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HALCOR

METAL WORKS S.A.



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HALCOR
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CORPORATE RESPONSIBILITY AND
SUSTAINABLE DEVELOPMENT REPORT



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About the Report

The 2012 Corporate Responsibility and Sustainable Development Report has been published by HALCOR for the last five consecutive year. The Company publishes the Corporate Responsibility and Sustainable Development Report every year. 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

In this Report, HALCOR seeks to provide an overall presentation of its activities in the Corporate Responsibility sector in 2012 (for the period 1.1.2012 - 31.12.2012). The goal of this Report is to depict the impact of HALCOR's business activities on the economy, the environment, occupational health and safety and on society, in order to inform institutional investors, employees, and other stakeholders, as well as any other party interested about the Company or in matters related to Corporate Responsibility and Sustainable Development.

This Report covers all HALCOR's activities relating to the company's production facilities in Greece but 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 2012 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 four years which can be found on its own website, www.cablel.gr. 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. Where information has been revised, 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
- Context of 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.

The procedure implemented fully complies with the principles and specifications in the GRI-G3.1 guidelines. The procedure involved three stages:

1. Identifying key issues relating to the Company's social responsibility

2. Having executives from HALCOR evaluate those key issues based on specific criteria, while also taking into account stakeholders' expectations.
3. Prioritising the key issues.

More information about the procedure followed and the conclusions it generated are set out in section 2.4 "Prioritising issues and actions".

Methodology

HALCOR's Corporate Responsibility and Sustainable Development Report for 2012 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.

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

The 2012 Corporate Responsibility and Sustainable Development Report was prepared with the support of and under the guidance of Sustainable Development Ltd. who provided assistance with data collection, data assessment, drafting and editing of the report.



www.sdev.gr

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 **Human Resources and Occupational Health and Safety** 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 112-114, 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.

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Message from the Chairman of the Board of Directors

For another year the entire business community was faced with an economic environment of unparalleled insecurity. This sense of insecurity has been affecting the global market over recent years and has hit the Greek economy particularly badly.

In the macroeconomic environment, volatility and challenges were they key features of 2012, with the Euro Area economies reporting a further slowdown and Greece remaining in deep recession. Industrial production in Europe also reported a negative growth rate.

During 2012, despite the difficult conditions that prevailed, especially the slowdown in growth in Europe, and the constant worsening of the situation on the domestic market, the HALCOR Group achieved a 5% increase in the volume of sales, by expanding its market share in most of the markets in which it operates. In addition the Company continued to implement its investment plan in 2012, making investments worth a total of euro 2.4 million. It is proof positive of our practical commitment to operating responsibility as we move towards Sustainable Development. In 2012 HALCOR's consolidated turnover stood at euro 1,259.3 million compared to euro 1,249.3 million in 2011, which reflects an increase of around 1%.

Deeply aware that the move towards Sustainable Development is intimately bound up with Corporate Responsibility, the Company has incorporated the principles of Corporate Social Responsibility into its business objectives and its day-to-day operations. In this context the Company is implementing a long-term development plan based on specific objectives and strategic priorities that include:

- Focusing on our people, allowing them to constantly grow and develop professionally, and providing a safe and healthy working environment.
- Protecting and respecting the natural environment (through proper environmental management our how our production facilities are run).
- Maintaining and constantly improving the outstanding quality of our products and the services we offer customers.
- Ensuring economic growth and implementing sound Corporate Governance practices to promote transparency in everything we do, and
- Building lasting partnerships with and supporting the local communities in which we operate.

In the occupational Health and Safety sector, which is a top priority for us, we are implementing actions and programmes aimed at preventing occupational safety incidents, while at the same time we are placing particular attention of training and raising awareness among employees and associates. HALCOR has an occupational health and safety system which has obtained certification according to the requirements of the OHSAS 18001:2007 standard. We take the view that in this sensitive sector, no preventative measure is ever enough, and that is why we are keeping up our efforts to achieve continuous improvements on the occupational Health and Safety issues.

As far as environmental management is concerned, in 2012 HALCOR invested more than euro 1 million to improve its environmental protection infrastructure, minimise its environmental footprint and constantly improve its performance ratings. HALCOR achieves comprehensive environmental management via an Environmental Management System certified in accordance to the requirements of the ISO 14001:2004 standard, which is applied at all the Company's production facilities / plants.

HALCOR has a long tradition in supporting the local community, recruiting people and working with suppliers from the local communities it operates in. The Company is there for the local community at all times, providing support to a diverse range of organisations, schools and other bodies. Each year we support a series of programmes and actions for society, the environment, vulnerable social groups, culture and health.

We deeply believe that in order for the Company to achieve Sustainable Development and to further bolster its social contribution, it is essential to foster strong ties and establish two-way communication with all stakeholders (shareholders, customers, employees, suppliers, society, Institutional bodies). For yet another year our Corporate Responsibility and Sustainable Development Report is the starting point for discussion with our stakeholders in order to bolster transparency, build mutual trust, communication and partnership, and to constantly improve our business strategy.

By investing in an improved production base, in the growth and development of its people and in further gains in the quality of and added value offered by its products, in 2013 HALCOR will continue to dynamically rise to the challenges of the demanding modern global business environment in which it operates, in a responsible manner, with the goal of contributing to a sustainable tomorrow. Our objective is to generate value for all HALCOR's stakeholder groups.

Theodosios Papageorgopoulos
Chairman of the Board of Directors

In case of any discrepancy, the Greek text shall prevail.

1.1 The HALCOR Group

Now in its eighth successful decade in the copper processing and trade sector, the HALCOR Group:

- is a leader in the process of copper products and copper alloys in Greece (as the only manufacturer of copper tubes in Greece).
- has been expanding dynamically, especially in Central and Southeast Europe.
- manufactures and sells rolled and extruded copper and brass products, copper, and titan-zinc alloys, and cables.
- has a robust production base with plants in Greece, Bulgaria and Romania.

Thanks to large investments in R&D to develop new know-how the company is creating new, innovative products to meet its goal of continuous innovation at national and global level.



HALCOR is a force to be reckoned with:

- 19 companies
- 10 production plants
- 2,477 employees
- Sales of euro 1,259 million
- 5% increase in the volume of sales
- Investments of euro 24 million in 2012



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



HALCOR – Pipe works, Oinofyta, Greece



HALCOR – Smelting plant, Oinofyta, Greece

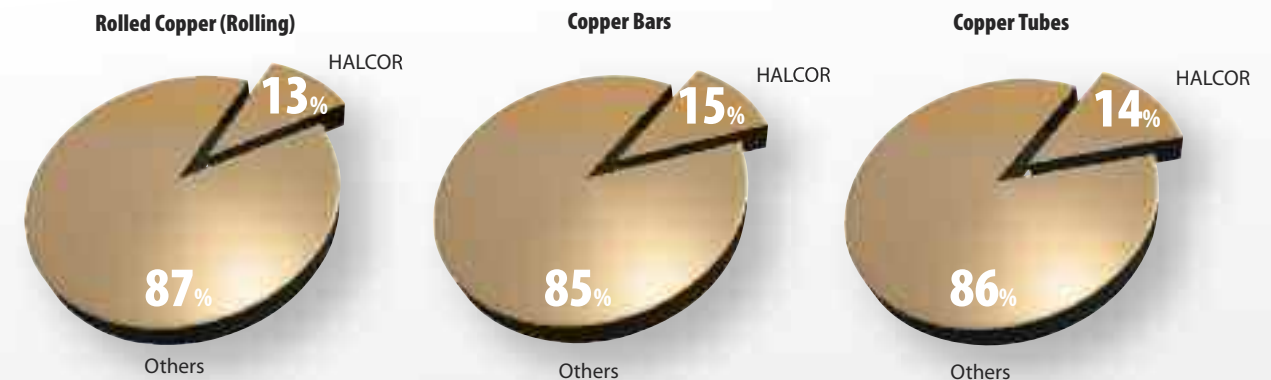


SOFIA MED, Sofia, Bulgaria

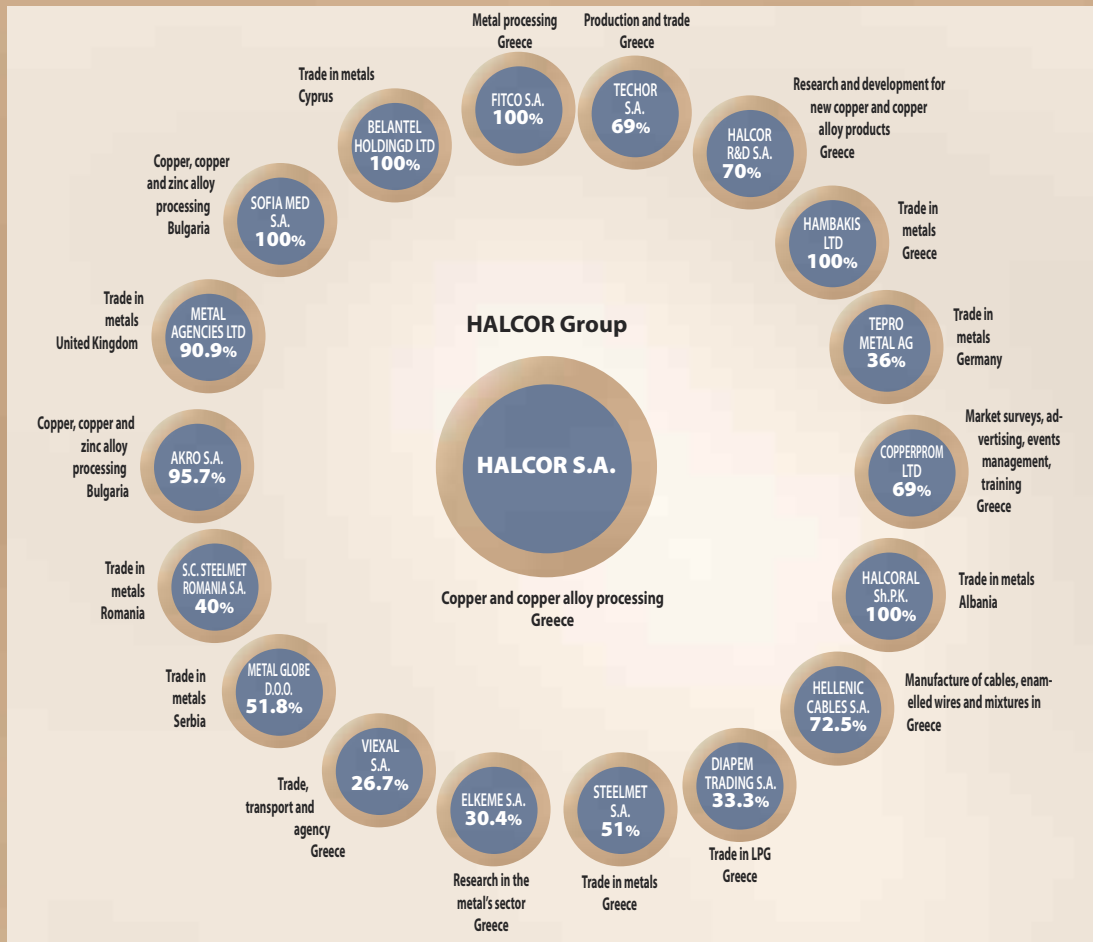


FITCO, Oinofyta, Greece

Group European Market Shares



Companies comprising the HALCOR Group



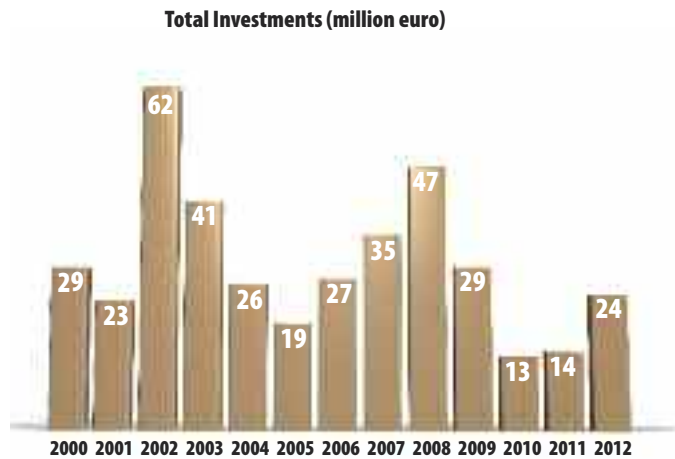
Seeking to ensure maximum customer satisfaction in all its partnerships, the HALCOR Group pays particular attention to reliability, rapid response to demand and the comprehensive nature of the product support services it offers. HALCOR's products are available in more than 50 countries worldwide.

The HALCOR Group currently has 10 production plants in Greece, Romania and Bulgaria, enabling it to manufacture an extensive range of products. The HALCOR companies' production base is fully vertically integrated. Using copper cathodes, zinc rods and scrap copper and brass, the companies can manufacture a particularly comprehensive range of products that includes copper pipes and tubes, sheets and strips, brass disks and rods, zinc sheets and strips, special alloys, and cables.

More information about the HALCOR Group's production facilities and its products can be found on the Company's website (www.halcor.gr, under Group / Facilities).

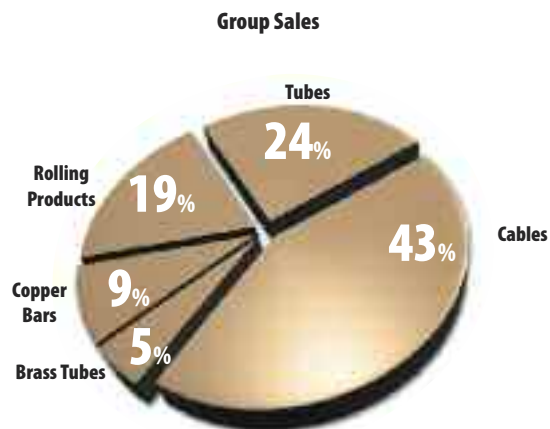


Having invested a total of euro 389 million over the period 2000 – 2012 in modernising and expanding its facilities and infrastructure, and in Research and Development, the HALCOR Group has demonstrated in practical terms its dedication to manufacturing innovative, top quality products that generate high added value for customers.



The Group's Financial Results

Despite the difficult conditions that dominated all of 2012, and in particular the slow-down in growth in Europe and the continued decline in the situation in the domestic market, the HALCOR Group managed to achieve a 5% increase in the volume of sales. In 2012 the HALCOR Group's total exports stood at euro 756 million.



Turnover



Gross profit



Earnings before interest, tax, depreciation and amortisation



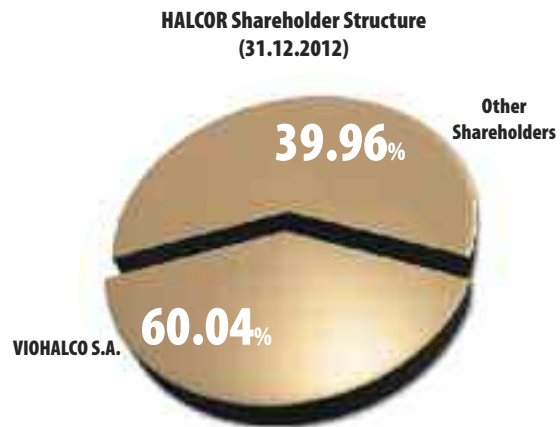
Earnings before interest and tax (EBIT)



1.2 The Company HALCOR S.A.

HALCOR METAL PROCESSING CO. S.A., trading as HALCOR S.A., is the parent Company of the HALCOR Group. The Company was founded in 1976 and its registered offices are in Athens at 2-4 Mesogeion Ave., Athens Tower, Building B, GR-11527, Greece. HALCOR is a public limited company and its shares have been listed on the Athens Exchange since 1996.

Its share capital stands at euro 38,486,258 divided into 101,279,627 ordinary unregistered shares with a nominal value of euro 0.38 each.



More information on HALCOR's shares is available in the 2012 Financial Report, the 2012 Annual Report and on the Company's website, www.halcor.gr (Investors Relations/Shares).



Having invested in research and technology, the Company:

- Offers an extensive range of products that save energy and respect the environment
- Pioneers, demonstrating its innovation in metal processing by creating cutting edge, high added value products for all building, industrial and architectural uses.
- Seeks to ensure maximum customer satisfaction in all its partnerships, by placing particular emphasis on reliability, the speed of response to demand and the comprehensiveness of its product support services.

More information about HALCOR's products are set out in the 'Marketplace' section of this Report and in section 5 of the Annual Financial Report.

1.2.1 Strategic Priorities

The Company is implementing a long-term development plan based on specific objectives and strategic priorities. Top among those objectives are:

- 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 ones
- Penetrating into new markets
- Maintaining high levels of customer satisfaction (by managing the quality of products and services).



Environmental management

The Company cares for the Environment, and implements an ISO 14001:2004 certified Environmental Management System for its production processes.

Quality

The Company provides top Quality products and is focused on continuously improving products and on ensuring customer satisfaction by implementing an ISO 9001:2008 certified Quality Management System.

Occupational Health and Safety Management

The Company safeguards its employees' Health and Safety by implementing an OHSAS 18001:2007 certified occupational Health and Safety Management System at all its production facilities.

1.2.2 Key Financials

Despite the adverse global economic environment, HALCOR managed to increase the volume of sales in 2012 by maintaining or increasing its market share in most of the markets in which it operates. Consolidated EBITDA was up 8.7% and stood at euro 13.4 million in 2012, compared to euro 12.3 million in 2011. Likewise, consolidated results (earnings / losses before tax) were up 10.5% and stood at losses of euro 10.1 million in 2012 compared to losses of euro 11.3 million in 2011.

HALCOR S.A.'s financials	2010	2011	2012
Net sales (in euro '000)	517,613	585,705	545,522
Other operating expenses (in euro '000)	5,267	5,177	5,275
Income from financial investments (in euro '000)	713	42	258
Total revenues (in euro '000)	523,593	590,924	550,755
Operating cost (in euro '000)	(499,040)	(564,182)	(524,466)
Employee salaries and benefits (in euro '000)	(26,556)	(22,147)	(20,119)
Payments to capital providers (in euro '000)	(9,691)	(15,875)	(16,271)
Net losses before tax (in euro '000)	(11,694)	(11,281)	(10,101)
Net losses net of tax (in euro '000)	(7,771)	(13,728)	(10,998)
Net earnings per share (in euro)	(0.0767)	(0.1355)	(0.0767)
Total payments to state Agencies (in euro '000) (taxes paid)	-	-	-
Company investments (in euro '000)	2,551	2,537	2,379
Total capitalisation (in euro '000)	70,895	50,639	88,315
Equity (in euro '000)	143,605	134,497	123,161
Total liabilities (in euro '000)	306,373	288,110	271,136
Total assets (in millions of euro)	449,979	422,607	394,297

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

More information on HALCOR's financials is available in the 2012 Financial Report, the 2012 Annual Report and on the Company's website, www.halcor.gr (Investors Relations).



1.2.3 Social Product

HALCOR seeks to create value for all its stakeholder groups. The Company's operation generate important direct and indirect benefits for society as a whole. Just some of these are listed below:

- An important contribution to the national economy
- Support for local communities and their economies
- Increased employment
- Improved level of technical and other skills among people
- Value generated for shareholders and investors
- Presenting the very best of Greek industry to international markets.

**In 2012 the
Company's
social product
stood at euro 84
million.**

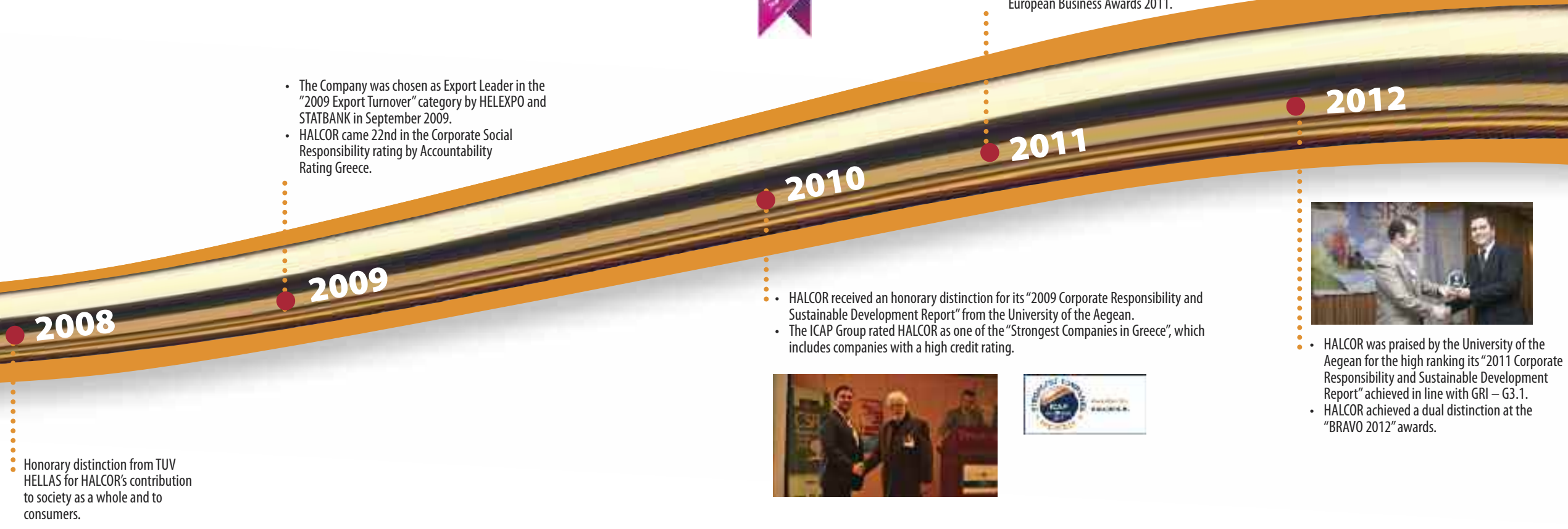


Each year the Company makes significant investments generating multiple benefits for the Company and the local communities it operates in, as well as for the country as a whole. These investments help improve the Greek economy overall by bolstering the income of recipients of the social product down the line, through the development of new activities. They also have a multiplier effect on improving the national economy thanks to the inflow of capital from abroad, the creation of jobs and a more highly skilled workforce.

Annual contribution to social development – Social Product (in euro '000)	2011	2012
Payments to suppliers (apart for those for materials and intragroup transactions)	35,386	45,620
Employee salaries and benefits (including Social security contributions)	22,147	20,118
Payments to capital providers	15,875	16,230
Company investments	2,537	2,379
TOTAL	75,945	84,347

1.3 Awards - Distinctions

The most important awards HALCOR has received to date are listed below:



« These awards are particularly important for everyone at HALCOR, as they vindicate the ongoing efforts being made to ensure that all company activities, departments and divisions operate in a responsible manner. We are committed to continuing our efforts in that direction by stepping up our activities to achieve continuous improvements ».

Strategic Planning and Corporate Responsibility Manager



Award for the Corporate Responsibility and Sustainable Development Report

During 2012 HALCOR won a prize for the high ranking achieved by its Corporate Responsibility and Sustainable Development Report. The prize was conferred on HALCOR by the University of the Aegean at a special ceremony organised as part of the CSR Reporting Forum in December 2012.

Each year the University of the Aegean evaluates Greek CSR reports to determine whether they successfully implement the international CSR reporting standard, GRI- G3.1 developed by the Global Reporting Initiative (GRI). This prize placed HALCOR among the top three companies in Greece in terms of accountability which successfully implemented the GRI-G3.1 standard.

"BRAVO 2012" Award

HALCOR won a dual distinction for itself at the "BRAVO 2012" award, at a special event held in November 2012. The distinction at the "BRAVO" awards related to:

- The Perception Index which evaluates the degree of perception among social partners about key issues presented in the reports prepared by businesses or organisations.
- The Sustainability Index which evaluates company reports based on internationally accepted standards and best practices.

HALCOR was among the companies that achieved high scores in relation to both indices, thereby demonstrating the extent to which CSR has been incorporated into the Company's operations.

1.4 Participation in Networks and Organisations

HALCOR is a member of various associations, sectoral organisations and other bodies that enable it to promote the concepts of Sustainable Development and Corporate Responsibility.

	Name of Organisation	HALCOR's Status
	Hellenic Network for Corporate Social Responsibility (CSR Hellas)	HALCOR has been a key member of the network since 2009
	Federation of Hellenic Recycling and Energy Recovery Industries (SEVIAN)	HALCOR is a founding member of SEVIAN having helped set it up in 2010
	Hellenic Federation of Enterprises (SEV)	HALCOR has been actively participating as a member of the SEV since 1977
	Athens Chamber of Commerce and Industry (ACCI)	HALCOR is an ordinary member of the ACCI
	Federation of Sterea Ellada Industries (SBSE)	HALCOR is a founding member of the Federation and has sat on its BoD since 1982
	Hellenic Copper Development Institute (HCDI)	HALCOR is a founding member of HCDI having helped set it up in 1996
	International Copper Association (ICA)	HALCOR has been a member of ICA since 1996
	International Wrought Copper Council (IWCC)	HALCOR is an ordinary member of the International Wrought Copper Council
	European Committee for Standardisation (CEN)	HALCOR participates as member in the committees formulating CEN specifications
	Hellenic Marine Environment Protection Association (HELMPEA)	HALCOR has been a member since 2011

More information about HALCOR's membership of organisations can be found in the 2011 Corporate Responsibility and Sustainable Development Report (<http://www.halcor.gr/el/corporate-responsibility/assessment-of-corporate-responsibility/>), page 12.

1.5 Key Facts about Copper

1.5.1 Copper and Health

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. Just some of the applications that have been fully studied are:

- The installation of door handles and stair railings and door pushes in two buildings which house 5 primary schools run by the Arsakeion Educational Association in Psychiko and Ekali, as an additional effective measure to limit the spread of dangerous microbes in schools.

The results of the research which was prepared by the HCDI's scientific team in collaboration with the Biopathology University Lab of the Athens Aretaieion Hospital, show that the use of antimicrobial copper at the school facilities referred to above resulted in a statistically significant reduction in bacteria levels. That resulted in a reduction in outbreaks of the common flu in the 2011-2012 school year.

There are encouraging results about the use of antimicrobial copper alloys to protect public health, but it must always be used in conjunction with the basic methods for preventing the spread of infections (washing hands, etc.).

- Antimicrobial copper was installed on the handles, knobs, door pushes and stair railings and the surfaces of trolleys and desks of doctors and supervisors of the "Attikon" General University Hospital ICU. This was the first application of this technology in the Greek NHS. Studies carried out by the HCDI scientific team and Attikon General University Hospital doctors showed a significant reduction in bacteria levels in the specific ICU.
- Antimicrobial copper was installed on the handles, knobs, door pushes and stair railings and the surfaces of trolleys and desks of doctors and supervisors of the "Peiraikos Hospital" in Piraeus, which also resulted in a significant reduction in bacteria levels in the specific ICU. The HCDI's scientific team has prepared a study concerning the positive impacts on how this ICU operates. The results indicate a prima facie reduction in the running costs of the specific ICU after the antimicrobial copper was installed.
- Copper was installed for the first time in the world at a Newborn ICU in September 2012 at the "Agia Sofia" Children's Hospital. Existing handles, knobs and the surfaces of trolleys and desks of doctors and super-



visors at the Hospitals' 2nd Newborn ICU were all replaced with antimicrobial copper. The results showed a significant reduction in bacteria levels at the specific ICU.

- The world's first copper ventilation system was installed in offices covering 3,000 m² in Marousi. Ten tons of copper were used to develop a cutting-edge, well-designed ventilation system that also improves workplace health. This programme was prepared by the HCDI in order to create a model facility to demonstrate the therapeutic value of clean air while also adding an innovative approach to workplace design.

These applications of copper which were developed in Greece have been presented at Global and Greek conferences and have also been published in the scientific proceedings of those conferences.

More information is available on the website www.copper.org.gr.



1.5.2 Copper and Public Transport

Public transport is used daily by millions of people. The surfaces that can be touched in public transport and the fact that public transport is frequently packed contribute to the spread of bacteria which impacts on public health. 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 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.

1.5.3 Copper and the Environment

Copper is an environmentally-friendly metal because of its special characteristics and properties. The use of copper causes no environmental impact but can also contribute significantly to protecting the environment since:

- It is 100% natural material found in the ground and in water
- It can be fully recycled. It can in fact be recycled many times over without losing any of its properties
- It is a great conductor of electricity thereby improving the efficiency of electrical devices, and it is exceptionally resilient and long-lasting.

Research and studies have shown that:

- The use of copper in the manufacture of high performance motors could lead to annual savings of 200 billion kW/h as well as reducing CO₂ emissions by 100 million tons, which is equivalent to 25% of the EU commitment under the Kyoto treaty (Study prepared as part of the Motor Challenge Programme)
- Energy savings from the use of copper in electrical devices (transformers, motors, etc.) could be as high as 70% of the energy consumed.

1.6 Key Facts about the Corporate Responsibility of Subsidiaries

Summary information about the Corporate Responsibility activities of the two main subsidiaries, SOFIA MED S.A. and FITCO S.A. is presented below. HALCOR's subsidiary HELLENIC CABLES S.A. has published its own separate Corporate Responsibility and Sustainable Development Report for the last four years which can be found on its own website, www.cablel.gr.

FITCO S.A.

FITCO, (a 100% subsidiary of HALCOR) is involved in brass extrusion and has had a commercial presence around the world for more than 60 years. The company has a production plant in Oinofyta, in the Prefecture of Viotia, covering a total of 14 acres and can manufacture up to 40,000 tn a year. Using scrap brass in the form of bars as its raw material, the FITCO plant in Oinofyta uses hot or cold extrusion to manufacture the following products:

- Solid and pierced brass bars (round, squared or hexagonal)
- Solid and pierced brass profiles
- Brass wire
- Brass sheets
- Seamless brass tubes with a variety of cross-sections
- Grooved brass tubes with a circular cross-section.

The company is constantly investing in research and know-how in order to produce top quality products. It also seeks to protect the environment and ensure occupational Health and Safety.

To achieve this, the company has put in place the following certified systems:

- A Quality Management System in line with ISO 9001:2008. Company products conform to the main European and US quality standards (EN, DIN, BS, NF, ASTM)
- An Environmental Management System in line with ISO 14001:2004
- An occupational health and safety management system in line with the requirements of the OHSAS 18001:2007 standard.

For more information about the company's profile and its products, visit its website, <http://www.fitco.gr>.



For the company it has been a strategic choice to implement responsible operating practices to all decisions, procedures and systems, in order to generate value for all stakeholders.

Customers

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.

As a result of its investments in research and technology, the Company can offer a large range of high quality products. FITCO ensures maximum customer satisfaction and has put in place communication channels to allow it to record and evaluate customer proposals.

Employees

For FITCO it is a top priority to ensure the ongoing development and growth of its people members, to provide suitable training programmes and to provide a healthy and safe working environment.

FITCO invests in its people placing emphasis on continuous training and personal development. The training courses the company offers vary, covering a wide range of technological and management issues that relate to all sectors of company operations and all echelons. One area though to which particular importance is attached is training in the occupational Health and Safety sector.

Occupational Health and Safety

A primary and overriding goal for FITCO is to ensure the highest possible level of Health and Safety for employees, associates and visitors.

In 2012 the company continued to implement its programme to ensure continuous improvement in this 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 and acid vapours at the acid baths
- Holding emergency drills
- Carrying out safety inspections at production plants
- Certifying bridge cranes and winches
- Installing ceiling-mounted fire fighting systems over burners, generators and electric forklift truck rechargers
- Successfully completing the annual OHSAS 18001 audit for Health and Safety systems which is carried out by an independent certification body.

Environment

The company is particularly respectful of the environment and ensures that its environmental footprint is constantly declining. It implements an Environmental Management System which complies with the requirements of the ISO 14001:2004 standard. Responsible environmental practices include:

- Distributing the environmental newsletter "Environmental Behaviour – Good Guidelines" to all employees
- Using an oil – solvent solution to reduce emissions
- Neutralising acid solutions at the physicochemical processing plant
- Using equipment to contain potential leaks (oil and chemical leak collectors).

Society

In 2012 the company gave something back to society by supporting various programmes and activities. These included:

- Financial support for the "Athens and Piraeus Metal Workers Association"
- Sponsorship for the 7th Architectural Biennale of Young Greek Architects organised by the Hellenic Institute.



Key Financials for 2012

A euro 0.8 million investment plan
 Turnover of euro 53.4 million
 Volume of sales: 14,034 tn
 75% of manufactured products exported
 190 customers in Greece
 90 customers abroad



Occupational Health and Safety Performance in 2012

euro 93,000 spent on Health and Safety issues
 83 hours of training of Health and Safety issues
 2 accidents
 75 man-days lost due to accident
 Accident Frequency Index: 11.3
 Accident Severity Index: 424



Employees 2012 data

75 employees
 66 men
 9 women
 10 employees drawn from the local community
 5 recruitments
 6 departures
 62 hours of training
 9 people trained



Environment Performance in 2012

euro 275,800 spent of environmental protection
 Electricity consumption: 3,569,799 KWh
 Thermal energy consumption: 5,874,672 KWh
 Water consumption: 28,894 m³
 86.89 Kg CO₂ per ton of product

SOFIA MED S.A.

SOFIA MED produces a wide range of rolled and extruded copper products, copper alloys and zinc products such as sheets, strips, slabs, disks, rods, bars, profiles and wires, used in a diverse range of applications. SOFIA MED is part of the HALCOR Group. The company's facilities are located in Sofia of Bulgaria on a plot covering 250,000 m² and it has three production plants 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 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's profile and its products, visit its website, www.sofiamed.bg/en.



Between 2002 - 2012 the company implemented a major investment plan worth euro 140 million. This included major works such as:

- New smelting and casting facilities at the foundry to product top quality copper, brass, special alloy and zinc products
- A new rolling plant to product wider strips and sheets
- Better equipment at the extrusion plant
- Improvements to and automation of the entire production process and quality procedures
- Energy performance projects.

These works are very important because they will contribute to an increase in production capacity and enable the company to expand its product range.

SOFIA MED has incorporated Corporate Responsibility into the way in which it works. The company acknowledges that the move towards Sustainable Development is intimately bound up with Corporate Responsibility and for that reason attaches great importance to managing these issues in a systematic way. Respecting the environment and people are core values and top priorities for the company. SOFIA MED has implemented a series of programmes and plans across the entire spectrum of its Corporate Responsibility activities (Human Resources, Society, Environment, Marketplace, Economic Growth and Corporate Governance). These programmes include actions to:

- Protect the natural environment and ensure continuous improvements in the company's environmental performance
- Continuously improve working conditions and ensure a safe and efficient working environment (by managing occupational Health and Safety)
- Maintain high levels of customer satisfaction to manage the quality of products and services.
- Ensure employee development and growth and to provide equal opportunities at work.
- Invest in technology to enable more recyclable materials to be used and to further reduce direct emissions.

Customers

Customer satisfaction is a top priority for SOFIA MED which has a comprehensive Quality Management System in place. Systematically implementing it, the company can guarantee the very high quality standards are met and that specific customer requirements can be achieved.

Implementation of the company's ISO 9001:2008-compliant Quality Management System is based on its Quality Policy. The company's business is the manufacture of copper, copper alloys and zinc products. The Quality Policy states that the company's objectives are:

- Continuous improvements in the level of customer satisfaction
- High quality products, so that they meet customer requirements, and remain highly effective
- Maintaining the company's reputation for quality, customer service and reliability and improving it further
- Constantly adapting to new market needs
- Collaborating with customers to develop customised, specialised products that match their needs.

Employees

For us, people are a top priority. That is why SOFIA MED makes substantial investments in its human resources, offering a diverse range of training courses to ensure a continuous improvement in know-how and to development skills and knowledge.

Every year the company gets employees and their families involved in a series of social events and educational campaigns. Some of these are listed below:

- May is the Health, Safety and Environment Month
- Annual employee and family social event featuring a tour around the plant
- Annual summer children's camp
- Annual children's Christmas party

SOFIA MED also offers employees additional healthcare insurance as part of its social policy.

Occupational Health and Safety

One of management's top priorities and objectives is to achieve a continuous improvement in occupational Health and Safety conditions. The company's 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 definitive factor in its operations and in the decisions it takes when investing in new technologies and in growth and development in general.

Environment

Environmental protection is a non-negotiable principle which the company abides by and forms an integral part of company strategy. SOFIA MED has an Environmental Management System certified in line with the ISO 14001:2004 standard. It is worth noting that over recent years a significant number of investments in different technologies have allowed the company to further increase the percentage of recyclable materials it uses.

Management's strategic objective is to reduce SOFIA MED's environmental footprint and increase the environmentally-friendly initiatives and actions implemented by the company, and to bolster 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 programmes. It also collaborates with various public sector bodies, technical schools and universities and provides vocational training to university students and graduates.

Applications of Antimicrobial Copper CU+



A new room within the ICU at the Tokuda Hospital in Sofia, Bulgaria was recently opened in collaboration with the Hellenic Copper Development Institute (HCIDI).

This is an isolation chamber used to aid the recovery of patients suffering from serious illnesses or recovering from serious operations. All door handles, hangers, handles, bed edges and all flat surfaces

have been made of Antimicrobial copper CU+ manufactured by SOFIA MED.

Antimicrobial copper CU+ neutralises bacteria in a natural way, reducing infections and leading to faster recovery and reduced pharmaceutical spending for patients.



Key Financials for 2012

Investments of euro 6.3 million
Gross profits of euro 5.3 million
euro 341.3 million in income from sales
EBITDA of euro 9.2 million
EBIT of euro 0.2 million
euro 34.5 million working capital
Debt/equity ratio of 1.32
388 customers



Employees 2012 data

548 employees
443 men
105 women
91 recruitments
64 departures
11 hours of training per employee



Occupational Health and Safety Performance in 2012

euro 0.51 million invested in Health and Safety
371 hours of Health and Safety training
10 accidents
Accident frequency index: 8.3
Accident severity index: 264
318 days lost



Environment Performance in 2012

Investments of euro 0.527 million
Energy consumption: 53,285 MWh
Water consumption: 655,563 m³
224.9 Kg CO₂ per lt of product

2. Approach to Corporate Social Responsibility



HALCOR's primary objective is to operate responsibly in all its business activities.

Corporate Responsibility and Sustainable Development

For the company it has been a strategic choice to implement responsible operating practices to all decisions, procedures and systems, in order to generate value for all stakeholders.

Respecting and protecting the environment, and ensuring the Health and Safety of employees are values and top priorities for the Company.

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



2. Approach to Corporate Social Responsibility






CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT POLICY

HALCOR and its subsidiaries have incorporated the principles of Corporate Social Responsibility in their business operations, thus recognizing that their long-term growth and prosperity of society at large can only be achieved through Sustainable Development. Concern for employee Health and Safety, respect and protection of the environment, comprehensive coverage of customer needs and harmonious coexistence with the local communities in which they operate are the main issues of Corporate Social Responsibility of HALCOR and its subsidiaries.

Corporate Social Responsibility and Sustainable Development Policy of HALCOR is in accordance with the Company's values of responsibility, integrity, transparency, effectiveness and innovation and is determined by the Management, which is committed to the following issues:

- implementation of the CSR Policy at all levels and in all the Company's operating entities.
- 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.

In order to realize the aforementioned commitments - even beyond formal compliance with the legislation in force - the Company voluntarily and responsibly has been planning and implementing the relative programs, while, at the same time, setting strategic priorities, which focus on the following areas of Corporate Social Responsibility of HALCOR:

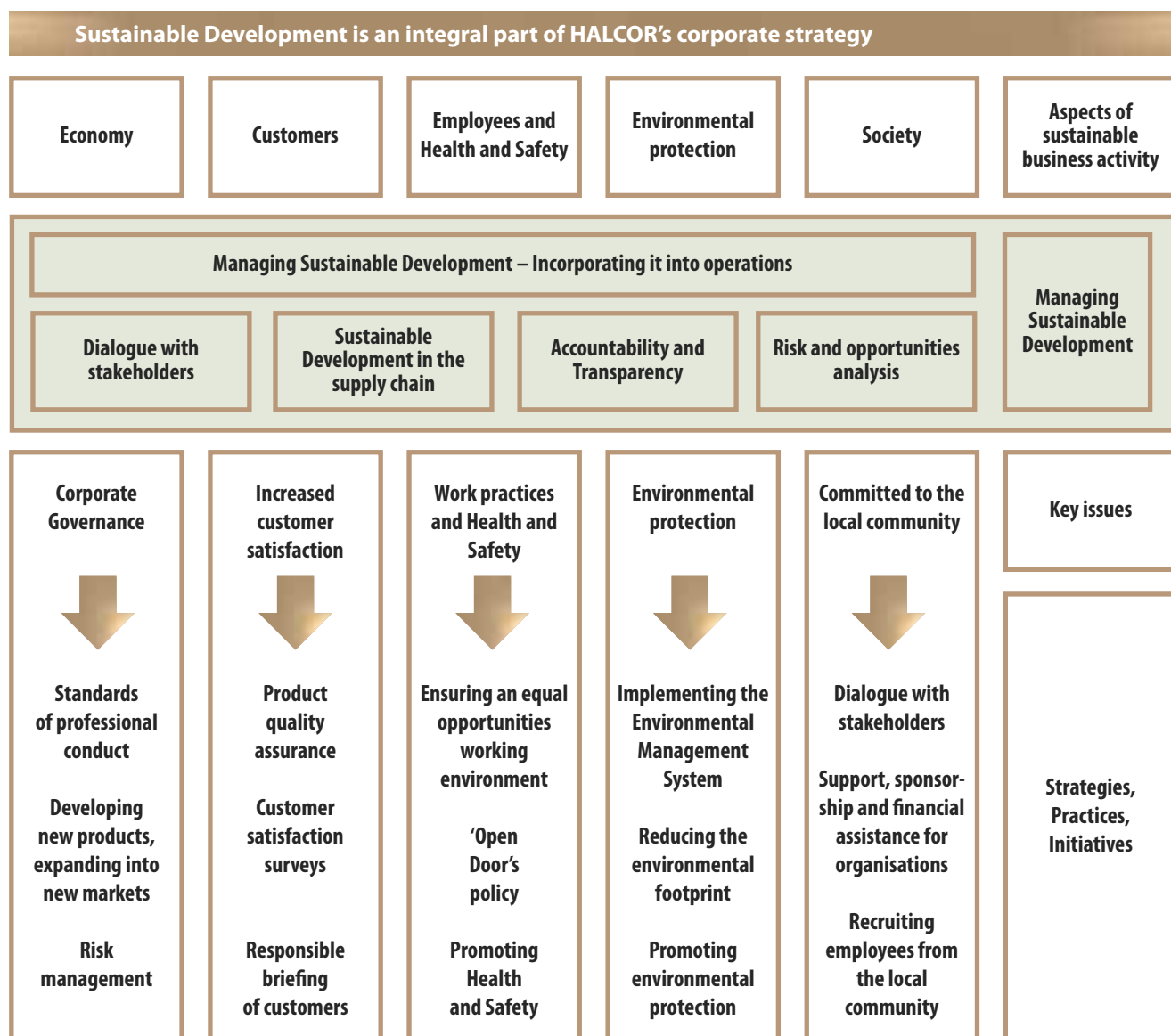
	1. Economic Growth and Corporate Governance	<p>The Company aims to achieve positive financial results, implements a system of sound Corporate Governance, assesses and manages business risks in order to safeguard the interests of the stakeholders. It develops procedures and takes measures both to enhance transparency and to prevent and combat corruption.</p>
	2. Marketplace	<p>The Company focuses on achieving best and complete customer satisfaction and invests in Research and Development in order to provide new products and services of high quality and added value, thereby improving its position in an ever-evolving business environment. Additionally, responsible business conduct is required to be practiced by the Company's suppliers and collaborators.</p>
	3. Staff - Occupational Health and Safety	<p>The Company respects and supports internationally- recognized human rights and implements fair reward, meritocracy and equal opportunities policies in respect of all its employees, free from any discrimination. It also provides opportunities for ongoing training and development of human resources with respect to its personnel diversity.</p> <p>A healthy and safe working environment is a matter of primary importance to the Company. The Company continually takes measures and implements investment plans, aiming at continuous improvement of Health and Safety at work.</p>
	4. Environment	<p>Concerning the domain of environmental management, the company applies the principle of prevention and takes systematic steps to minimize the impact of its operations on the environment. Aiming at environmental protection, the Company implements various programs for optimal management of resources, promotes metal recycling, reduction of carbon emissions and waste management.</p>
	5. Local Community	<p>The Company designs and implements actions to meet the fundamental needs of society in terms of employment, development, education, health, environment, social welfare and culture. It encourages volunteerism and supports initiatives, in order to develop the local communities, in which it operates.</p>

In respect of all the above key issues concerning HALCOR and its subsidiaries, we set targets of Corporate Social Responsibility and Sustainable Development, which are annually assessed for their effectiveness and revised when deemed necessary.

The relevant policy, the results of HALCOR performance as regards issues of Corporate Social Responsibility, as well as the implementation of programs and achieving the objectives set, are disclosed, on an annual basis, in order to keep all stakeholders informed.

The opinions and view of the stakeholders are taken into account under an annually-held Management Review of all the above issues.

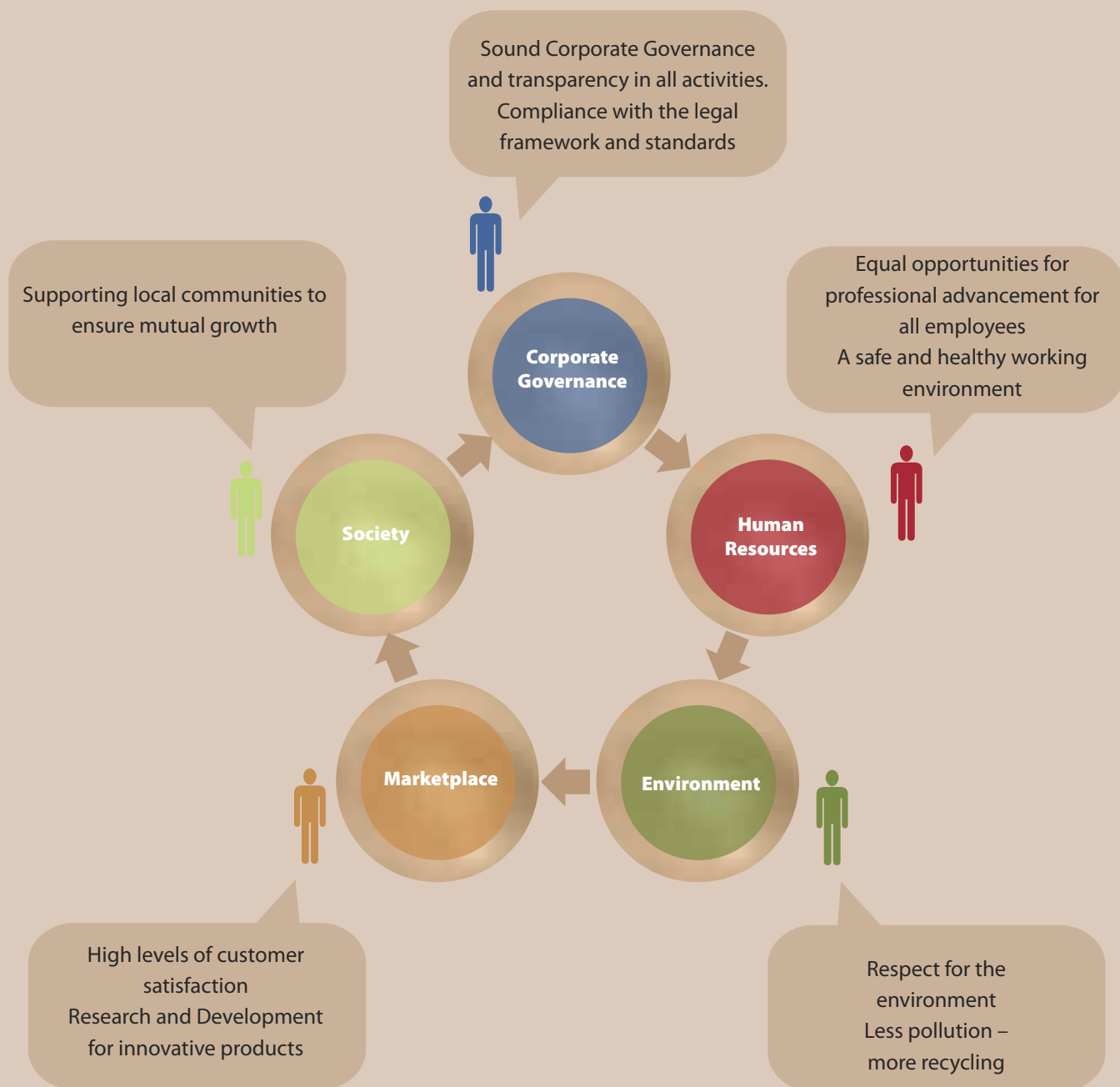
2. Approach to Corporate Social Responsibility



2.1 Corporate Responsibility at HALCOR

HALCOR has incorporate CSR principles into its business strategy and ensures that it operates responsibly. Having recognised that the path to Sustainable Development is intimately bound up with Corporate Responsibility, HALCOR has identified specific actions that it needs to take. For each aspect of its CSR programme, HALCOR:

- Has set top priorities and targets for itself
- Is implementing the relevant programmes
- Monitors whether targets are achieved by using specific performance indicators.



2.1.1 Organisational Structure on Corporate Responsibility

In order to improve its performance in the Corporate Responsibility sector and to comprehensively manage Corporate Responsibility issues in everything it does, in 2009 HALCOR set up a Corporate Responsibility Team. This team:

- Consists of people from the company's Divisions, coordinated by the Strategic Planning Division which reports to General Management.
- Continuously monitors the company's progress in achieving its Corporate Responsibility objectives
- Each month examines issues that have arisen and plans the relevant actions that need to be taken.

HALCOR's general management team conveys major Corporate Responsibility issues to the Board of Directors via quarterly reports that cover the entire range of company operations. In addition, the Board of Directors briefs shareholders about the company's CSR issues in the Corporate Responsibility and Sustainable Development Report which is published each year. This report is distributed to shareholders at the Ordinary General Meeting of Shareholders.

2. Approach to Corporate Social Responsibility

Corporate Responsibility organisational structure



Capitalising on this structure, the company's senior management can ensure that it remains well-briefed, that it is in control and that it can responsibly manage issues relating to the financial, environmental and social aspects of its operations.

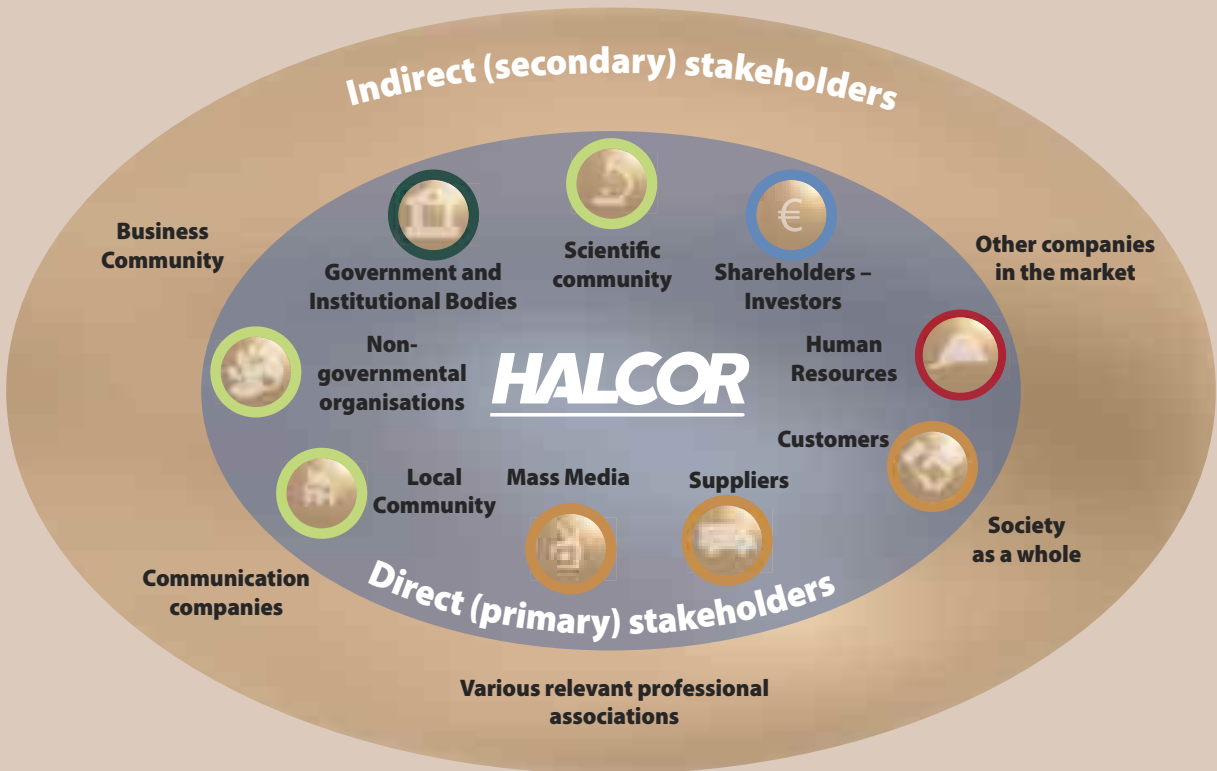
HALCOR has adopted the Federation of Greek Industry's Code of Principles for Sustainable Development (<http://www.sevbcsd.org.gr/principles>).



2.1.2 Stakeholder Engagement

HALCOR communicates with, collaborates with and interacts with different stakeholder groups. These groups consist of all individuals and legal entities who directly or indirectly affect or are affected by its operations. HALCOR's engagement with each stakeholder group generates significant benefits for both the Company and each group and for society as a whole. HALCOR's goal is to generate value for each of its stakeholder groups.

Stakeholder prioritisation



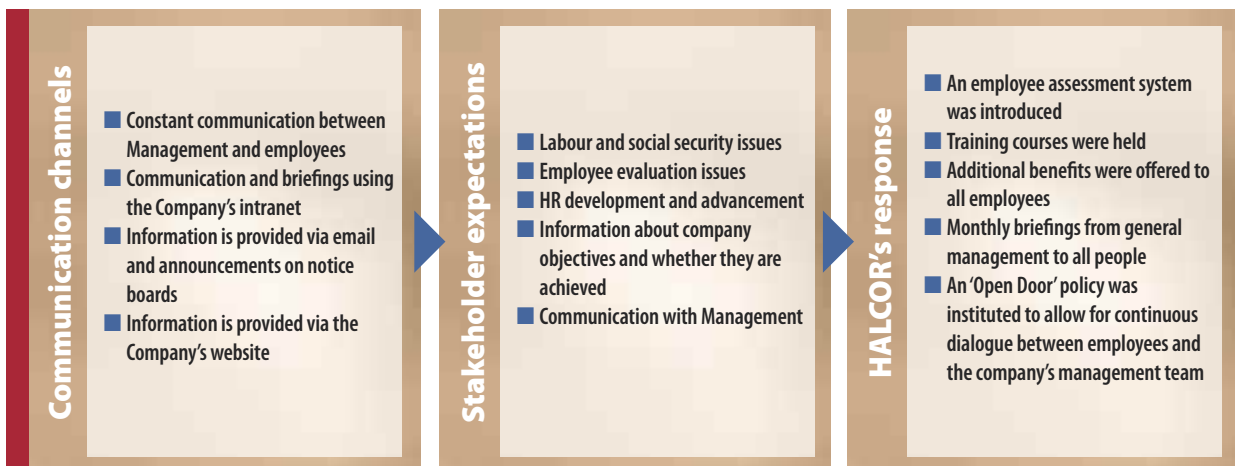
Relationship-Interaction Framework with Direct - Primary Stakeholders

The company has developed two-way communication with each stakeholder group and collaborates with them to explore key issues. The methods of communication, the key issues examined and the expectations of each group are set out in the table below.



Human Resources:

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

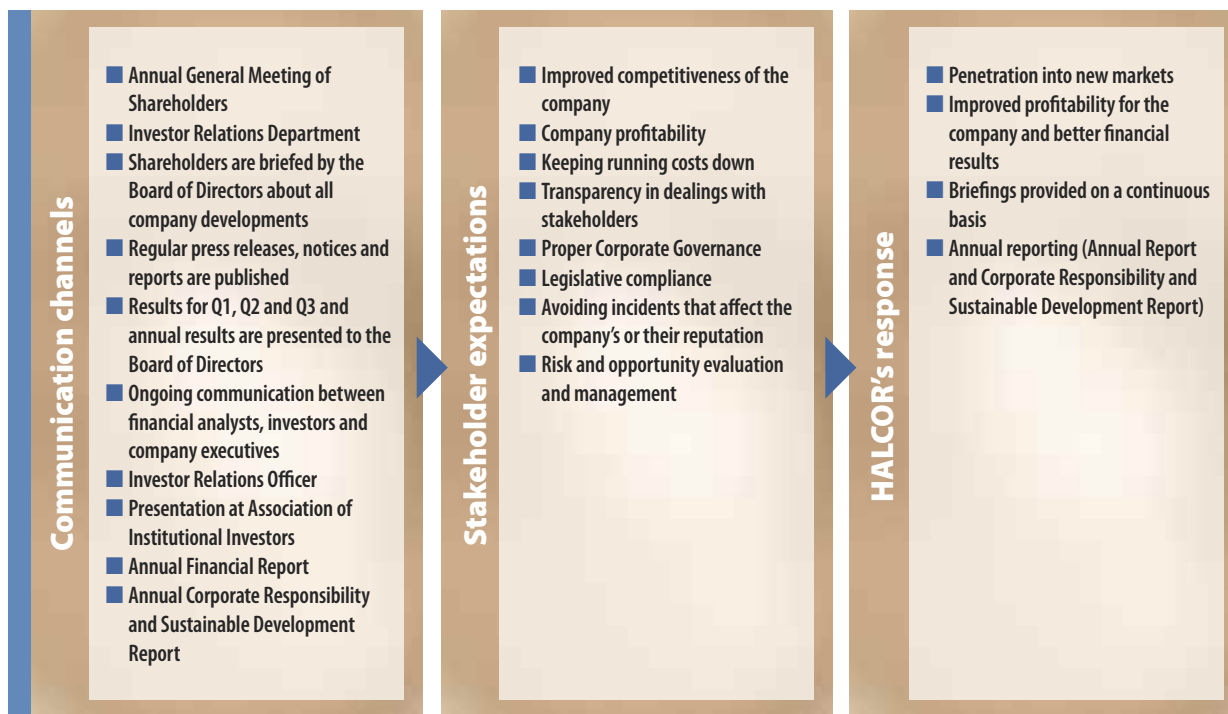


2. Approach to Corporate Social Responsibility



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





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



2. Approach to Corporate Social Responsibility



NGOs – 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



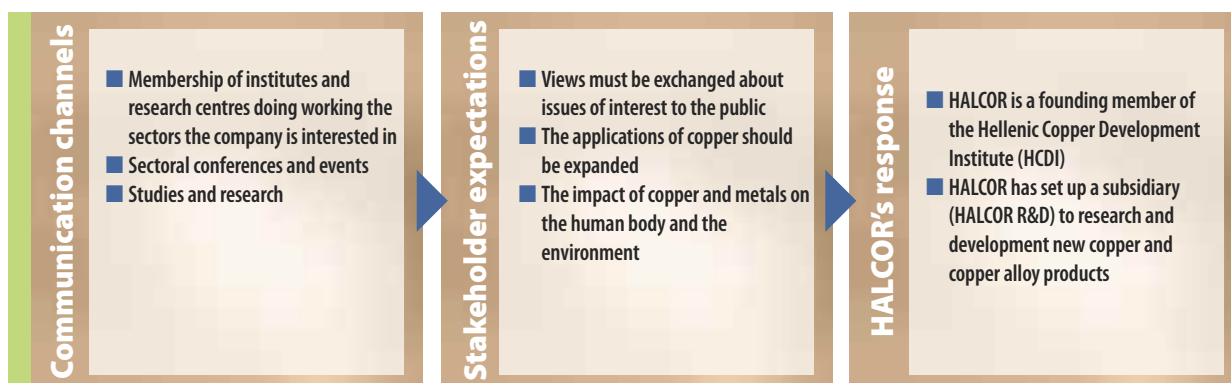
Government and Institutional Bodies:

- 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:

- 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



The key topics of dialogue with each stakeholder group are issues on which HALCOR steps up its activities in order to improve its performance. This Corporate Responsibility and Sustainable Development Report also presents how the company responds to each one of those issues. HALCOR monitors and measures its Corporate Responsibility performance each year and sets targets for each aspect of its Corporate Responsibility activities. These are presented in the relevant sections of this Report. HALCOR's goal is to ensure continuous improvement at all levels and to meet its stakeholders' expectations.

2. Approach to Corporate Social Responsibility

2.2 Corporate Responsibility Principles, according to the International Standard ISO 26000 for Social Responsibility

HALCOR follows the guidance provided in the ISO 26000 standard. ISO 26000 is the most comprehensive Corporate Responsibility standard offering guidance to organisations about how to implement actions and take measures to cover a series of Corporate Responsibility issues. HALCOR has incorporated responsible operating practices into all its activities to maximise the benefit for itself and for society as a whole in general.

At HALCOR Corporate Responsibility is not limited to specific sectors but pervades all the Company's activities. For that reason, HALCOR implements a uniform management system which includes the three certified systems that the Company implements:

- ISO 9001:2008 Quality Management System run by the Quality Assurance Division.
- ISO 14001:2004 Quality Management System run by the Quality Assurance and Environment Division.
- OHSAS 18001:2007 Occupational Health and Safety system run by the Health and Safety Division.

Consumer Issues	Environment	Cooperation with Local Communities	Corporate Governance	Human Rights	Employment Practices	Fair Operating Practices
 <p>HALCOR is a responsible presence in the marketplace and the products and services it offers are top quality.</p> <p>The Company communicates with customers to identify and record possible complaints they may have and take appropriate corrective and preventative steps.</p> <p>In addition, HALCOR complies with all requirements as regards the information it must provide on its products and services. As a result, during 2012, there were no incidences of non-compliance with legislation and regulations related to the impact of products, the information given to customers by the Company and the labelling that must accompany its products.</p>	 <p>HALCOR is committed to operating with respect for the natural environment and in full compliance with the applicable legislation. In many cases HALCOR's performance has gone far beyond the requirements laid down by law.</p> <p>In order to ensure comprehensive management of environmental issues the company has put an Environmental Management System in place, certified in line with the requirements of the ISO 14001:2004 standard.</p> <p>Continuous endeavours are being made to reduce the company's environmental footprint by implementing responsible measures to minimise the company's impact on the natural environment.</p>	 <p>HALCOR seeks to develop the areas in which it operates and takes specific steps to achieve that goal. The majority of suppliers come from Greece and a significant portion of them come from the local communities in which the Company operates.</p> <p>A significant part of the company's human resources needs are met by local communities, thereby contributing to more jobs for locals.</p> <p>HALCOR also organises employee volunteer programmes each year with a social or environmental focus, to give something back at a local level.</p>	 <p>HALCOR seeks to ensure the maximum possible level of transparency in its operations and continuous, two-way, constructive collaboration with stakeholders.</p> <p>For HALCOR respect for the applicable legislative and regulatory framework and proper conduct are non-negotiable principles.</p>	 <p>HALCOR is firmly committed to respecting human rights and ensuring compliance with fundamental freedoms and human rights.</p> <p>The Company offers a work environment that respects diversity and provides equal opportunities to all. There has never been an incidence of discrimination or related complaint.</p>	 <p>HALCOR's people have been the driving force that have enabled the company to grow. It has adopted a Code of Employee Values and Conduct. All people are obliged to implement this Code. Providing an equal opportunities and rewarding work environment, without discrimination and with significant opportunities for personal and professional development, is an objective the Company constantly strives to maintain.</p>	 <p>For HALCOR, responsibility in its operations is a matter of strategic priority. Although the risk for incidence of corruption is low, HALCOR has taken all the necessary measures to control and identify potential occurrences. To date there have been no incidences of corruption within the Company.</p> <p>HALCOR fully respects the right of ownership (material or intellectual) and strives to promote social responsibility.</p>

◀ CORPORATE GOVERNANCE ▶

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.

2. Approach to Corporate Social Responsibility

2.3 The Global Compact

HALCOR is committed to operating responsibly creating value for its stakeholders by:

- Defending human rights
- Providing optimum working conditions
- Protecting the environment
- Ensuring transparency in all its operations.

In light of that, HALCOR has incorporated the 10 principles contained in the Global Compact into its Corporate Social Responsibility and Sustainable Development Policy in large part, and into the relevant policies, procedures and systems it has.

The Global Compact is a United Nations initiative that aims to combine the efforts of businesses, trade unions and civil society organisations in the areas of human rights, labour, environment and anti-corruption.

Supporting the Principles in the Global Compact



As a company which respects the principles in the Global Compact, HALCOR has prepared the table below which matches the GRI indicators with the relevant Global Compact principles.

The Global Compact's 10 Principles	GRI indicators	HALCOR's Actions
Human rights		
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights	EC5, LA4, LA6-9, LA13, LA14, HR1-11, S05, PR1, PR2, PR8	For HALCOR, respect for internationally accepted human rights is an indisputable principle. The Company ensures respect for human rights in all of its activities. In 2012 training was provided about human rights, attended by the company's executives. Special human rights training was also provided to all company security staff.
Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	HR1-11, S05	There have been no incidences of human rights violations within the Company. <i>More information is available in the section entitled 'HUMAN RESOURCES'.</i>
Labour conditions		
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	LA4, LA5, HR1-3, HR5, S05	The Company respects and implements applicable collective labour agreements and the relevant labour law. HALCOR is opposed to child labour and forced or compulsory labour. All employees are aged over 18 and the company applies an equal opportunities / no discrimination policy. In 2012, as in previous years, no incidences of discrimination were reported or identified.
Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour	HR1-3, HR7, S05	There have been no incidences of discrimination in recruitment and employment within the Company. <i>More information is available in the section entitled 'HUMAN RESOURCES'.</i>
Principle 5: Businesses should uphold the effective abolition of child labour	HR1-3, HR6, S05	
Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and recruitment	EC7, LA2, LA13, LA14-15, HR1-4, S05	
Environment		
Principle 7: Businesses should support a precautionary approach to environmental challenges	EC2, EN18, EN26, EN30, S05 EN1-30, S05, PR3, PR4 EN2, EN5-7, EN10, EN18, EN26, EN27, EN30, S05	The Company implements an Environmental Management System certified in line with the requirements of the ISO 14001 standard and takes steps to reduce its environmental footprint, in many cases exceeding legal requirements. To ensure that it has the least possible impact on the natural environment, the Company has adopted the preventative principle when managing its environmental issues.
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility		Respect for the environment is an objective of primary importance. <i>More information is available in the section entitled 'ENVIRONMENT'.</i>
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologie		
Anti-corruption		
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	S02-6	The Company is opposed to all forms of corruption and is committed to operating in an ethical and responsible manner. The Company has provided training to its executives about transparency and corruption in order to prevent and avoid such phenomena.
		To date there have been no incidences of corruption within the Company. <i>More information is available in the section entitled 'CORPORATE GOVERNANCE'.</i>

2. Approach to Corporate Social Responsibility

2.4 Materiality Analysis

It is particularly important to identify the key Corporate Responsibility and Sustainable Development issues for each and every organisation since this allows the company to focus on the most fundamental issues and prioritise how it will manage them.

The GRI guidelines state that a basic principle in determining the content of a report is to identify material Corporate Responsibility and Sustainable Development issues.

To set its priorities, ensure comprehensive management of key issues and to plan future actions, the company has performed a materiality analysis for Corporate Responsibility and Sustainable Development issues arising from its operations.

The procedure followed complies with the principles and specifications laid down in the GRI-G3.1 standard. Middle and senior management from all Company departments and divisions were involved prioritising key issues. This ensured that a full record of all possible issues that could potentially be related to or have an impact on the Company's Corporate Responsibility was prepared.

The procedure for analysing the material issues consists of three stages:

Phase 1

Identifying key issues relating to the Company's social responsibility

Phase 2

Having company executives evaluate the key issues by integrating the expectations of company stakeholders into the analysis

Phase 3

Prioritising the key issues

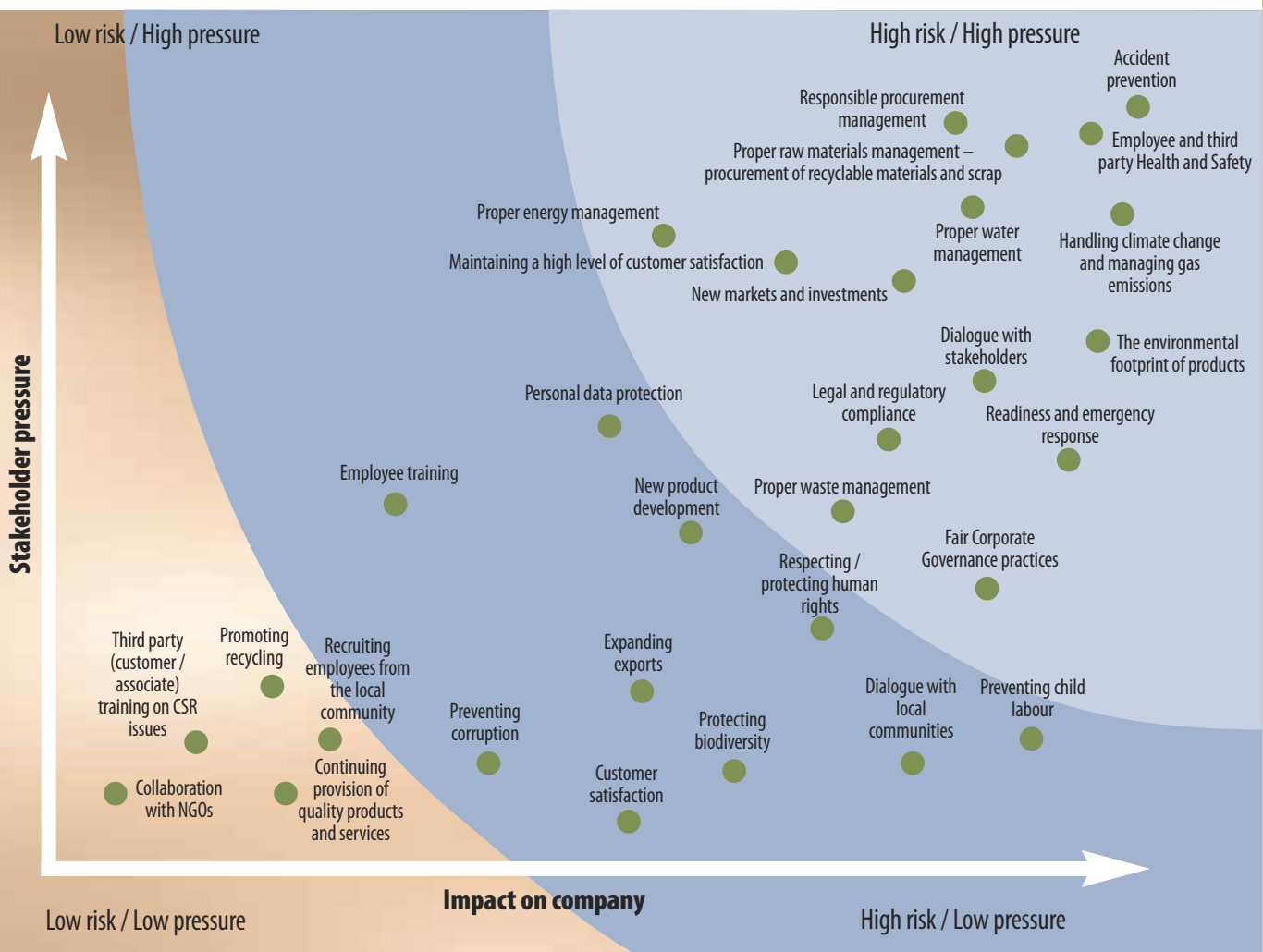
In order to optimally manage Corporate Responsibility and Sustainable Development issues and attach the right weighting to each one of them, material issues were identified and prioritised based on the possible impact they could have on the company and stakeholder expectations. The degree of impact these issues have depends on the likelihood of them occurring and on the potential scale of the impact. In addition the relevant actions taken by the company so far in each sector were also taken into account.

In order to optimally manage Corporate Responsibility and Sustainable Development issues and attach the right weighting to each one of them, material issues were identified and prioritised based on the possible impact they could have on the company and stakeholder expectations. The degree of impact these issues have depends on the likelihood of them occurring and on the potential scale of the impact. In addition the relevant actions taken by the company so far in each sector were also taken into account.

1. Accident prevention
2. Employee and third party Health and Safety
3. Responsible procurement management
4. Proper raw materials management – procurement of recyclable materials and scrap
5. Handling climate change and managing gas emissions
6. Proper water management

7. Proper energy management
8. Maintaining a high level of customer satisfaction
9. New markets and investments
10. The environmental footprint of products
11. Dialogue with stakeholders
12. Legal and regulatory compliance
13. Readiness and emergency response
14. Proper waste management
15. Fair Corporate Governance practices

The diagram below shows how the Company's material issues which were identified as part of this process have been prioritised.



Taking into account the results of the evaluation of the key Corporate Responsibility and Sustainable Development issues for the company, HALCOR included those issues in an action plan for 2013 and set targets and committed the relevant financial and human resources to achieve those targets. This has allowed the company to focus on important Corporate Responsibility and Sustainable Development issues arising from its operations, which affect stakeholders to a large degree.



3. Corporate Governance



All our business activities are underscored by integrity, respect and transparency.

Our Commitment:

- Transparency in all its business activities, to ensure proper, two-way partnership with shareholders, customers, employees and all stakeholders.
- Compliance with the legislative and regulatory framework and the relevant standards.
- Implementing practices that go beyond the requirements laid down by law, while acting with integrity and ethos at all times.

As part of its approach to Corporate Responsibility, HALCOR considers that transparency and effectiveness are key to planning its growth and development. At the same time, for HALCOR Corporate Responsibility is a concept that is fully integrated into its modus operandi.

2012



11 members
Board of Directors

- 5 executive members
- 4 non-executive members
- 2 independent non-executive members



84 million euro
HALCOR's social product

To date there have been no recorded / identified incidents of corruption

"Proper governance and regulatory compliance in all areas is the building block for responsible business".



3. Corporate Governance

Review of progress in achieving 2012 targets

What we said	Performance	What we did
Train executives about transparency and Corporate Governance issues	✓	At total of 18 executives received training about transparency and Corporate Governance issues
Train members of the Corporate Responsibility team about Corporate Responsibility issues.	✓	We held a training course for the Corporate Responsibility team about human rights, equal opportunities and combating discrimination.

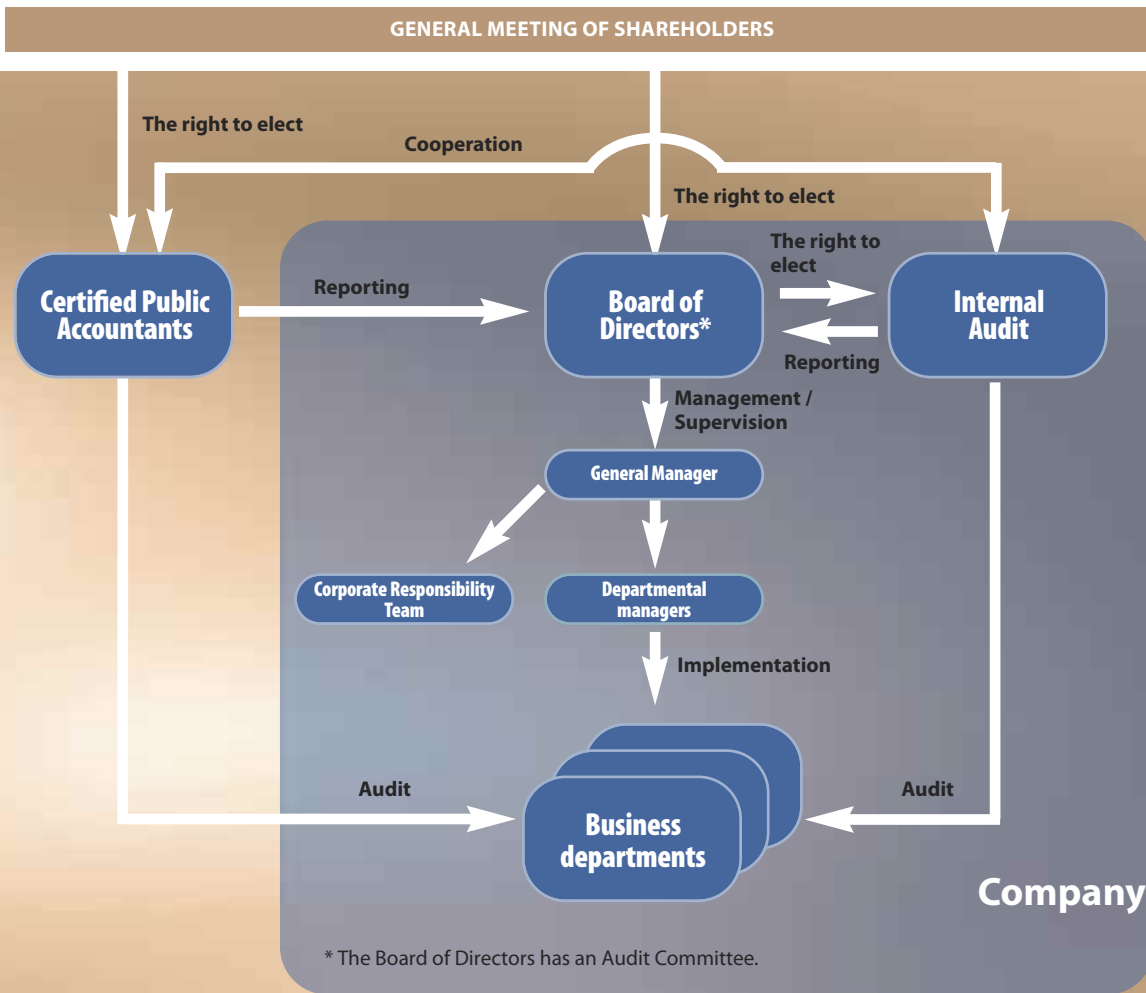
3.1 Corporate Governance

The Company has put in place a comprehensive Corporate Governance framework which reflects international best practices and includes:

- Protecting the rights of all shareholders
- Ensuring a clear segregation of the roles of management bodies and that they are selected based on qualifications and experience in the Corporate Governance sector
- Transparency, integrity, responsibility in decision-making procedures
- Particular emphasis on Corporate Social Responsibility issues.

Since March 2011 HALCOR has been applying the Federation of Greek Industries' Corporate Governance Code. When preparing the Annual Corporate Responsibility and Sustainable Development Report the Company reviewed the Code to record all those areas where its practices diverge from the guidance provided by the Code. (More information about the Federation of Greek Industries' Code can be found on the website http://www.sev.org.gr/Uploads/pdf/KED_SEV_InternetVersion_updatednew2132011.pdf).

CORPORATE GOVERNANCE DIAGRAM



In order to bolster corporate transparency and auditing mechanism within HALCOR the company has adopted bylaws. All employees are obliged to apply these across the entire spectrum of company operations. The Bylaws:

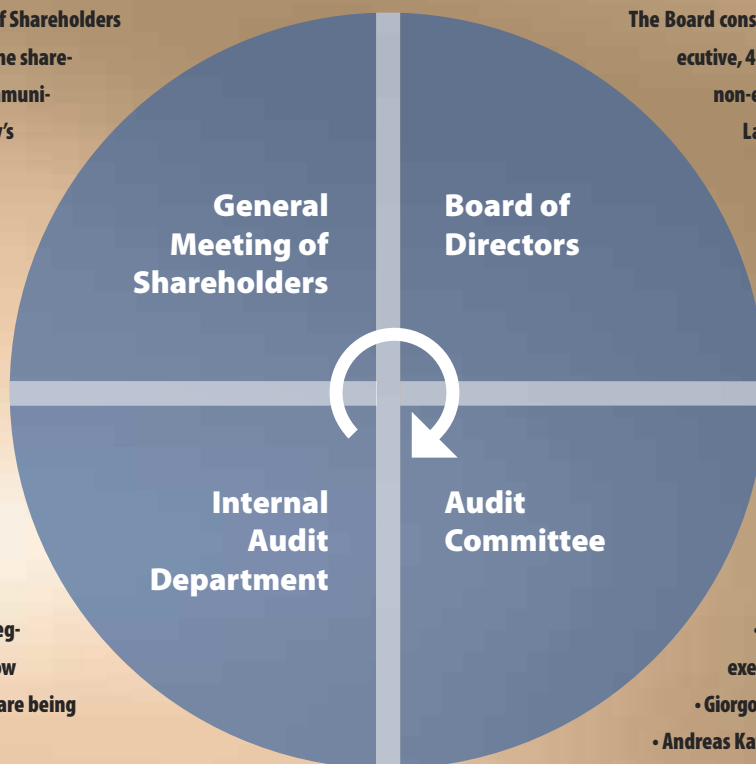
- Have been approved by the Company's Board of Directors.
- Record the competences, duties and obligations of each statutorily-mandated body, department or unit referred to in the Company's Articles of Association and the relevant legislation.
- Outline the basic operations performed by the Company and go well beyond the legislative requirements which relate to the obligations of companies whose shares are listed on the Exchange.



3. Corporate Governance

The main Corporate Governance bodies are listed below:

The General Meeting of Shareholders provides a means for the shareholders to directly communicate with the Company's management team.



The Board consists of 11 members in total (5 executive, 4 non-executive and 2 independent non-executive members) as required by Law 3016/2002 as a company whose shares are listed on the Athens Exchange.

This Dept. briefs the Board of Directors at regular intervals about how the Company's bylaws are being implemented.

Line-up of the Committee:

- Andreas Kyriazis (independent non-executive member of the Board)
- Giorgos Passas (non-executive board member)
- Andreas Katsanos (independent non-executive member of the Board)

General Meeting of Shareholders

- The Board of Directors is evaluated once a year by the company's share holders during the General Meeting. The evaluation criteria relate to how the Board of Directors performed and its activities over the previous year, primarily based on the Management Report the Board submits to the General Meeting.
- During the General Meeting of Shareholders, minority shareholders are also given the chance to participate, to express their views and to communicate with members of the Company's Board of Directors. The Company fully complies with the provisions of Law 2190/1920 concerning how minority shareholders participate in the meeting and express their views. The remuneration for members of the BoD is tied into the Company's overall performance (including responsible operating practices) but at present there is no separate procedure for monitoring the BoD's performance on issues of responsible, sustainable operations.

Board of Directors (BoD)

- Members of the Board of Directors are elected by the General Meeting of Shareholders. The criteria used to elect the BoD members include experience, expertise, formal university qualifications, distinctions during their ca-

reer, managerial skills, conceptual / synergistic and analytic thinking skills, social recognition and good character.

- Convenes at regular intervals and is responsible for providing guidance and taking decisions concerning the Company's operations.
- Receives briefings via quarterly or half-yearly reports which cover important topics and the performance indicators relating to health and safety and human resources, and key environmental issues. The heads of company departments also attend BoD meetings in order to brief the board and raise issues.
- On an annual basis, the Board of Directors reviews the corporate strategy, main business risks and Internal Control Systems.

Audit Committee

- The Committee is elected and operates in accordance with Law 3693/2008.
- Its main task is to provide support to the Company's Board of Directors and its objective is to implement the financial reporting principles and the Corporate Governance and internal auditing principles. The Committee continuously audits the effectiveness, independence and objectivity of the external auditors for the Company, subsidiaries and associated companies.
- In 2012 it met four times and had a full quorum.

Internal Audit Department

- Internal audits examine environment, health and safety and human resources issues and the results of those audits are sent to members of the Board of Directors.
- The Department includes a special, independent audit team which carries out internal auditing activities for the company and is supervised by the Board of Directors' three non-executive members. The internal auditors on this team perform their duties in an independent, impartial manner and do no report to any other unit in the hierarchy.

More information about the Corporate Governance bodies (and their roles and competences) can be found in the Company's 2012 Annual Financial Report pages 15-20 which also contains brief CVs of the members of the Board of Directors.

The Company has put in a place a procedure so that when necessary the Company's Quality, Environment, Health and Safety and Human Resources Managers can directly inform about the Board of Directors of issues of concern to them.



3. Corporate Governance

Line-up of the Board of Directors

T. Papageorgopoulos,
Chairman of the Board
(Executive Member)

Executive Members

N. Koudounis
Vice-Chairman of the Board

P. Sapountzis

A. Kasapoglou

E. Kotsabasakis

Non-Executive Members

K. Bakouris

A. Katsanos

G. Passas

C. Komninos

Independent Non-Executive Members

N. Galetas

A. Kyriazis

* All members of the Board of Directors are Greek citizens.

Ratio of men to women on Board of Directors and age line-up of Board members

Gender	Members of Boards of Directors	<30	30-50	>50
Women	-	-	-	-
Men	11	-	-	√
Total	11	-	-	√

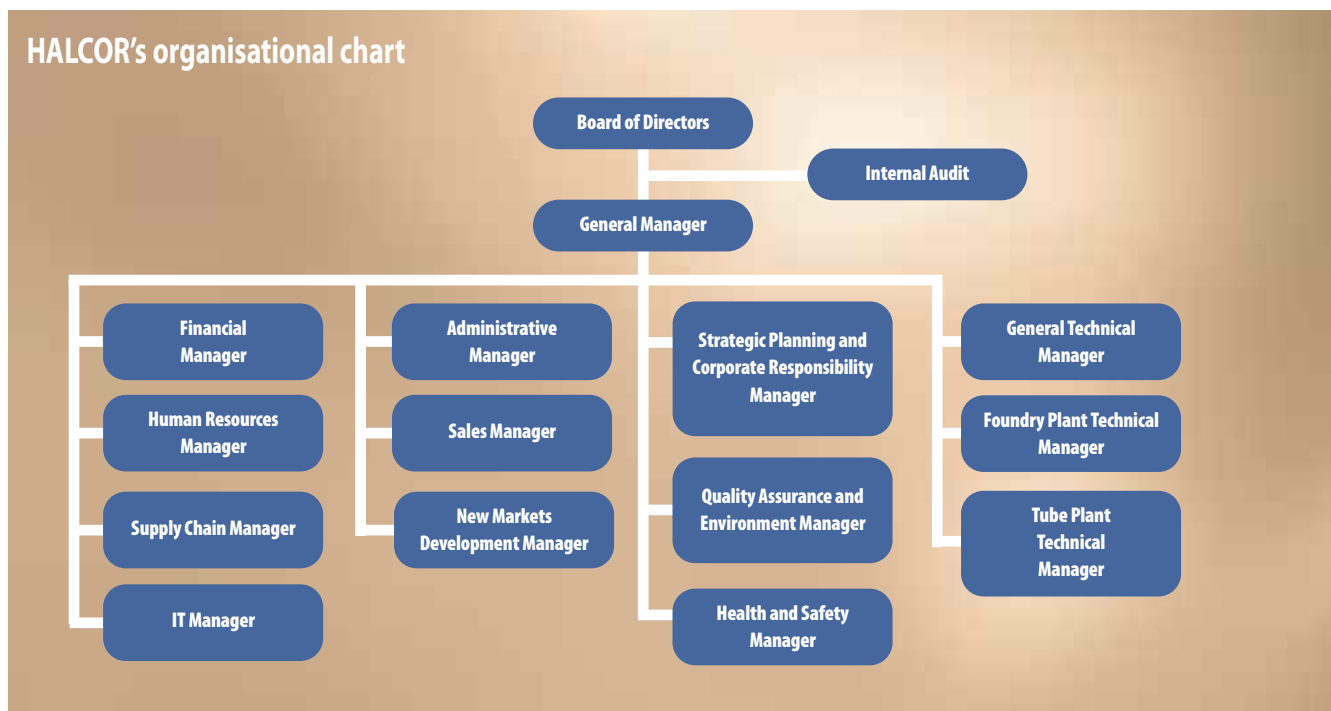
3.1.1 Avoiding Conflicts of Interest

In order to avoid any conflict of interest, HALCOR implements a series of procedures which ensure the prevention of conflicts between the interests of Board members, executives as well as other employees and the Company. Furthermore, with the aim of ensuring transparency, HALCOR has incorporated terms, conditions and commitments into the Company's Articles of Association and the Bylaws, which are followed and implemented by all members of the Board of Directors or the managers involved in running the Company, in order to avoid conflicts of interest.

In addition, in order to ensure the principle of independent decision-making by HALCOR executives in its various fields of activities, the company has a policy in place whereby recruitment of persons whose spouse or second degree relative by blood or marriage, is already employed by the Company, is prohibited.

3.2 Administrative Organisation

HALCOR's production, financial and administrative activities fall under the Company's General Management.



3.3 Risk Management

Company operations are associated with a series of risks and opportunities which the company must identify, assess and manage appropriately via specific mechanisms and procedures it has put in place. Company risk management policies are based on the preventative principle and are implemented to recognise and analyse risks faced by the Company and to set risk assumption limits and implement checks and controls relating to them. HALCOR's Board of Directors monitors and checks all issues relating to the Company's Sustainable Development and the risk management procedure.

3.3.1 Main Impacts, Risks and Opportunities

Just like any type of business activity, HALCOR faces specific risks and opportunities. HALCOR has developed methods and practices to prevent and manage those risks and to capitalise on opportunities which arise, thereby ensuring a proper operating environment.

Risks and opportunities can arise from fluctuations of metal prices at the London Metal Exchange (LME) and fluctuations in foreign currency prices, as well as from the impact of the Company's business operations on the Environment and Society.



3. Corporate Governance

Risk category	Relevant information
Industrial risk	<p>In order to fully accomplish the goals set for industrial risks, HALCOR applies very strict operational and safety criteria, in full compliance with Greek legislation and the SEVESO II Directive. In addition:</p> <ul style="list-style-type: none">• the Company has developed a detailed emergency response plan, covering all possible situations.• It collaborates closely with local authorities and the Fire Department to ensure an immediate and effective response in the event of any potential incident.
Environmental and Occupational Risk	<p>In addressing its potential environmental impact and occupational health and safety issues, HALCOR:</p> <ul style="list-style-type: none">• has put policies and systems in place, and continuously invests in research and the development of know-how in order to achieve Sustainable Development• has completed all the risk assessment studies required by law• takes preventive measures and initiatives, by monitoring the relevant performance indicators (Quality, Environment, Health and Safety, Human Resources) it has set.
Financial risks and uncertainties	<p>The main categories of financial risk related to HALCOR's operation are:</p> <ul style="list-style-type: none">• Market risk• Liquidity risk• Exchange rate risk• Interest rate risk• Risk of raw metal price fluctuations.

More information about management of financial risk can be found in the Annual Report of the Board of Directors, included in the HALCOR 2012 Annual Report in section D (Main Risks and Uncertainties), which is available at the Company's website, www.halcor.gr (Investor Relations / Financial Results).



The company's activities have impacts on society, employees, local communities, shareholders, and other stakeholders associated with its operations. For example, the Company has transformed its suppliers into associates and wherever possible seeks to collaborate with local suppliers. It also attaches great importance to recruiting employees from the local community. It also seeks to offer customers top quality products and services and ensures that risk and opportunities associated with its activities are suitably managed.

3.3.2 Impact Management and Issue and Action Ranking

HALCOR engages with its stakeholders. The stakeholder groups affecting it and which are also affected by the company to a large extent are human resources, shareholders, customers and suppliers (for more information about the Company's key issues see section 2, Prioritising issues and actions).



With the aim of ensuring continuous improvements for all impacts arising from its operations, the Company has incorporated actions into its business strategic relating to the following:

- reduction of the Company's carbon footprint through implementation of its Environmental Management System
- Continuous improvement of the Occupational Health and Safety Management System
- further product development in order to meet the growing needs of its customers and of the market in which it operates
- cooperation and harmonious interaction with the local community
- economic growth and the generation of value for the Company's shareholders and society as a whole.

Targets for 2013



- To provide training on transparency and Corporate Governance to the company's administrative employees (over the two-years period 2013-2014)
- To support the activities of a NGO in relation to transparency and corruption.



We are investing in Research and Development, demonstrating in practical terms our dedication to manufacturing innovative products of outstanding quality that ensure high added value for our customers.

Our Commitment:

In order to maintain customer satisfaction levels high:

- We manufacture products and provide services that meet –and often more than meet- customer requirements and expectations.
- Systematically monitor customer needs and requirements and constantly improve the Quality Management System
- Offer our people on going training in order to have the necessary professional skills and know-how needed.
- Set measurable quality targets which the company systematically monitors via periodic Management Reviews.
- Invest in development, in research and innovation to constantly improve the quality and financial competitiveness of the company's products and services, for the benefit of customers.

2012



9% of suppliers are local



847 customers
1,393 Suppliers

85% Domestic customer satisfaction level

74% Foreign customer satisfaction level

64% of all metals procured were scrap

4. Marketplace

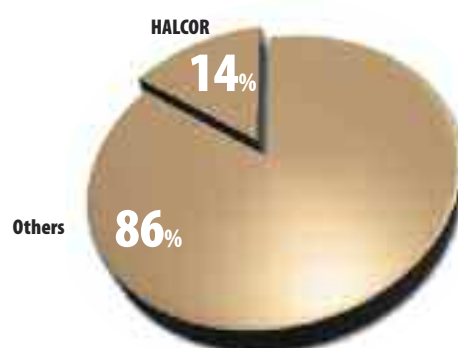
Review of progress in achieving 2012 targets

What we said	Performance	What we did
A further reduction in customer complaints by at least 5%	✓	Overall the number of complaints HALCOR received dropped 11% compared to the previous year, reflecting the high quality of the products and services the company offers.
An improved customer complaint monitoring and handling system	✓	The customer complaint monitoring and handling system was successfully upgraded and the relevant procedures were improved.
An increase in the amount of scrap purchased to at least 48% of the metals procured	✓	64% of all metal procured was scrap metal, which was considerably higher than the figure for the previous year.
Retaining a high level of domestic customer satisfaction and an increase in the level of satisfaction among foreign customers by at least 5%.	✓	Domestic customer satisfaction levels rose by 3% , while satisfaction levels among foreign customers rose by 5%.
An extended product range.	✓	During 2012 the company expanded its product range launching two new products: Metal-plated copper tubes and Talos Geothermal.
More certificates for new and existing products.	✓	Certificates were obtained from KIWA (Holland) and SWEREA (Sweden).
Retaining and expanding the customer base in new markets.	✓	Not only did the company manage to retain existing customers, it also increased the number of customers by 5% (72 new customers in 12 new markets).

4.1 Market Share

HALCOR's products are sold in more than 50 countries around the world. It is one of the leading companies worldwide in the copper and copper alloy processing sector and the largest copper products manufacturing company in SE Europe. It is the undisputed leader of the Greek market.

HALCOR's products market shares (Copper Tubes) in Europe





93% of the volume of sales was abroad

HALCOR makes a significant contribution to the country's balance of trade.

In 2012 93% of the volume of copper tubes sold by the Company was to foreign markets, which made a significant contribution to the outward focus of Greece, and bolstered the Greek economy thanks to the inflow of foreign exchange.

HALCOR's exports in 2012 were worth euro 471.9 million.

4.2 Products

HALCOR offers an extensive range of top quality products that combine high reliability with innovative characteristics as a result of the investments the Company has made in research and technology. It is one of the few companies in Europe able to manufacture inner grooved copper tubes for cooling and air-conditioning applications (ACR) with a minimum wall thickness of 0.25 mm. These high-tech tubes are highly efficient and are extensively used in the a/c industry.

4. Marketplace



Company	HALCOR Group products
HALCOR S.A.	<p>Manufactures</p> <p>Copper tubes (TALOS and CUSMART)</p> <p>8mm copper wires</p> <p>Trades in</p> <p>Copper and titan zinc gutters (DOMA)</p>
SOFIA MED S.A.	<p>Manufactures</p> <p>Copper products: Sheets and strips (DOMA), disks and bars</p> <p>Brass products: Sheets and strips (DOMA) and disks</p> <p>Titan zinc products: Sheets and strips DOMAZINC</p> <p>Special alloy products: Cups and coins</p> <p>Trades in</p> <p>Copper tubes (TALOS and CUSMART)</p>
HELLENIC CABLES S.A. - CABLEL	<p>Manufactures</p> <p>Power and telecommunications cables</p> <p>Enamelled wires</p> <p>Plastic and rubber compounds</p> <p>Copper and aluminium conductors</p>
FITCO S.A.	<p>Manufactures</p> <p>Brass products: Tubes, bars and rods</p> <p>Trades in</p> <p>Copper products: Sheets and strips (DOMA), disks and bars</p> <p>Brass products: Sheets and strips (DOMA) and disks</p> <p>Titan zinc products: Sheets and strips DOMAZINC</p>

TALOS GEOTHERMAL – COPPER TUBES FOR GEOTHERMAL SYSTEMS

Geothermal heat pumps are electrical systems that use the earth’s energy to provide heating and cooling and also heat water for homes and other buildings. In contrast to conventional systems that burn fuel in order to generate heat, geothermal heat pumps use electricity to move the heat from the soil into the building thereby enable higher performance levels. Studies have shown that geothermal systems reduce heating and cooling costs by between 30% and 60% on average compared to conventional systems. That is possible because they exploit the relatively stable temperature of the soil below the surface. Since the soil almost always has a more favourable temperature than the surrounding air, the savings generated by geothermal systems are visible in both summer and winter.



4. Marketplace

Copper pipes are run underground and are used to circulate the coolant which exchanges the heat from the ground via the copper tube's walls. The coolant absorbs and more easily conveys the heat because of the exceptionally conductive copper in the tubes. A direct exchange system using copper is able to achieve excellent performance levels using a relatively small number of buried tubes, thereby reducing installation costs.

METAL PLATED COPPER TUBES

Metal-plated copper tubes have been developed to be used in plumbing and heating systems. The metal-plated copper tubes look great and are suitable for new builds and renovation work. They are exceptionally resistant to corrosion because of the innate properties of copper and their hard outer layer which guarantees a shiny surface which is long-lasting and matches other parts used in modern bathroom installations and heating systems.

More information about each category of HALCOR products and their technical characteristics can be found on the company's website (www.halcor.gr) in the Products section and in the HALCOR 2012 Annual Report in the Products section.



4.3 Product Quality

For HALCOR ensuring quality products is a strategic choice that offers it a competitive edge, and is a matter of responsible business. The Company has put in place a Quality Management System that is certified according to the standard ISO 9001:2008 and in all stages of production strict quality controls are carried out in order to ensure product quality.

Product monitoring and checking

- HALCOR carries out continuous checks that aim to ensure compliance with the specifications of orders and customer requirements.
- All incoming materials are checked in relation to quality and quantity (the checks aim to ensure that the materials comply with the order specifications and the corresponding customer requirements).
- Various checks are also carried out during production based on specific procedures and detailed work instructions to ensure product compliance with the performance criteria, as specified by international standards and customer requirements.
- Data about all checks is recorded on appropriate measurement and test forms and records are kept to ensure the reliability of products even after a long period of use.

Safe product use after sale

- HALCOR issues Material Safety Data Sheets for its products that inform the recipients of its products that contact with these products is safe.
- Fact sheets are also prepared that include all necessary information about the optimal conditions for use of its products. In the case of water supply and natural gas pipes, manuals are also published that contain the operational guarantees the company offers.
- HALCOR regularly checks the interaction of its products with the Health and Safety of users, since in many occasions the Company's products are used in critical applications such as water pipes. In all events, copper's natural properties contribute to protecting the health of end users, since copper possesses significant antimicrobial properties.

4.3.1 Product Quality Marks

The outstanding quality of HALCOR's products, compliance with local regulations and specifications and the suitability of the products for the applications and markets they are intended for have been verified by approved certification bodies in many countries.

CERTIFICATION	COUNTRY	MARK	CERTIFICATION	COUNTRY	MARK
AFNOR	FRANCE		AENOR	SPAIN	
CSTB	FRANCE		ZIK	CROATIA	
CU	GERMANY		KIWA	HOLLAND	
DVGW	GERMANY		GOST	RUSSIA	
GL	GERMANY		SITAC	SWEDEN	
TUV CERT	GERMANY		VTT	FINLAND	
CE	EUROPEAN UNION		SETSCO	SINGAPORE	
BSI	UNITED KINGDOM				

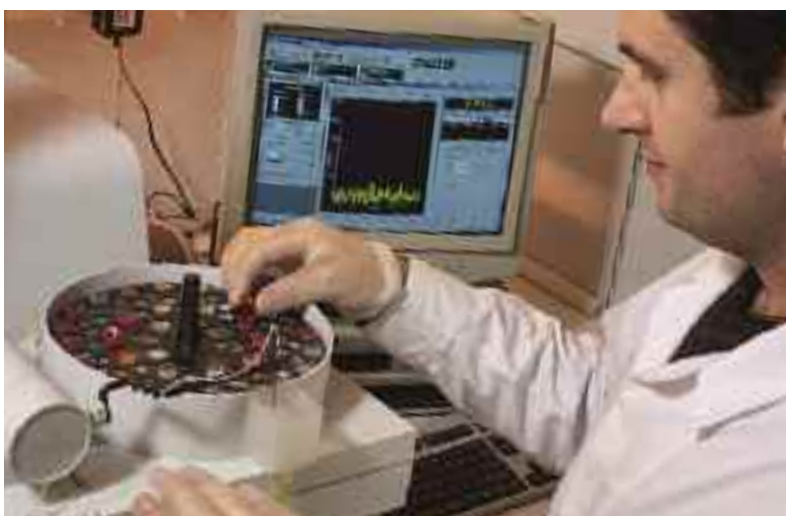
4.4 New products Research and Development

Research is particularly important in developing innovative products based on new technologies. HALCOR is investing towards this and has set up HALCOR R&D S.A. which developed the TALOS DUAL product range among others. In parallel with the on going investment plan the company implements each year to optimise production processes; HALCOR is also seeking to check the quality of manufactured products and to develop new ones.

HALCOR also works closely with Hellenic Research Centre for Metals 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.

4. Marketplace

**ELKEME has built partnerships with some universities and technological educational institutes in Greece and with many abroad which specialise in metals and materials research. It contributes to student training by offering materials, equipment and trained people so that they can receive the hands-on experience that their curriculum requires.*



Hellenic Copper Development Institute (HCDI)

HALCOR is a founding member of the HCDI and is actively involved in preparing the programmes the Institute runs, either by providing materials and premises for workshops or by financing specific programmes nationwide.

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 these long-term surveys demonstrate the benefits of using copper and that it has neutral to positive impacts on man and the environment. Moreover the HCDI receives financing from and is supported by the not-for-profit International Copper Association (ICA), an international network of 24 copper centres.

Hellenic Research Centre for Metals ELKEME

HALCOR supports the activities of ELKEME*. Its objective is to develop new technologies relating to the production and use of steel, aluminium, copper and zinc products.



4.5 Customer Relationship Management

In numerical terms the majority of copper tube customers come from Greece. The Company has a customer focus, seeking to ensure high levels of customer satisfaction and to collect, handle and resolve any potential complaints it may receive.

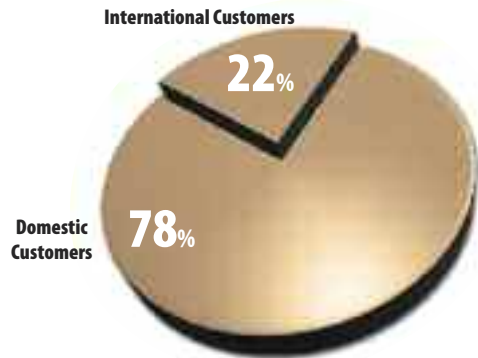
4.5.1 Customer Satisfaction

The company seeks to cultivate trust-based relationships with its customers and to that end ensures that high levels of customer satisfaction are achieved. The emphasis is on reliability, response time to requests, and on the comprehensive nature of the product support services offered.

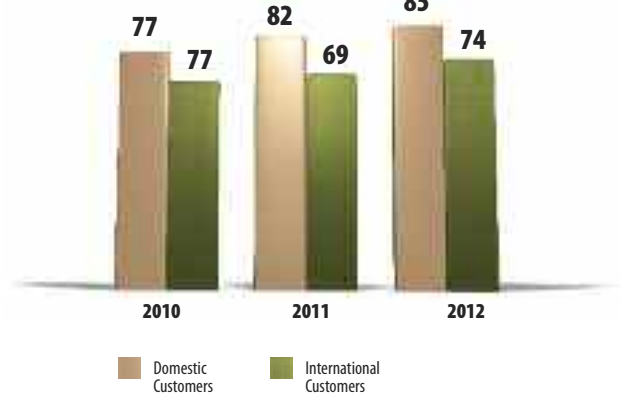
HALCOR's Quality Management System records and evaluates the views of customers as well as any complaints they may have and takes into account comments and proposals they have made in order to continuously improve the company's products and services. Each year the company sends customers a questionnaire. Based on the answers it receives, it plans actions needed for improvements, where that is considered necessary.

Overall levels of customer satisfaction rose for both Greek and foreign customers. For yet another year customer satisfaction levels were high, and there was an additional improvement compared to the previous year:

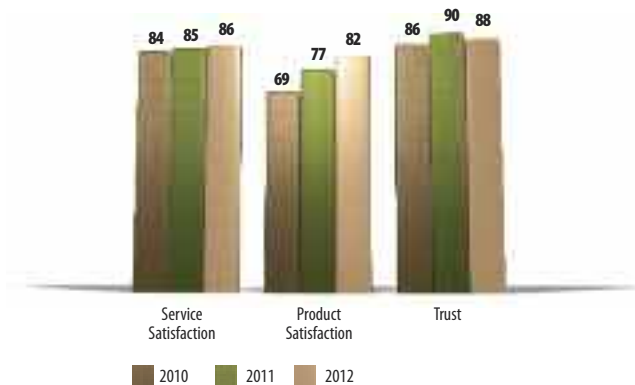
HALCOR Customer Base Distribution (Product: Tubes)



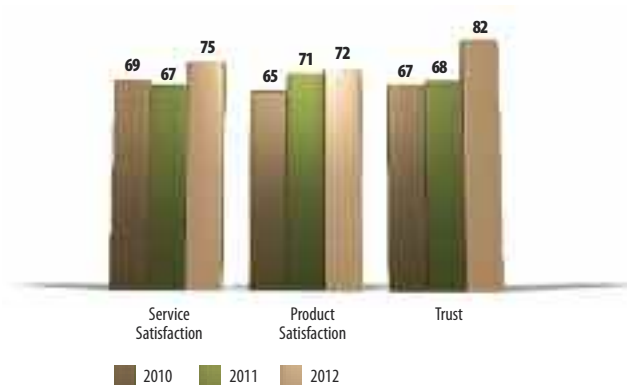
Total HALCOR Customer Satisfaction (%)



Degree of Satisfaction Domestic Customers (%)



Degree of Satisfaction International Customers (%)



4. Marketplace

- 5% increase in satisfaction levels among foreign customers
- 3% increase in satisfaction levels among domestic customers.

In order to make customers more aware of Corporate Responsibility, the Company included questions relevant to Corporate Responsibility in its customer satisfaction questionnaire. The results of the customer satisfaction survey are also taken into account and used when strategically planning for Corporate Responsibility issues. In 2012 the Company once again sent all customers its Corporate Responsibility and Sustainable Development Report in hard copy accompanied by a letter signed by the General Manager.

4.5.2 Complaint Management

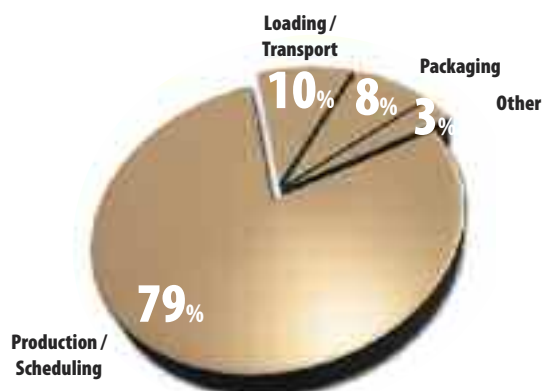
Possible customer complaints are managed, recorded and handled with the aim of resolving them. They are treated as an opportunity for improvement.

In 2012 there were a total number of 72 complaints, which was considerably down compared to the previous year. This reflects the Company's on going endeavours to improve itself and the qualitatively better level of customer service it offers. The relevant departments of HALCOR replied to all complaints.

Total Customers complaints



Complaint Type / Category



4.6 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:

- This code has been prepared by the Hellenic Association of Advertising and Communication Agencies, the Hellenic Advertisers Association, and radio and television stations, and relates to all advertising for all types of products and services and all forms of commercial and social communication.
- The Code lays down rules of professional ethics and moral conduct which should be observed in relation to citizens – consumers by all persons involved in advertising, i.e. companies advertising their products, advertising agencies and advertising media, and principals and proxies for all the above forms of communication.

4.7 Responsible Procurement

HALCOR's suppliers are valuable associates which is why managing them is a critical factor in the company's growth and development. The Company implements specific procedures to manage its suppliers and also seeks to spread the word about Corporate Responsibility through its supply chain.

4.7.1 Supplier Evaluation and Selection

The quality of the materials and items the Company procures is directly tied into the quality of its products and for that reason HALCOR follows specific procedures aimed at ensuring compliance with specifications and the required quality standards for all supplies and end products. The evaluation criteria used to select suppliers include, among other things, environmental criteria and Corporate Responsibility criteria.

4.7.2 Suppliers and Environmental Management

Promoting Corporate Responsibility in the supply chain is particularly important for us. Our policy states that priority is to be given to selecting suppliers who have an Environmental Management System that conforms to the ISO 14001:2004 standard. This ensures that the environment is also protected from the activities of the company's suppliers.

4.7.3 Protecting the Health and Safety of Associates

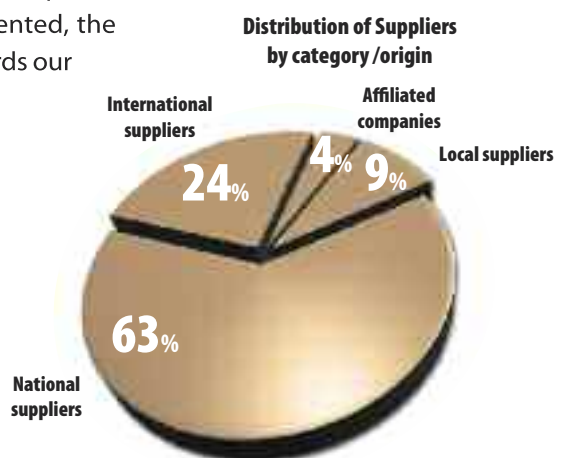
The safety rules applicable to company employees are also mandatory for contractors who have undertaken to carry out work at the Company's facilities. To ensure unwavering compliance with those rules, in order for the company to be able to collaborate with any supplier it is an essential step before the collaboration can begin 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 (a detailed check is then carried out so that HALCOR can rest assured that all employees working at its facilities are insured).
- 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.

When selecting suppliers who provide meals for human resources, we require a certificate showing that a food safety management system is in place that meets the requirements of ISO 2200 / HACCP (Hazard Analysis and Critical Control Points). The company also sends a special team to the supplier's facilities to check and evaluate them. If the inspection reveals that the specific food safety management rules are not being properly implemented, the prospective supplier will be rejected. This approach safeguards our employees' health.

4.7.4 Supporting Local Suppliers

In the Company's Corporate Responsibility strategy suppliers are associates, and where possible HALCOR seeks to collaborate with local suppliers.



4. Marketplace

HALCOR is continuously focused on bolstering the local community and the local economy in the areas in which it operates. Although the majority of the company's supplies are raw materials (metals) that can only be procured from abroad, in 2012 8.7% of all domestic purchases other than metals were procured from local suppliers.

4.7.5 Purchasing Recyclables (scrap)

One major factor in the Company's endeavour to reduce its environmental footprint is the use of recyclable rather than primary metals. This approach combines economic efficiency with environmental protection (by reducing the waste generated) and preserves natural resources. Utilising this approach HALCOR is using increasing quantities of scrap metals as raw materials. As a result today HALCOR is Greece's largest recycler of copper, zinc and their alloys.

What is scrap?

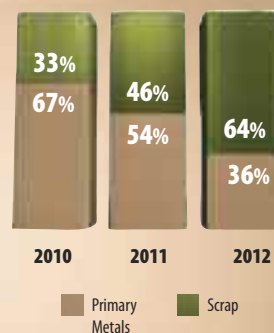
The term "scrap" is used to describe recyclable materials which are left over from all kinds of production processes and product usages, such as vehicle components, building equipment and other materials.



In 2012 for the first time the percentage of scrap purchased exceeded 50% of all metals procured by HALCOR.

Although "scrap" is frequently confused with the term 'waste', in reality it is an exceptionally useful secondary raw material with significant environmental value. Globally, the scrap industry processes more than 145,000,000 tons of recyclables every year to produce raw material for industrial use.

Scrap proportion to total metal purchases



Targets for 2013



- To maintain the percentage of scrap to primary metals purchased at the same high levels as 2012
- To maintain the level of Greek and foreign customer satisfaction at 2012 levels
- To new products and expand into new markets
- To increase the share in existing markets
- To expand the range of certified products

Marketplace: Our Performance

Number of Suppliers per category /origin

Supplier Category	2010	2011	2012
Local Suppliers	161	118	130
National Suppliers	1,116	990	880
International Suppliers	404	313	334
Group Companies (Affiliated companies)	34	52	49
Total	1,715	1,473	1,393
Suppliers from the local community	9.4%	8%	9%

Customers Geographical Distribution

Customer Categories	Europe	America	Asia	Africa	Total
Industrial Tubes Customers	61.7%	92.6%	81.1%	14.7%	63.4%
Installation Tubes Customers	38.3%	7.4%	18.9%	85.3%	36.6%

Customers Satisfaction

	2010		2011		2012	
	Domestic Customers	International Customers	Domestic Customers	International Customers	Domestic Customers	International Customers
Total Customers Satisfaction	77%	67%	82%	69%	85%	74%
Customer Service Satisfaction	84%	69%	85%	67%	86%	75%
Product Satisfaction	69%	65%	77%	71%	82%	72%
Trust	86%	67%	90%	68%	88%	82%

Customer Complaints

	2008	2009	2010	2011	2012
Number of Complaints	202	169	101	81	72



«Having set customers as our priority, each and every cooperation is characterized by consistency, respect and quality of products and services. Our products and services meet the standards and are appropriately certified».

Purchased Materials

Categories	Type of material	Measurement unit	2010	2011	2012
Raw Materials*	Metals	Kg	n/a	n/a	n/a
	Metals	pieces	n/a	n/a	n/a
	Plastic	Kg	n/a	n/a	n/a
	Plastic	pieces	n/a	n/a	n/a
	Plastic	m	n/a	n/a	n/a
	Plastic	m ²	n/a	n/a	n/a
Production Related Materials	Consumables	Kg	1,153,031.44	880,503.08	1,064,456.13
	Consumables	Lt	118,403.70	174,546.30	188,141.00
	Consumables	m ³	4,942,501.20	4,670,568.07	4,194,670.20
	Consumables	pieces	1,735.00	72.00	12.00
	Fuel	Lt	260,204	250,069	224,657
	Fuel	m ³	10	-	-
	Fuel	Nm ³	7,031,422	6,817,937	5,492,572
	Fuel	Kg	105,555	27	-15,830*
Supporting Materials and Spare Parts	Spare parts	Kg	139,620.61	102,256	126,530
	Spare parts	m	10,063.54	17,051.7	10,591.4
	Spare parts	m ²	193.4	4	100
	Spare parts	set	232	247	158
	Spare parts	carton boxes	10	20	30
	Spare parts	pairs	2	4	-
	Spare parts	pieces	93,827	90,582	124,315
Packaging Materials	Metal	pieces	15,900	5,400	-
	Metal	m	-	58,550	-
	Metal	Kg	26,943.5	29,151	29,368.5
	Wood	pieces	68,804	220,828	92,327
	Wood	m ³	1,525.3	-	915.3
	Paper	Kg	15,951	22,785	21,048
	Paper	pieces	1,210,917	1,507,999	1,439,409
	Belts	pieces	262,317	261,697	205,680
	Plastic	Kg	193,782	207,334	182,094.4
	Plastic	m	737,100	59,438	63,000
	Plastic	Km	-	618	777
	Plastic	pieces	-	1,752	204
	Plastic	m ²	103,348	-	-
	Plastic plugs	pieces	6,749,524	7,314,443	7,269,976

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

* Return to Supplier

Distribution of Purchased Raw Materials and Scrap

	2010	2011	2012
Metals	67%	54%	36%
Scrap	33%	46%	64%

5. Human Resources



We invest in people because we recognise that our business success and future growth depends on our people.

Our Commitment:

It is particularly important for HALCOR to create an enterprise-wide culture of responsible behaviour espoused by all members of human resources. For that reason the company has adopted a code of employee values and conduct, which all people must implement in everything the company does. The general principles of the Code of Employee Values and Conduct can be summarised as follows:

- Team spirit, respect for colleagues
- Support for and cooperation with the local community
- Protecting the environment and culture heritage of the local community
- Respect for the environment
- Responsibility, honesty and respect towards the customer
- Protecting human rights
- Respecting human values: no form of discrimination
- Confidentiality of personal data
- Appropriate behaviour towards customers and associates
- Protect the company's interests, reputation and property

2012

434 employees

- ♂ 398 men
- ♀ 36 women



41%
of employees come
from the local
community

8.3%

of staff members are
women

“We respect diversity and internationally enshrined human rights. In doing so we offer equal opportunities to all employees when it comes to development and advancement. The company is opposed to all forms of forced labour and ensures that there cannot be any likelihood of incidents of child labour occurring at its facilities”.

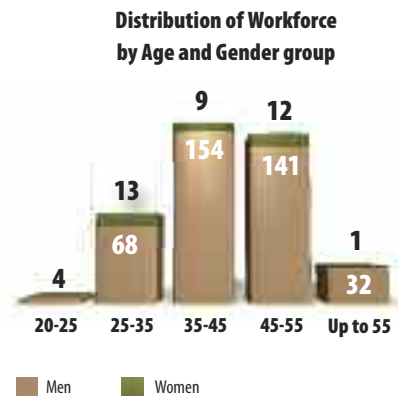
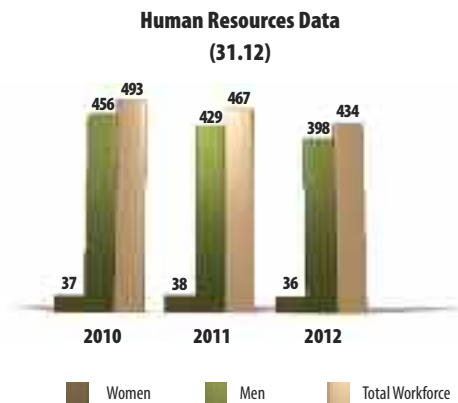
5. Human Resources

Review of progress in achieving 2012 targets

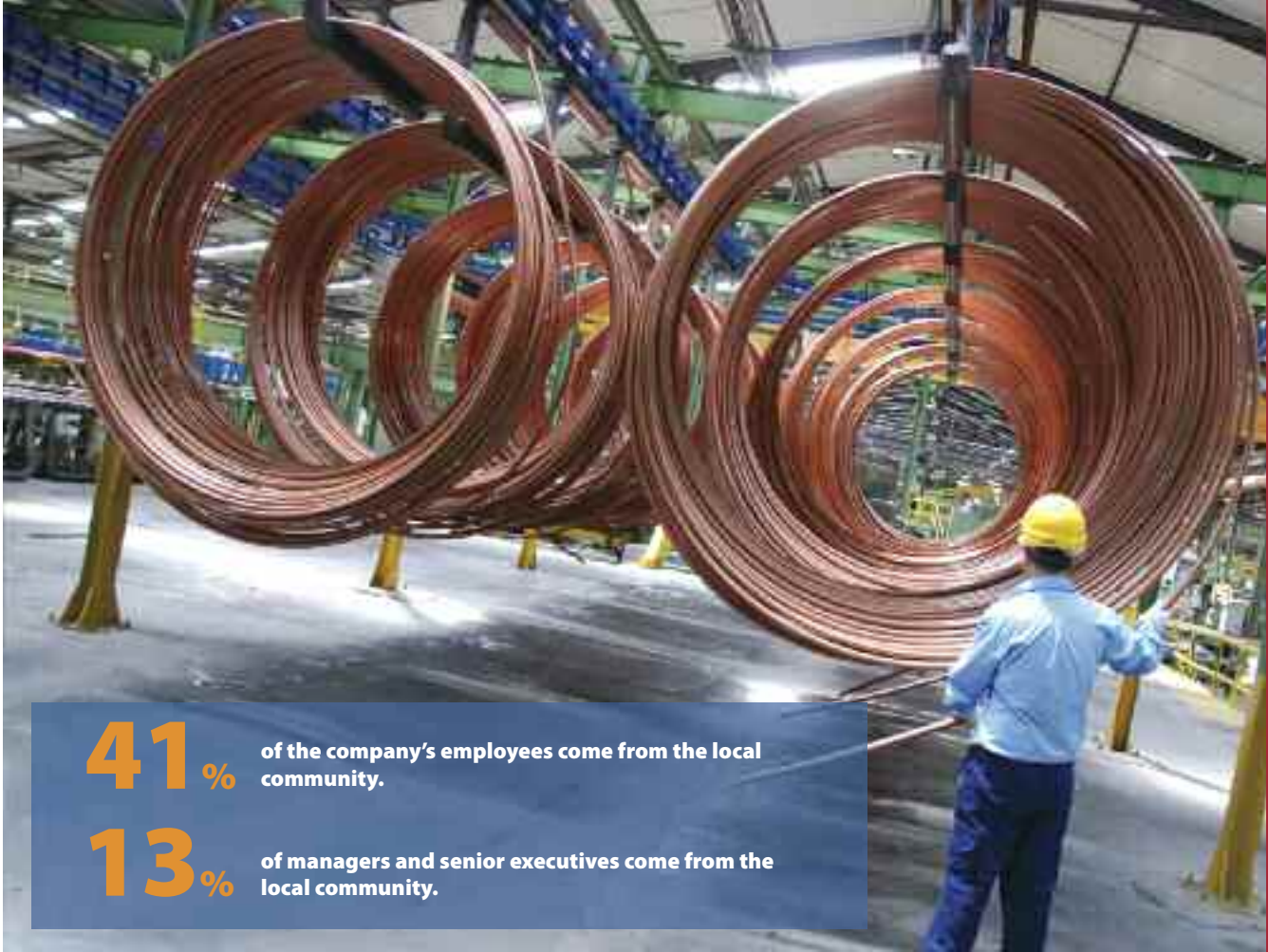
What we said	Performance	What we did
Increase people assessments by 20%	✓	Employee assessments rose by 39% (in 2012 57 people underwent appraisal compared to 41 in 2011).
Provide training to executives about human rights and the challenges of the modern age	✓	We held a special training workshop on human rights. The workshop was attended by managers from all divisions.
Continue the student work experience scheme in order for them to acquire experience of what it is like to work at the Company's facilities.	✓	In 2012 we continued to run the student work placement scheme. In total 5 students did their work experience at the Company.

5.1 Human Resources Data

All employees are employed full time and are covered by collective labour agreements.



The age profile of people has a greater focus on the middle age bracket (35-55 years old) without excluding people in the 20-25 year old age bracket. In order to integrate young people into work, the Company offers students and young graduates the opportunity to do work experience at the Company's premises and acquire workplace experience at HALCOR's facilities.



41%

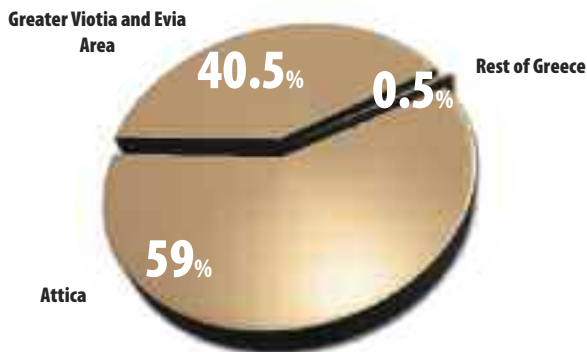
of the company's employees come from the local community.

13%

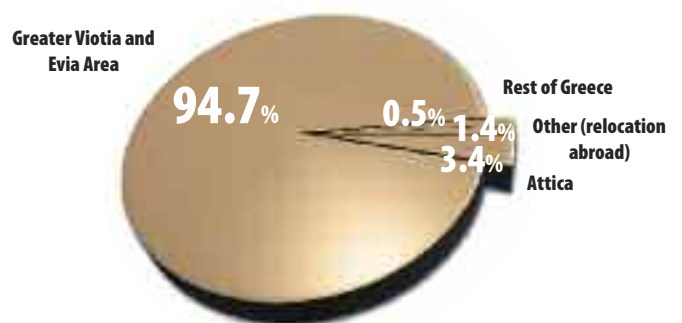
of managers and senior executives come from the local community.

HALCOR seeks to meet a large part of its staffing needs by drawing employees from the local communities in which it operates, to generate mutual benefits for all involved. 41% of the Company's employees come from the local community (in the wider area of Evia and Viotia). 13% of managers and senior executives also come from the local community.

Breakdown of HALCOR Human Resources by Geographical Sector



Employee Distribution by Geographical Sector of Employment



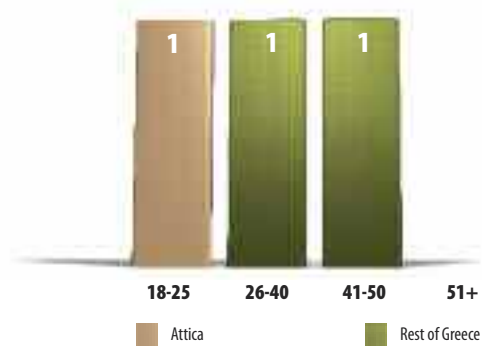
In 2012 only three members of human resources were hired since it was a difficult year financially speaking for the country and the business community.

5. Human Resources

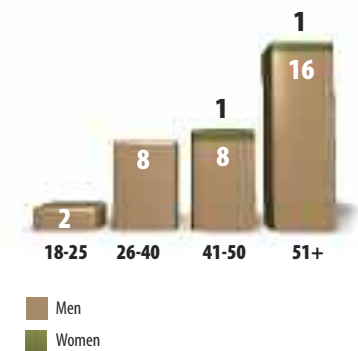
Total employee hires by gender and age group



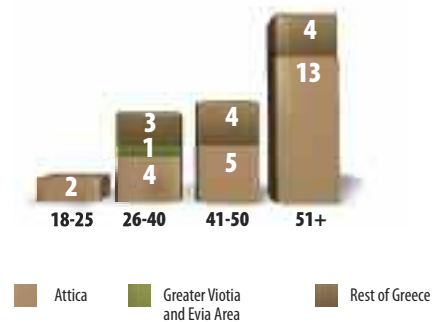
Total employee hires by geographical sector and age group



Total employee departures by gender and age group



Total employee departures by geographical sector and age group



In 2012 36 employees left the company because of:

- Resignation
- Dismissal (the seven dismissals actually involved employees being relocated to another associated company)
- Retirement.

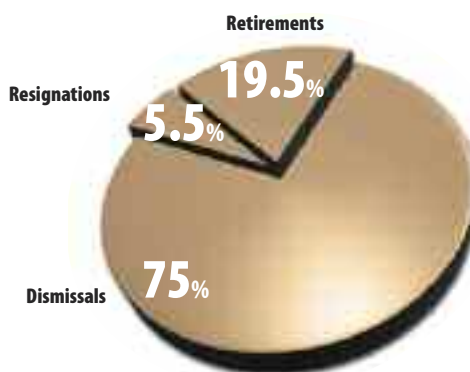
5.2 Responsible Employment Practices

The Company seeks to incorporate responsible working practices into how work-related issues are managed.

5.2.1 Diversity, Equal Opportunities and Human Rights

The Company's work environment is one where diversity is respected and everyone has equal opportunities.

Breakdown of Departures (%)





22 non-Greek employees
8.3% of the workforce is women

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

All procedures, actions and policies related to the Company's human resources are based on the equal opportunity principle. In this context the Company has included a special provision in its Code of Employee Values and Conduct that prohibits all manifestations of discrimination on grounds of gender, race, religion, national origin, nationality, age, special abilities, marital status, sexual orientation, socio-economic status or any other characteristics which is protected by internationally enshrined human rights.

The number of women as a percentage of the overall workforce is relatively low due to the nature of the company's activities as an industry and due to the fact that its production facilities are located far from large urban centres. The company encourages women to work in industry and has made efforts to attract more women employees.

No form of pay-related or other discrimination is acceptable. The only criterion used in recruitment, evaluation and in setting the pay of employees is the skills they have and their performance. Employees holding the same post all receive the same pay. Women's pay is no different from that of men holding the same posts.



5. Human Resources

Training about Human Rights

A four -hours long workshop about “Human Rights, Equal Opportunities and Diversity” was held in 2012. The workshop was designed to provide information and raise awareness among employees about those issues and was attended by senior executives from all departments and divisions of the Company. As part of the workshop participants engaged in debate about how to promote equal opportunities and ensure that human rights are safeguarded by the company as well as about the positive actions that could be taken in this regard.

A special workshop relating to Human Rights, attended by all the Company’s security staff, was also held in 2012.



* Including 2 administrative staff

Ratio of Gender per category / staff grade

Board of Directors	11	0
Managers	13	0
Senior executives	31	2
Administrative Staff	68	31
Labourers	286	3

5.2.2 Additional Benefits

As a responsible employer, the Company offers its employees a series of additional benefits which go beyond those specified by law. This is intended to increase the sense of reward employee’s feel for making a contribution and to retain capable executives.

Just some of the additional benefits HALCOR offers include:

- private insurance for all people against risks to life and health
- check-ups for all employees
- half-board hospitalisation allowance for all employees
- loans and cash assistance
- free transport for staff using company vehicles
- company car and mobile phone for executives
- accommodation for employees in line with company policy.



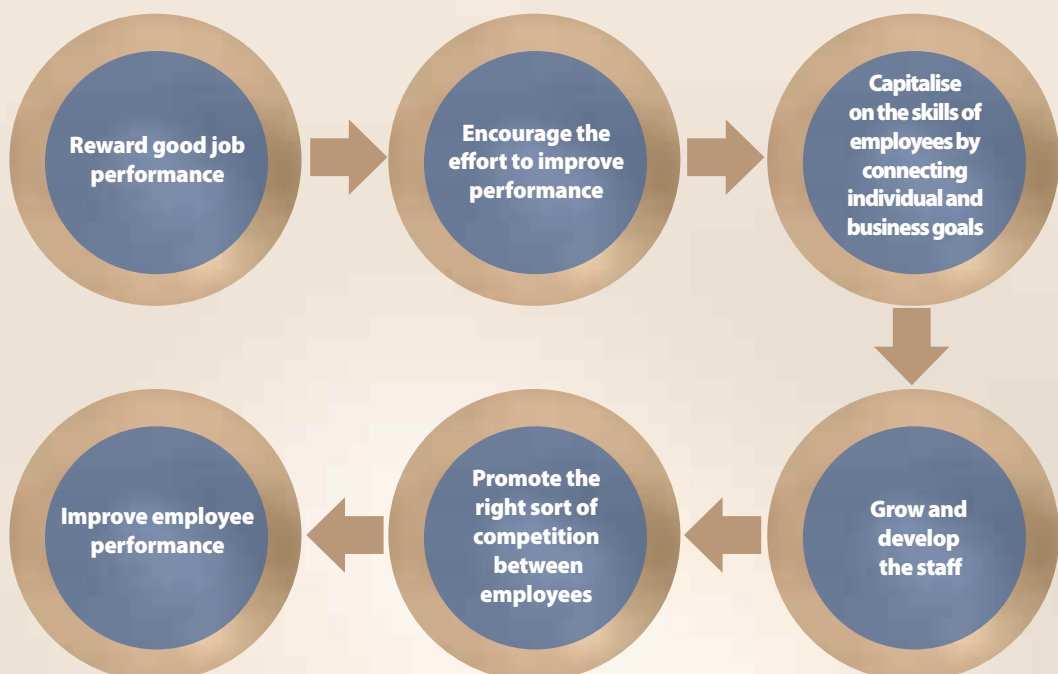
The support the Company provides to employees and their families includes:

- Free accommodation at a campsite for all children of employees aged up to 14 for 3 weeks during the summer
- Christmas party with a gift voucher for all children of employees aged up to 12
- Financial assistance to cover emergency personal or family needs (primarily health-related matters) which is on top of the amount covered by the insurance policy.

5.3 Employee Assessment

HALCOR's employee professional performance assessment system is implemented using dialogue-based procedures, with the collaboration and involvement of employees. The key issue evaluated is how people have performed in relation to the duties and targets set for them.

HALCOR's appraisal system aims to:



5. Human Resources

The employees being appraised are actively involved in the appraisals process and each of them receives the results of his own appraisal. In 2012 a total of 57 employees underwent appraisal in relation to the work performance and target achievement.

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

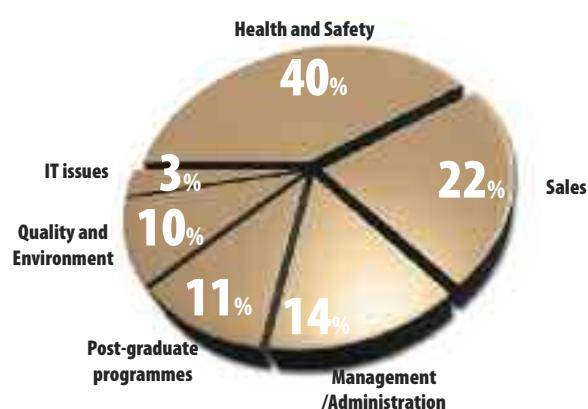
5.4 Training / Development and Internal Communication

The Company provides training opportunities to its employees, by organising a series of training courses each year on different topics. A total of 132 training events were held in 2012 (either in-house or externally) attended by 688 people. They received a total of 1,520 hours of man-hours of training.

In addition, in 2012 two employees received assistance with the cost of their post-graduate degrees in order to promote their personal and professional development. Their studies related to:

- Business administration (Professional MBA)
- Business administration for executives

Distribution of training man-hours by subject



5.5 Employee Volunteer Schemes

The Company supports volunteerism and encourages its employees to volunteer.

5.5.1 Volunteering Scheme

Volunteering is an act of social solidarity and of making a contribution to society. That is precisely how HALCOR's people treat it. Against that background, for the third consecutive year an in-house volunteer programme was run by company employees to collect food, clothing and footwear, toys and books. The programme was successfully completed at the end of 2012 and the items collected were delivered to a local monastery which arranged for them to be distributed to impoverished families in the local area. Despite the economic difficulties, the sheer extent of the contribution made the company's employees was astounding and reflected an increase compared to the previous year.

5.5.2 Beach Clean-up

A volunteering event was organised to clean a beach in one of the local municipalities in 2012 to promote environmental protection and make a contribution to local communities. The beach was successfully cleaned by HALCOR employees who volunteered to help out. Guidance was provided by the NGO HELMEPA. The company has been a member of HELMEPA since 2010.



5.5.3 Blood Bank

As a supporter of voluntary blood drives, HALCOR has had a blood bank since 2001 to meet the needs of employees and their families. An annual blood drive is also held every year at the company's premises in collaboration with the Laiko Hospital.

Year	Bottles of blood collected
2010	38
2011	30
2012	34

5.6 Societal Activities

Having acknowledged the local community's needs, each year HALCOR responds to those needs with sensitivity, implementing actions to give something back to society in the form of sponsorship or donations by supporting vulnerable social groups, local bodies and institutions.

Support for educational institutions

HALCOR supported schools and technological educational institutes by providing copper products or by providing the necessary school equipment such as boards, computers, or projectors.

In 2012 sponsorship was also provided for the training exercise run by the Hellenic Recovery Recycling Corporation at the Recycling Funfair held at the Oinofyta Primary School.

Support for NGOs

For yet another year the company opted not to give corporate gifts at Christmas but to donate an amount to assist the work being done by the NGO "PNOE" which provides assistance to children in intensive care.

In 2012 HALCOR also opted to provide sponsorship to the NGO "The Smile of the Child".

Support for local associations and bodies

HALCOR has a long tradition in providing support to and continuously collaborating with the local authorities. In that contact, it provided the local authorities (fire brigade, police and customs) with office suppliers and various other materials to meet their needs.

In 2012 it also offered sponsorship to "Floga - the Association of Parents of Children with Neoplastic Disease", to foster its activities.

Targets for 2013



- Support the activities of NGOs and support schools
- Continue the student work experience scheme in order for them to acquire experience of what it is like to work at the Company's facilities.
- Brief employees about health issues (e.g. collaborate with NGOs about briefing female employees about health issues).

5. Human Resources

Human Resources: Our Performance

HALCOR Human Resources Data			
Data (31/12)	2010	2011	2012
Men	456	429	398
Women	37	38	36
Total Workforce	493	467	434
Employee Departures (p.e. retirement, contract termination)	122	35	36
Employee Hires	14	8	3
Third-party employees (e.g. contractors)	56	57	62
Ethnic minority (and different nationalities) employees	38	31	22

Human Resources data by Geographical sector			
Geographical Sector	2010	2011	2012
Attica	297	279	256
Greater Viotia and Evia Area	190	182	176
Rest of Greece	6	6	2
Total	493	467	434

Human Resources data by Geographical sector and gender group					
Geographical Sector	2011		2012		
	Men	Women	Men	Women	
Attica	252	27	229	27	
Greater Viotia and Evia Area	172	10	167	9	
Rest of Greece	5	1	2	-	
Total	429	38	398	36	

Human Resources data by Geographical sector of Employment			
Geographical Sector	2010	2011	2012
Attica	50	18	15
Greater Viotia and Evia Area	429	431	411
Rest of Greece	6	6	2
Other (relocation abroad)	8	12	6
Total	493	467	434

Employee Distribution per Hierarchical Level and Gender Group									
Hierarchical Level	2010			2011			2012		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Board of Directors	9	-	9	11	-	11	11	-	11
Managers	14	-	14	13	-	13	13	-	13
Senior Executives	40	2	42	39	2	41	31	2	33
Office staff	80	31	111	71	32	103	68	31	99
Other personnel (Warehouse staff and workers)	322	4	326	306	4	310	286	3	289
Total	456	37	493	429	38	467	398	36	434

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

Employee Mobility

Employee Mobility Average	2011	2012
Employee Hires (total new hires / total employees)	1.71%	0.7%
Employee Departures (total departures / total employees)	7.49%	8.3%

Breakdown of Departures

Category	2010	2011	2012
Dismissals	98	23	27
Contract termination	3	-	-
Resignations	9	4	2
Retirements	12	8	7
Total	122	35	36

Total Workforce by Employment Type and Employment Contract

Types of Employment	2011			2012		
	Men	Women	Total	Men	Women	Total
Total employees	429	38	467	398	36	434
Collective bargaining agreement	429	38	467	398	36	434
	(100%)	(100%)	(100%)	(100%)	(100%)	(100%)
No collective bargaining agreement	-	-	-	-	-	-
Indefinite-term bargaining agreement	428	38	466	398	36	434
	(100%)	(100%)	(100%)	(100%)	(100%)	(100%)
Fixed-term bargaining agreement	1	-	1	-	-	-
Full-time employees	429	38	467	398	36	434
	(100%)	(100%)	(100%)	(100%)	(100%)	(100%)
Part-time employees	-	-	-	-	-	-
Seasonal employees	1	-	1	-	-	-

Training Indicators per Employee Category/Jierarchy (2012)

Position/Rank	Total training hours			Average hours of training per category		
	Men	Women	Total	Men	Women	Total
Managers	184	-	184	14.2	-	14.2
Senior Executives	141	70	211	4.5	35	6.4
Office staff	386	123	509	5.7	4.1	5.2
Other staff	616	-	616	2.1	-	2.1
Total	1,327	193	1,520	3.3	5.5	3.5

Employee Postgraduate Programmes

	2010	2011	2012
Number of Postgraduate Programmes	6	3	2

6. Health and Safety



A top priority for us to ensure occupational Health and Safety. Our overriding goal is to eliminate accidents.


Our Commitment:

- Our primary and overriding goal is to ensure the highest possible level of health and safety for employees, associates and visitors.
- We provide the necessary resources in financial, human and organisational terms, etc. to achieve that.
- We recognise that promoting health and safety is a best business practice and undertake to constantly improve the level of health and safety.
- We are committed to complying with the relevant legislation and implementing the strictest health and safety standards.
- We view health and safety as a key criterion when it comes to evaluating and taking all business decisions.
- We attach top priority to preventing accidents by carrying out scheduled inspections for potentially hazardous situations.
- We recognise the unparalleled importance of the human factor and ensure that our people are constantly briefed about Health and Safety issues and that their awareness of those issues is high.
- We support the active involvement of all company people irrespective of their place in the hierarchy in our endeavour to improve the company's Health and Safety performance levels.
- We seek to build a safety-based culture for all company activities, including the operations of associated companies, contractors, and suppliers.

2012

 **608 hours of Health and Safety training**

 **92,000** euro invested in Health and Safety


↓ **67%**
Accident Severity Index down

6 accidents

“Health and safety for employees and third parties (such as contractors, or associates) in the workplace is a top priority for HALCOR. The company is making concerted efforts to provide a safe working environment which safeguards and promotes the health and prosperity of its employees. Health and Safety is a matter for us all”.

6. Health and Safety

Review of progress in achieving 2012 targets

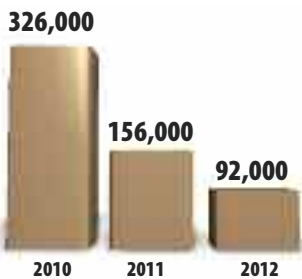
What we said	Performance	What we did
Review the hazardousness studies.	✓	The review of the studies was completed in January 2012.
Have each supervisor carry out 10 Health and Safety inspections at all plants.	✓	80 planned Health and Safety inspections were carried out.
Provide at least 2 hours of training to each production process employee.	✓	2 hours of training were provided per employee (608 hours / 302 employees).
Carry out 10 Health and Safety monthly meetings at each plant.	✓	23 Health and Safety meetings were held instead of the planned 20.
Implement a programme to raise awareness about reporting near misses.	✓	23 near misses were reported compared to 8 in 2011. This was a 187% increase.
Carry out medical checks on the remaining 25% of employees involved in production (blood tests and x-rays) who were not examined in 2011.	✓	143 employees (47% of all production employees) took the necessary medical tests.
Involve 25% more production employees in emergency drills compared to last year	✓	111 employees took part in emergency drills (36% of production employees).
Get at least 70% of employees / contractors involved in Health and Safety training.	✓	Employee involvement: $238/302 = 78\%$ Associate involvement: $63/67 = 94\%$

6.1 Health and Safety Investments and Expenditure

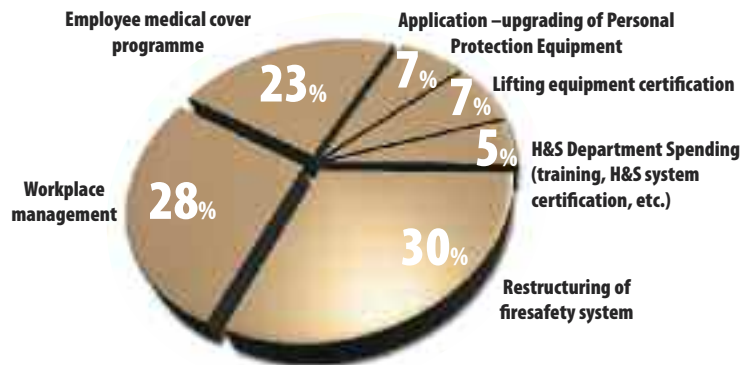
Continuous investments are being made to improve infrastructure and the equipment used to protect employee Health and Safety. Over the 3-year period 2010-2012, euro 575,000 has been sent on Health and Safety programmes.

6.2 Occupational Health and Safety Management System

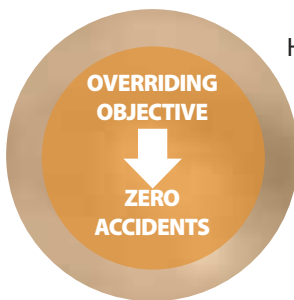
Investments & Operational Expenditures on Health and Safety (euro)



Breakdown of investments on Health & Safety (2012)



Safeguarding employee Health and Safety is a top priority for HALCOR. For that very reason, it implements an Occupational Health and Safety Management System certified in line with the requirements of the OHSAS 18001:2007 standard. The scope of application of that System covers all of HALCOR's production facilities (copper tube plant and the recycling plant - foundry).



HALCOR implements a Health and Safety policy whereby it is committed to providing the means to ensure full compliance with the legal and other requirements governing its operations". It is also committed to continuous endeavours that seek to prevent workplace accidents and occupational diseases, and to eliminating or minimising risks that could arise from its operations.

6.3 Health and Safety Programmes

Each year actions and programmes are organised to ensure a continuous improvement in the occupational Health and Safety sector. The Company has a specialised team of executives to ensure that the Health and Safety system is implemented at its facilities who check compliance with Health and Safety rules and advise employees about such issues utilising their expertise.



Preventative Health Programme for Employees

- The necessary facilities and equipment at all premises were either built, maintained or cleaned (changing rooms, toilets, individual lockers).
- Personal hygiene rules were introduced (washing during working and/or showers after the end of work).
- There is a fully-fitted infirmary at every plant and an occupational physician visits based on a pre-arranged schedule.
- The personal medical records of all employees are kept confidential.
- Pharmacies have been installed in every department and medicines are topped up by the heads of departments.
- The occupational physician visits the victim after every accident.
- Suitable medical tests are carried out to check and monitor employee health.
- First aid seminars are held by the Red Cross.
- Voluntary blood drives are organised and a blood bank has been set up to meet the needs of employees and their families. Over the last three years in collaboration with the Laiko Hospital the company has had a blood drive in the workplace which has resulted in 102 bottles of blood being collected.
- Measurements of harmful agents are taken to ensure suitable conditions in the workplace.

Preventative Safety Programme for Employees

- Scheduled Health and Safety inspections are carried out with the participation of the heads of departments and employees to identify dangerous activities and situations to allow corrective and preventative measures to be taken to prevent incidents from occurring.
- Accidents and incidents are suitably investigated to identify underlying causes and take corrective and preventative measures, to avoid similar situations recurring in the future.
- A Health and Safety Manual has been published and 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.
- Since 2009 the Company has been implementing the 5S programme at its production plants.
- Training courses are organised in partnership with external bodies to provide continuous updates and training to people about health and safety issues.
- The hazardousness of work tasks is reassessed at regular intervals with the involvement of people, in order to take measures and constantly reduce hazard levels.
- Action plans and budgets are prepared and improvements made, where necessary.
- Surveys are carried out to procure and use cutting edge personal protection equipment appropriate to the needs of each post.
- Emergency drills are conducted to ensure people are ready and that equipment is working properly.

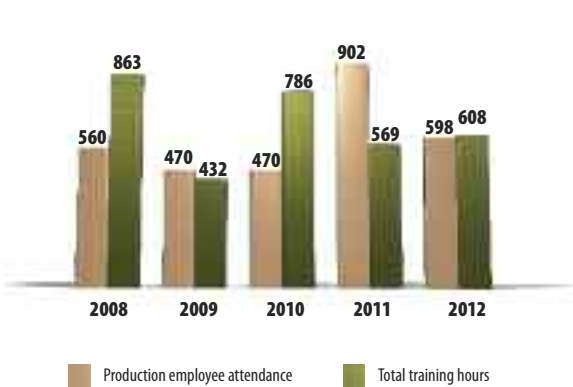
6.3.1 Employee Training about Occupational Health and Safety Issues

In 2012 HALCOR continued to implement its series of training courses and inspections in the Health and Safety sector. One of the company's primary objectives is to eliminate all injuries and incidents relating to people safety. The following steps have been taken in this regard:

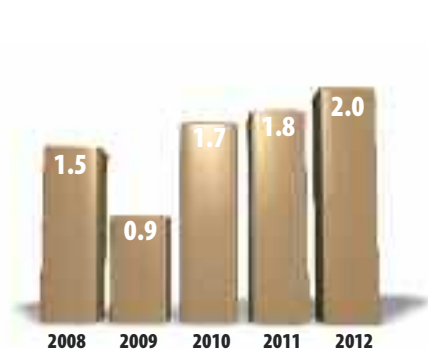
- Continuous training for people about Health and Safety issues via in-house workshops relating to occupational Health and Safety, electrical checks and safety for electricians, and implementation of the 5S programme.
- Specialised training on specific technical issues entailing high risk such as the handling of chemical substances.
- A team of supervisors in each area of remit carries out monthly inspections in all sections of the plant to ensure compliance with safety rules and the use of personal protection equipment.
- The Health and Safety officer carries out monthly inspections with the assistance of the supervisors and heads of all departments. Inspections are carried out using the 5S method, and an action plan is then prepared to ensure continuous improvements.
- The hazardousness of work is reassessed using reliable risk assessment tools, with the involvement of people.



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



Average training hours per employee



* The 2008-2010 data include the employees of FITCO S.A. which was spun off on 30.6.2010.

6.3.2 System 5S: Continuous Improvement Programme

The 5S system has been used by HALCOR since 2009 and is an important tool in its efforts to ensure continuous improvements with occupational Health and Safety issues and the efficient management of resources and equipment. The philosophy of this system is based on five implementations stages (Sorting, Setting in order, Shine, Standardising, and Sustaining). In implementing the 5S System HALCOR has set targets aimed

6. Health and Safety

at ensuring continuous improvement in the Occupational Health and Safety sector. Targets have been set and are monitored.

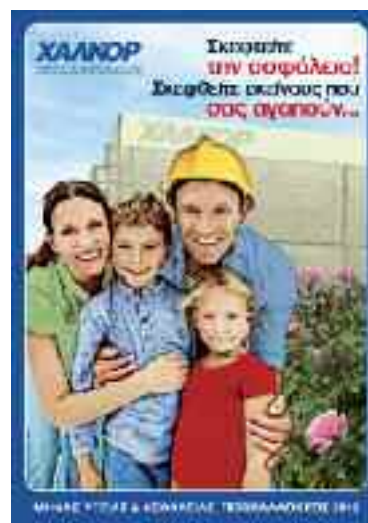
The 5S system targets:

- Improvements in occupational Health and Safety issues
- Zero accidents
- Improved working conditions
- Increased people morale
- Cleanliness and a clean environment
- Improved productivity
- Recycling and respect for the environment
- Energy savings
- Getting everyone involved and further improvements in the culture

6.3.3 Health, Safety and Environment Month

To foster a deeper Health and Safety culture HALCOR instituted the “Health, Safety and Environment Month” in 2010. Each year a major training course is organised at HALCOR’s premises whose primary aim is to change the culture and build more awareness among people about occupational Health and Safety and about environmental management issues. The topics covered at the 2012 Health, Safety and Environment Month attended by company employees and people included:

- Using reinforced knitted bands
- Risk identification – accident prevention
- Using bridge cranes safely
- Using forklift trucks safely
- Tidiness in the workplace
- Burns – First Aid
- Industrial noise – impacts – how to deal with it
- Securing and releasing equipment
- Using automatic fire fighting systems
- Using breathing equipment
- Emergency drills – putting out fires.

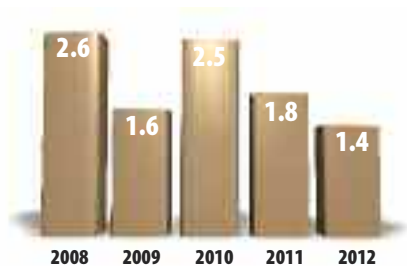


6.4 Monitoring Health and Safety Performance

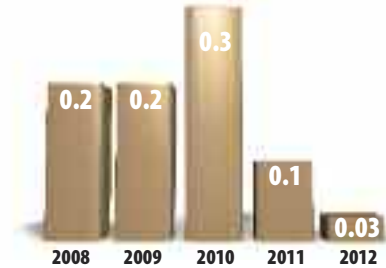
The company keeps a close eye on its Health and Safety performance and implements actions and programmes to ensure a continuous improvement in that sector. It also carries out additional inspections and checks at various departments at its facilities. Working with the manager of each plant and the safety en-

gineers, the Health and Safety officer holds meetings with the heads of each department each month. Scheduled inspections are also carried out each month by the head of each department. This seeks to encourage the exchange of views with employees and the submission of proposals to ensure continuous improvements in the Health and Safety sector. The company's Health and Safety team ensure that employee health is looked after, that work is done safely and there are continuous improvements in order to eliminate accidents totally.

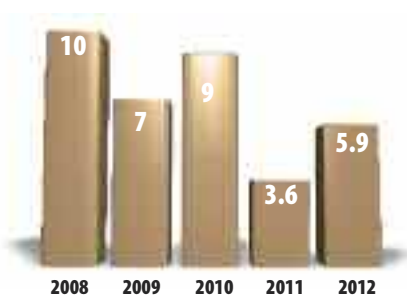
Rate of injuries / accidents over total employees (%)



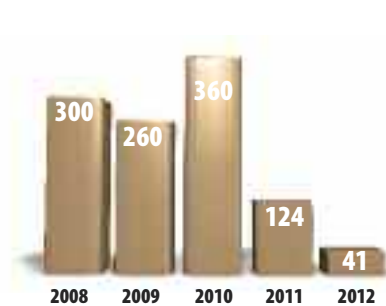
Rate of days lost due to occupational injury or accident over total employees (days lost /total workdays %)



Incident Frequency Rate



Incident Severity Rate



HALCOR fully complies with the relevant national legislation on recording, investigating and disclosing any possible accidents to the competent authorities. In addition, incidents are recorded in the Incident Log, so that the circumstances surrounding the event can be investigated with the aim of determining the true causes that led to the accident. Plans are then made and corrective and preventative actions taken by the Company.

To date no occupational diseases have been recorded at HALCOR.

Targets for 2013



- Have each supervisor carry out 11 Health and Safety inspections at all plants
- Carry out 11 Health and Safety monthly meetings at each plant
- Provide at least 1.5 hours of training to each production process employee
- Involve 25% more production employees in emergency drills compared to last year
- Get at least 70% of employees / contractors involved in Health and Safety training.

Occupational Health and Safety: Our performance

Number of Accidents			
Plant	2010	2011 ⁽²⁾	2012
Copper Tubes	6	1	4
Recycling-Foundry	3	3	2
Titanium-zinc Rolling Plant ⁽¹⁾	2	-	-
Total	11	4	6

(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
Copper Tubes	20
Recycling-Foundry	3
Titanium-zinc Rolling Plant ⁽¹⁾	-
Total	23

Accident Frequency Rate			
Plant	2010	2011 ⁽²⁾	2012
Copper Tubes	7	1.1	4.8
Recycling-Foundry	15	16.8	13.3
Titanium-zinc Rolling Plant ⁽¹⁾	20	-	-
Total	9	3.6	5.9

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

Accident Severity Rate			
Plant	2010	2011 ⁽²⁾	2012
Copper Tubes	205	3,4	12
Recycling-Foundry	1235	397	213
Titanium-zinc Rolling Plant ⁽¹⁾	760	2,965	-
Total	360	124	41

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

Days Lost			
Plant	2010	2011 ⁽²⁾	2012
Copper Tubes	182	3	10
Recycling-Foundry	256	71	32
Titanium-zinc Rolling Plant ⁽¹⁾	77	64	-
Total	515	138	42

Manhours			
Plant	2010	2011	2012
Copper Tubes	887,729	878,755	828,957
Recycling-Foundry	207,145	178,807	149,835
Titanium-zinc Rolling Plant	101,491	55,214	43,358*

* 21,848 hours of the Sales Department are included

Occupational Health and Safety Indicators			
Occupational Health and Safety Indicators	2010	2011⁽²⁾	2012
Incidents without lost days	4	7	2
Injury rate (IR)	1.9	0.7	1.2
Occupational disease rate (ODR)	-	-	-
Lost days rate (LDR)	74	25	8
Absentee rate (AR)	592	198*	66

* Reviewed due to a printing error.

Injury rate (IR) =	$\frac{\text{number of injuries} \times 200,000}{\text{number of manhours worked}}$	Occupational disease = rate	$\frac{\text{number of occupational diseases} \times 200,000}{\text{number of manhours worked}}$
Lost Days index = (LDR)	$\frac{\text{Absence days due to accidents} \times 200,000}{\text{number of manhours worked}}$	Absence index = (AR)	$\frac{\text{absence days due to accidents} \times 200,000}{\text{number of manhours worked}}$

Occupational Health and Safety Indicators 2012 – Contractors*	2012
Total number of Employees	67
Manhours	163,868
Total Health & Safety and Environment Training Hours	138
Total Accidents	2
Days Lost	72
Near Misses	4
Frequency Rate	12,2
Severity Rate	440

* It refers to only one of HALCOR's contractors, whose employees work within HALCOR's facilities.



Our Commitment:

Respect for the Environment is of primary importance for HALCOR. Thanks to the Environmental Policy it has put in place, the Company is committed to:

- Ensuring that its business development is environmentally responsible and that it operates to ensure continuous improvements in its environmental management performance ratings
- Saving natural resources and in particular water, energy and raw materials
- Preventing pollution
- Complying with requirements that go beyond those laid down by law, by providing all the necessary equipment.

Practical demonstrations of this commitment are that the company operates in a fully transparent manner and complies in full with the applicable environmental legislation, that it has committed itself to minimising its environmental footprint, and its policies, systems and the know-how it has developed for environmentally responsible Sustainable Development.

All of us are responsible for respecting the Environment. HALCOR is committed to environmental protection and it is closely tied into Company strategy.

2012

499 Electricity consumption
KWh/tn of product

127,460 m³ Water consumption

138 Kg CO₂ per ton of product

1.05 million euro
invested in environmental
protection

95.6% recycling of waste, used
to produce energy

“HALCOR’s management team is committed to environmental protection, a commitment it implements by comprehensively managing the environmental impacts of its operations. At HALCOR we implement an Environmental Management System at all our production plants, which is certified in line with the requirements of the ISO 14001:2004 standard”.

7. Environment

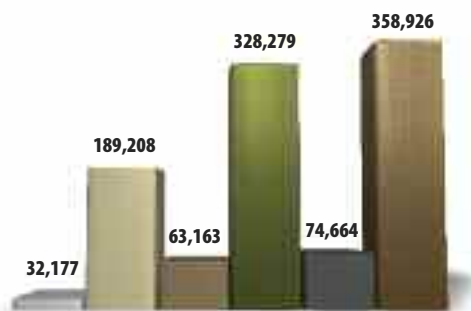
Review of progress in achieving 2012 targets

What we said	Performance	What we did
Increase training time on environmental issues by 10%	✓	Training time on environmental issues increased by 23%.
Implement measures to save electricity by making changes to indoor and outdoor lighting	✓	Measures to save electricity by making changes to indoor and outdoor lighting were completed.
Plant trees and extend green areas by at least 10% on a site at the copper tube production plant	✓	Trees were planted at the copper tube production plant at a figure of over 10%.
Train employees about Life Cycle Assessment and the Carbon Footprint so that this can be implemented at the Company in the future.	✓	Special training about Life Cycle Assessment and the Carbon Footprint was approved and then provided to executives comprising the environment team.
Increase the scrap recycling rate by at least 2%	✓	The scrap recycling rate rose by 21% in 2012.
Reduce waste products generated per ton of total by 5% over the next five years (2012-2016).	👉	Total waste generation per ton of product stood at 175 kg in 2012 down some 16.3% compared to the average of the three - years period 2009-2011 (209 kg waste / ton of product).
Publish a training booklet about environmental issues.	✓	The training booklet about environmental issues was prepared and distributed during training sessions to all people.
Save energy at the copper tube production plant over a two -years period (2012-2013)	👉	Electric light bulbs are in the process of being replaced. An electricity control mechanism (SCADA) was installed.
Install an urban waste processing plant at the copper tube plant over the two -years period 2013-2013.	👉	The company has also built a new sewerage network and procured suitable equipment for managing urban waste.

7.1 Environmental Protection Investments and Expenditure

In order to improve its environmental protection infrastructure and to ensure a continuous improvement in its performance, HALCOR makes investments for environmental protection each year. In 2012 the amount invested and spent exceeded euro 1 million.

Environmental Expenditures (euro)



7.2 Environmental Protection Measures and Principles

Environmental protection is a top priority for HALCOR. Management is committed to providing all the necessary resources in order to effectively protect the environment. HALCOR's environment policy is not limited to simply implementing rules, putting in place the necessary arrangements and taking the appropriate measures, but is also expressed via management's commitment to environmental protection.

The company carries out a systematic check of all its activities at all plants in order to implement the policy and to implement suitable measures to ensure a continuous improvement in the environmental management sector.

HALCOR achieves comprehensive environmental management via an Environmental Management System certified in line with the requirements of the ISO 14001:2004 standard, which is applied at all the Company's production facilities / plants.

- Landscape improvement and maintenance
- Support to Environmental Management Department and consulting services
- Monitoring environmental parameter
- Waste management by licensed contractors
- New environmental infrastructure and anti-pollution systems
- Maintenance and operation of environmental protection equipment

ISO 14001 certification at HALCOR's plants

No.	Plant	2009	2010	2011	2012
1	Copper Tubes	√	√	√	√
2	Recycling plant - Foundry	√	√	√	√
3	Titan zinc Rolling*	√	√	√	√
4	Polyethylene sheet production line (Plastic and rubber compounds plant)	-	-	√	√

(*) This plant suspended production activities on 1.1.2011.



7. Environment

To this end HALCOR's point is reference is the efforts it has made in the environmental management sector and the adoption of a series of measures and principles such as those outlined below:

1. Compliance with existing national and European environmental legislation and compliance with emission limits at Company plants.
2. Responsible operation with full knowledge of existing and potential environmental consequences and taking appropriate measures to reduce these.
3. Cooperation with licensed waste management companies (for the collection, transportation, further use and disposal of waste), that follow practices in full compliance with relevant legislation.
4. Continuous improvement of the HALCOR environmental performance and minimisation of the environmental impact from its operations.
5. Transparency via open communication between the Company and all stakeholders on environmental issues.
6. Continuous Training, updating and awareness of employees on environmental issues so that they actively participate in matters of environmental concern.
7. Implementation of an Environmental Management System to ensure continuous improvement in the Company's environmental performance and full compliance with the relevant legislation.

In addition, the organisational chart includes a special Environment Department staffed by experts who are responsible for implementing the Environmental Management System and monitoring the progress in implementing its environmental programmes. Management is briefed about environmental protection issues and monitors who environmental policy is being implemented.

7.3 Employee Training

To successfully implement its Environmental Policy and to really protect the environment everyone needs to participate. For that reason, the Company gives employees the opportunity to attend special training courses on environmental issues such as environmentally safe management of raw materials and waste.

Training on environmental issues	2010	2011	2012
No. of employees	120	109	241
Number of workshops held	8	12	11
Hours of training	67	283	349

In 2012, 241 Company employees received 349 hours of training. The main issues the training courses addressed were:

- Implementing the Environmental Management System
- Implementing the environmental legislation
- Waste management
- Emergencies and incidents
- Proper environmental behaviour.

Moreover, in 2012 HALCOR published a training booklet providing information and raising awareness about environmental protection issues focused on the following four key matters:

65%

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

In 2012 65% of the metals used in HALCOR's production processes can from recycled metals.

1. Involvement in environmental protection
2. Rational waste management
3. Saving natural resources
4. Protecting the environment and our home.

The booklet includes guidelines about proper environmental conduct by employees and was distributed to all employees during the relevant training sessions which were held.

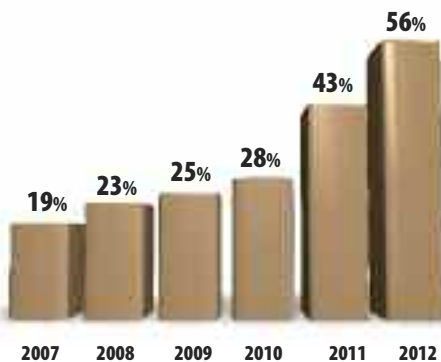
7.4 Raw Materials

The most important raw material procured and used by the Company is copper. HALCOR meets a significant part of its raw material needs by utilising used metals whose life cycle is over (scrap metal) thereby combining environmental management with economic efficiency and preserving the earth's natural resources.

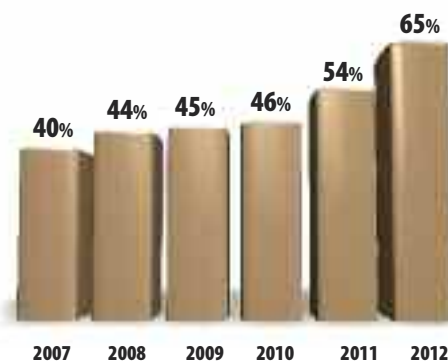
The **benefits of recycling copper** (compared to producing primary copper from ores or producing it from recycling copper):

- It prevents hazardous gases such as SO₂ and various particulates being released into the air.
- It saves around 85% of the energy required (3 times less electricity is needed and 2.5 times less thermal energy)
- It saves around 75% of CO₂ emissions thereby significantly contributing to a global reduction in greenhouse gas emissions.

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



Recycled metal consumption average in relation to total metal consumption (*)



(*) Recycled metals by internal returns during production process have been included in the diagram.

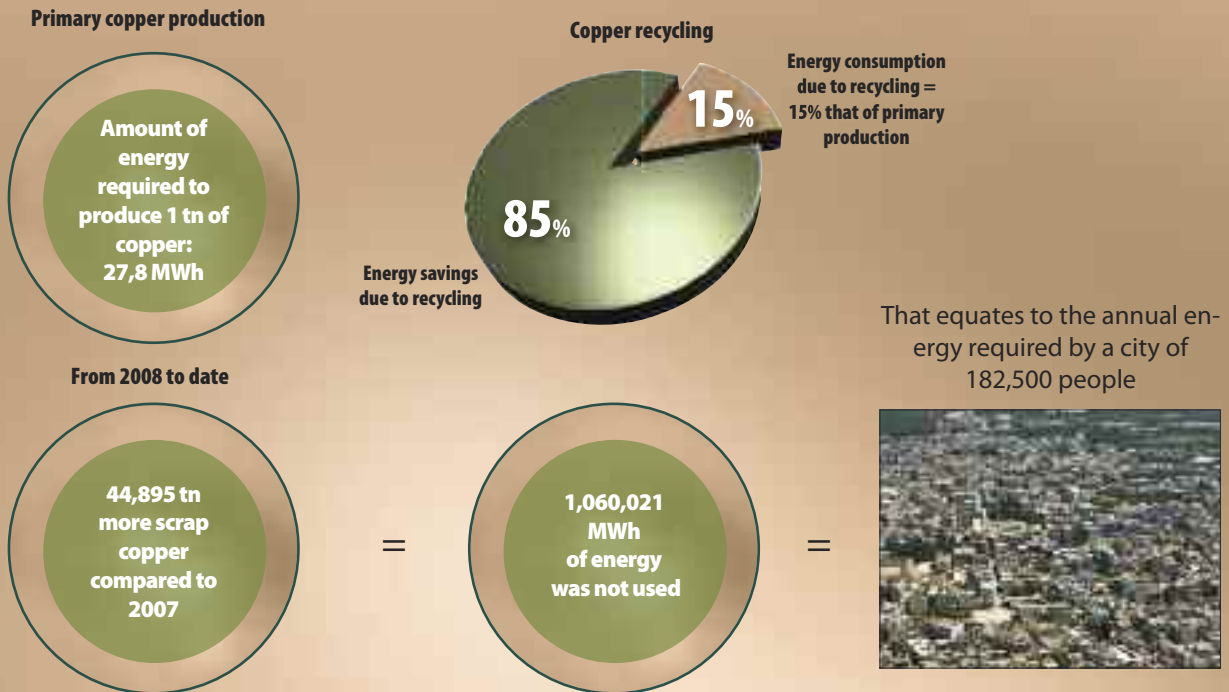
7. Environment

Copper Recycling: Major Environmental and Economic Benefits

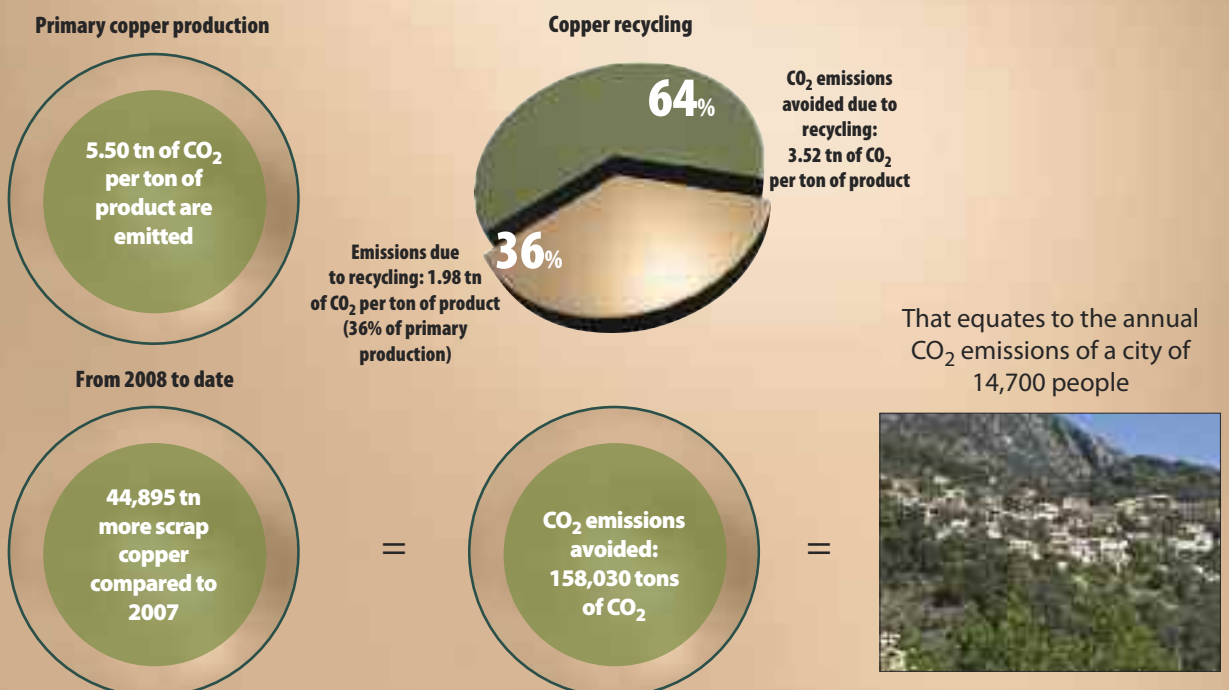
HALCOR is Greece's largest recycler of copper and its alloys. From 2007 to the end of 2012 the company has recycled and re-used large quantities of metals thereby achieving a significant saving in natural resources and a cost reduction, while also reducing the quantity of waste generated that needs to be disposed off in landfill sites. The use of scrap has risen significantly over recent years from 19% in 2007 to 56% in 2012.

The energy savings compared to the energy required for primary production of the same quantity of copper have been estimated at 1,060,021 MWh* which is equivalent to the energy consumed each year by a city of 182,500 people (calculated using the EU average).

Reduction in energy consumption



Reduction in CO₂ emissions



* 100 GJ/tn is the quantity of energy required to produce 1 tn of primary copper.

The energy saving is at least 85%.

$100 \text{ GJ/tn} \times 85\% \times 44,895 \text{ tn} = 3,816,075 \text{ GJ} \times 1 \text{ KWh} / 0.0036 \text{ GJ} = 1,060,020,133 \text{ KWh} = 1,060,021 \text{ MWh} (1 \text{ KWh} = 0.0036 \text{ GJ})$

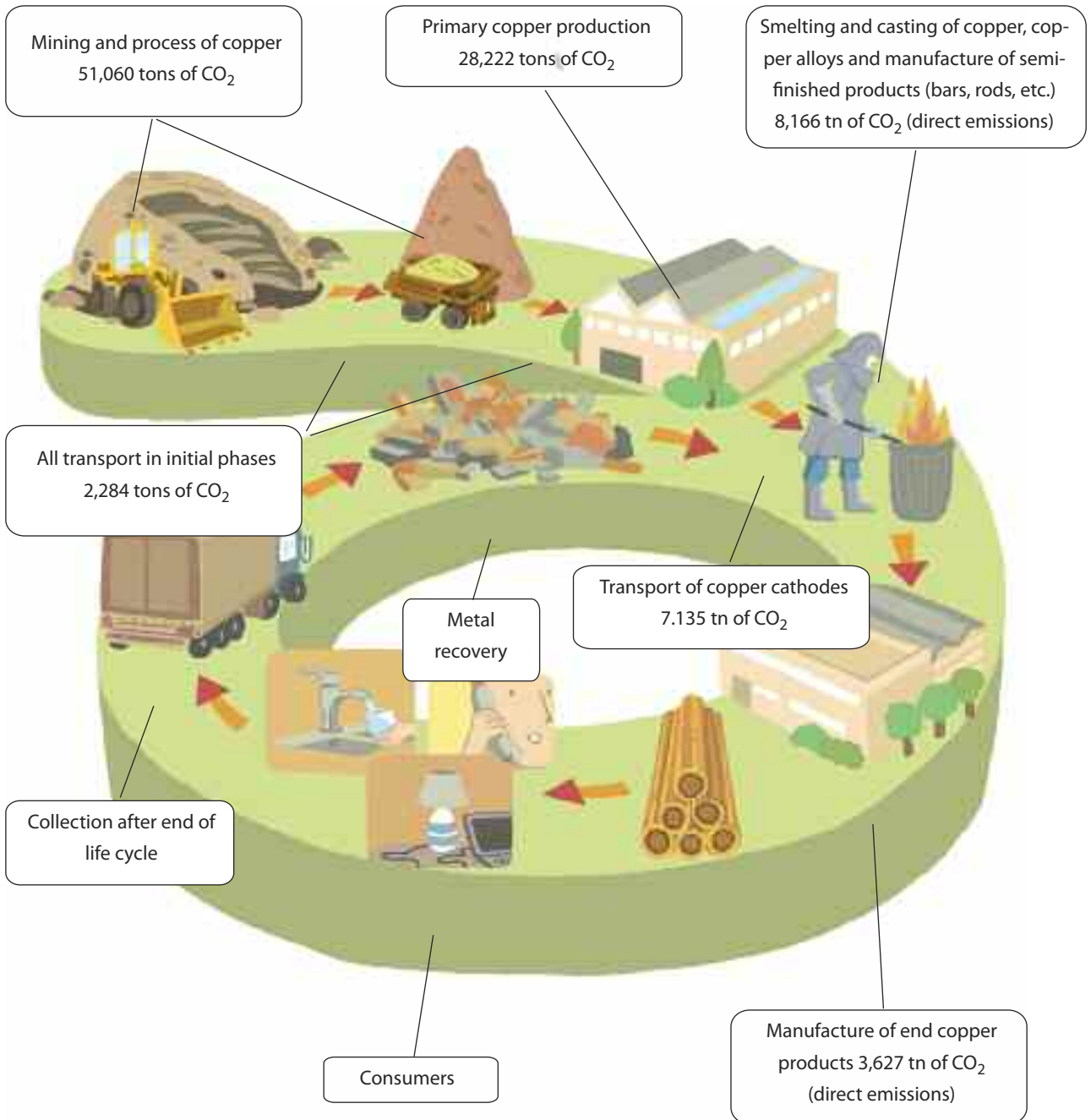
7.4.1 HALCOR's Products Life Cycle Analysis

HALCOR's use of scrap compared to primary metals has had a significant positive impact on the life cycle of HALCOR's products.

Life Cycle Analysis is a method which entails the use of a series of systematic processes to quantify the inflows and outflows of resources in all stages of a product's life cycle.

HALCOR Copper Life Cycle Analysis

METAL WORKS S.A.



Note: More information about the way in which CO₂ levels are computed in these phases is contained on page 112.

7. Environment

HALCOR ensures that each year it obtains a significant part of the raw materials it needs from old recyclable metal (scrap). In doing so, it not only reaps financial gains but also achieves a drastic reduction in its environmental impact from the viewpoint of the life cycle analysis of copper products.

In 2012 employees from HALCOR attended a special Life Cycle Analysis workshop to help the company better organise its activities in this sector. The diagram on the previous page includes the data calculated relating to the Environmental impact from evaluation of the stages of the Life Cycle of HALCOR's products (Global Warming Potential (GWP) and CO₂ emissions). The analysis of all Life Cycle phases seeks to identify the overall environmental footprint and provides valuable conclusions in relation to the monitoring and reduction of environmental impacts.

7.4.2 Safe Use of Raw and Other Materials

Various chemical substances are used during HALCOR's manufacturing procedure, which are necessary in order to properly process metals. HALCOR takes great steps to limit the use of such chemicals to the quantities absolutely necessary.

HALCOR records suitable data about any substance that it imports, exports, produces or trades. All actions in this direction are in full compliance with the standards and specifications contained in the Safety Data Sheets (SDS) in relation 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 preventive measures to avoid spillage and leakage of chemical substances.

7.4.3 Reduction in the Use of Packaging

The products HALCOR manufactures are suitably packaged to ensure that they can be safely stored and transported. Various packaging materials are used such as wooden pallets, plastic lids, plastic packaging materials, plastic and metal bands, etc. HALCOR takes all the appropriate measures to ensure that the packaging materials used are fully recyclable.

7.5 Energy Use

One key aim of the Company is to limit energy usage to the levels necessary and to increase energy efficiency. However, the Company needs high amounts of thermal energy (Natural Gas, LPG and oil) and electricity because of the very nature of its activities.

HALCOR fully complies

with the legislative rules relating to chemical substances and preparations:

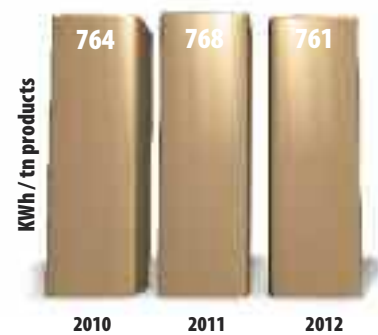
- The EU REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals)
- CLP (Classification, Labelling and Packaging)
- RoHS (Restriction of the use of certain Hazardous Substances in electrical and electronic equipment).

In 2012 HALCOR underwent an inspection carried out by representatives of the Greek State Chemical Laboratory to check how it was implementing the legislation relating to chemical products (the REACH regulation). The inspection report prepared shows that HALCOR was complying in full with the legislation.

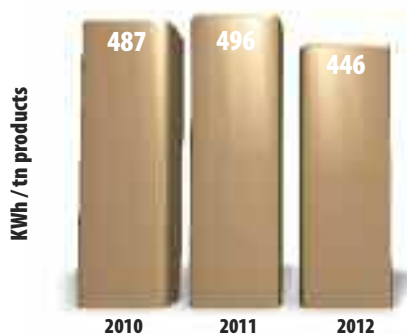
Thermal Energy

Thermal energy consumption in 2012 stood at 65,034 MWh down a significant 19% compared to 2011. This was primarily due to the reduce in 8mm copper rods. The specific thermal energy consumption rate (consumption per product quantity) was 761 KWh per tn of product down 1.4% compared to the 3-year average over the period 2009-2011 which was 772 KWh.

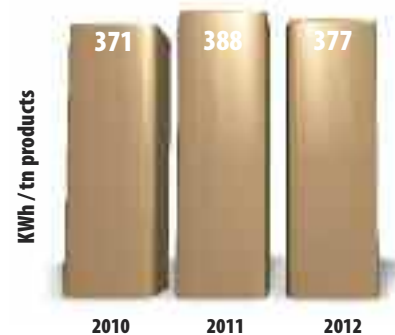
Specific Thermal Energy Consumption



Specific thermal energy consumption Recycling-Melting plant



Specific thermal energy consumption - Copper Tubes plant



In order to save and more efficiently use thermal energy HALCOR has taken a series of measures resulting in significant reductions in energy consumption. The measures HALCOR took as listed below:

- The monthly power demand profile was smoothed out resulting in gains for the company and better planning for PPC
- Reduced amounts of natural gas were used to heat the copper production line resulted in savings of 1,739 MWh per year
- The system for enriching exhaust fumes with oxygen seeks to ensure a better level of performance for the natural gas system and a reduction of consumption when producing copper, which resulted in savings of 484 MWh per year
- Production was better planned resulting in a reduction in the specific natural gas production rate in the copper production process.

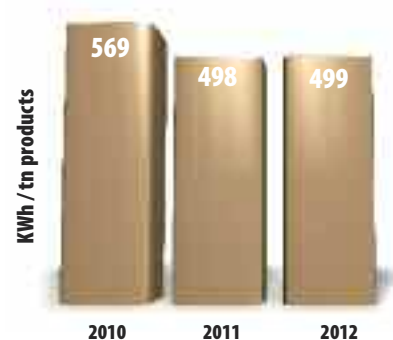
Electric Energy

The specific electricity consumption rate in 2012 was 499 KWh per ton of product, which was around the same level as in 2011.

To ensure efficient use of electricity and a reduction in consumption HALCOR took a series of steps in 2012 which are listed below:

- Conventional light bulbs are in the process of being replaced with new energy saving ones indoors at the copper tubes production plant
- An electricity control mechanism (SCADA) was installed
- Unnecessary use of loads at cooling towers, lighting systems, a/c and computer systems was limited

Specific electric energy consumption



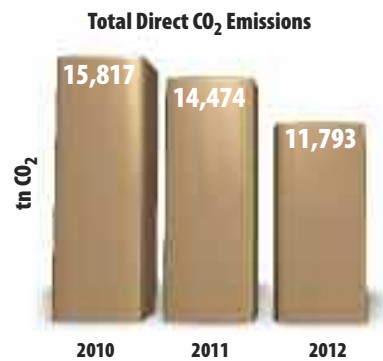
7. Environment

- Heat losses from electrical furnaces and channels were reduced
- A central offset system and local devices were installed on the electrical furnaces in order to improve the power rating
- Savings were achieved on the gas circuit by avoiding the unnecessary use of air compressors and by fixing leaks in the gas circuit
- More efficient, new generational engines and rev governor drivers were installed.

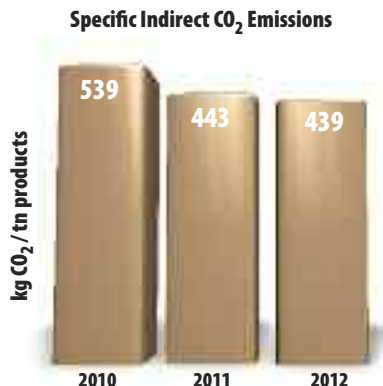
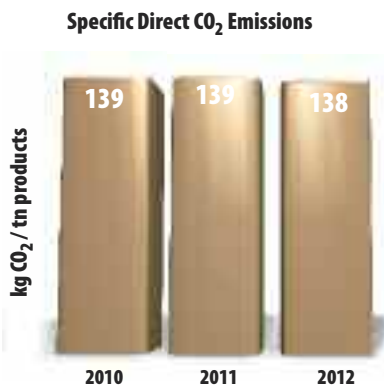
7.6 Climate Change

HALCOR recognises the need to combat climate change and the importance of the collective effort in doing so. It has made continuous efforts to limit greenhouse gas emissions which arise from its operations by taking a series of measures that are outlined 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.



The main sources of greenhouse gases are fossil fuels that are burned to generate heat in production processes, and when using forklift trucks. Total emissions in 2012 were down 19% due to the reduced level of 8mm copper rod production.



* The quantity of direct emissions is calculated based on liquid gas consumption in the production process and the level of diesel used for transportation. A factor of 0.88 kg CO₂/KWh was used to calculate indirect CO₂ emissions for 2012.

7.7 Transportation

Both the nature of the Company's activities and the location of its production plant require people to travel there and that raw materials be taken to and products taken from the production plant.

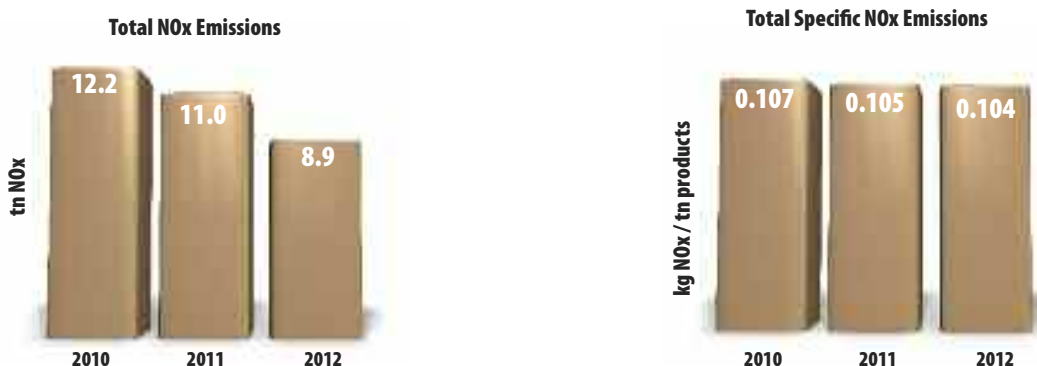
In order to limit CO₂ emissions to the atmosphere from the consumption of liquid fuels when transporting staff the company has taken initiatives such as those listed below:

- It has installed teleconferencing systems which it used to communicate with customers and associates abroad
- Rent subsidies for executives to live locally
- Employees are transported using company buses
- Staff are recruited from the local community
- Car pooling is encouraged.

7.8 Air Emissions

Total emissions of volatile organic compound (VOCs) during 2012 was 186.3 tn. That reflects a 26.6% drop compared to the previous year.

Natural gas and other fossil fuels used to generate heat energy result in NO_x emissions. In 2012 8.9 tn of NO_x were emitted which reflects a significant 20% drop compared to the average over the three -years period 2009-2011 (11.2 tn of NO_x) which was due to the reduced 8mm copper rod production levels.



The Company is constantly monitoring its atmospheric emissions via:

- Continuous monitoring instruments that record the level of solid particulates
- A programme of scheduled measurements of various environmental parameters at flue gas emission locations at the recycling plant - foundry.

An airborne particle continuous monitoring system has been installed on the flues of the furnaces at the recycling plant - foundry in order to constantly monitor the level of solid particulates being emitted.

Continuous Measurements

Continuous measurements of suspended particulates are taken using three permanent recorders installed on the flues of furnaces at the recycling plant - foundry. All guidance specified in the legislation is also complied with at all times in relation to the level of particulate emissions from the production process. To date the measurements taken show that there has been no exceedance of the permissible limits laid down in the relevant Greek legislation.

7. Environment

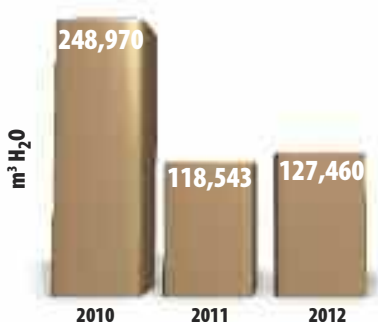
7.9 Water Use

In 2012 HALCOR used 127,460 m³ of water which is 7.52% more than the amount used in 2011.

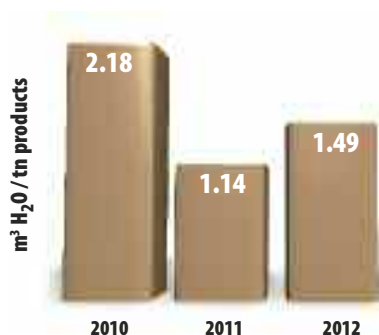


- EYDAP water supply network
- Borehole (privately owned by the company and fully licensed)
- Tanker trucks
- The Oinofyta water supply network for the copper tube plant and the smelting plant and foundry

Total Water Consumption



Specific Water Consumption



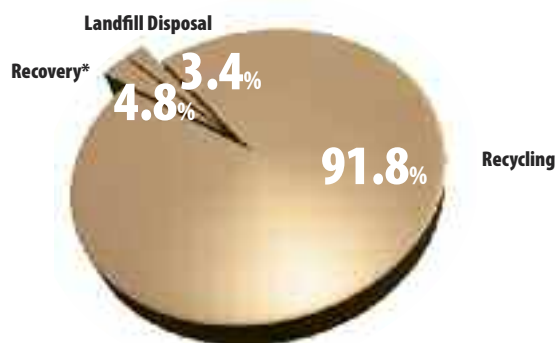
7.10 Waste

As part of its Environmental Policy, HALCOR has kept its promise to properly manage and utilise the waste generated by its production processes, by implementing management practices that are specified in the relevant legislation and regulations.

The management process which is used states that the primary objective is to reduce the volume of waste generated and then recycling, reuse and exploitation methods are then used. This achieves a drastic reduction in the final volume of waste that is disposed of in landfill sites.

Total waste generation per ton of product (specific waste generation) stood at 175 kg in 2012 down some 16.3% compared to the average of the 3-year period 2009-2011 (209 kg waste / ton of product).

Waste Management Method



*Recovery (energy or other form of recover)

The Company not only complies with the relevant legislation but also takes measures that go well beyond the relevant requirements. In compliance with Law 2939/2001 HALCOR has a contract with all the alternative waste management schemes that operate in Greece.

Wastewater from the production process is carried via a suitable network to the industrial wastewater treatment plants that HALCOR has installed at its facilities. These systems differ depending on the quality characteristics of the waste being disposed of.

HALCOR has three wastewater treatment plants that consist of simple primary treatment systems (sedimentation and oil removal). By properly operating and maintaining this infrastructure, the company ensures that the wastewater leaving its facilities complies with the sanitary 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.

Having put an Environmental Management System in place, by constantly striving to improve its environmental performance HALCOR seeks to go beyond the requirements laid down by law to ensure optimum environmental protection.

Industrial wastewater treatment systems

Wastewater from the production process is carried via a suitable network to the industrial wastewater treatment plants that HALCOR has installed at its facilities.

7.11 Noise

All guidance specified in the legislation is also complied with at all times in relation to noise levels from the production process. Noise sources are recorded at all facilities and measures have been put in place to reduce noise levels both to protect employee health and for general environmental reasons.

Targets for 2013



- A 45% reduction in the use of solvents in the production process compared to the 2012 quantities by 2015.
- Replacement of conventional light bulbs with energy saving ones in all indoor areas in the copper tubes plant by 2015.
- Installation of a closed copper pipe degreasing system by the end of 2014.
- A 50% increase in the number of hours of training (compared to 2012) by 2014.
- Carry out a life cycle analysis on HALCOR's products by 2017.
- Start the process of recording the environmental footprint from transporting products and employees by 2015.
- A further 5% reduction in waste per tn of product compared to the average for the three-year (period 2010-2012).
- Completion of the new sewerage network and procurement of suitable equipment to manage urban waste by 2014.

7. Environment

Environment: Our Performance

Environmental Expenditures			
Categories	2010	2011	2012
Maintenance and operation of environmental protection equipment	412,709	337,069	358,926
Environmental Management Department's operation and consulting services	260,120	197,176	189,208
Waste management by licensed contractors	239,009	234,948	328,279
Monitoring environmental parameters	155,817	67,891	63,163
New environmental infrastructure and anti-pollution systems	154,317	175,207	74,664
Landscape improvements and maintenance	10,944	20,844	32,177

Use of Recyclables			
Year	2010	2011	2012
Recycled metal consumption average (without internal returns)	28%	43%	56%
Recycled metal average (including internal returns)	46%	54%	65%

Specific Thermal Energy Consumption per Production Unit			
Specific thermal energy consumption (KWh/tn product)	2010	2011	2012
HALCOR total thermal energy consumption	764	768	761
Recycling-Foundry	487	496	446
Copper Tubes	371	388	377
Titanium-zinc Rolling	153	-	-
Compounds	1,174	1,512	1,359

Direct Energy Consumption by Type of Fuel			
Type of fuel	2010	2011	2012
Diesel (lt)	246,219	246,554	229,840
Natural Gas (Nm ³)	7,320,002	6,826,706	5,492,610
Liquefied Petroleum Gas (LPG) kg	117,390	500	-
Total (GJ)	300,807	275,783	223,084

Specific Electric Energy Consumption			
Year	2010	2011	2012
Specific electric energy consumption (KWh/tn product)	569	498	499

Total Direct CO ₂ Emissions			
Year	2010	2011	2012
Total direct CO ₂ emissions (tn)	15,817	14,474	11,793

Total Direct and Indirect CO ₂ Emissions (kg/tn product)						
A/A HALCOR Total	Direct Emissions			Indirect Emissions		
	2010	2011	2012	2010	2011	2012
Specific CO ₂ Emissions (Kg/tn product)	139	139	138	539	443	439

Total NOx Emissions

Year	2010	2011	2012
NOx emissions (tn)	12.2	11.0	8.9

Total Specific NOx Emissions

Year	2010	2011	2012
Specific NOx Emissions (Kg/tn product)	0.107	0.105	0.104

Water Consumption (m³)

Water Source	2010	2011	2012
EYDAP water supply network	154,238	113,614	120,124
Borehole/Well (Titanium Zinc rolling plant)	84,162	-	-
Oinofyta Water Supply Network	10,492	3,010	4,667
Water Tanker trucks	78	1,919	2,669
Total	248,970	118,543	127,460

Specific Water Consumption

Year	2010	2011	2012
Specific water consumption (m ³ /tn product)	2.18	1.14	1.49

Breakdown of Waste by Category and Management Method

Waste	Category	Waste Management	Method Quantity (Kg)		
			2010	2011	2012
Mixed recyclables (scrap metal, metal packaging paper, wood, plastic)	solid	Recycling	24,561,474	13,977,193	13,708,666
Sewage sludge	solid	Recycling	81,830	-	-
Slag	solid	Recycling	1,505,261	966,885	929,343
Mixed materials	solid	Recovery	164,410	114,000	102,880
Waste	solid	Landfill disposal	175,188	132,160	552,460
Used oils	liquid	Recycling	358,179	310,010	375,509
Batteries	solid	Recycling	2,486	2,100	530
Filter dust	solid	Recycling	858,900	245,500	-
Emulsions	liquid	Recovery	872,430	575,820	627,740
Polluted absorbing materials	solid	Recovery	36,480	71,615	53,430
Fluorescent lamps	solid	Recycling	20	270	130
WEEE	solid	Recycling	-	8,160	2,670
Tires	solid	Recycling	-	9,560	4,360
Total Waste			28,616,658	16,413,273	16,357,718

Following is the table which links the contents of the Corporate Responsibility and Sustainable Development Report 2012 with the GRI - G3.1 indicators and ISO 26000 Standard.

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, §1.2, § 1.2.3, §1.5.1, §1.5.2, §1.5.3, §2.1.2, §2.2, §2.4, §3 Corporate Governance - 2012 Target Performance, Targets for 2013, §3.3, §3.3.1, §3.3.2, §4 Marketplace - 2012 Target Performance, Targets for 2013, §5 Human Resources 2012 Target Performance, Targets for 2013, §6. Health and Safety 2012 Target Performance, Targets for 2013, §6.2, §6.4, § Monitoring Health and Safety Performance, §7 Environment 2012 Target Performance, Targets for 2013, §7.2, §7.4.1, § Our Performance, Annual Financial Report 2012 / Annual Report by Board of Directors – Section D – Main Risks and Uncertainties P. 4
2.1	Name of the Company		«HALCOR METAL WORKS S.A.», §1.2
2.2	Primary brands, products, and/or services		§1.2, §4.2
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	6.2	§1.1, §4.2
2.4	Location of organization's headquarters.		§1.2
2.5	Countries where HALCOR operates		§1.1, §4.1, § 4.2
2.6	Nature of ownership and legal form		§1.2
2.7	Markets served		§1.1, §4.1, §4.2, Website www.halcor.gr – Investor Relations / Corporate Presentations – Corporate presentation p. 12-15. /The Company's sales are oriented to specific international projects rather to retail sales for End users.
2.8	Scale of HALCOR		§1.1, §1.2.2, § 5.1 Human Resources Data / Annual Financial Report 2012 (sales) P.7,9,17
2.9	Significant changes during the reporting period		There were no significant changes during the reporting period / P 1-2 Annual Financial Report 2012.
2.10	Awards received in the reporting period		§1.3
3.1	Reporting period		1/1/2012 - 31/12/2012
3.2	Date of most recent previous report		Corporate Responsibility and Sustainable Development Report 2012
3.3	Reporting cycle		Annual
3.4	Contact point		P. 2 About the Report
3.5	Process for defining report content		P. 2 About the Report
3.6	Boundary of the report		The Report covers all activities of HALCOR in Greece (all products and production facilities as are referred in the Report, with no limitation). The Report covers the Company's activities but not the entire Group (subsidiaries are not included). P. 2 About the Report
3.7	Specific limitations on the scope or boundary of the report		P. 2 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 reference to SOFIA MED S.A. and FITCO S.A., subsidiaries of HALCOR. The data of the above companies are presented separately in relation to HALCOR's data. P. 2 About the Report
3.9	Data measurement techniques and the bases of calculations		P. 2 About the Report, §6.4, §7.4
3.10	Explanation of the effect of any re-statements of information provided in earlier reports		P. 2 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 / P. 2 About the Report
3.12	Table identifying the location of the Standard Disclosures in the report		P. 106-111 / GRI G3.1 Indicators and ISO 26000 Table
3.13	Policy and current practice with regard to seeking external assurance for the report	7.5.3	About the Report / Application Level Check Statement
4.1	Governance structure of the organization	6.2	§ 3.1, § 3.2, Annual Financial Report 2012 P. 11-17
4.2	Indicate whether the Chair of the highest governance body is also an executive officer	6.2	§3.1, Annual Financial Report 2012 P. 15

GRI Indicator	Description	ISO 26000	Notes / Section
4.3	Number and gender of members of the highest governance body that are independent and/or non-executive members	6.2	§3.1, § 5.2.1
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	6.2	§3.1. HALCOR applies an "open door policy" according to which Management is always willing to discuss employee issues and cooperate with them.
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives	6.2	§3.1
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	6.2	§3.1.1. Annual Financial Report 2012, P. 15
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	Criteria for selection of members of the Board of Directors not include gender, nationality and other indicators of diversity. This leads to avoidance of any kind of discrimination. §3.1
4.8	Internally developed statements of mission or values, codes of conduct, and values relevant to economic, environmental, and social performance	6.2	§2, §2.1, §2.1.1, §2.2, §2.3, §2.4, §3 Corporate Governance - Our Commitment, §4 Marketplace - Our Commitment, §5 Human Resources - Our Commitment, §6 Health and Safety - Our Commitment, §7 Environment - 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	§2.1, §2.1.1, §2.2, §2.3, §2.4, §3.2, §3.3, §3.3.1, §3.3.2, §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	§3.1
4.11	Explanation of whether and how the precautionary approach or value is addressed by the organization	6.2	§2.4, §3.3, §3.3.1, §6.2, §7 Environment - Our Commitment, §7.2, §7.3, §7.4, Annual Financial Report 2012 - Annual Report by Board of Directors – Section D – Main Risks and Uncertainties / Annual Financial Report - Statement of Corporate Governance – P. 13 paragraph ii, 14 paragraph iii
4.12	Externally developed economic, environmental, and social charters, values, or other initiatives to which the organization subscribes or endorses	6.2	P. 2 About the Report, §1.4, §2.2, §2.3, §3.1
4.13	Memberships in associations and/or national/international advocacy organizations	6.2	§1.4
4.14	List of stakeholder groups engaged by HALCOR	6.2	§2.1.2
4.15	Basis for identification and selection of stakeholders with whom to engage	6.2	§2.1.2. The process for defining stakeholder groups (categorization and prioritization) is 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	§2.1.2
4.17	Key topics and concerns that have been raised through stakeholder engagement	6.2	§2.1.2
Economic Performance Indicators			
	Disclosure on Management Approach	6.2, 6.8	Introduction to Corporate Governance Chapter, §4.7.4, §5.1, §5.2.2, §5.5, §5.6
EC1	Direct economic value generated and distributed	6.8, 6.8.3, 6.8.7, 6.8.9	§1.2.2, §1.2.3
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	6.5.5	Financial implications and other risks and opportunities for the organization's activities due to climate change have not been identified. §3.3.1, §7.6
EC3	Coverage of the organization's defined benefit plan obligations		HALCOR covers all insurance payment policy according to the law. Retired employees receive pension by the responsible public organization. §5.2.2
EC4	Significant financial assistance received from government		During the year 2012 the Company received grants 1.702.632 euro (P. 38 §25. Grants, Audit Report prepared by Independent Chartered Auditor - Annual Financial Report 2012)
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 respects and follows national, collective bargaining and profession-related agreements (National General Collective Agreement). The vast majority of HALCOR employees receive remuneration higher than the minimum required by the National General Collective Agreement. No discrimination is made on the employees payments based on the gender. HALCOR respects and promotes gender equality.

8. GRI G3.1 Indicators and ISO 26000 Table

GRI Indicator	Description	ISO 26000	Notes / Section
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation	6.6.6, 6.8, 6.8.5, 6.8.7	\$1.2.3, \$2.1.2, \$4.7.4 \$Marketplace: Our Performance
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	\$5.1, \$Human Resources: Our Performance
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	\$1.2.3, \$1.5, \$5.5 \$5.6
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	\$1.2.3, \$1.5, \$5.5, \$5.6
Environmental Performance Indicators			
	Disclosure on Management Approach	6.2, 6.5	Introduction of Environment Chapter, \$7.2, \$7.3, \$7.4, \$7.5, \$7.5, \$7.6, \$7.7, \$7.8, \$7.9, \$7.10, \$7.11
EN1	Materials used by weight or volume	6.5, 6.5.4	\$4.7.5, \$Marketplace: Our Performance, \$7.4, \$Environment: Our Performance
EN2	Percentage of materials used that are recycled input materials	6.5, 6.5.4	\$4.7.5, \$Marketplace: Our Performance, \$7.4, \$Environment: Our Performance
EN3	Direct energy consumption by primary energy source	6.5, 6.5.4	\$7.5, \$Environment: Our Performance. Total direct energy consumption results solely from non-renewable energy sources (see 7.5 paragraph)
EN4	Indirect energy consumption by primary source	6.5, 6.5.4	\$7.5, \$Environment: Our Performance. Total direct energy consumption results solely from electrical energy (see 7.5 paragraph)
EN5	Energy saved due to conservation and efficiency improvements	6.5, 6.5.4	\$7.5, \$Environment: Our Performance
EN6	Initiatives to provide energy-efficient or renewable energy based products and services	6.5, 6.5.4	\$4.2, 7.5, \$Environment: Our Performance
EN7	Initiatives to reduce indirect energy consumptions and reductions achieved	6.5, 6.5.4	\$7.5, \$Environment: Our Performance
EN8	Total water withdrawal by source	6.5, 6.5.4	\$7.9, \$Environment: Our Performance
EN9	Water sources significantly affected by withdrawal of water	6.5, 6.5.4	The company does not operate in protected areas with wetlands and no water is withdrawn from surface aquifers (e.g. rivers, lakes).
EN10	Percentage and total volume of water recycled and reused	6.5, 6.5.4	No reuse or recycling of water is taking place
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	HALCOR's facilities are not located inside or near protected areas or areas with a high biodiversity (e.g. RAMSAR or NATURA 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	There has been no negative impact, since the Company does not operate in or adjacent to protected areas
EN13	Habitats protected or restored	6.5, 6.5.6	Except the tree planting activities no other habitat restoration plan has been developed.
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity	6.5, 6.5.6	There is no negative impact on biodiversity, since the Company does not operate in 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 is 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	\$7.6, \$Environment: Our Performance
EN17	Other relevant indirect greenhouse gas emissions by weight	6.5, 6.5.5	N/A
EN18	Initiatives to reduce greenhouse gas emissions by weight	6.5, 6.5.5	\$7.5, \$7.6, \$Environment: Our Performance
EN19	Emissions of ozone-depleting substances by weight	6.5, 6.5.3	N/A
EN20	NOx, SOx, and other significant air emissions by type and weight	6.5, 6.5.3	\$7.8, \$Environment: Our Performance
EN21	Total water discharge by quality and destination.	6.5, 6.5.3	\$7.10, \$Environment: Our Performance
EN22	Total weight of waste by type and disposal method	6.5, 6.5.3	\$7.10, \$/ Environment: Our Performance
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	\$7.10, \$Environment: Our Performance, 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.

GRI Indicator	Description	ISO 26000	Notes / Section
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 are no water discharges in protected areas - There is no negative impact on biodiversity, since there are no operations in, or adjacent to, protected areas
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	\$7.2, \$7.4, \$7.5, \$Environment: Our Performance
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	6.5, 6.5.4, 6.7.5	\$7.4, \$7.4.1, \$7.4.3, \$Environment: Our Performance. Due to the nature of the Company's products, they are not reclaimed, however the Company uses extensive scrap which is metal recycling. During 2012, 65% 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
EN29	Significant environmental impacts of transporting products and other goods and materials	6.5, 6.5.4, 6.6.6	The main impacts stemming from transportation of products and employees are combustion of hydrocarbons and the consequent air emissions, which remain at low levels.
EN30	Total environmental protection expenditures and investments by type	6.5	\$7.1, \$Environment: Our Performance
Labor Practices and Descent Work Performance Indicators			
	Disclosure on Management Approach	6.2, 6.4, 6.3.10	Introduction of the Chapter 5. Human Resources, \$5.1, \$5.2, \$5.3, \$5.4, \$5.5, Introduction of the Chapter 6. Health and Safety, \$6.2, \$6.4
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	6.4, 6.4.3	\$5.1, \$Human Resources: Our Performance
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region	6.4, 6.4.3	\$5.1, \$ Human Resources: Our Performance
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	\$5.2.2. Additional benefits are not offered to any fixed-term employees which may be employed.
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 2012, 1 female employee took the parental leave she was 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	\$5.1, \$Human Resources: Our Performance
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	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 advise on occupational health and safety programs.	6.4, 6.4.6	There is a Health and Safety Committee which reports directly to the Board of Directors for relevant issues concerning all 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	\$6.4, \$Monitoring Health and Safety Performance
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	During the year 2012 no education programs were organized regarding consultation and prevention of serious diseases. However such programs are planned for 2013.
LA9	Health and safety topics covered in formal agreements with trade unions	6.4, 6.4.6	\$3.1, \$6.4
LA10	Average hours of training per year per employee by gender, and by employee category	6.4, 6.4.7	\$Human Resources: Our Performance
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	\$5.4, \$Human Resources: Our Performance
LA12	Percentage of employees receiving regular performance and career development reviews, by gender	6.4, 6.4.7	\$5.3
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	\$5.2.1, \$Human Resources: Our Performance
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	\$5.2.1
Human Rights Performance Indicators			
	Disclosure on Management Approach	6.2, 6.3	\$4.7.3, \$5.1, \$5.2

8. GRI G3.1 Indicators and ISO 26000 Table

GRI Indicator	Description	ISO 26000	Notes / Section
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
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	HALCOR implements thorough checks in order to ensure that all Contractors' employees working in HALCOR's facilities are insured as defined by the law. §4.7.3
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	§5.2.1
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. §5.2.1
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. §5.1
HR6	Child labor	6.3, 6.3.3, 6.3.4, 6.3.5, 6.3.7, 6.3.10	Human Resources - Our Commitment / 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	§5.2.1
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	Up to date no incident of human rights violation of local people has been reported or recorded.
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments		It is estimated that there is no risk for human rights violations in the Company. For this reason it is considered that there is no need for a specific review to be made.
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms		There were no complaints for human right violations. It is estimated that there is no risk for human rights violations in the Company and for this reason it is not considered as necessary to develop such mechanism.
Society Performance Indicators			
	Disclosure on Management Approach	6.2, 6.6, 6.8	Introduction of Environment Chapter, §5.5, §5.6, §7.1, §7.2, §7.3, §7.4
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	§5.5, §5.6. The Company reviews the direct and indirect impacts towards local communities during business plans preparation.
S02	Percentage and total number of business units analyzed for risks related to corruption	6.6, 6.6.3	All business units are being systematically audited. There were no incidents of corruption.
S03	Percentage of employees trained in organization's anti-corruption policies and procedures	6.6, 6.6.3	18 employees (2.4% of the total workforce) were trained (15 senior managers and 3 employees)
S04	Actions taken in response to incidents of corruption	6.6, 6.6.3	There were no incidents of corruption
S05	Public policy positions and participation in public policy development and lobbying	6.6, 6.6.4, 6.8.3	§1.4
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	6.6, 6.6.4, 6.8.3	The Company does not contribute in-kind or financially to politicians and/or political parties
S07	Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes	6.6, 6.6.5, 6.6.7	There have been no incidents of non compliance in 2012
S08	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with laws and regulations	6.6, 6.6.7, 6.8.7	There have been no incidents of non compliance in 2012
S09	Operations with significant potential or actual negative impacts on local communities.	6.3.9, 6.8, 6.8.5, 6.8.7, 6.6.7	§1.5.1, §1.5.3, §5.6
S10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities	6.3.9, 6.8, 6.8.5, 6.8.7, 6.6.7	§5.6, §7.1, §7.2, §7.3, §7.10 §7.11

Product Responsibility Performance Indicators			
GRI Indicator	Description	ISO 26000	Notes / Section
	Disclosure on Management Approach	6.2, 6.6, 6.7	Introduction of Marketplace Chapter, §4.3, §4.5, §4.6
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 positive impacts in the end user's Health and Safety and for this reason the Company develops and provides appropriate products and applications towards the market / §1.5.1, §4.3
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, §4.3
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	§4.5.1, §Marketplace: Our Performance
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	§4.6
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

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+	
Standard Disclosures	<p>100 Profile Disclosure (B+)</p> <p>Report on: 1.1 2.1-2.12 3.1-3.8, 3.16-3.18 4.1-4.4, 4.14-4.17</p>	<p>100 Management Footnote Disclosure (B+)</p> <p>Not required</p>	<p>100 Performance Indicators & Sector Disclosures (B+)</p> <p>Report on a maximum of 19 Performance Indicators, including at least one from each of Economic, Social, and Environmental.</p>	<p>100 Materiality (B+)</p> <p>Report on all material indicators.</p>	<p>100 Management Footnote Disclosure (B+)</p> <p>Report on all material indicators.</p>	<p>100 Profile Disclosure (B+)</p> <p>Same as required for level B.</p>	<p>100 Management Footnote Disclosure (B+)</p> <p>Same as required for level B.</p>
		Report Extent Fully Aligned	Report Extent Fully Aligned	Report Extent Fully Aligned	Report Extent Fully Aligned	Report Extent Fully Aligned	

HALCOR Product Life Cycle Analysis – CO₂ Computation Method

In order to compute the amount of CO₂ released during various phases, the following data and assumptions were used:

- 1) As far as the level of CO₂ emitted in the first phase (i.e. from mining to primary production of copper, from 'cradle to gate') factors 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 CO₂ emissions from merchant ships carrying containers: 15gr CO₂ / tn 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 tn of copper / container
 - Distance from Piraeus to Oinofyta: 70km
 - Bulk copper: Shipment of 22 tn / container, 1 container per truck
 - Average CO₂ emissions by trucks carrying containers: 200 gr CO₂ / tn km (based on International Maritime Organisation data).
- 3) CO₂ emissions data was used for the phase at the HALCOR facilities (smelting and casting of copper and manufacture of final copper products).

9. Independent Assurance Statement

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 2012 ('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

The Provider undertook the following tasks during May 2013:

1. Data checks for the Report's chapters under the title "Human Resources" and "Health & Safety".
2. Visits in the Company's factory for production of copper tubes and the foundry on the 24th of May 2013, 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.

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

On behalf of TÜV AUSTRIA HELLAS,
Athens the 29th of June 2013

Sifakis Nikolaos
Lead Auditor



Kallias Yiannis
General Manager

Information on the Level Check Statement



The Assurance Provider TÜV AUSTRIA HELLAS ('the Provider') has been engaged to provide external assurance on the disclosures published in the Sustainability Report 2012 ('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 inspection of data and information, as well as 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 Level Check

The Provider undertook the following task during May 2013:
 Review of the Report's content against the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines G3.1 and confirmation of the application level (GRI Application Level Check).

Conclusions

The Provider concurs that the criteria for GRI Application Level 'B+' have been met.

Opportunities for Improvement

Based on the observations and concluding remarks derived from the level check engagement, the Provider's recommendation for the improvement of the Company's future Sustainability Reports is as follows:

- ☞ Provision of information for additional GRI G3.1 indicators in order to accomplish Level A.

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

On behalf of TÜV AUSTRIA HELLAS,
 Athens the 29th of May 2013

Sifakis Nikolaos
 Lead Auditor



Kallias Yiannis
 General Manager

11. 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. You are welcome to express any issues or concerns you may have identified when dealing with HALCOR by completing and sending in the questionnaire below, or to actively participate in our efforts to improve our performance and the Company's annual Corporate Responsibility and Sustainable Development Report:

What HALCOR stakeholder group do you belong to?

- | | | |
|---|--|--|
| <input type="checkbox"/> Employee | <input type="checkbox"/> Supplier | <input type="checkbox"/> Public / statutory body |
| <input type="checkbox"/> Shareholder / investor | <input type="checkbox"/> Local Community | <input type="checkbox"/> Mass Media |
| <input type="checkbox"/> Customer | <input type="checkbox"/> Non-governmental organisation | <input type="checkbox"/> Other: |

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

CRITERIA / FEATURES	Excellent	Very good	Satisfactory	Needs Improvement
Coverage of key issues relating to the company's activities	<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 of 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 senior management	<input type="checkbox"/>	<input type="checkbox"/>
Company Profile	<input type="checkbox"/>	<input type="checkbox"/>
Approach to Corporate Social Responsibility	<input type="checkbox"/>	<input type="checkbox"/>
Corporate Governance	<input type="checkbox"/>	<input type="checkbox"/>
Marketplace	<input type="checkbox"/>	<input type="checkbox"/>
Human Resources and Society	<input type="checkbox"/>	<input type="checkbox"/>
Society	<input type="checkbox"/>	<input type="checkbox"/>
Occupational health and safety	<input type="checkbox"/>	<input type="checkbox"/>
Environment	<input type="checkbox"/>	<input type="checkbox"/>
GRI and ISO 26000 indicators table	<input type="checkbox"/>	<input type="checkbox"/>

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.

11. Corporate Responsibility and Sustainable Development Report Feedback Form

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
57th km Athens-Lamia National Road, Oinofyta, Viotia,
Greece GR-32011, email: csr@halcor.vionet.gr
Or fax 0030 22620 48910

All data submitted on this form will be used exclusively for internal assessment by HALCOR's Strategic Planning Division (in relation to Corporate Responsibility issues). Personal data is protected in the manner laid down by the privacy legislation.

Contact details:

- Domestic Sales Department - domestic@halcor.vionet.gr
- Exports Department, Copper Tube Installations - installations@halcor.vionet.gr
- Exports Department, Industrial Copper Tubes - industrial@halcor.vionet.gr
- Marketing Department - marketing@halcor.vionet.gr
- Supply Chain Department - supplychain@halcor.vionet.gr
- Strategic Planning Division (Corporate Responsibility issues) - csr@halcor.vionet.gr
- HR Division - hr@halcor.vionet.gr
- Finance Division - finance@halcor.vionet.gr