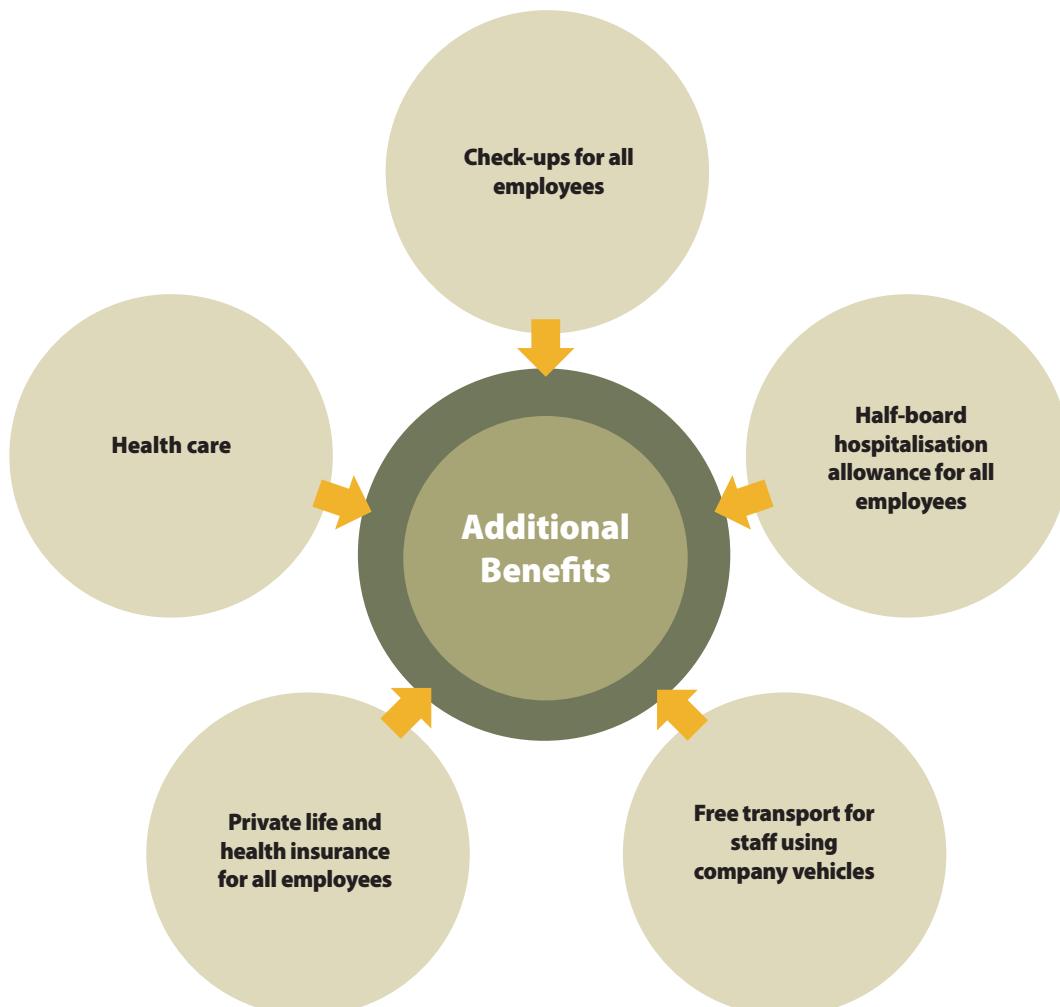
## 4.5 Salary and Benefits Policy

The pay policy implemented is based on certain key factors such as level of education, experience, responsibility, and the value / weighting of the post in the labour market.

In addition to statutory pay and the benefits the Company is required by law to provide, HALCOR also offers a series of major benefits to both its employees and their families. The additional benefits are offered to all Company employees, without discriminating between employees at different facilities or involved in different activities.

The following additional benefits are offered in line with Company policy:

- Housing
- A company car and mobile phone for executives.

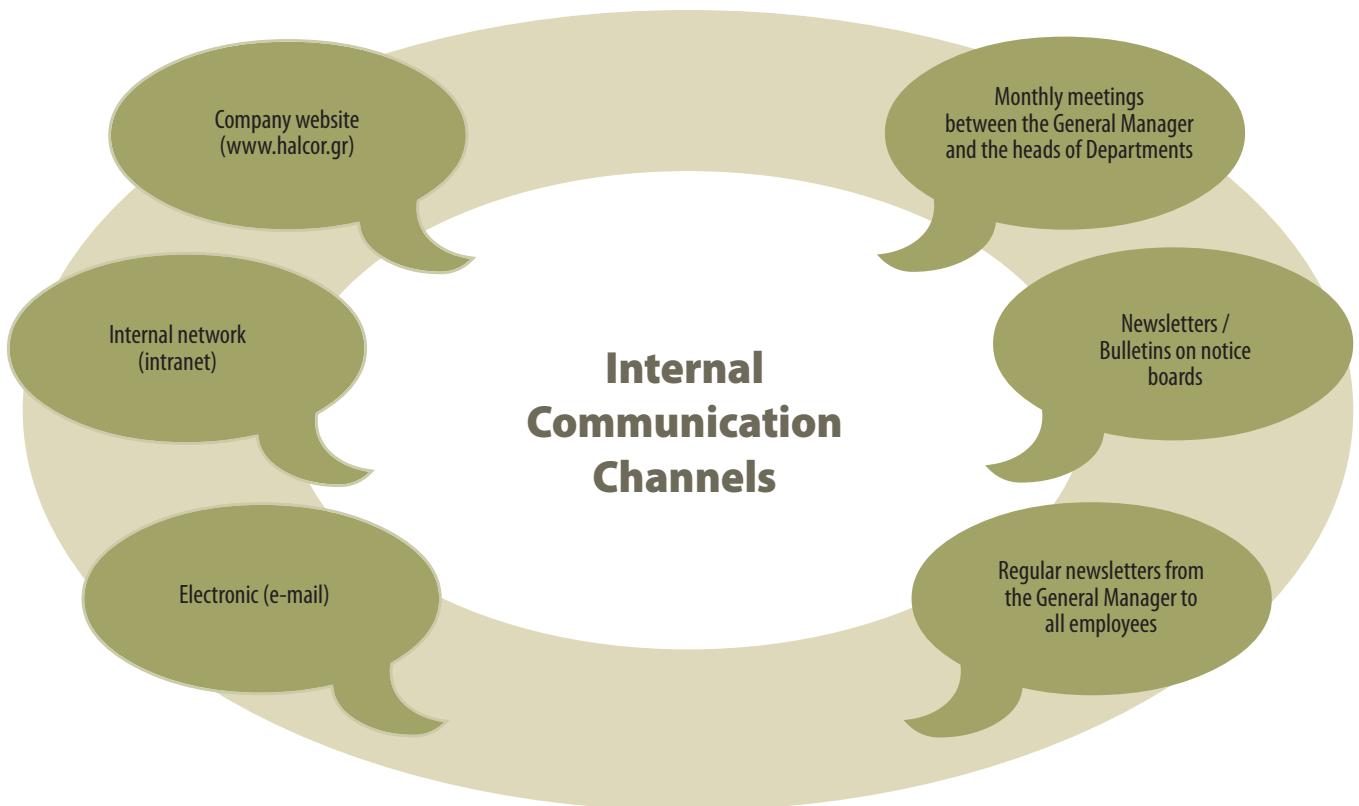




#### 4.6 Internal Communication

A key factor in success for HALCOR is communicating and consulting with employees. Using these channels, employees are briefed about Company strategy, initiatives, services and products and a climate of trust between employees and management is fostered. Using internal communication channels, two-way communication between employees and management is encouraged, dialogue and cooperation between various units is strengthened and corporate philosophy becomes more engrained and ties between Company employees become stronger.

To foster communication between employees and management, the Company operates an "Open Door" policy under which management is always willing to listen to and discuss issues of concern to its staff.



#### 4.7 Employment contracts

The Company fully respects its employees' collective bargaining rights in the context of its more wide-ranging respect for internationally agreed human and labour rights.

All employees (100%) have employment contracts and work full-time (in 2013 the Company had no seasonal or part-time employees).

**Total workforce by employment type and employment contract**

Category employment type and employment contract 2013	2013		Total
	Men	Woman	
Total employees	384	30	414
Full-time employees	384	30	414
Collective bargaining agreement	100%	100%	100%
Indefinite-term employment contract	100%	100%	100%
Fixed-term employment contract	0	0	0

Employee pay is in line with the relevant statutory rules from time to time. All Company employees are paid above the minimum pay set in law.

**4.8 Employee volunteer initiatives**

The Company fully respects the idea of volunteerism and supports and encourages initiatives and actions taken by its employees in this sector. HALCOR's employees have demonstrated their social awareness in practical terms, not only by making a contribution but also by organising actions to support vulnerable social groups and to protect the environment, as well as blood drives, on their own initiative.

**Volunteerism Programme**

In 2010 HALCOR's staff on their own initiative launched the in-house programme called 'Contributing all together for a solidarity-based society'. This programme is designed to support poor families by raising awareness among the Company's employees in order to collect food, clothing, games and books. For yet another year, despite the difficult economic backdrop, this scheme was a success and employees made a considerable contribution. In recognition of the contribution made by its employees and to further stimulate and encourage them to engage in volunteerism, the Company purchased double the quantity of food collected. The scheme ended in December 2013 and the items collected were handed over to a Church in the local area which distributed them to poor families in the local communities.

**Environmental Protection Actions*****Beach Cleaning***

To protect the environment and make a contribution to local communities, in 2013 employees from the Company organised a volunteer beach cleaning activity in the local municipality. The beach was successfully cleaned with the voluntary participation of employees from HALCOR under the guidance of the NGO, HELMEPA. The Company has been a member of HELMEPA since 2010.





#### *Tree planting event*

HALCOR's employees were involved in a volunteer tree planting event organised by the radio station/television channel SKAI as part of its 'Together We Can, for the environment' scheme. Trees were planted in the Karaouli area of Mt. Pentelis to protect and regenerate the mountain. 10,000 saplings were planted by volunteers from various organisations, schools and bodies from Penteli, Marousi, Kifissia and other municipalities in NE Attica.

#### **Volunteer Blood Donation Programme**

The Company has been organising a voluntary blood donation programme with great success since 2001, covering the needs of employees and their families. The Company schedules blood drives each year at its premises in cooperation with the Laiko Hospital.

	2011	2012	2013
Bottles of blood collected	30	34	54

Over the last 3 years, HALCOR's blood bank has helped a total of 79 people

### 4.9 Societal Activities

Each year HALCOR supports a series of activities for the society responding to the needs and expectations of its stakeholders (local communities, NGOs, schools and local bodies), thereby displaying its social concern in very practical terms. Just some of the main social investment activities the Company engaged in, in 2013, are listed below:

- Support for NGOs:
  - o Over recent years HALCOR has supported the work of the NGO "PNOE" which provides assistance to children in intensive care. PNOE is a not-for-profit association set up to provide assistance to children and new-borns in intensive care units.
  - o For another year the Company also supported the activities of the NGO Transparency International Greece. Transparency International Greece is a NGO which has been operating since 1997 for the sole purpose of combating corruption.
  - o The Company also supported the work of the NGO "Volunteers against Cancer – Angaliazo / Embrace".
- Support for schools:
  - o In 2013 HALCOR supported the Paralia Avlidas Primary School by purchasing heating oil for it and also bought computers and other electronic equipment for the Oinofyta Junior High School. It also provided IT support to the Oinofyta Primary School to help set up a school computer network, and also donated several computers.



- Support for local associations and bodies:

- o In 2013 the Company provided sponsorship to the ERMIS Schimatari Sports Club. The Company also provided sponsorship to the Federation of Sterea Ellada Industries, which supported the Pan-hellenic Athletics Championships held at the Schimatari Municipal Stadium.



- o The Company was also involved in an initiative run by the Municipality of Tanagra to set up and run a local social grocery store. The Company purchased food which was then distributed via the Municipality's social grocery store.



- o HALCOR has a long tradition in providing support to and continuously collaborating with the local authorities. In that context, it provided the local authorities (such as the police) with office supplies and various other materials to meet their needs.

- o The Company also provided sponsorship for a hydraulics / thermohydraulics competition run by the Hellenic Copper Development Institute in which 22 schools participated.

## OUR TARGETS FOR 2014



To train employees about first aid, in cooperation with a certified body.

To continue to further expand the employee awareness campaign about health issues and serious illness prevention in partnership with NGOs.

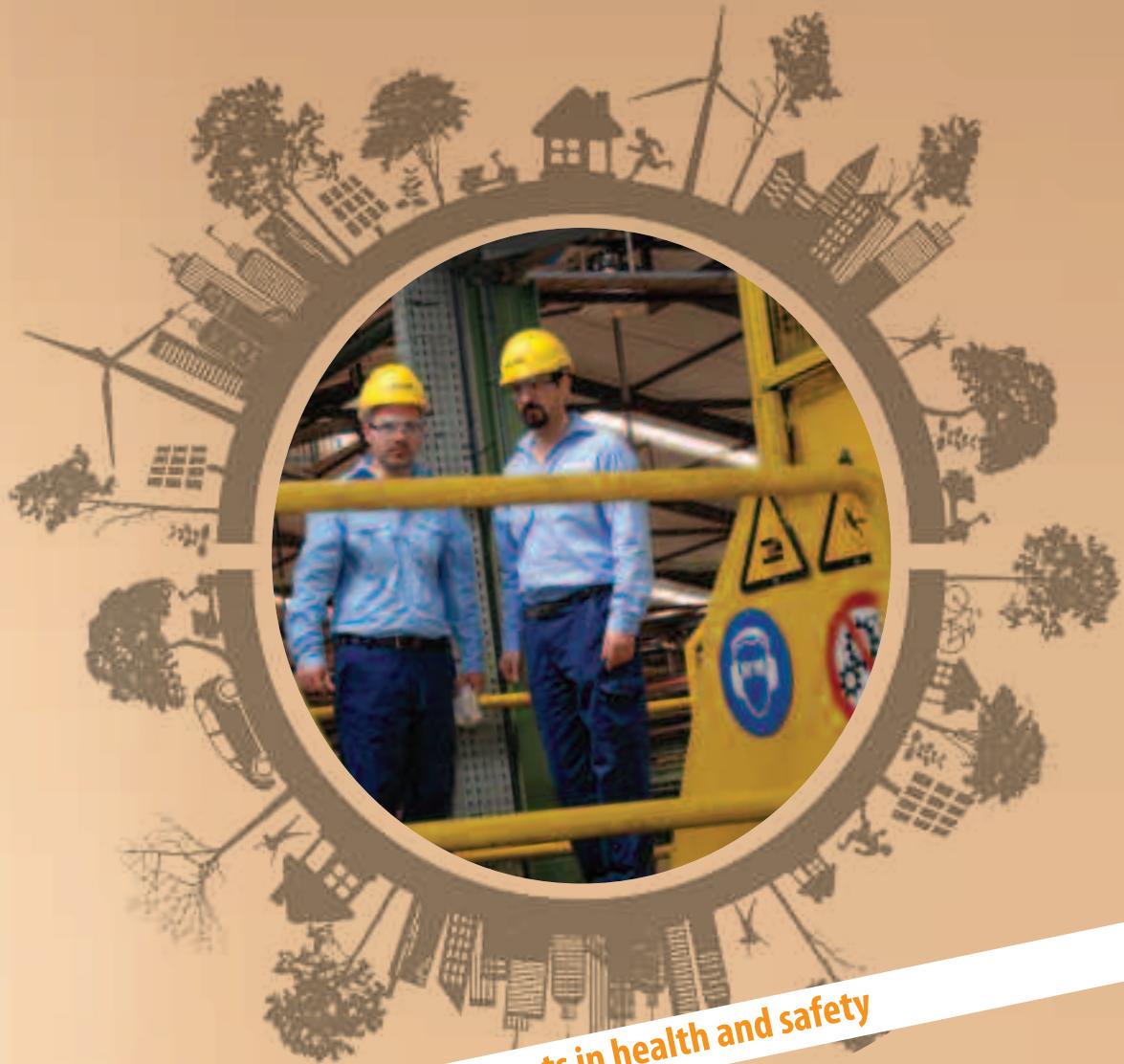
To continue the internship scheme to allow students to acquire work experience.

To support the activities of NGOs.

To continue to support local schools and local associations, bodies and authorities.



**We are committed to occupational health and safety and it is top priority for us.**



**Euro 127,000 on investments in health and safety**



**692 hours of training of health and safety issues (597 hours training employees in the production process and 95 hours training administrative staff / labourers)**



**233 hours of training on health and safety issues for the employees of third parties (contractors)**

## Our approach



## We are focusing on key issues:

- Protecting employee and third party health and safety
- Creating and maintaining a working environment free of risks, injuries, accidents and occupational diseases.
- Accident prevention
- Employee training



## Our Commitment

- To implement the Company's Occupational Health and Safety Policy.
- To safeguard the health and safety of employees, associates and visitors.
- To implement a certified Occupational Health and Safety Management System.
- To comply with the applicable legal framework and high health and safety standards.
- To give absolute priority to preventing accidents via scheduled inspections of potentially hazardous situations.
- To provide continuous briefings, to raise awareness and promote active involvement by all employees in health and safety issues.
- To build a safety-based culture for all company's activities, including the operations of associated companies, contractors, and suppliers.

## 2013 IN SUMMARY



12.4

Accident Frequency Index



2.1

Hours of training per employee



12

Injuries / accidents



2.5

Injury Ratio (IR)



13

Lost Days Ratio (LDR)

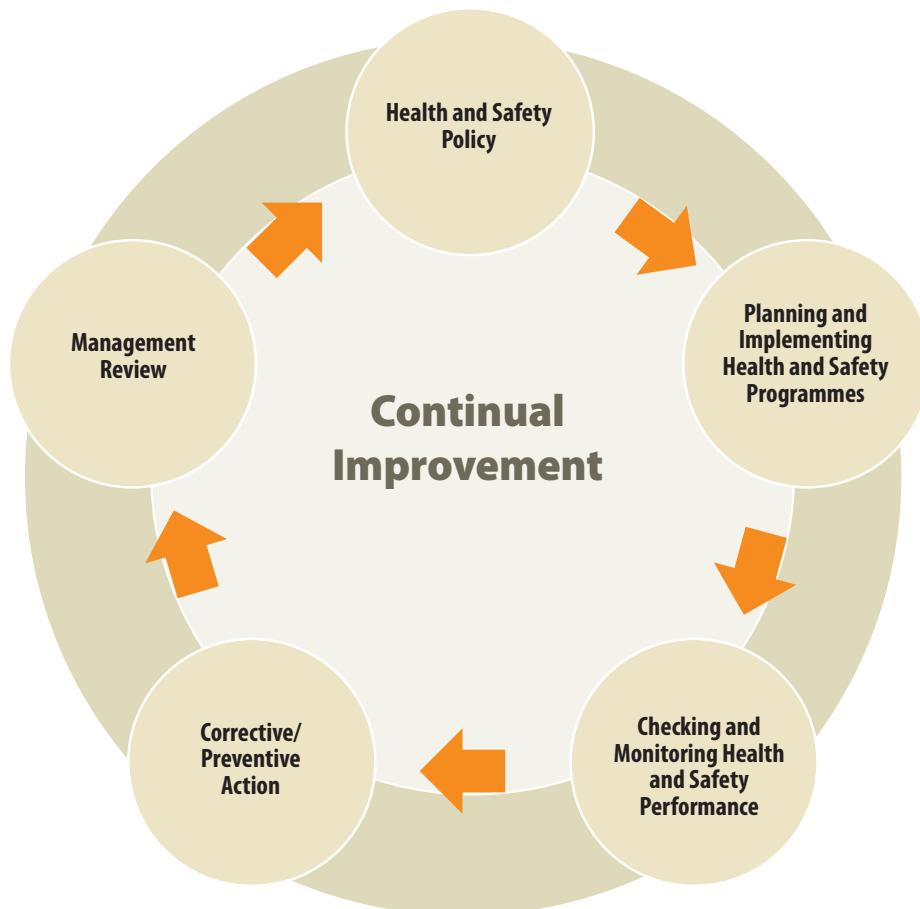


### 5.1 Occupational Health and Safety Management System

HALCOR demonstrates its commitment to safeguarding employee health and safety via the Occupational Health and Safety Management System it implements. The Company achieves continuous improvements in the health and safety arena by effectively implementing the System, investing in projects and programmes, and also thanks to the contribution and involvement of all employees who act responsibly in relation to these matters. The standing objective for all of us remains 'zero accidents'.

HALCOR's Health and Safety Management System:

- is based on prevention.
- seeks to ensure constant improvements to occupational health and safety conditions.
- covers all of HALCOR's production facilities (copper pipes/tubes plant, recycling plant – foundry).
- is certified in line with the requirements of the OHSAS 18001:2007 standard.



In order to ensure continuous improvements in the occupational health and safety sector, each year the Company makes major investments. Annual health and safety needs are evaluated, ranked, and the relevant steps are taken in line with the targets set by the Company's Health and Safety Division, and are approved by HALCOR's management team. Total health and safety expenditure in 2013 was Euro 127,000 while over the last

**Ongoing  
investments in the  
health and safety  
sector**



6-year period (2008-2013) more than Euro 1.5 million has been spent on health and safety programmes and improving HALCOR's infrastructure in this area.

**5.1.1. 5S system: Continuous Improvements Programme**

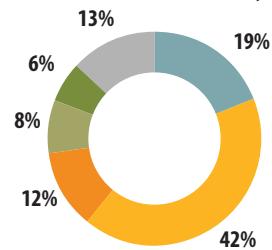
A key tool in HALCOR's endeavour to achieve continuous improvements in occupational health and safety and to more effectively manage its resources and equipment is the 5S system it implements. The philosophy underscoring this system rests of 5 implementation stages (Sorting, Setting in order, Shine, Standardising, and Sustaining).

**5.1.2. Management structure for health and safety issues**

HALCOR has a standing health and safety team at its facilities, which manages all occupational health and safety issues, checks that work is being done safely, and whether the System is being implemented and constantly improved at all Company facilities. HALCOR's management team receives direct and monthly briefings from production boards and executives about all issues impacting on health and safety and seeks to promote the uninterrupted implementation of health and safety Policy and the relevant national legal requirements.

Checks and inspections are constantly being carried out at the various departments in the Company facilities. The Health and Safety Officer working with the Manager of each plant and the safety technician hold meetings with the heads of each department every month. Regular inspections are also carried out by the heads of department each month. As part of this process, HALCOR encourages the exchange of views with employees and asks them to submit proposals to achieve continuous improvements in the health and safety sector.

**Investments & Operational Expenditures on Health and Safety**



- ▶ Restructuring of fire safety system
- ▶ Workplace management
- ▶ Employee medical cover programme
- ▶ Application –upgrading of Personal Protection Equipment
- ▶ Lifting equipment certification
- ▶ H&S Department Spending (training, H&S system certification, etc.)

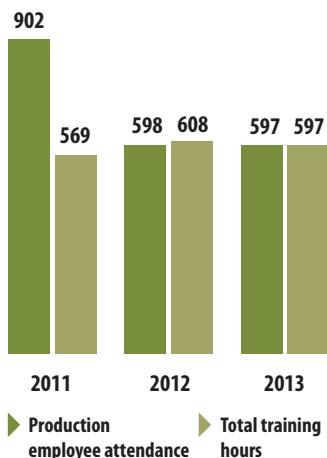


**5.2 Training for Health and Safety**

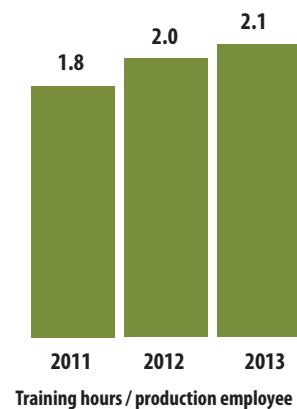
Company performance in the health and safety sector is to a large degree dependent on the involvement of all employees, and the responsible attitude they take towards such matters. That is why HALCOR attaches particular importance to training its employees about health and safety issues. In parallel with training courses, a Health and Safety Manual is also distributed to employees, containing the Company's Health and Safety Principles and relevant rules in order to provide guidance and change their attitude towards safer practices at work.

**Protecting health and safety is the responsibility of each and every one of us**

**Health and Safety Training indicators Number of attendance & Total training hours**



**Average training hours per production employee**



In 2013 HALCOR provided its staff with a total of 692 hours of training about various health and safety issues. 597 of those hours related exclusively to staff involved in the production process.

Training on health and safety issues is not only offered to HALCOR's own staff but also to the staff of contractors working at its facilities. In 2013 a total of 233 hours of training about health and safety issues were provided to third parties.

### Health, Safety & Environment Month

The Health, Safety & Environment Month is now a firm fixture on HALCOR's annual calendar and is designed to promote knowledge about health, safety and environmental issues and to raise more awareness among staff in this sector. For the 4th consecutive year the Company has run this scheme, confirming that occupational health and safety is a top priority and unwavering commitment for HALCOR.

The 2013 Health, Safety & Environment Month was successful, due to a high level of participation by staff at all levels within the Company. During the month the Company ran a long training course to ensure continuous improvements in employee technical skills on critical aspects of safety such as how to manage chemical leaks, how to put out fires, and how to work safely at heights, and various environmental topics were also addressed. Printed material were also distributed to all company staff and associates about Health, Safety and Environment at work and away from the workplace. The subjects discussed in the training courses each year are selected depending on the requirements that need to be fulfilled.





### 5.3 Health and Safety Programmes

HALCOR is constantly striving to safeguard the health and safety of its employees. Each year a series of actions and programmes are organised to protect the health and safety of Company staff.



#### Briefings about serious illnesses: Breast Cancer

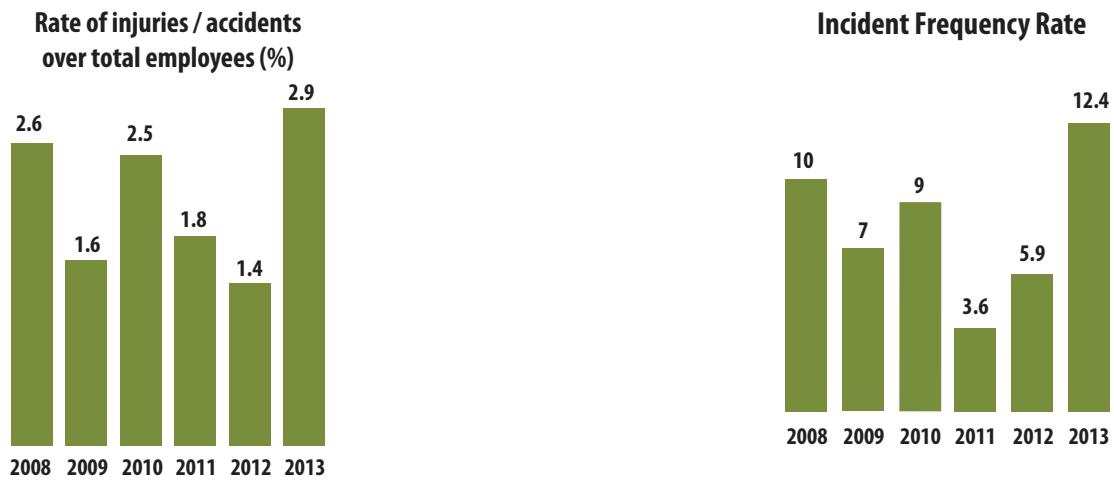
In 2013 the Company held a briefing for female employees in partnership with the NGO "Volunteers Against Cancer / Angaliazo / Embrace" about how to prevent and diagnose breast cancer in good time. The issues addressed were:

- What is breast cancer
- Prevention – Risk factors
- Timely diagnosis
- Stages of the disease
- Treatment and side effects
- Post-treatment
- Diet and exercise.

Female employees were given hard copied material as well as material in electronic format about prevention and self-examination techniques.

## 5.4 Monitoring Health and Safety Performance

The Company keeps a close eye on and records the Occupational Health and Safety's performance. HALCOR continuously strives to reduce the number of occupational accidents with the goal being to totally eliminate them and to ensure that its employees remain free of occupational diseases. HALCOR makes every concerted effort to achieve this.



*NOTE: When calculating lost days, the measurement starts from the day after the accident and includes minor accidents that only require first aid.*

Company management is committed to taking all necessary measures required to ensure a safe working environment. Despite all the measures taken to eliminate all likelihood of accidents occurring, unfortunately at the beginning of 2013 there was a tragic incident which shocked the Management team and employees of HALCOR. The loss of a human life was a painful reminder that no preventative measures in the occupational safety sector should ever be considered enough. When managing scrap brass, a large diameter shell exploded resulting in one employee being fatally injured. This is an unprecedented sort of accident since that sort of material has been used at our plant for more than 40 years as a raw material and no incident of this sort had ever occurred. The explosion was caused because a detonator had been left in the shell even though the scrap metal was certified as being non-hazardous.

To rule out all likelihood of such an accident reoccurring in the future, it was immediately decided to cease deliveries of scrap metal containing large-size shells. The necessary procedures covering the period before delivery of metal to the plant have now been put in place. The Safe Work Guidelines drawn up the Raw Materials Delivery and Management Department were also revised accordingly to include instructions about the case where 'suspect' materials are found despite all the precautions taken.



HALCOR fully complies with the relevant national legislation on recording, investigating and disclosing accidents to the competent authorities. It investigates the accident conditions to discover the root causes that led to the accident. Subsequently, corrective and preventive measures are designed and implemented.

**To date no occupational diseases have been recorded at the Company**

#### OUR TARGETS FOR 2014



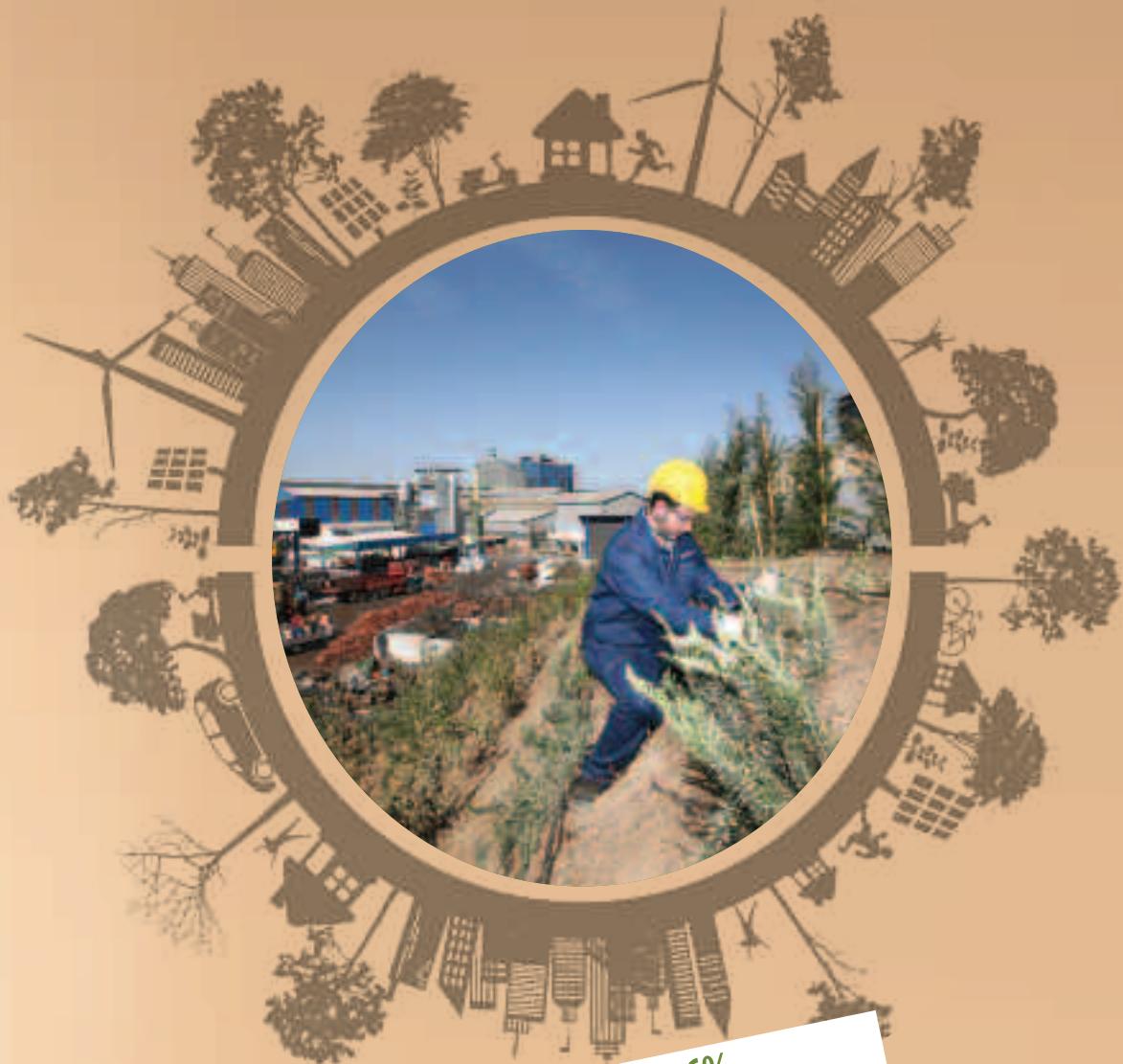
To have every production, maintenance and quality control supervisor carry out 10 health and safety inspections at each plant.

To carry out 10 monthly meetings at each plant concerning health and safety to ensure that each employee involved in the production process attends at least 1 ½ hours of training on health and safety issues.

To implement an awareness-raising scheme for staff about the need to report near misses.



**Our overriding goal is  
to protect the environment.**



**Specific water consumption fell by 6%  
(m<sup>3</sup> per ton of product) compared to 2012**



**295,857 kWh of energy were saved per year compared to 2012  
due to production process re-engineering**



**Recycled metal usage rose by 3% per ton of end  
product compared to 2012**

## Our approach



## We are focusing on key issues

- Proper management of raw materials
- Emissions management/reduction
- Energy savings
- Water savings
- Proper waste management



## Our Commitment

- To implement the Environmental Policy and the certified Environmental Management System
- To minimise our environmental footprint
- To comply with the applicable environmental laws
- To save natural resources (water, energy, raw materials)
- To prevent pollution
- To implement capital expenditure plans to ensure that the Company achieves continuous improvements in environmental management and develops know-how for environmentally-responsible Sustainable Development

## 2013 IN SUMMARY

Energy consumption:  
**659**  
kWh/ton of product

Water consumption:  
**103,728**  
m<sup>3</sup>

**95.7%**  
of waste recycled and reused

CO<sub>2</sub> generated:  
**10,665**  
tons

NOx generated:  
**8**  
tons

**892**  
hours of training

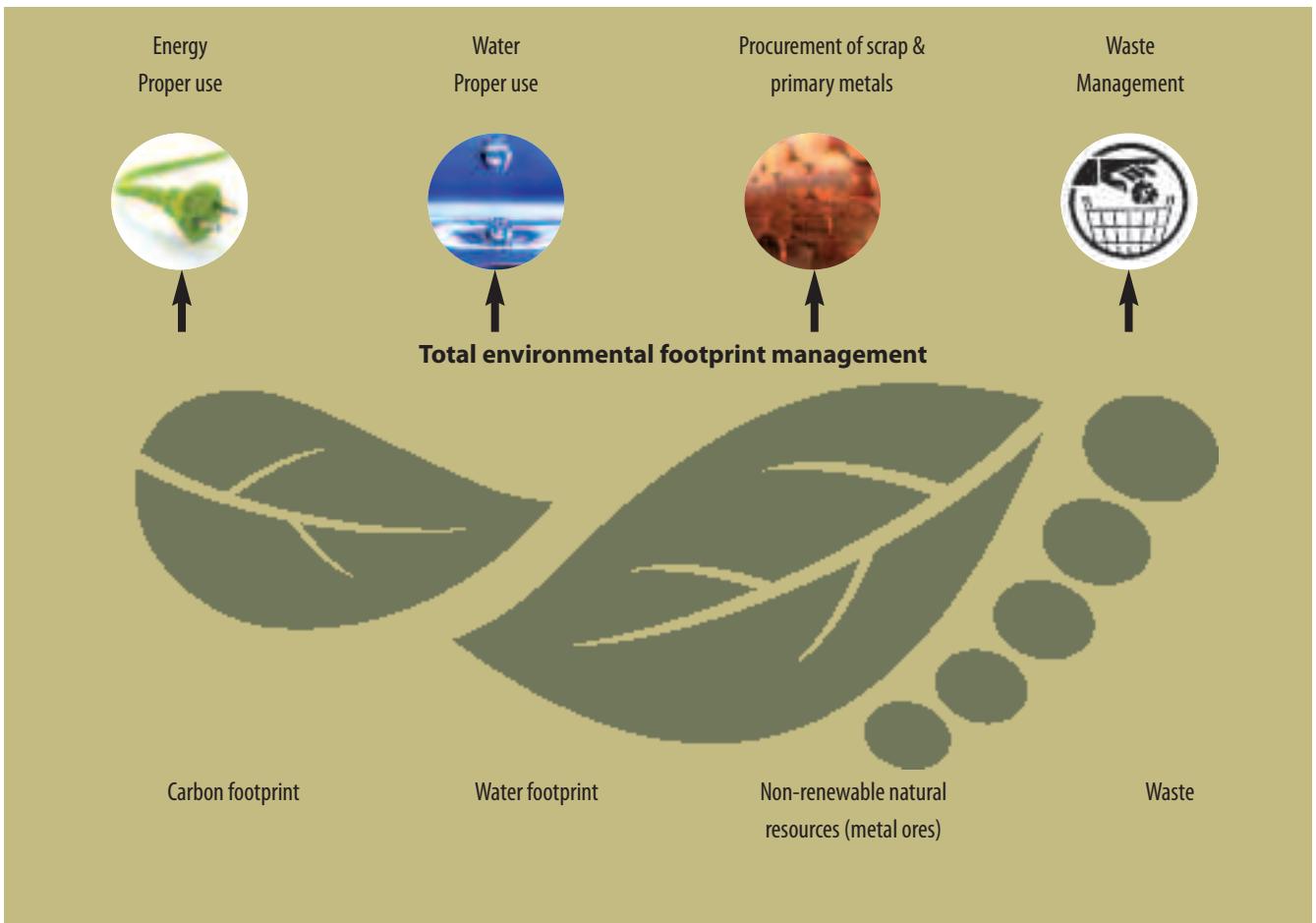
**144**  
Kg CO<sub>2</sub> per ton of product  
(direct emissions)

**1.13**  
Euro million invested and spent  
on environmental protection

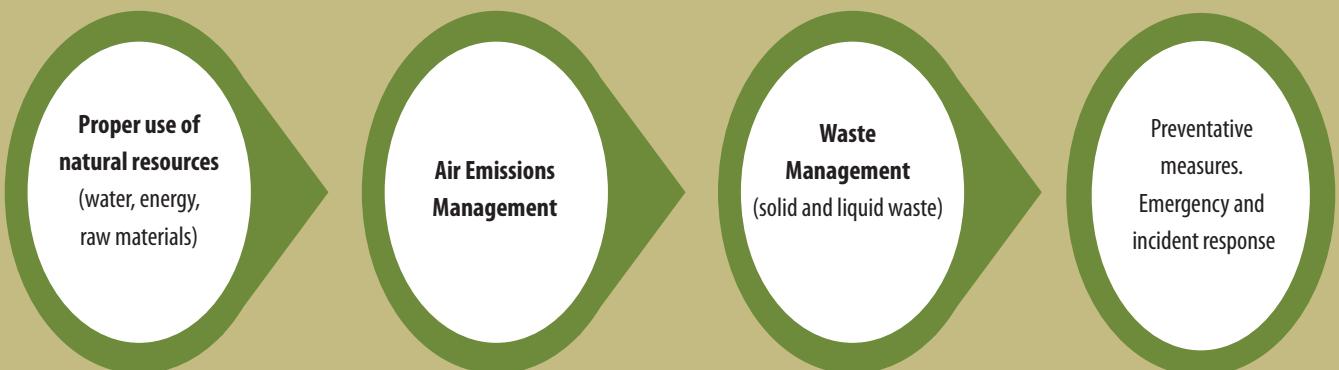


**6.1 Environmental Footprint Management**

An essential condition in properly and comprehensively managing environmental issues is that the Company’s environmental impacts are measured and constantly monitored. Environmental impacts are HALCOR’s footprint on the environment due to consumption of natural resources, greenhouse gas emissions, and the disposal of / recycling / reuse of waste and so on.



The main categories in which HALCOR implements environmental management activities are listed below:



HALCOR actively supports Greece’s attempts to set up recycling infrastructure. The contributions it has paid to the Hellenic Recovery Recycling Corporation (HERRC) from 2007 to the present have financed the purchase of around: **635 blue recycling bins or 1 recycling truck.**

## 6.2 Environmental Management System

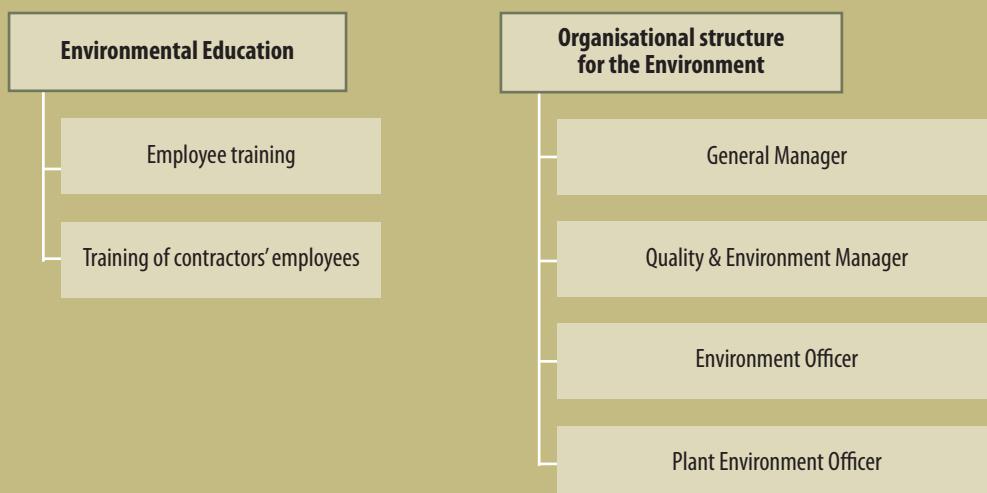
HALCOR’s management team is committed to environmental protection, a commitment it implements by comprehensively managing the environmental impacts of its operations. To achieve this, the Company has adopted a specific Environmental Policy (*see <http://www.halcor.gr/en/corporate-responsibility/environment/environmental-policy/>*) and is committed to implementing it as part of an ISO 14001:2004 certified Environmental Management System which applies to all its production plants.



ISO 14001 certification at HALCOR’s plants						
No	Plant	2009	2010	2011	2012	2013
1	Copper Tubes	√	√	√	√	√
2	Recycling - Melting	√	√	√	√	√
3	Titanium-zinc Rolling Plant*	√	√	√	√	√
4	Polyethylene sheet production line (Plastic and rubber compounds plant)	-	-	√	√	√

\* This plant suspended production activities on 01.01.2011.

The Company achieves continuous improvements in its environmental ratings by properly implementing its Environmental Management System, and by investing in projects and programmes. To help monitor the progress of its environmental programmes and the continuous improvements in the Environmental Management System the Company set up an Environment Department division staffed by skilled experts. Management is briefed about all environmental protection issues and monitors how Environmental Policy is implemented.





Effective environmental protection arises as a result of the collective endeavours and culture of all employees. In 2013, 892 hours of training were provided, and a total of 262 employees were trained about environmental issues (66 of whom were staff of our contractors).

Training on environmental issues	2011	2012	2013
Number of employees	109	241	262*
Number of workshops held	12	11	16
Training hours	283	349	892

\* 66 of them are contractors' employees

Every year HALCOR implements a major capital expenditure plan with environmental protection and prevention works, to achieve continuous improvements in the field of environmental management. Annual environmental protection needs are evaluated, ranked, and the relevant actions are taken in line with the targets set by the Company's Environment Department, and are approved by HALCOR's management team. In 2013 total company spending on environmental management and protection exceeded Euro 1.13 million.

**Major investments  
in environmental  
management**

#### **Audits and Compliance with Legal Requirements**

HALCOR's guiding principle is fully compliant with the relevant national and European environmental legislation. It continuously carries out environmental audits at all facilities to check compliance with the legislation and observance of the Company's environmental procedures and measures. The results of these environmental audits are presented to HALCOR's management team and additional measures are taken if necessary.

From June to August 2013 data was submitted to the State General Laboratory in compliance with the chemical products legislation and as part of the REACH-EN-FORCE 3 inspection programme being run by the European Chemicals Agency (ECHA) concerning implementation of the REACH Regulation (Reg. (EC) No 1907/2006).

**In 2013 there were no  
complaints about HALCOR's  
operations and no sanctions  
for environmental issues were  
imposed.**

### **6.3 Efficient Use of Natural Resources**

HALCOR ensures that natural resources needed in its production processes are managed as efficiently as possible. To achieve this, it monitors and manages water and energy consumption levels, and a major part of its raw material requirements are now met by using scrap metals whose life cycle is over.

### HALCOR's Product Life Cycle Assessment

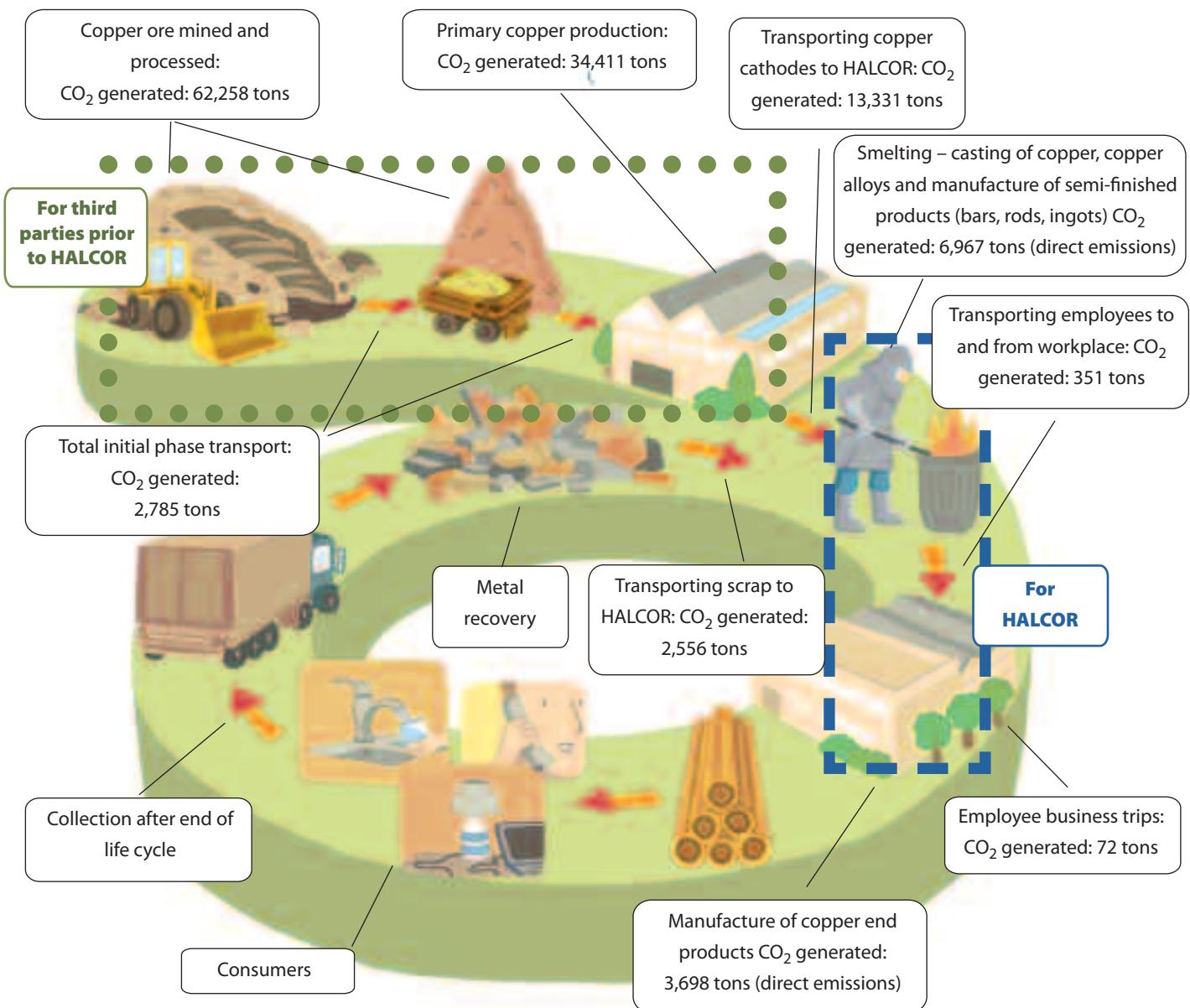
HALCOR strives to minimise the impact its products have on the natural environment across their entire life cycle. Life Cycle Assessment (LCA) is a method that uses a series of exacting processes to quantify resources inflows and outflows in all stages of a product's life cycle.

Using scrap metal instead of primary metal, HALCOR combines economic efficiency with environmental protection, having achieved a major reduction in its impact on the natural environment both by reducing the quantity of natural resources mined, and in terms of energy and water consumption and gas emissions.

The diagram below shows the CO<sub>2</sub> emissions released in 2013 during various phases of HALCOR's product life cycle. Additional information about the formulas, calculation methods, and assumptions used can be found in Annex I.



### Copper Life Cycle Assessment



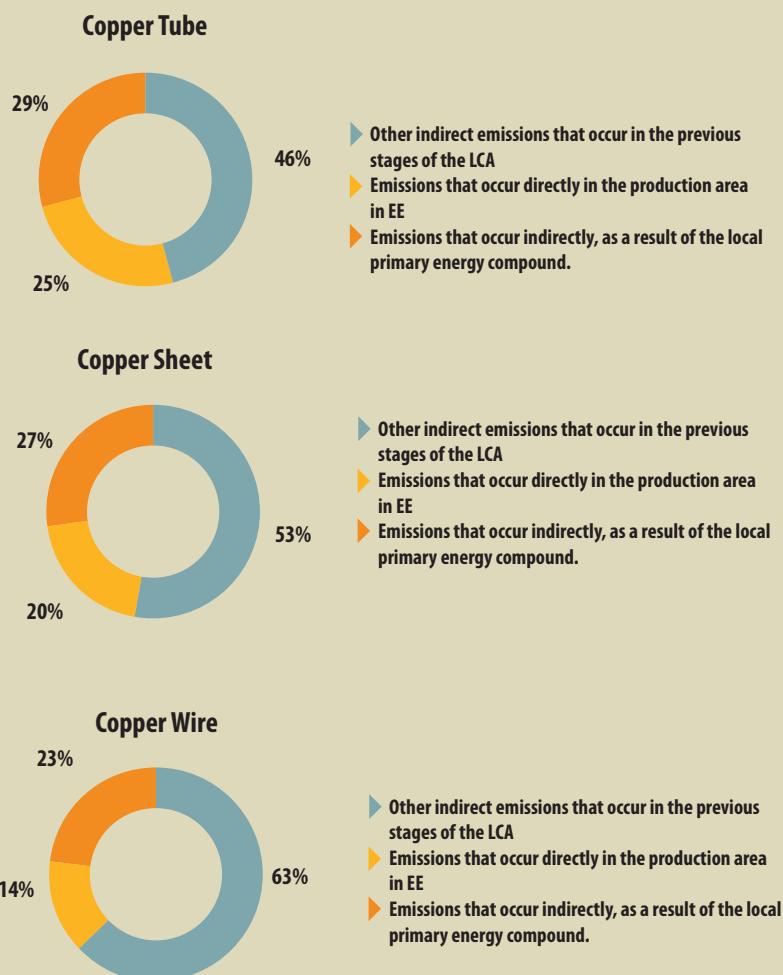


### Copper Products Life Cycle Assessment

Improving the environmental performance of products, while also fostering Sustainable Development throughout the entire supply chain has become a matter of great interest for both consumers and industries over recent years. European Union initiatives such as “sustainable consumption”, also seek to promote the efficient use of resources and to showcase the use of more environmentally-friendly products.

The copper industry has committed itself to reducing the environmental impacts of its activities. In response to requests from end users and regulatory authorities detailed LCAs have been prepared for copper and copper’s intermediate products (sheets, pipes and wires).

The diagrams below show the results of the LCA (Global Warming Potential / GWP) based on official sources.



More information is available on the website address below:  
<http://www.copperalliance.eu/gr/about-copper/life-cycle>.



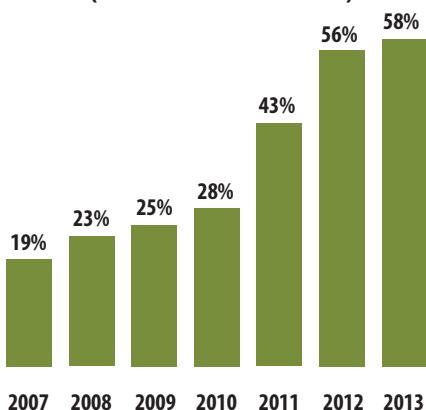
### 6.3.1 Raw materials

The Company's key raw material is copper. One overriding objective for the Company is to use raw and ancillary materials with the maximum degree of efficiency since an increase in efficiency leads, among other things, to a reduction in the waste generated. HALCOR also ensures that it meets a significant part of its copper needs by utilising used metals whose life cycle is over (scrap metal) thereby combining economic efficiency with a reduced environmental footprint in the best possible way.

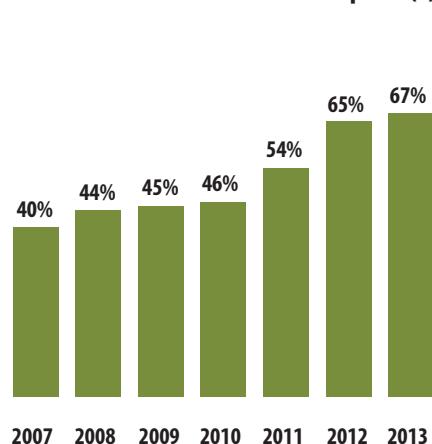
**HALCOR is Greece's largest recycler of copper and its alloys**

**In 2013, 67% of metals used in the HALCOR production process (along with in-house returns) came from recycled metals.**

**Recycled metal consumption (percentage) in relation to total metal consumption (without internal returns)**



**Recycled metal consumption (percentage) in relation to total metal consumption (\*)**



(\*) The diagram also shows the quantities of recycled metals from in-house returns during the production process.

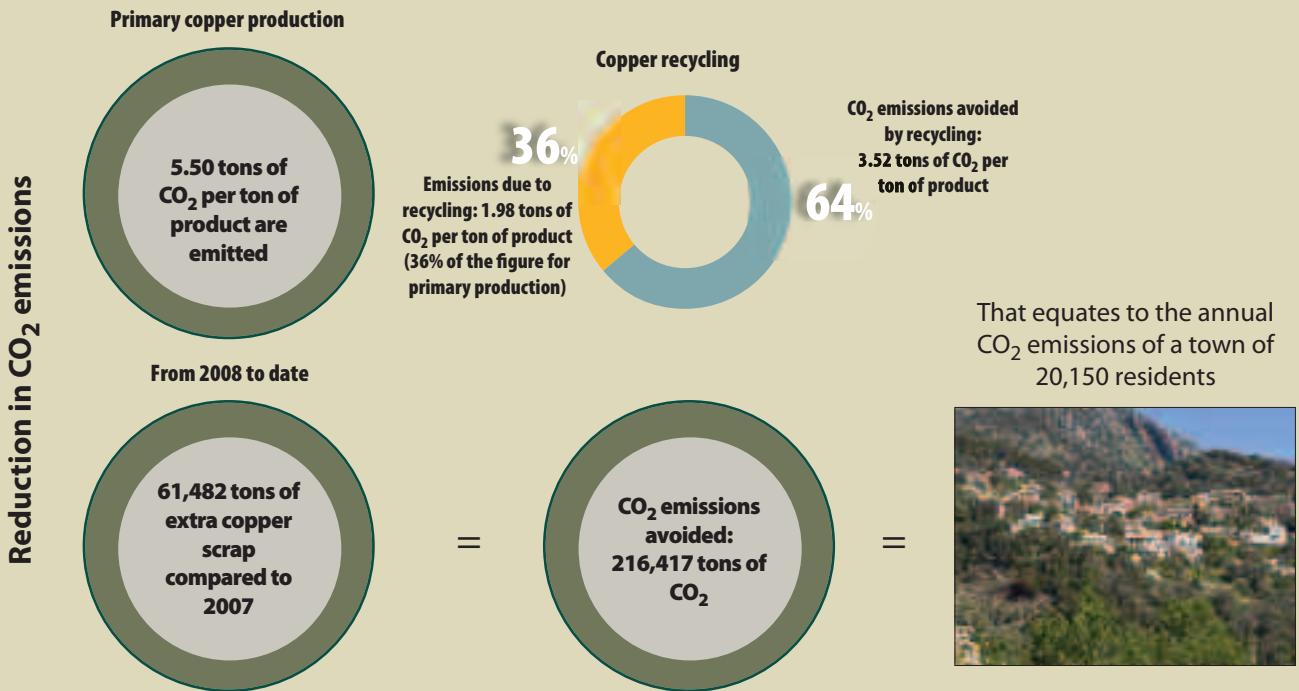
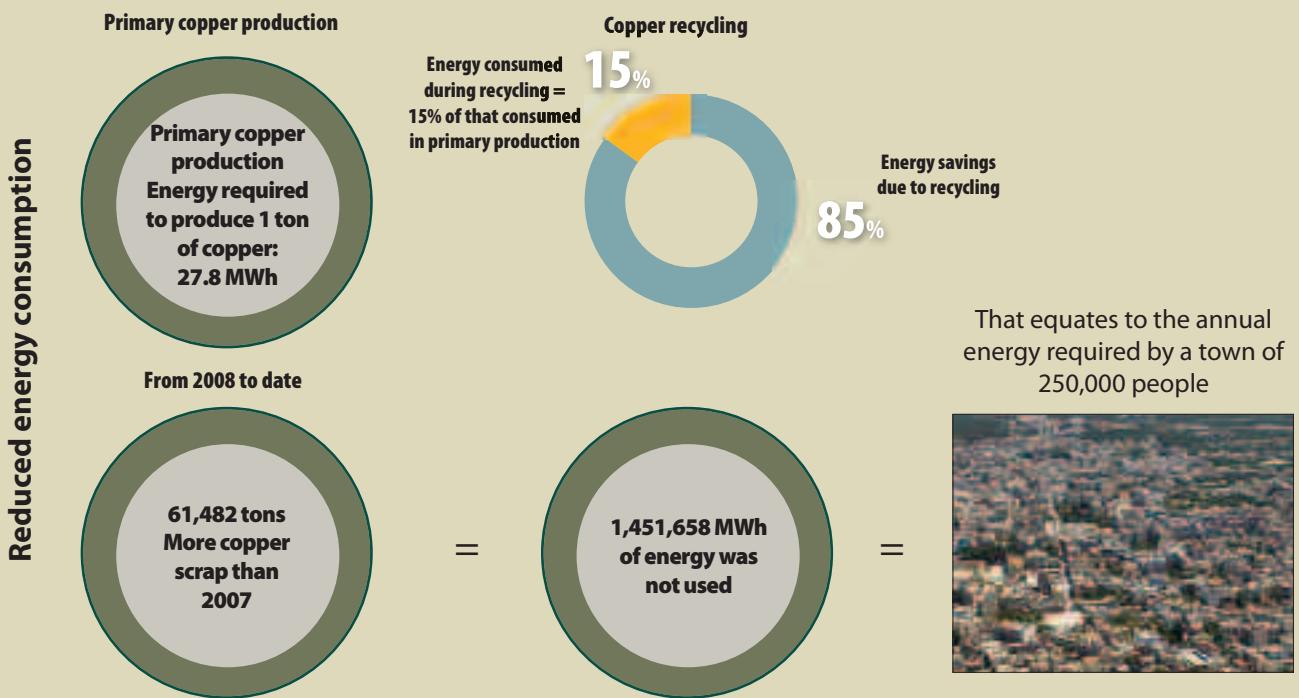




**Copper Recycling: Major environmental and economic benefits**

HALCOR promotes the recycling of metals, especially copper, and meets a large part of the copper needs by reusing used metals whose life cycle is completed (scrap metal).

From 2007 to 2013 HALCOR recycled large quantities of metal, making it Greece's largest recycler of copper and its alloys, thereby achieving a significant saving in natural resources and energy and a cost reduction. The use of third party scrap at HALCOR has significantly increased over recent years, from 19% in 2007 to 58% in 2013, resulting in a major drop in the Company's impact on the natural environment. The savings in energy compared to the amount required for primary production of the same quantity of copper are estimated at 1,451,658 MWh\* at least, which equates to the energy consumed each year by a town of 250,000 residents (computed using the EU average).



\* 100 GJ/tons is the quantity of energy required to produce 1 ton of primary copper. The energy saving is at least 85%.  
 $100 \text{ GJ/tons} \times 85\% \times 61,482 \text{ tons} = 5,225,970 \text{ GJ} \times 1\text{KWh}/0.0036\text{GJ} = 1,451,658,333 \text{ KWh} = 1,451,658 \text{ MWh} (1\text{KWh} = 0.0036 \text{ GJ})$

Like all industries, it is essential for HALCOR to use various chemicals at its facilities during the production process. The use of chemicals is necessary to properly process metals. HALCOR always ensures that it strictly complies with the applicable legislation as regards the use and disposal of chemicals and takes additional measures to limit their use to absolutely necessary levels. All actions that HALCOR takes to ensure the proper use and management of substances, fully conform to the standards and requirements mentioned in the Safety Data Sheets (SDS) and relate to:

- storage in water-tight and secure areas, where necessary.
- user training in proper handling and prevention of leaks into the environment.
- conducting readiness drills in case of emergency.
- taking preventative measures to avoid chemical leaks.

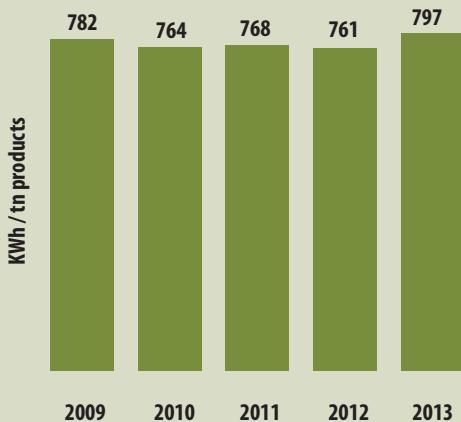
### 6.3.2 Energy Use

The Company uses energy (primary thermal energy from natural gas and oil) to cover its operational needs. A key objective for the Company is to reduce energy consumption where that is feasible, and to increasingly make more efficient use of energy.

#### Thermal Energy

Thermal energy consumption in 2013 stood at 58,909 MWh down almost 10% compared to 2012. However, this reduction was partially due to a drop in production and to a different product mix. The specific thermal energy consumption rate (consumption per product quantity) was 797 KWh per ton of product.

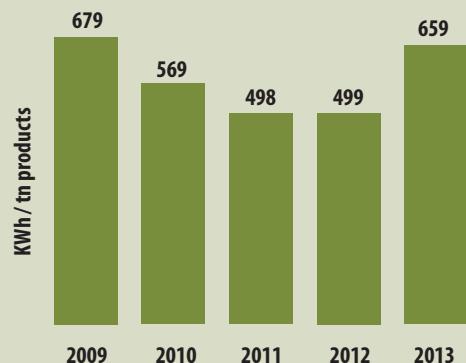
Specific Thermal Energy Consumption



#### Electricity

HALCOR's total indirect energy consumption comes from electricity which the Company procures from Public Power Corporation (PPC) S.A. In 2013 the specific electricity consumption rate was 659 kWh per ton of product, which was significantly higher than in 2012. This rise was primarily due to a different product mix.

Specific Electric Energy Consumption



The efficient use of energy is a key concern of HALCOR's since it is tied into both economic and environmental benefits. That is why the Company has taken a series of measures and steps to achieve energy savings and to increase efficiency.



### Electricity savings

HALCOR seeks to increase efficient energy use and has implemented investments and taken measures to achieve this. In 2013 production processes were re-engineered to achieve electricity savings. The savings generated by these measures equated to 295,857 kWh per year. The most important steps taken in this regard are outlined below.

Scope of change	Type of change (process re-engineering)	Energy savings/year
Induction furnace cooling pump	Automatically stops after being 4 hours out of use	25,400 kWh
Press container	Set point of 250°C for periods out of use lasting more than 48 hours and automatic preheating restart function	24,000 kWh
Tool press furnace	Automatically stops when out of use for period lasting more than 48 hours and automatic preheating restart function	8,000 kWh
Hydraulic units	Automatically stops after engine goes off	20,000 kWh
Air compressor	Smaller compressor used rather than a large one, with lower network pressure	144,000 kWh
Cooling towers	Cooling tower operations checked based on water temperature	70,000 kWh
PPC tariffs	Change in maximum tariff from 3,535 kW in the second half of 2012 to 3,089 kW in 2013	4,457 kWh

HALCOR also made certain changes to equipment or rebuilt certain pieces of equipment in 2013. For example, it replaced conventional light bulbs with LED lower wattage bulbs, resulting energy savings of 5,250 kWh/year.

In 2013 it also began to implement a series of changes (by re-engineering production processes) to save more energy which will be completed in 2014. These steps are outlined in the table below.

Scope of change	Type of change (process re-engineering)	Energy savings/year
Pump Room	Pumps automatically stop after engines stop and automatically come back on	52,000 kWh
Cooling pumps	Pumps stop automatically after operations cease	102,080 kWh

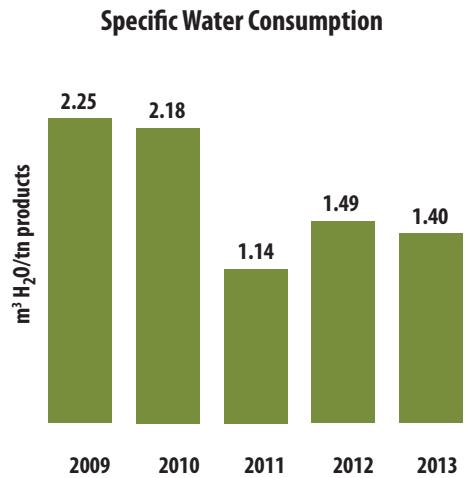
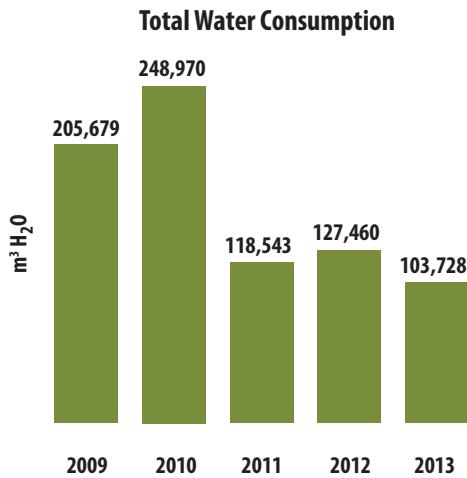
The measures taken to convert or rebuild pieces of equipment that commenced in 2013 which are expected to be completed in 2014 are listed below:

Scope of change	Type of change (process re-engineering)	Energy savings/year
Furnace bellows	Inverter installed capable to regulating air flow speed	189,000 kWh
Lighting	Light bulbs replaced with energy saving ones	500,000 kWh
Lighting	LED light bulbs changed from 250W to 100W ones	5,250 kWh

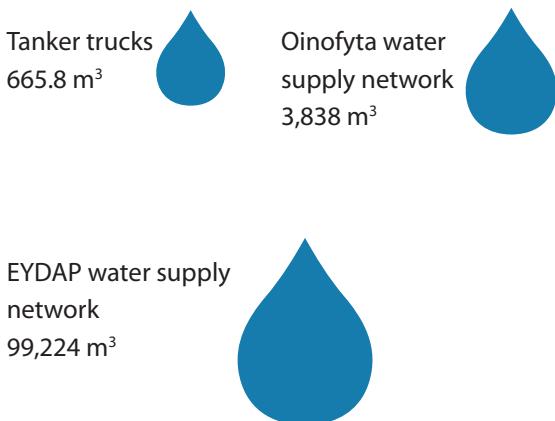
HALCOR seeks to continue its capital expenditure plan and its programme of changes to achieve greater electricity savings over the years to come.

### 6.3.3 Water Use

Water usage is essential in HALCOR's production processes. However, the Company acknowledges the importance of this natural resource and takes all the appropriate measures to efficiently use it and limit the quantities used to the absolute necessary. At the same time, where feasible it re-uses water and places particular emphasis on minimising wastewater disposal. In 2013 water usage was 103,728 m<sup>3</sup>, which reflects a significant 19% drop compared to water consumption in the previous year.



### Water consumption by source



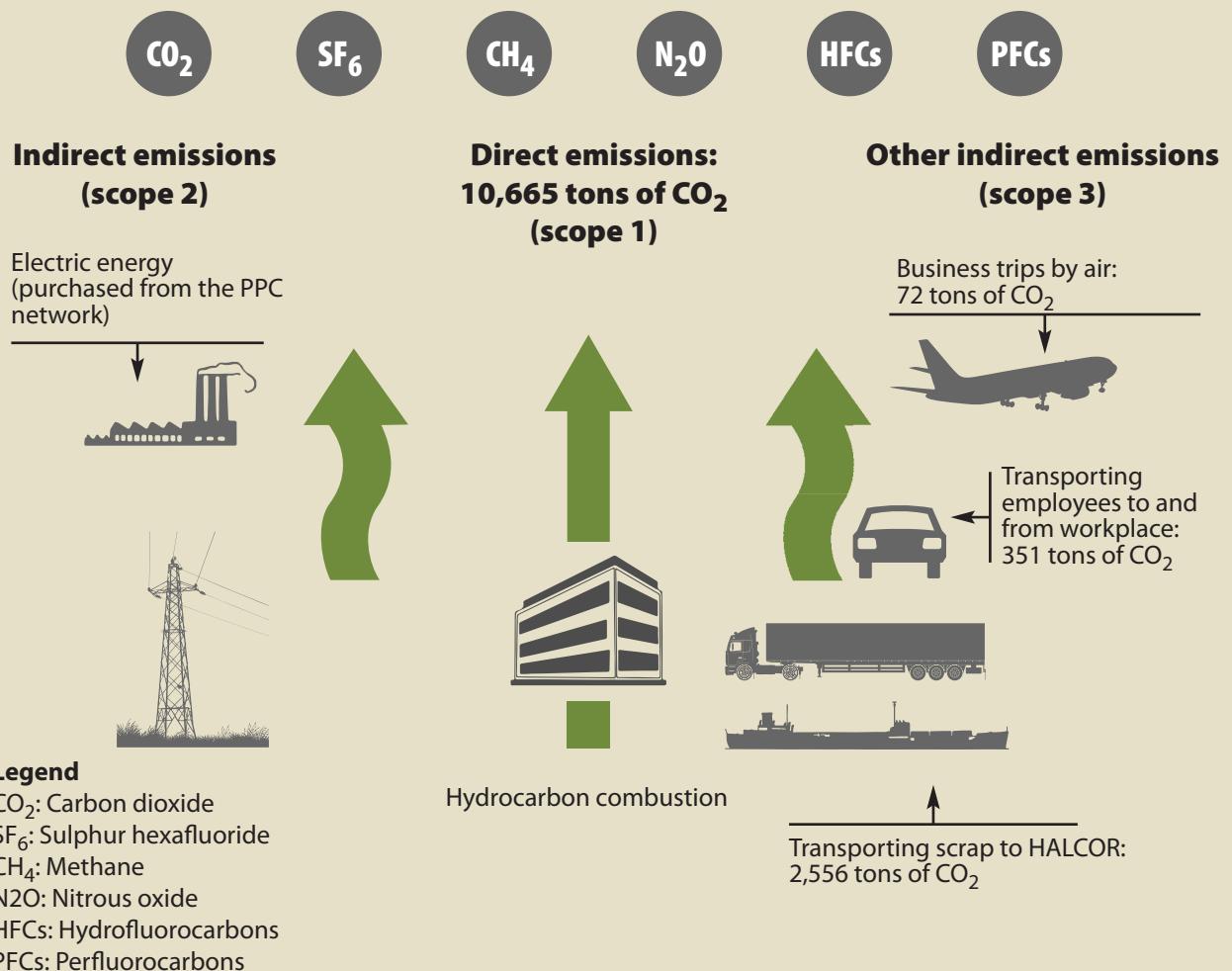


### 6.4 Air Emissions Management

HALCOR recognises the need to combat climate change and the importance of all of us striving together to achieve this goal. It is making continuous efforts to limit greenhouse gas emissions resulting from its operations. To achieve this it has taken a series of measures which are listed below:

- It uses fuels that emit fewer greenhouse gases per unit of energy generated, such as natural gas.
- It carries out frequent, appropriate maintenance and adjusts equipment to achieve optimal fuel usage and consequently fewer atmospheric pollutants.

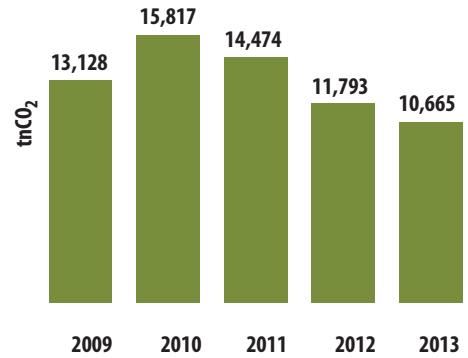
### Direct and Indirect Air Emissions



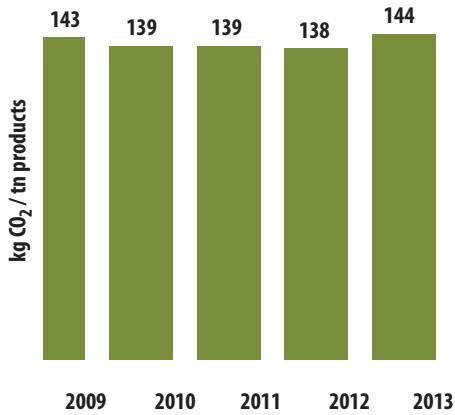
**Carbon dioxide (CO<sub>2</sub>)**

The main source of greenhouse gases is burning fossil fuels for heat in the production process and to power forklift trucks. Total direct emissions in 2013 stood at 10,665 tons of CO<sub>2</sub>, which reflects a drop compared to the previous year.

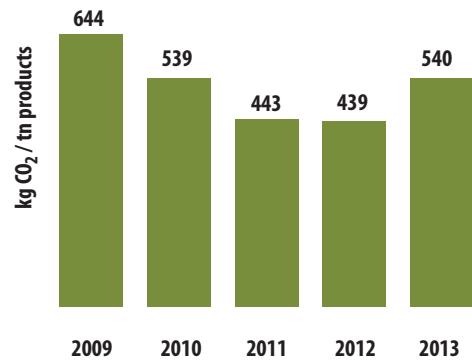
**Total Direct CO<sub>2</sub> Emissions**



**Specific Direct CO<sub>2</sub> Emissions**



**Specific Indirect CO<sub>2</sub> Emissions**



\* The percentage of direct emissions is computed using natural gas consumption in the production process and petrol used for transportation purposes. To compute indirect CO<sub>2</sub> emissions, a factor of 0.82kg CO<sub>2</sub>/kWh for 2013 was used.



### Other emissions (NO<sub>x</sub>, VOCs)

During its production process HALCOR emits nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs). The Company monitors and suitably manages these emissions with the goal of ensuring the least possible deterioration of the air.

In 2013, total emissions of:

- NO<sub>x</sub> stood at 8 tons, which reflects a significant drop of around 10% compared to the previous year.
- VOCs stood at 143.6 tons, reflecting a 22.9% drop compared to 2012.

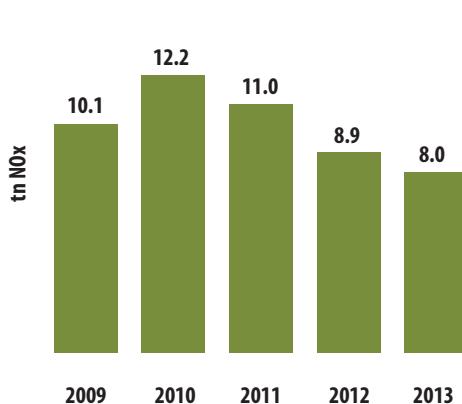
### Monitoring and measures to reduce emissions

To constantly monitor the emission levels of solid particulates, the Company has installed a system to constantly measure suspended solid particulates on the flues from furnaces at its recycling plant and foundry.

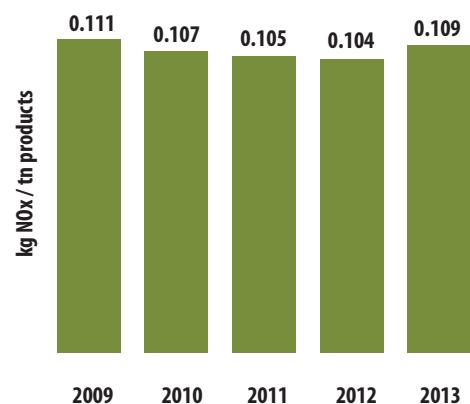
To date the measurements taken do not indicate any overrun of permissible limits specified in the relevant national laws, or the facilities' environmental terms and conditions.

Compliance with emission limits is achieved by implementing Best Available Techniques like the use of sack filters to deal with particulate emissions and active carbon filters to deal with VOC emissions.

**Total NO<sub>x</sub> Emissions**



**Specific NO<sub>x</sub> Emissions**



### Transport emissions

Both the nature of the Company's activities and the location of its production plant require personnel to travel there and that raw materials be taken to and products taken from the production plants. HALCOR seeks to minimise the number of journeys required to the bare minimum. To achieve that it has taken the following steps:

- teleconference systems have been installed and are used to communicate with customers and associates abroad.
- employees are provided with accommodation in the local area.
- staff is transported using company buses.
- staff is recruited from the local community.

In 2013 CO<sub>2</sub> emissions from transporting scrap to HALCOR by ship and by road were estimated at 2,556 tons of CO<sub>2</sub>. Emissions from business trips by air that HALCOR's staff carried out resulted in 72 tons of CO<sub>2</sub> being emitted, and the emissions from transporting employees to and from the workplace were 351 tons of CO<sub>2</sub>.

### Other impacts

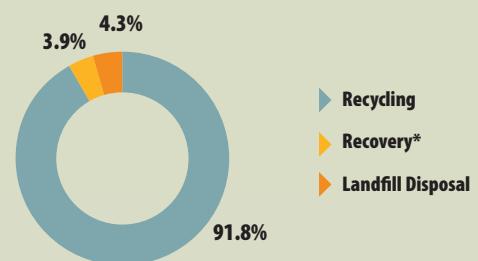
In addition to emitting gases to the atmosphere, the act of transporting raw materials, products and employees also has certain other limited impacts on the environment. These impacts and the measures taken to manage them are presented in Annex I.

## 6.5 Waste Management

HALCOR takes steps to manage the waste generated as a result of its production processes by acting in full compliance with the relevant legislation. At the same time by implementing an Environmental Management System and by constantly striving to improve its environmental performance, HALCOR seeks to go beyond the requirements laid down by law, in order to ensure optimum environmental protection.

A specific waste management procedure is implemented, whose objective is to reduce the volume of waste generated. Best practices for recycling, reuse and recovery are then employed. Most of the waste generated is recycled or recovered to generate energy. As it is clear from the diagram below, only a small portion of the waste ends up in landfill sites, thereby minimising the Company's impact on the natural environment.

Waste Management Method



\*Recovery (energy or other form of recovery)

HALCOR:

- fully complies with the applicable legislation
- takes additional measures to further reduce the volume of waste generated
- has a contract with all alternative waste management schemes established under Law 2939/2001 for the waste it generates.



In 2013 the specific waste generation rate was 18.2 kg/ton of product for the recycling plant and foundry, down some 12.3% compared to the average for the 3-year period 2010-2012. Likewise, the specific waste generation rate for the copper tubes plant was 228 kg/ton, down 9.3% compared to the average for the 3-year period 2010-2012.

HALCOR has industrial wastewater treatment systems to suitably manage wastewater from its production processes. There are three wastewater treatment plants in operation, for primary treatment (sedimentation and oil removal – physical treatment) and/or chemical treatment (by regulating the pH level). By properly operating and maintaining this infrastructure, the Company ensures that the wastewater leaving its facilities complies with the provisions governing the disposal of wastewater to natural bodies of water.

In addition, each month HALCOR monitors treated waste environmental parameters (such as pH, BOD5, COD, total suspended solids, fats and oil- hydrocarbons, heavy metals, temperature, etc.) in line with the terms of its approved wastewater disposal licenses. In fact in 2013 HALCOR prepared and implemented a new procedure and inspection schedule and measure quality assurance schedule.

#### Expansion of the rainwater treatment plant

In 2013 HALCOR expanded its rainwater treatment plant to increase capacity. This now allows it to optimally treat rainwater.

#### OUR TARGETS FOR 2014



To install a closed circuit degreasing system for copper tubes .

To keep the number of hours of training at 2013 levels.

To complete the new sewerage network and procure suitable equipment to manage wastewater.

To replace light bulbs, install inverters and make further changes to procedures to save energy.

To achieve a 45% reduction in the use of solvents in the production process by 2015.

To replace all conventional light bulbs with energy-saving ones indoors at the Copper Tubes Production Plant by 2015.

To commence the process of recording the environmental impact from transporting employees and products by 2015.

To carry out a HALCOR product life cycle assessment by 2017.





**We diligently monitor customer needs and requirements, and are continuously improving the quality of products and services.**



**Overall customer satisfaction is up**



**11% of suppliers are local**



## Our approach



## We are focusing on key issues:

- Investments in R&D
- Providing top quality products and services
- Implementing a certified Quality Management System and ensuring that all our products have suitable certificates
- Promoting Sustainable Development throughout the entire supply chain
- Supporting local suppliers



## Our Commitment

- To ensure high levels of customer satisfaction.
- To ensure our products and services faithfully comply with the requirements of standards and have suitable certification.
- To implement and constantly improve our Quality Management System.
- To constantly train our staff to achieve the necessary levels of professional competence and expertise.

## 2013 IN SUMMARY



**822**  
Customers



**86%**  
Of domestic customers  
satisfied



**77%**  
Of foreign customers  
satisfied



**1,378**  
Suppliers



**51%**  
Of all metal procured  
was scrap



### 7.1 New Product Research and Development

HALCOR is dedicated to research, to developing innovative, cutting-edge products by constantly improving and developing, while also striving to meet all customer needs.

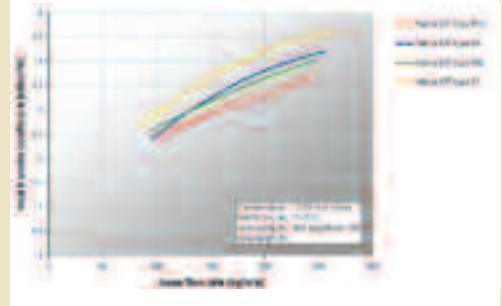
Coupled with its ongoing capital expenditure plan which is implemented each year to optimise production processes, HALCOR aims to check the quality of all products manufactured and to develop new products and applications for its product range.

**With the customer as a priority, all partnerships reflect our reliability, our respect for customers and the quality of our products and services.**

**At HALCOR we are systematically investing in research and technology, to promote innovation and generate new cutting-edge products.**

### Comprehensive services: New Inner Grooved Tubes (IGT) thermal performance testing lab

To provide as comprehensive a range of services to customers as possible and to make continuous improvements and developments in what it does, HALCOR has set up a new innovative lab to test the thermal performance of Inner Grooved Tubes (IGTs). The thermal performance testing lab allows the heat transfer coefficient of tubes intended for heat exchangers to be measured. The heat transfer coefficient is measured for HFC cooling fluids (like R410A, R134A and others) in the condensation and evaporation phase. It is also possible to measure pressure drops due to friction.



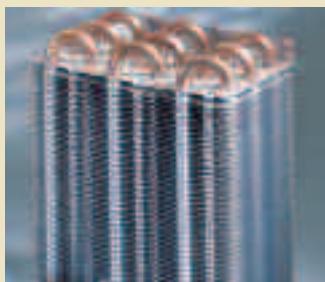
The purpose of the lab is:

- To measure / evaluate the different thermal performance rates of different IGT designs and shapes.
- To provide technical support to manufacturers of heat exchangers (air-conditioning units).
- To develop IGT designs for tailor-made applications depending on the specific needs and specifications of each and every customer.

Having set up this lab, HALCOR is now well poised to:

- accurately understand the key principles governing how heat exchangers behave depending on the different designs of IGTs.
- correlate the operating conditions of heat exchangers with corresponding lab conditions.
- tailor the design of IGTs to achieve the preferred performance targets set by manufacturers for the design of the heat exchanger.

The benefits of having this facility are particularly important for HALCOR and its customers, given the new range of services that can now be offered. It is worth noting that thanks to this new lab the tests to be carried out will result in the energy performance of IGTs being optimised, which will also have particularly encouraging effects on the environment. Using tubes with a high energy rating results in an overall improvement in the energy rating of new heat exchangers, resulting in reduced energy consumption and therefore fewer pollutant gases being emitted to the atmosphere.





## 7. Customer-Oriented Approach

HALCOR is an active member of the Hellenic Research Centre for Metals (ELKEME) to help it promote new technology R&D in the copper sector, product improvements and the achievement of cutting edge requirements. The Company is also a founding member of the Hellenic Copper Development Institute and is actively involved in its programmes, either by providing materials and space for seminars to be held, or by financing the running of specific programmes across all of Greece.

### Hellenic Research Centre for Metals (ELKEME)

The Centre's activities focus on developing new production technologies and on the use of steel, aluminium, copper and zinc products. HALCOR works in partnership with and collaborates with ELKEME. Its significant contribution to improving quality and its involvement in the development of innovative products and production processes has helped make HALCOR's products more competitive.

### Hellenic Copper Development Institute (HCDI)

The Hellenic Copper Development Institute's primary objective is to promote the latest developments that showcase the vital role copper has to play in the fields of the environment and health.

Through HCDI, which is a member of the European Copper Institute (ECI), HALCOR is actively involved in major research projects concerning copper's impact on human health and the environment. The results of this long-term research demonstrate the benefits of using copper and that it has neutral to positive impacts on man and the environment. HCDI also receives financing from and is supported by the not-for-profit International Copper Association (ICA), an international network of 24 copper centres.

One of the HCDI's most important objectives is to provide continuous, direct briefings to professionals who use copper. HCDI's partnership with HALCOR is just one of its activities designed to achieve this objective. In 2013 they jointly organised a special seminar on Andros island for plumbers and professionals from the sector.

The issues this seminar addressed were:

- how to install copper pipes.
- a commercial presentation of Cusmart and TALOS Solar copper pipes.
- Antimicrobial Copper - Properties / Applications.

The instructors from HALCOR and HCDI placed emphasis on copper's values, its quality and special features, like the fact that it requires zero maintenance and its low, competitive cost. Major emphasis was also placed on top class training for today's professionals in the sector and the certified products they need to use.



The HCDI training programme, which includes a competition for young plumbers / thermohydraulic engineers, was once again financed for the fifth consecutive year by HALCOR.

The competition takes place in Thessaloniki and was launched in early March and ended in mid-April 2013. The prizes went to students who did well in the thermohydraulic facilities competition. The competition aims to bring today's students and tomorrow's professionals who are still in training in the fields of thermohydraulics, cooling systems and natural gas, closer to copper materials and the applications of copper products.

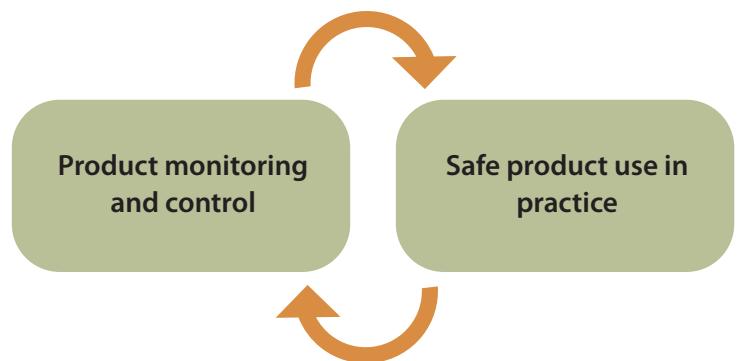
This complements HCDI's overall activities in the field of training secondary school pupils and meets the needs schools have for technically flawless, well-organised training for their pupils, while also conveying know-how about proper hydraulic facilities to tomorrow's professionals in the sector.

The aim is to bring those competing into an environment and conditions similar to those in which they would find themselves working in the future, to be able to showcase their skills and experience by working copper in the most professional way possible.



## 7.2 Outstanding product quality

For HALCOR, ensuring quality products is a strategic choice, a competitive advantage, and a matter of business responsibility. The Company is particularly focused on the quality of the products it manufactures, and that is why it implements a well-designed, cutting-edge Quality Management System tailored to its own needs, and certified in line with the requirements of the ISO 9001:2008 standard. During all stages of production, strict, in-depth checks are carried out by specialised, highly trained staff, to ensure the top quality of our products. Quality control procedures at HALCOR are verified both by frequent customer inspections and audits carried out by independent Greek and international certification bodies.



**HALCOR holds a leading place in the European and global market because of the top quality of its products and services.**



HALCOR carries out continuous checks to ensure that its products conform to performance criteria specified in the requirements of international standards, order specifications and customer requirements.

#### **Product monitoring and controls**

- ▶ Checks of all incoming materials (qualitative and quantitative checks)
- ▶ Regular checks are carried out during production (based on specific procedures for which there are detailed work instructions).

#### **Safe product use in practice**

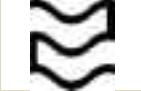
- ▶ A Safety Data Sheet (SDS) is issued to brief end recipients.
- ▶ Info-sheets are prepared and published containing all information relevant to optimum operating conditions for the products manufactured.
- ▶ Manuals are also provided which contain the warranties the Company offers (for water supply and natural gas pipes).

*All checks and controls are recorded in measurement and testing logs and records are kept to ensure product reliability even after long-term use.*



The Company systematically checks how its products interact with user health and safety, since its products are frequently used in important applications such as water supply pipes. In all events, copper's physical properties help protect the health of end users since it has major antimicrobial properties.

All Company products come with quality marks, confirming that exacting specifications have been complied with. HALCOR has recently been granted the right to use the quality marks for its products provided by the Czech Republic (SZU), Holland (ATA) and VIK (Croatia) for water supply tubes. This is an important condition for marketing its products in those markets.

CERTIFICATION COUNTRY		MARK	CERTIFICATION COUNTRY		MARK
GREDEC	ALGERIA		AENOR	SPAIN	
AFNOR	FRANCE		VIK	CROATIA	
CSTB	FRANCE		ATA/KIWA	HOLLAND	
CU	GERMANY		KIWA	HOLLAND	
DVGW	GERMANY		KIWA/GASTEC	HOLLAND	
GL	GERMANY		GOST	RUSSIA	
TUV CERT	GERMANY		SETSCO	SINGAPORE	
CE	EUROPEAN UNION		SITAC	SWEDEN	
BSI	UNITED KINGDOM		SZU	CZECH REPUBLIC	
NSAI	IRELAND		VTT	FINLAND	
			NSF	USA	



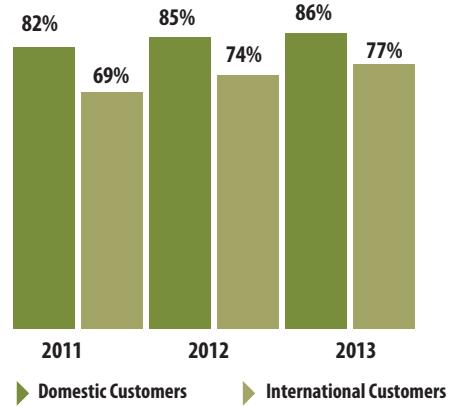
**7.3 Customer Satisfaction**

One of HALCOR's key concerns is to maintain and develop trust-based relationship with customers. The Company's customer-oriented philosophy emphasises response time to requests, and the comprehensive nature of the product support services offered.

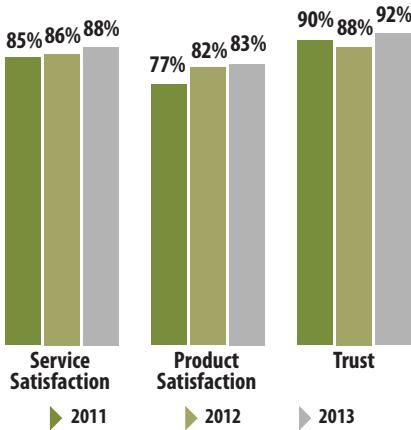
Customer satisfaction levels are recorded in a systematic, well-organised manner, via regular customer satisfaction surveys, and the results of surveys are evaluated and steps planned to achieve improvements, wherever that is considered necessary. As part of the Company's Quality Management System, HALCOR records and evaluates the views of customers, any complaints they have and also takes into account comments and proposals to achieve continuous improvements in the quality of its products and services.

For yet another year, overall customer satisfaction levels improved both for domestic and foreign customers, with the overall figures remaining high.

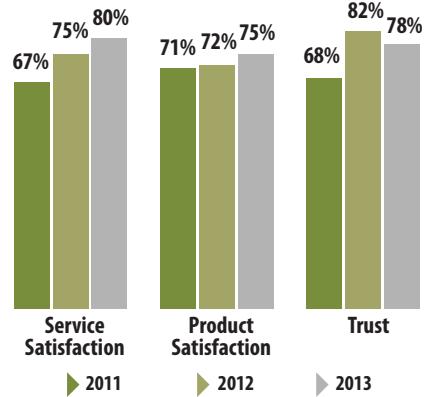
**Total HALCOR Customer Satisfaction (%)**



**Degree of Satisfaction Domestic Customers (%)**



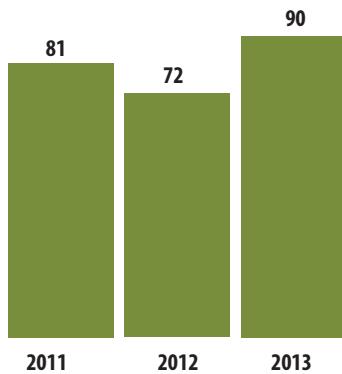
**Degree of Satisfaction International Customers (%)**



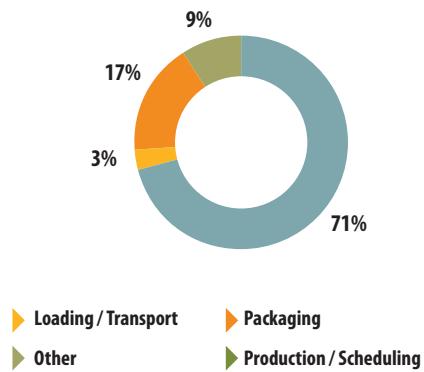
### 7.4 Complaint Management

As a company firmly focused on maximising levels of customer satisfaction, HALCOR treats complaints it may receive from customers as a source of information and an opportunity to improve, and also to potentially re-engineer processes if that is considered necessary. The Company manages complaints in a well organised manner, recording them and forwarding each complaint to the appropriate department. In 2013 HALCOR achieved a major improvement in response time to customer complaints, reflecting its ongoing endeavours to make improvements and the high level of customer satisfaction.

**Total Customers Complaints**



**Complaint Type / Category**



**We take account of customer complaints to achieve continuous improvements.**

- Following complaints about products sent by container where systematic damage was found to have been caused during unloading, the loading method was reviewed and steps were taken to provide additional protection for products against wear and tear. The customer was also notified about how to handle the products properly. The results of these steps taken by HALCOR were that complaints of this type stopped.
- Following complaints about the failure of plugs inserted into the end of straight pipes, checks were carried out on the quality of the material the plugs were made of, and the material was found to deviate from the specifications. A complaint was lodged with the supplier about failure to comply with specifications and the deviant materials were returned. The problem has not arisen since then.



### 7.5 Responsible Procurement

For HALCOR, its suppliers are key business partners, as the quality of materials and supplies is directly related to its products. Managing suppliers is a critical factor in the development of HALCOR and for that reason the Company implements specific procedures to manage its suppliers.

#### 7.5.1 Supplier Evaluation and Selection

In procurement:

- Specific procedures are followed that aim to ensure that specifications are complied with and that the quality of supplies and the end product are safeguarded.
- Policies are implemented to check the specifications of materials that are ordered and received. In cases of non-compliance suppliers are sent the results in the form of a complaint and the Company awaits improvements to be made.
- The Company, if necessary, takes part in trial production runs at its suppliers' facilities and evaluates the results.

**The supplier evaluation/selection criteria include environmental criteria, and corporate responsibility criteria, among others.**

#### 7.5.2 Suppliers and Environmental Management

HALCOR has begun promoting Corporate Responsibility practices in its supply chain. When evaluating suppliers we attach particular importance to compliance with an Environmental Management System that conforms to the ISO 14001:2004 standard. In certain cases, though, it is vital that suppliers have such a system in place. When certain materials are being ordered, it is vital that there is a certificate of compliance with the REACH Regulation and that the relevant Safety Data Sheets (SDS) are sent.

#### 7.5.3 Protecting the Health and Safety of Associates

HALCOR's concern for health and safety is not limited solely to its own people but also extends to its associates. The safety rules applicable to our employees are mandatory for contractors carrying out work at the Company's facilities. In order for the Company to be able to commence collaboration with any supplier it is an essential step that the contractor fills out and signs a special form in which it warrants that:

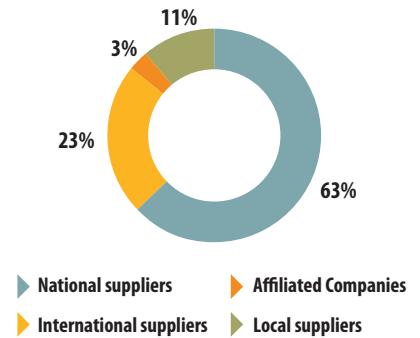
- Its people are insured with the relevant social security funds (detailed checks are then carried out so that HALCOR).
- It takes all necessary safety measures specified by law that are appropriate to the nature of the specific project being carried out.
- It complies with all the provisions of HALCOR's occupational Health and Safety regulations.

#### 7.5.4 Supporting local suppliers

The Company is always there for the local community and encourages the growth and development of the local market across the board in all areas where it operates. When evaluating potential suppliers, it views the fact that they come from the local area in a positive light, and wherever feasible collaborates with suppliers and contractors locally (from the wider

Evia and Viotia areas). Although the majority of items HALCOR procures are raw materials / metals that can only be procured from abroad, in 2013, 11.4% of the total procurement spend (total domestic purchases excl. metals) went on local suppliers.

Distribution of Suppliers 2013

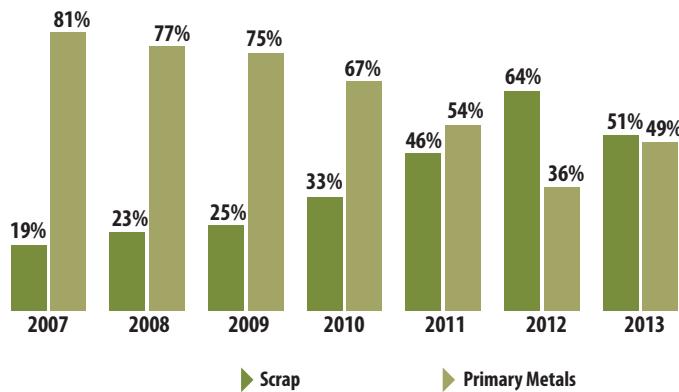


**7.5.5 Purchasing recyclables (scrap)**

HALCOR combines economic efficiency with environmental protection (by reducing the waste generated), preserves natural resources (by reducing the amount of raw materials used), and is using increasing quantities of scrap metals as raw materials. As a result, HALCOR has become Greece’s largest recycler of copper, zinc and their alloys.

**Scrap is an exceptionally useful secondary raw material with major environmental value.**

Scrap proportion to total metal purchases



**OUR TARGETS FOR 2014**



- \_\_\_\_\_ To develop new products and services.
- \_\_\_\_\_ To expand into new markets and increase the existing customer base.
- \_\_\_\_\_ To further expand the range of products which are certified.
- \_\_\_\_\_ To increase the amount of scrap purchased as a % of all metal procured.

### **About the Report**

By publishing the 2013 Corporate Responsibility and Sustainable Development Report HALCOR is seeking to provide a comprehensive picture of its performance and activities in the Corporate Responsibility and Sustainable Development sector in 2013 (the period 1.1.-31.12.2013) and its strategy for the forthcoming period. HALCOR's goal is to increasingly involve stakeholders. This publication presents the impact of the Company's business activities on the economy, the environment and society, to provide information to investors, shareholders, employees, customers, suppliers and other stakeholders and all persons interested in the Company or Corporate Responsibility and Sustainable Development issues.

The Company publishes its Corporate Responsibility and Sustainable Development Report each year. This is the sixth consecutive year in which the Report has been published. All HALCOR Corporate Responsibility and Sustainable Development Reports are available on the Company's website at <http://www.halcor.gr> under Corporate Responsibility / Corporate Responsibility and Sustainable Development Reports.

### **Scope and Boundary**

This Report covers all HALCOR S.A.'s activities relating to the Company's production facilities in Greece but it does not include data about its subsidiaries, suppliers or third parties. However, certain additional information relevant to the Group is mentioned at certain points. There have been no major changes relating to size, structure or ownership which affect the content of the Report. Where differences do exist, they are mentioned in the specific sections of this Report.

The Report covers the entire range of issues that relate to the Company's economic, environmental and social impact, but there is no specific restriction on the scope or boundary of the Report.

The 2013 Report provides summary information about two key subsidiaries of HALCOR (SOFIA MED S.A. and FITCO S.A.), however they have not been included in the scope of this Report. HALCOR's subsidiary HELLENIC CABLES S.A. has published its own separate Corporate Responsibility and Sustainable Development Report for the last five years which can be found on its own website, [www.cablel.com](http://www.cablel.com). The scope of the Report does not include information about possible acquisitions, sales, joint ventures or other such arrangements.

Compared to the previous Report, there have been no major changes in the scope or methods used to assess the data presented, which means that the ability to make year-on-year comparisons remains unaffected in the sectors presented. There have been no major revisions to the information presented, and where information from the previous year has been corrected, this is suitably highlighted.

### **Determining the content of the Report – Materiality**

In determining the issues to be included in the Report HALCOR followed the principles set out in the Global Reporting Initiative concerning the content of such reports and the principles relating to the quality of such reports.

**Principles used to determine content:**

- Materiality
- Stakeholder Engagement
- Sustainability
- Comprehensiveness

**Principles used to determine quality:**

- Balance
- Comparability
- Accuracy
- Timeliness
- Clarity
- Reliability

In relation to the principle of materiality in particular, HALCOR performed a special Materiality Analysis to identify key issues in relation to Corporate Responsibility and Sustainable Development arising from its operations. This procedure is repeated every year to capture any changes and to incorporate any new trends. In addition, at the start of 2014 specific steps were taken to have a representative group of stakeholders evaluate the key issues raised by the Company at a special workshop. Information about the verification procedure used is contained on p. 31.

*More information about the procedure followed and the conclusions it generated are set out in section 2.1 "Prioritising issues and actions".*

**Guidelines**

HALCOR's Corporate Responsibility and Sustainable Development Report for 2013 was prepared in accordance with the latest guidelines for Corporate Responsibility / Sustainability Reports issued by the international Organisation, Global Reporting Initiative (GRI - G3.1). The specifications in the ISO 26000 standard were also used. To gradually prepare for the report being drafted in line with the G4 issue of the GRI Methodology in the future, responses to certain selected G4 requirements have been included in this report.

**Methodology and project team**

The data and information presented in this Report have been collected on the basis of the Company's existing record-keeping procedures, as well as from files and databases maintained as part of various systems. In certain areas where processed data are presented, reference is made to the manner or method of calculation, while at the same time, all relevant GRI - G3.1 guidelines have been followed.

A special team of executives from all divisions and departments of HALCOR involved was formed to prepare the Report. The team's main task is to collect all information required pertaining to the Company's various Corporate Responsibility sectors.

The members of HALCOR's Corporate Responsibility Team who were involved in this report are:

- **Coordinator:** George Mavraganis
- **Departmental/ Divisional representatives – contributors:** Thalia Angelidi, Panagiotis Danamos, Katerina Kapeleri, Eftychios Kotsambasakis, Giorgos Samartzis, Dionysis Skarmoutsos, Vasilis Solidakis, Giorgos Tzortzos, and Spyros Hondrogiannis.



This 2013 Corporate Responsibility and Sustainable Development Report was prepared in cooperation with Action Public Relations Hellas Ltd. with the support and scientific guidance of the specialised consultants Giorgos Iliopoulos and Tania Takou in relation to data collection, evaluation and authoring.

### **External Verification**

HALCOR recognises the added value that external verification brings to the Report as it helps to increase the quality and integrity of its accountability in the eyes of its stakeholders. For that very reason, HALCOR opted to undergo external verification of the data included in the "Care for our People", "Occupational Health and Safety" and "Customer-Oriented Approach" sections of the Report in association with an independent external organisation. The conclusions drawn and comments made during this external verification process will be utilised by the Company to improve the quality of the Corporate Responsibility Reports it publishes. In light of this, in future it plans to expand the data verification practice to other sections of the Report.

The application level of GRI - G3.1 indicators to this report is set out on pages 118-119, along with the letter from the independent organisation which performed the verification.

### **Contact**

HALCOR welcomes any questions, enquiries, clarifications or suggestions for improvement, as the opinions of its stakeholders are very important to the Company.

#### **HALCOR S.A.**

**George Mavraganis**

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**[www.halcor.gr](http://www.halcor.gr)**

# ANNEXES



# ANNEX I - Key Corporate Responsibility Indicators

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## Customers

### Customers geographical distribution

Customer Categories	Europe	America	Asia	Africa	Total
Industrial Tubes Customers	75.9%	91.7%	91.9%	50.0%	77.5%
Installation Tubes Customers	24.1%	8.3%	8.1%	50.0%	22.5%

## Purchasing

### Number of Suppliers per category /origin

Supplier Category	2011	2012	2013
Local suppliers	118	130	145
National suppliers	990	880	877
International suppliers	313	334	315
Group Companies	52	49	41
Total	1,473	1,393	1,378
Suppliers from the local community (percentage)	8%	9%	11%

## Purchased materials

Categories	Type of material	Measurement unit	2011	2012	2013		
					Quantity / Volume	Presence in the final product	Non Renewable
Raw materials	Metals	Kg	n/a	n/a	58,088.224	√	n/a
	Metals	pieces	n/a	n/a	329,270	√	n/a
	Plastic	Kg	n/a	n/a	768,567	√	n/a
	Plastic	pieces	n/a	n/a	277,950	√	n/a
	Plastic	m	n/a	n/a	45,330	√	n/a
	Plastic	m <sup>2</sup>	n/a	n/a	2,750	√	n/a
Production related materials	Consumables	Kg	880,503.08	1,064,456.13	1,155,016	-	n/a
	Consumables	Lt	174,546.30	188,141.00	162,690	-	n/a
	Consumables	m <sup>3</sup>	4,670,568.07	4,194,670.20	4,210,644	-	n/a
	Consumables	pieces	72	12	24	-	n/a
	Fuel	Lt	250,069	224,657	189,060	-	n/a
	Fuel	m <sup>3</sup>	-	0	7,5	-	n/a
	Fuel	Nm <sup>3</sup>	6,817,937	5,492,572	4,996,117	-	n/a
	Fuel	Kg	27	-15,830*	100	-	n/a
Supporting materials or spare parts	Spare parts	Kg	102,256	126,530	139,798	-	n/a
	Spare parts	m	17,051.7	10,591.4	9,703	-	n/a
	Spare parts	m <sup>2</sup>	4	100	18	-	n/a
	Spare parts	set	247	158	378	-	n/a
	Spare parts	carton boxes	20	30	30	-	n/a
	Spare parts	pairs	4	0	8	-	n/a
	Spare parts	pieces	90,582	124,315	97,134	-	n/a
Packaging materials	Metal	pieces	5,400	0	-	-	n/a
	Metal	m	58,550	0	-	-	M/A
	Metal	Kg	29,151	29,368.5	32,038	√ (only 27,232)	n/a
	Wood	pieces	220,828	92,327	98,885	√	-
	Wood	m <sup>3</sup>	-	915.3	664	√	-
	Paper	Kg	22,785	21,048	27,121	√	-
	Paper	pieces	1,507,999	1,439,409	1,532,672	√	-
	Belts	pieces	261,697	205,680	232,017	√ (only 227,617)	n/a
	Plastic	Kg	207,334	182,094.4	187,524	√	n/a
	Plastic	m	59,438	63,000	47,350	√	n/a
	Plastic	Km	618	777	780	√	n/a
	Plastic	m <sup>2</sup>	-	1,752 204	6,486	√	n/a
	Plastic	m <sup>2</sup>	-	0	-	√	n/a
Plastic plugs	pieces	7,314,443	7,269,976	8,584,784	√	n/a	

n/a : The Company does not publish this information.

\* Return to Supplier

## Human Resources

### Human Resources data by Geographical sector and Gender Group

Geographical Sector	2012			2013		
	Men	Women	Total	Men	Women	Total
Attica	229	27	256	221	24	245
Greater Viotia and Evia Area	167	9	176	160	6	166
Rest of Greece	2	-	2	3	-	3

### Human Resources data by Geographical sector of Employment

Geographical Sector	2011	2012	2013
Attica	18	15	12
Greater Viotia and Evia Area	431	411	393
Rest of Greece	6	2	2
Other (relocation abroad)	12	6	7
<b>Total</b>	<b>467</b>	<b>434</b>	<b>414</b>

### Total employee hires by gender and age group

	18-25	26-40	41-50	51+
Men	-	2	1	1
Women	1	-	-	-
<b>Total</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>

### Total employee hires by geographical sector and age group (2013)

	18-25	26-40	41-50	51+
Attica	-	2	-	1
Greater Viotia and Evia Area	1	-	1	-
Rest of Greece	-	-	-	-
<b>Total</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>

### Total employee departures by gender and age group (2013)

	18-25	26-40	41-50	51+
Men	-	2	3	13
Women	1	4	2	-
<b>Total</b>	<b>1</b>	<b>6</b>	<b>5</b>	<b>13</b>

## Environment

### Environmental Expenditures

Category	Category Environmental Expenditures (Euro)	2013
Prevention	Waste management by licensed contractors	196,338
	Support to Environmental Management Department and consulting services	177,932
	Monitoring environmental parameters	70,557
	New environmental infrastructure and anti-pollution systems	292,265
Emissions treatment	Maintenance and operation of environmental protection equipment	387,080
Remediation	Landscape improvement and maintenance	10,460

### Use of recyclables

Year	2011	2012	2013
Recycled metal consumption – percentage (without internal returns)	43%	56%	58%
Recycled metal – percentage (including internal returns)	54%	65%	67%

### Specific Thermal Energy Consumption per Production Plant

Specific Thermal Energy Consumption (kWh/tn products)	2011	2012	2013
HALCOR total thermal energy consumption	768	761	797
Recycling-Melting	496	446	435
Copper Tubes	388	377	370
Titanium-zinc Rolling	-	-	-
Compounds	1,512	1,359	1,367

### Direct energy consumption by type of fuel

Type of fuel	2011	2012	2013
Diesel (lt)	246,554	229,840	185,678
Natural Gas (Nm <sup>3</sup> )	6,826,706	5,492,610	4,996,117
LPG kg	500	-	-
<b>Total (GJ)</b>	<b>275,783</b>	<b>223,084</b>	<b>202,016</b>

**Specific electric energy consumption**

Year	2011	2012	2013
Specific electric energy consumption (KWh/tn product)	498	499	659

**Total direct CO<sub>2</sub> emissions**

Year	2011	2012	2013
Total direct CO <sub>2</sub> emissions (tn)	14,474	11,793	10,665

**Total Direct and Indirect CO<sub>2</sub> Emissions (kg/tn product)**

Total HALCOR	Direct Emissions			Indirect Emissions		
	2011	2012	2013	2011	2012	2013
Specific CO <sub>2</sub> Emissions (Kg/tn product)	139	138	144	443	439	540

**Total NOx Emissions**

Year	2011	2012	2013
NOx emissions (tn)	11.0	8.9	8.0

**Total Specific NOx Emissions**

Year	2011	2012	2013
Specific NOx Emissions (Kg/tn product)	0.105	0.104	0.109

**Water consumption (m<sup>3</sup>)**

Water Source	2011	2012	2013
EYDAP water supply network	113,614	120,124	99,224
Borehole/Well (Titanium-zinc rolling plant)	-	-	-
Oinofyta Water Supply Network	3,010	4,667	3,838
Water tanker trucks	1,919	2,669	665.8
<b>Total</b>	<b>118,543</b>	<b>127,460</b>	<b>103,728</b>

**Specific water consumption**

Year	2011	2012	2013
Specific water consumption (m <sup>3</sup> /tn product)	1.14	1.49	1.40

**Breakdown of waste by category and management method**

Waste	Category	Waste Management Method	Quantity (Kg)		
			2011	2012	2013
Mixed recyclables (scrap metal, metal packaging paper, wood, plastic)	solid	Recycling	12,550,868*	12,271,374*	11,667,513
Sewage sludge	solid	Recycling	-	-	-
Slag	solid	Recycling	808,720*	288,876*	509,486
Mixed materials	solid	Recovery	114,000	102,880	-
Waste	solid	Landfill disposal	132,160	552,460	587,270
Used oils	liquid	Recycling	310,010	375,509	288,364
Batteries	solid	Recycling	2,100	530	1,020
Filter dust	solid	Recycling	245,500	124,750	178,600
Emulsions	liquid	Recovery	575,820	627,740	498,900
Polluted absorbing materials	solid	Recovery	71,615	53,430	44,440
Fluorescent lamps	solid	Recycling	270	130	193
WEEE	solid	Recycling	8,160	2,670	4,130
Tires	solid	Recycling	9,560	4,360	2,700
<b>Total Waste</b>			<b>14,828,783*</b>	<b>14,279,959*</b>	<b>13,782,616</b>

\*Review due to incorrect register

**Breakdown of PPC's fuel compound (as provided by PPC at country's level. 12months, 12/2011-11/2012)**

Breakdown of production and interconnections	percentage %
Lignite	47.69%
Oil	8.20%
Natural gas	23.93%
Hydroelectrical	6.21%
Renewable Energy	10.55%
Interconnections	3.42%
<b>Total</b>	<b>100%</b>

**Environmental impacts by transferring raw materials, products and employees as well**

Environmental impacts by transferring raw materials, products and employees as well	Significant Impact	Quantities	Measures against impacts
Energy consumption	Yes	The procedure for registering energy consumption in various types of transfer has begun.	See previous paragraph "Emissions"
CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>x</sub> emissions	Yes	The procedure for registering emissions in various types of transfer has begun.	See previous paragraph "Emissions"
Waste due to certain chemical use for the vehicles (e.g. batteries, lubricants)	Non-significant	impact because of limited quantities and suitable management.	
Noise	Non-significant	impact because the noise levels are limited to road/sea transports as well.	
Chemical and oil leaks etc.	Non-significant	impact, no leak incidents have been reported.	

**Occupational Health and Safety****Number of Accidents**

Plant	2011 <sup>(2)</sup>	2012	2013
Copper Tubes	1	4	11
Recycling - Melting	3	2	1
Titanium-zinc Rolling Plant <sup>(1)</sup>	0	0	0
<b>Total</b>	<b>4</b>	<b>6</b>	<b>12</b>

(1) Production has stopped since 01.01.2011.

(2) 2011 data do not include FITCO SA data. The company spun-off from HALCOR on 30/6/2010.

**Number of near misses**

Plant	2012	2013
Copper Tubes	20	15
Recycling - Melting	3	10
Titanium-zinc Rolling Plant <sup>(1)</sup>	0	0
<b>Total</b>	<b>23</b>	<b>25</b>

### Accident Frequency Rate

Plant	2011 <sup>(2)</sup>	2012	2013
Copper Tubes	1.1	4.8	13.6
Recycling - Melting	16.8	13.3	7.6
Titanium-zinc Rolling Plant <sup>(1)</sup>	0	0	0
<b>Total</b>	<b>3.6</b>	<b>5.9</b>	<b>12.4</b>

$$\text{Frequency Rate} = \frac{\text{number of accidents (LTI)} \times 10^6}{\text{number of manhours worked}}$$

### Accident Severity Rate

Plant	2011 <sup>(2)</sup>	2012	2013
Copper Tubes	3.4	12	78
Recycling - Melting	397	213	0 (45,765*)
Titanium-zinc Rolling Plant <sup>(1)</sup>	2,965	0	0
<b>Total</b>	<b>124</b>	<b>41</b>	<b>65</b> <b>(6,260*)</b>

\* Including the penalty on the lost man-days due to the fatal accident, based on VIOHALCO's national regulation (respectively to the international practice).

$$\text{Severity Rate} = \frac{\text{absence days due to incidents} \times 10^6}{\text{number of manhours worked}}$$

### Days Lost

Plant	2011 <sup>(2)</sup>	2012	2013
Copper Tubes	3	10	63
Recycling - Melting	71	32	0 (6,000*)
Titanium-zinc Rolling Plant <sup>(1)</sup>	64	0	0
<b>Total</b>	<b>138</b>	<b>42</b>	<b>63</b> <b>(6,063*)</b>

\* Including the penalty on the lost man-days due to the fatal accident, based on VIOHALCO's national regulation (respectively to the international practice).

**Manhours**

Plant	2011	2012	2013
Copper Tubes	878,755	828,957	807,842
Recycling - Melting	178,807	149,835	131,104
Titanium-zinc Rolling Plant	55,214	43,358*	29,206
<b>Total</b>	<b>1,112,776</b>	<b>1,022,150</b>	<b>968,152</b>

\* 21.848 hours of the Sales Department are included

**Occupational Health and Safety Indicators**

Indicators	2011 <sup>(2)</sup>	2012	2013
Incidents without lost days	7	2	5
Injury rate (IR)	0.7	1.2	2.5
Occupational disease rate (ODR)	0	0	0
Lost days rate (LDR)	25	8	13 (1,252*)
Absentee rate (AR)	198	66	104 (10,020*)

\* Including the penalty on the lost man-days due to the fatal accident, based on VIOHALCO's national regulation (respectively to the international practice).

$$\text{Injury rate (IR)} = \frac{\text{number of injuries} \times 200,000}{\text{number of manhours worked}}$$

$$\text{Occupational disease rate (ODR)} = \frac{\text{number of occupational diseases} \times 200,000}{\text{number of manhours worked}}$$

$$\text{Lost Days index (LDR)} = \frac{\text{Absence days due to accidents} \times 200,000}{\text{number of manhoursworked}}$$

$$\text{Absence index (AR)} = \frac{\text{absence days due to accidents} \times 200,000}{\text{number of mandays worked}}$$

<b>Occupational Health and Safety Indicators – Contractors</b>	<b>2012</b>	<b>2013</b>
Total number of employees	67	63
Manhours	163,868	159,440
Total Health & Safety and Environment Training Hours	138	233
Total Accidents	2	0
Days Lost	72	0
Near Misses	4	0
Frequency Rate	12.2	0
Severity Rate	440	0

## Other information

### Responsible Communication

All HALCOR's promotional actions and advertising regarding its products are in full compliance with the applicable national legislation and regulations. The Company does not distribute products that are the subject of public consultation or disputes. Moreover, HALCOR has voluntarily committed itself to provide full and clear information by adopting the Hellenic Advertising and Communications Code: For more information see the 2012 Corporate Responsibility and Sustainable Development Report, p. 62.

### Assumptions used in Life Cycle Assessment calculations

In order to compute the amount of CO<sub>2</sub> released during various phases of a product's life cycle, the following data and assumptions were used:

- 1) As far as the level of CO<sub>2</sub> emitted in the first phase (i.e. from mining to primary production of copper, from 'cradle to gate') coefficients and data based on studies carried out by PE International AG were used.
- 2) The following assumptions were used in relation to transport of copper cathodes from the supplier's gate to HALCOR's gate (gate to gate):
  - The distance in km between international ports was computed based on the website <http://www.searates.com/reference/portdistance/> and an additional 20% was added as a safety margin.
  - The CO<sub>2</sub> emissions from merchant ships carrying containers: 15gr CO<sub>2</sub> / tons km (based on International Chamber of Shipping data)
  - An additional 20% was added to the distance in km by road as a safety margin.
  - Ship container capacity: 22 tons of copper / container
  - Distance from Piraeus to Oinofyta: 70 km
  - For transportation within Greece it was assumed that the average distance was 70 km.
  - Bulk copper: Shipment of 22 tons / container, 1 container per truck
  - Average CO<sub>2</sub> emissions by trucks carrying containers: 200 gr CO<sub>2</sub> / tons km (based on International Maritime Organisation data).
- 3) Transport of scrap copper to HALCOR: the CO<sub>2</sub> emissions quoted (2,556 tons of CO<sub>2</sub>) only relate to the quantities of scrap intended for HALCOR and not the quantities of scrap used to manufacture third party products.
- 4) The CO<sub>2</sub> emissions data for the phase at HALCOR facilities (smelting and casting of copper and manufacture of final copper products) is data measured by HALCOR and include the manufacture of unfinished products for third parties. The direct emissions for the smelting plant – foundry have been computed for all plant activities, and therefore include third party emissions as well (e.g. FITCO).

To compute the CO<sub>2</sub> released when transporting HALCOR's staff using hired coaches, it was assumed that the fuel consumption rate was 39lt/100km.

In order to compute the amount of CO<sub>2</sub> emitted by employee cars, the following data and assumptions were used:

- For CO<sub>2</sub> emissions from cars fuelled by petrol, it was assumed that CO<sub>2</sub> emissions were 2.3035 kg of CO<sub>2</sub>/lt.
- For CO<sub>2</sub> emissions from cars fuelled by diesel, it was assumed that CO<sub>2</sub> emissions were 2.6256 kg of CO<sub>2</sub>/lt.

To compute the CO<sub>2</sub> released by executives travelling abroad, the following data and assumptions were used:

- A rate of 115 gr CO<sub>2</sub>/passenger per km was used (based on data on the website [http://www.carbonindependent.org/sources\\_aviation.htm](http://www.carbonindependent.org/sources_aviation.htm))
- Distances between cities were computed 'as the crow flies' using the website [http://www.apostaseis.gr/loc\\_ap/apostaseis-se-eftheia.asp](http://www.apostaseis.gr/loc_ap/apostaseis-se-eftheia.asp)

## Annex II - GRI G3.1 and ISO 26000 Indicators Table

Following is the table which links the contents of the Corporate Responsibility and Sustainable Development Report 2013 with the GRI - G3.1 indicators and ISO 26000.

GRI Indicator	Description	ISO 26000	Notes / Section
1.1	Chairman's statement	6.2	Message from the Chairman of the Board of Directors
1.2	Description of key impacts, risks and opportunities	6.2	Message from the Chairman of the Board of Directors, Presentation of HALCOR Group, Presentation of HALCOR S.A section Strategic Priorities, section Copper Value Chain, section - Management of Responsible Operation Affairs, §1.1, §1.2, §1.3, §1.5, §1.7, §1.8, introduction section «2. Creating Value», §2.1, section «3. Communication with Stakeholders» - CSR Targets, chapter «4. Care for our People» Our Targets for 2014, Health and Safety Chapter 5 – Our Targets for 2014, chapter 6 Environmental Protection – Our Targets for 2014, chapter 7 Customer-Oriented – Our Targets for 2014, website www.halcor.gr – section Investor Relations / Corporate Presentations – Presentation May 2014 pages 15-16, Annual Financial Report 2013 - Annual Report of the Board of Directors - section «4.Main risks and uncertainties » pages 6-8
2.1	Name of the Company		«HALCOR S.A.»
2.2	Primary brands, products, and/or services		Presentation of HALCOR Group / Presentation of HALCOR S.A. Section «Products», §7.1, Website www.halcor.gr – Section Investor Relations / Corporate Presentations – May 2014 pages 7, 13.
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	6.2	Presentation of HALCOR Group – Group Structure, Presentation of HALCOR S.A. – §1.3, §1.9, website www.halcor.gr - Section Investor Relations / Corporate Presentations – Presentation May 2013 pages 4-5, 8-9, 11, Annual Financial Report 2013 – Section VI Financial Notes - section 7 Operating Segments page 23.
2.4	Location of organization's headquarters.		Presentation of HALCOR S.A.
2.5	Countries where HALCOR operates		Presentation of HALCOR Group, HALCOR Group, Presentation of HALCOR S.A – Production Facilities, §1.9
2.6	Nature of ownership and legal form		Presentation of HALCOR S.A. – HALCOR Shareholder Structure
2.7	Markets served		Presentation of HALCOR Group – Group Sales, Presentation of HALCOR S.A., §1.9, Annex I – Customers – Customers geographical distribution, Website www.halcor.gr – section Investor Relations / Corporate Presentations – Presentation May 2014 pages 5, 8, 11, 14. The Company's sales are oriented primarily to wholesale clients-distributors rather than to retail end users.
2.8	Scale of HALCOR		Presentation of HALCOR Group – 2013 Data, Presentation of HALCOR S.A. – Production Facilities, §1.1, §1.9, § 4.1, Human Resources Data
2.9	Significant changes during the reporting period		There were no further significant changes during 2013. Annual Financial Report 2013 – Annual Report of the Board of Directors - pages 4-5.
2.10	Awards received in the reporting period		§1.6
3.1	Reporting period		1/1/2013 – 31/12/2013
3.2	Date of most recent previous report		Corporate Responsibility and Sustainable Development Report 2012
3.3	Reporting cycle		Annual
3.4	Contact point		About the Report
3.5	Process for defining report content		About the Report
3.6	Boundary of the report		The Report involves all activities of HALCOR in Greece (all total number of production units as these are referred to) (subsidiaries are not included) / About the Report
3.7	Specific limitations on the scope or boundary of the report		About the Report
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities		Full comparability. As in previous years, the Report does not include any data on subsidiaries / joint ventures / third parties. However, there is a brief report on the subsidiaries SOFIA MED S.A., and FITCO S.A. without altering the comparison of the years, since the data are not unified to the group's data but separately/ About the Report
3.9	Data measurement techniques and the bases of calculations		About the Report, § 4, §6.3.1, §6.4, Annex I- Other information – LCA calculations.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports		There is no change (apart from the review mentioned in page 110)/ About the Report
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report		There is no change / About the Report
3.12	Table identifying the location of the Standard Disclosures in the report		Annex II - GRI Indicators Table
3.13	Policy and current practice with regard to seeking external assurance for the report	7.5.3	About the Report / Statement on the Level Check
4.1	Governance structure of the organization	6.2	§1.3, Annual Financial Report 2013 – Annual Report of the Board of Directors - Section 6 Corporate Governance – pages 14-18
4.2	Indicate whether the Chair of the highest governance body is also an executive officer	6.2	§1.3, Annual Financial Report 2013 – Annual Report of the Board of Directors - Section 6 Corporate Governance – pages 14-18
4.3	Number and gender of members of the highest governance body that are independent and/or non-executive members	6.2	§1.3, Annual Financial Report 2013 – Annual Report of the Board of Directors - Section 6 Corporate Governance – pages 14-18

GRI Indicator	Description	ISO 26000	Notes / Section
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	6.2	HALCOR's CSR Report 2012 –page 46 The Company enforces an open-door policy, according to which Management is always willing to discuss issues concerning its human resources.
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives	6.2	HALCOR's CSR Report 2012 –page 46
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	6.2	§1.4, Annual Financial Report 2013 – Annual Report of the Board of Directors – page 16
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	6.2	§1.3, HALCOR's CSR Report 2012 –pages 46–47, Annual Financial Report 2013 – Corporate Governance section, page 14. The selection criteria for the members of the Board of Directors and of its individual committees are irrelevant to gender, nationality or other indicators of diversity, preventing thus any eventual discrimination.
4.8	Internally developed statements of mission or values, codes of conduct, and values relevant to economic, environmental, and social performance	6.2	Presentation of HALCOR S.A. – Management of Corporate Responsibility Affairs §1.2, Introduction of Creating Value chapter 2, §2.1, §2.2, chapter 4 Care for our People – Our Commitment, chapter 5 Occupational Health & Safety - Our Commitment, chapter 6 Environment - Our Commitment, chapter 7 Customer-Oriented – Our Commitment
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental and social performance, including relevant risks and opportunities	6.2	Presentation of HALCOR S.A. – Management of Corporate Responsibility Affairs, §1.2, §1.3, §1.5, Introduction of Creating Value chapter 2, §2.1, §2.2, §5.1, §6.2, §7.2
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance	6.2	HALCOR's CSR Report 2012 –page 46, Annual Financial Report 2013 – Corporate Governance section pages 14
4.11	Explanation of whether and how the precautionary approach or value is addressed by the organization	6.2	§1.4, §1.5, §2.1, chapter 5 Occupational Health & Safety - Our Commitment, §5.1, chapter 6 Environment - Our Commitment, §6.2
4.12	Externally developed economic, environmental, and social charters, values, or other initiatives to which the organization subscribes or endorses	6.2	§1.7, §2.2, About the Report
4.13	Memberships in associations and/or national/international advocacy organizations	6.2	§1.7
4.14	List of stakeholder groups engaged by HALCOR	6.2	Chapter 3 Communication with Stakeholders
4.15	Basis for identification and selection of stakeholders with whom to engage	6.2	Chapter 3 Communication with Stakeholders / The process for defining the stakeholder groups (categorization and prioritization) is being reviewed every year by HALCOR's Corporate Responsibility Team.
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	6.2	Chapter 3 Communication with Stakeholders
4.17	Key topics and concerns that have been raised through stakeholder engagement	6.2	§2.1, Chapter 3 Communication with Stakeholders
<b>Economic Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.8	Presentation of HALCOR Group, Presentation of HALCOR S.A., Strategic Priorities, §1.1, §1.2, §1.3, §4.3, §4.5, §4.9, §7.5.4
EC1	Direct economic value generated and distributed	6.8, 6.8.3, 6.8.7, 6.8.9	§1.1
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	6.5.5	No significant Financial implications on the business activities of the Company have been identified or other risks and opportunities for the organization's activities due to climate change / §1.5, – HALCOR's CSR Report 2012 –pages 49-50
EC3	Coverage of the organization's defined benefit plan obligations		HALCOR covers insurance expenses for all employees as defined by the law. Retiring employees receive retirement by relevant governmental authorities. Furthermore, according to the company's policy, the ability to voluntarily participate in a saving program is provided along with the company's support by offering twice the employees' deposited amount. Annual Financial Report 2013 – FY 2013 Financial Report (HALCOR Group and Company) pages 45–46, §4.5
EC4	Significant financial assistance received from government		No significant financial assistance was received by governmental organizations during 2013 (Annual Financial Report 2013 – FY 2013 Financial Report (HALCOR Group and Company) page 47 §27 (financial assistance)
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	6.4.4, 6.8	The Company observes and applies the national, collective profession-related labour agreements. There is no differentiation in employees remuneration based on sex. HALCOR respects and supports equality between men and women.
EC6	Policy, practices, and proportion of spending on locally-based n suppliers at significant locations of operatio	6.6.6, 6.8, 6.8.5, 6.8.7	§7.5.4, Annex I: Purchasing – Our Performance

GRI Indicator	Description	ISO 26000	Notes / Section
EC7	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation	6.8, 6.8.5, 6.8.7	\$4.1, Annex I: Human Resources – Our Performance. In 2013, 5 of the new hired employees came from the local community (1 executive and 2 office staff)
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement	6.3.9, 6.8, 6.8.3, 6.8.4, 6.8.5, 6.8.6, 6.8.7, 6.8.9	\$4.8, \$4.9. So far there is no need for special studies in order to identify the local community's needs, since they are pinpointed through the communication and direct contact among the local authorities and associations.
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	6.3.9, 6.6.6, 6.6.7, 6.7.8, 6.8, 6.8.5, 6.8.6, 6.8.7, 6.8.9	HALCOR Group, Creating Value Chapter, \$1.1, \$4.1, \$4.8, \$4.9
<b>Environmental Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.5	Introduction of Environment Chapter / \$6.1, \$6.2, \$6.3, \$3.4, \$6.5
EN1	Materials used by weight or volume	6.5, 6.5.4	\$6.3.1, Annex I – Purchasing
EN2	Percentage of materials used that are recycled input materials	6.5, 6.5.4	\$6.3.1, \$7.5.5, Annex I - Environment
EN3	Direct energy consumption by primary energy source	6.5, 6.5.4	\$6.3.2 /The total direct energy consumption results from non-renewable sources (as described in section 6.3.2)
EN4	Indirect energy consumption by primary source	6.5, 6.5.4	\$6.3.2 /The total indirect energy consumption results exclusively from electrical energy (as described in section 6.3.2)
EN5	Energy saved due to conservation and efficiency improvements	6.5, 6.5.4	\$6.3.2
EN6	Initiatives to provide energy-efficient or renewable energy based products and services	6.5, 6.5.4	\$7.1
EN7	Initiatives to reduce indirect energy consumptions and reductions achieved	6.5, 6.5.4	\$6.3.2
EN8	Total water withdrawal by source	6.5, 6.5.4	\$6.3.3, Annex I - Environment
EN9	Water sources significantly affected by withdrawal of water	6.5, 6.5.4	The company does not operate in protected areas and no water withdrawal from surface aquifers (e.g. rivers, lakes).
EN10	Percentage and total volume of water recycled and reused	6.5, 6.5.4	Water recycling is applied where feasible, however without being possible to have an exact measuring of the amount being recycled.
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.5, 6.5.6	The Company does not operate in or adjacent to protected areas
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	6.5, 6.5.6	The Company does not operate in or adjacent to protected areas
EN13	Habitats protected or restored	6.5, 6.5.6	No habitat restoration plan has been developed.
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity	6.5, 6.5.6	There has been no negative impact on biodiversity, since the Company does not operate in or adjacent to protected areas
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	6.5, 6.5.6	There has been no negative impact on IUCN Red List species and national conservation list species, since the Company does not operate in such areas
EN16	Total direct and indirect greenhouse gas emissions by weight	6.5, 6.5.5	\$6.3, \$6.4, Annex I - Environment
EN17	Other relevant indirect greenhouse gas emissions by weight	6.5, 6.5.5	\$6.3, \$6.4
EN18	Initiatives to reduce greenhouse gas emissions by weight	6.5, 6.5.5	\$6.3, \$6.3.1, \$6.4
EN19	Emissions of ozone-depleting substances by weight	6.5, 6.5.3	Not available
EN20	NO <sub>x</sub> , SO <sub>x</sub> , and other significant air emissions by type and weight	6.5, 6.5.3	\$6.4, Annex I - Environment
EN21	Total water discharge by quality and destination.	6.5, 6.5.3	\$6.5, Annex I - Environment
EN22	Total weight of waste by type and disposal method	6.5, 6.5.3	\$6.5, Annex I - Environment
EN23	Total number and volume of significant spills	6.5, 6.5.3	There were no spills
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally	6.5, 6.5.3	Annex I – Environment – table 'Breakdown of waste by category and management method'. The Company does not operate in waste management sector. HALCOR fully complies with Law 2939/2001 and in its framework has contracts with all Alternative Waste Management Systems.
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff	6.5, 6.5.4, 6.5.6	There have been no water discharges in protected areas. There has been no negative impact on biodiversity, since no operations in, or adjacent to, protected areas have been performed.
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	6.5, 6.5.4, 6.6.6, 6.7.5	\$6.1, \$6.2, \$6.3, \$6.4, \$7.1, \$7.5.5, Annex I - Environment
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	6.5, 6.5.4, 6.7.5	\$6.3, \$7.5.5, Annex I - Environment. Due to the nature of the Company's products, they are not reclaimed, however the Company uses extensive scrap which is metal recycling. During 2013, 67% of the total metals used, was scrap.
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with environmental laws and regulations	6.5	There were no fines

GRI Indicator	Description	ISO 26000	Notes / Section
EN29	Significant environmental impacts of transporting products and other goods and materials	6.5, 6.5.4, 6.6.6	6.4 - § Emissions from transportation, Annex I – Environment
EN30	Total environmental protection expenditures and investments by type	6.5	§6.2, Annex I – Environment - Investments and expenditure on environmental protection
<b>Labor Practices and Descent Work Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.4, 6.3.10	Introduction of Human Resources chapter 4, §4.1, §4.2, §4.3, §4.4, §4.5, §4.6, §4.7, §4.8, §4.9, Introduction of Health and Safety Chapter 5, §5.1, §5.2, §5.4
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	6.4, 6.4.3	§4.1, Annex I Key Corporate Responsibility Performance Indicators: Human Resources
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region	6.4, 6.4.3	§4.1, Annex I Key Corporate Responsibility Performance Indicators: Human Resources
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees by significant locations of operations	6.4, 6.4.3, 6.4.4	§4.5. Extra benefits are provided to employees with fix-term employment contract
LA15	Return to work and retention rates after parental leave, by gender		The Company provides parental leaves to all employees who already have child or are about to have one. In 2013, 2 female employees took the parental leave they were entitled to. All employees who receive such a leave continue working in the Company 12 months after they take this leave.
LA4	Percentage of employees covered by collective bargaining agreements	6.4, 6.4.3, 6.4.4, 6.4.5, 6.3.10	§4.7. Total employees of HACOR is covered by collective bargaining agreements
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	6.4, 6.4.3, 6.4.4, 6.4.5	The company has not established a specific minimum notice period. However, all legal restrictions are applied. Employees are informed directly by the Company's management for every important issue concerning the Company.
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advice on occupational health and safety programs.	6.4, 6.4.6	There is a Health and Safety Team which reviews annually Health Safety and Environment issues and the Company's Health, Safety Department reports directly to the BoD on relevant issues that may affect the employees.
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region and by gender	6.4, 6.4.6	§5.4, Annex I Annex I Key Corporate Responsibility Performance Indicators: Health and Safety. The company's production facilities are located in Oinofyta Viotias. The total of workforce consists of men.
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases	6.4, 6.4.6, 6.8, 6.8.3, 6.8.4, 6.8.8	§5.3
LA9	Health and safety topics covered in formal agreements with trade unions	6.4, 6.4.6	There are no relevant agreements-all legal restrictions are applied.
LA10	Average hours of training per year per employee by gender, and by employee category	6.4, 6.4.7	§4.4
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	6.4, 6.4.7, 6.8.5	§4.4
LA12	Percentage of employees receiving regular performance and career development reviews, by gender	6.4, 6.4.7	§4.2
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	6.3.7, 6.3.10, 6.4, 6.4.3	§4.1, §4.3. 22 employees of different nationalities (21 of them are male and 1 women). The members of the Board of Directors are of Greek nationality and do not belong in any minority group (ethnic minorities or disabled).
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation	6.3.7, 6.3.10, 6.4, 6.4.3, 6.4.4	§4.3. HALCOR does not approve remuneration discrimination or any other kind of discrimination. Salaries are equal for all similar positions. Therefore, women's salary is equal to men's for the same work positions.
<b>Human Rights Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.3	§4.3, §4.7, §7.5.3
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening	6.3, 6.3.3, 6.3.5, 6.6.6	Not applicable to the Company's activities. So far, no relevant restrictions are included in investment agreements and contracts, since there is no association to the company's work.
HR2	Percentage of significant suppliers contractors, and other business partners that have undergone human rights screening, and actions taken	6.3, 6.3.3, 6.3.5, 6.4.3, 6.6.6	The Company performs thorough checks in order to ensure that all Contractors' employees working in HALCOR's facilities are insured in accordance with the provisions of the law. In 2013 the company ceased cooperating with a contractor who was inconsistent to his obligations to his employees and violated the agreement. §7.5.3
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	6.3, 6.3.5	During 2013 no educational program took place since it was implemented in 2012 and all manager executives participated. HALCOR's CSR REPORT 2012 – page 74.

GRI Indicator	Description	ISO 26000	Notes / Section
HR4	Total number of incidents of discrimination and corrective actions taken	6.3, 6.3.6, 6.3.7, 6.3.10, 6.4.3	No incident / §4.3
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	6.3, 6.3.3, 6.3.4, 6.3.5, 6.3.8, 6.3.10, 6.4.3, 6.4.5	The Company respects the law and acts in accordance with the relevant legislation. §4.7
HR6	Child labor	6.3, 6.3.3, 6.3.4, 6.3.5, 6.3.7, 6.3.10	There is no risk of child labor – The Company is against child labor, is complies with relevant legislation and implements control procedures of relevant documents during personnel hiring in order to ensure that no child labor occurs.
HR7	Forced and compulsory labor	6.3, 6.3.3, 6.3.4, 6.3.5, 6.3.7, 6.3.10	There is no risk of compulsory labor. The Company is against compulsory labor.
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations	6.3, 6.3.5, 6.4.3, 6.6.6	During 2013 no educational program took place since it was implemented in 2012 and all manager executives participated and the security staff as well. HALCOR's security staff consists of 100% company's employees and no security staff from third parties is used. HALCOR's CSR REPORT 2012 – page 74.
HR9	Total number of incidents of violations involving rights of indigenous people	6.3, 6.3.6, 6.3.7, 6.3.8, 6.6.7	No incident of human rights violation of local people has been reported or recorded to date.
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments		HALCOR S.A. - State-of-the-art productive facilities. No risk of human rights violations on the part of the Company has been identified. Therefore, it was not deemed necessary the elaboration of a relevant specialized study.
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms		There have been no complaints regarding the violation of human rights. It is considered that there is no such risk on the part of the Company. Therefore, the development of a relevant mechanism was not deemed necessary.
<b>Society Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.6, 6.8	Introduction of Environment Chapter / 1.7, §1.1, §2.1, §3, §4.8, §4.9 §6.4, §6.5
S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs	6.3.9, 6.8, 6.8.5, 6.8.7, 6.6.7	Collaboration programs with the local communities are applied the production area of the company (Oinofyta Viotias) and the wider area. §1.1, §2.1, §3, §4.8, §4.9. However, due to restricted and production activities impact no special study is considered necessary apart from the Environmental Impact Studies that are conducted according to the relevant legislation. The Company reviews the direct and indirect impacts towards local communities during business plans preparation.
S09	Operations with significant potential or actual negative impacts on local communities.	6.6, 6.6.3	There are no negative impacts to local communities. Through the Company's presence in the area, employment is offered in local level and local suppliers are supported. Chapter 1: Presentation of HALCOR S.A.– Production Facilities, §6.1, §6.2, §6.3 §6.4, §6.5
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities	6.6, 6.6.3	There are no negative impacts to local communities. Through the Company's presence in the area, employment is offered in local level and local suppliers are supported. Chapter 1: Presentation of HALCOR S.A.– Production Facilities, §6.1, §6.2, §6.3 §6.4, §6.5
S02	Percentage and total number of business units analyzed for risks related to corruption	6.6, 6.6.3	Annual Financial Report 2013 – Corporate Governance– pages 14-15. All business units are being systematically audited. There have been no incidents of corruption.
S03	Percentage of employees trained in organization's anti-corruption policies and procedures	6.6, 6.6.4, 6.8.3	All new employees are explicitly informed based on the company's Internal Regulation which includes relevant issues. Furthermore, in 2013 a new specialized seminar took place and 31 of the company's employees were trained (8,1% of employees) (17 senior executives and 14 office staff)
S04	Actions taken in response to incidents of corruption	6.6, 6.6.4, 6.8.3	There have been no incidents of corruption
S05	Public policy positions and participation in public policy development and lobbying	6.6, 6.6.5, 6.6.7	Energy cost: The company's positions on this particular issue are clear and are mentioned in unit 1.7
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	6.6, 6.6.7, 6.8.7	The Company does not provide any financial or in-kind support to politicians and/or political parties
S07	Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes	6.3.9, 6.8, 6.8.5, 6.8.7, 6.6.7	There have been no legal actions in 2013
S08	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with laws and regulations	6.3.9, 6.8, 6.8.5, 6.8.7, 6.6.7	There have been no incidents of non-compliance in 2013

GRI Indicator	Description	ISO 26000	Notes / Section
<b>Product Responsibility Performance Indicators</b>			
	Disclosure on Management Approach	6.2, 6.6, 6.7	\$1.8, \$7.1, \$7.2, \$7.3, \$7.4
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement	6.3.9, 6.6.6, 6.7, 6.7.4, 6.7.5	Copper has a positive impact on Health and Safety of the Users and therefore, the company develops products with suitable applications. \$1.8, \$7.1, \$7.2
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	6.3.9, 6.6.6, 6.7, 6.7.4, 6.7.5	There have been no incidents of non compliance
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	6.7, 6.7.3, 6.7.4, 6.7.5, 6.7.6, 6.7.9	All products are accompanied with the appropriate documents, signs and quality labels according with relevant regulation and/or law. / \$7.2
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	6.7, 6.7.3, 6.7.4, 6.7.5, 6.7.6, 6.7.9	There have been no incidents of non compliance
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	6.7, 6.7.4, 6.7.5, 6.7.6, 6.7.8, 6.7.9	\$7.3, \$7.4
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	6.7, 6.7.3, 6.7.6, 6.7.9	Annex I – Other Information § Responsible Communications
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes	6.7, 6.7.3, 6.7.6, 6.7.9	There have been no incidents of non compliance
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	6.7, 6.7.7	There have been no complaints
PR9	Monetary value of significant fines for non compliance with laws and regulations concerning the provision and use of products and services	6.7, 6.7.6	There have been no administrative or judicial sanctions

n/a: Non available

The photographs in this Report were taken by the photographers Spyros Haraktinos and Simon Pitsillidis.



The paper this Report was printed on was produced from FSC forests and plantations and contains 60% recycled paper pulp.

### GRI Indicator Application Level in the Report

HALCOR has met the requirements of application level B in version G3.1 of the Global Reporting Initiative guidelines in this Corporate Responsibility and Sustainable Development Report.

In order to improve the quality of its accountability and transparency, HALCOR assigned an external verification body the task of checking the application level for the Global Reporting Initiative Guidelines (B+). The external verification body's statement is set out below.

Report Application Level	C	C+	B	B+	A	A+
<b>G3 Profile Disclosures</b> output	Report on: L1 2.1-2.11 3.1-3.6, 3.10-3.13 4.1-4.6, 4.14-4.19		Report on all criteria listed for Level C plus: L2 3.8, 3.13 4.7-4.11, 4.16-4.17		Same as requirements for Level B	
<b>G3 Management Approach Disclosures</b> output	Not Required		Management Approach Disclosures for each In-Scope Category	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured
<b>G3 Performance Indicators &amp; Sector Supplement Performance Indicators</b> output	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and (Environmental)		Report on a minimum of 20 Performance Indicators, at least one from each of: Economic, Environmental, Human rights, Labor, Society, Product Responsibility.	Report Externally Assured	Report on each one (G) and (Sector Supplement) Indicators with due regard to the Materiality Principle by either: (a) reporting on the Indicator or (b) explaining the reason for its omission.	Report Externally Assured

\*Sector supplement Indicators



# Independent Assurance Statement

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## 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 Sustainability Report 2013 ('the Report') of HALCOR S.A. ('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, apart from the audit of Management Systems.

## Scope of Assurance

Ο Φορέας διενήργησε τις ακόλουθες εργασίες κατά το μήνα Μάιο 2014:

1. Data checks for the Report's chapters under the title "Human Resources", "Health & Safety" and "Client-oriented Approach".
2. Visits in the Company's factory for production of copper tubes and the foundry on the 5th and 6th of May 2014, for the implementation of verification and sampling inspections of files in order to evaluate:
  - the reliability and accuracy of performance indicators of the Sustainability Report
  - the processes for generating, gathering and managing information included in the Report.

## Conclusions

During the assurance engagement, it was confirmed that the data and information of the above-mentioned chapters are accurate and 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.

## 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:

- ☞ Assurance of additional chapters in order to extend the report's validity.
- ☞ Assurance of the Report's qualitative information too.
- ☞ Preparation of the company for the adaptation of its Sustainability Report for the year 2014 to the requirements of the GRI-G4 framework.

On behalf of TÜV AUSTRIA HELLAS,  
Athens the 15th of May 2014

Sifakis Nikolaos  
Lead Auditor



Kallias Yiannis  
General Manager



# Corporate Responsibility and Sustainable Development Report Feedback Form

HALCOR strives to maintain an open, transparent and two-way dialogue with those who are interested in its activities. Please fill out the questionnaire below to record your views about the HALCOR 2013 Corporate Responsibility and Sustainable Development Report, or express any concerns or issues you identified during your collaboration with HALCOR. This will actively assist us in our attempt to improve our performance ratings and the annual Corporate Responsibility and Sustainable Development Report.

**What HALCOR stakeholder group do you belong to?**

- Employee
- Shareholder / Investor
- Customer
- Supplier
- Other:
- Local Community
- Non-governmental organisation
- Public/Statutory body
- Mass Media

**Please evaluate the content and quality of this report on the basis of the following criteria:**

CRITERIA / FEATURES	Excellent	Very Good	Satisfactory	Needs Improvement
In your opinion, did the Company's Corporate Responsibility Report include sufficient information to enable you to gain an overall picture of its actions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data comparability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data transparency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Balance between sections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corporate Responsibility targets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Actions under each area of Corporate Responsibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reference to international standards and systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ability to find information of interest to you	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visual illustrations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Which of the following sections of the report were most useful and important in addressing the information that interests you with regard to HALCOR?**

REPORT SECTIONS	Very useful	Needs improvement
Message from management	<input type="checkbox"/>	<input type="checkbox"/>
Presentation of HALCOR Group	<input type="checkbox"/>	<input type="checkbox"/>
HALCOR S.A. Profile	<input type="checkbox"/>	<input type="checkbox"/>
Creating Value	<input type="checkbox"/>	<input type="checkbox"/>
Stakeholder Engagement	<input type="checkbox"/>	<input type="checkbox"/>
Care for our People	<input type="checkbox"/>	<input type="checkbox"/>
Occupational Health and Safety	<input type="checkbox"/>	<input type="checkbox"/>
Environment	<input type="checkbox"/>	<input type="checkbox"/>
Customer-Oriented Approach	<input type="checkbox"/>	<input type="checkbox"/>
GRI and ISO 26000 indicators table	<input type="checkbox"/>	<input type="checkbox"/>



## Corporate Responsibility and Sustainable Development Report Feedback Form

**In your opinion, did HALCOR's Corporate Responsibility Report include sufficient information to enable you to gain an overall picture of its actions?**

Yes  No  Needs improvement

Is there any information or data about the Company that you looked for but could not find in the report? Please explain:.....

.....

Please describe basic concerns or issues you have identified during your cooperation with the Company which you wish to communicate. ....

.....

What actions do you suggest the Company should take to respond to your concerns? .....

.....

### **Personal details (optional):**

Name-surname: .....

Company / Organisation: .....

Address: .....

Tel./Fax: .....E-mail: .....

### **Please send the completed form to the address below:**

HALCOR, attn. G. Mavraganis, Strategic Planning and Corporate Responsibility Manager

57th km Athens-Lamia National Road, GR-32011, Oinofyta, Viotia, Greece

e-mail: [csr@halcor.vionet.gr](mailto:csr@halcor.vionet.gr)

or by fax to +30 22620 48910

All data submitted on this form will be used exclusively for internal assessment by the Strategic Planning Division of HALCOR which is responsible for and Corporate Responsibility issues. Personal data is protected in the manner laid down by the privacy legislation.

### **Contact details:**

- Strategic Planning Division (Corporate Responsibility issues) - [csr@halcor.vionet.gr](mailto:csr@halcor.vionet.gr)
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- Exports Department, Industrial Copper Tubes - [industrial@halcor.vionet.gr](mailto:industrial@halcor.vionet.gr)
- Marketing Department - [marketing@halcor.vionet.gr](mailto:marketing@halcor.vionet.gr)
- Supply Chain Department - [supplychain@halcor.vionet.gr](mailto:supplychain@halcor.vionet.gr)
- HR Division - [hr@halcor.vionet.gr](mailto:hr@halcor.vionet.gr)