

HELLENIC PETROLEUM 2014 CORPORATE RESPONSIBILITY REPORT



HELLENIC
PETROLEUM

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1. OUR APPROACH

“To be a leading regional Energy Group
with sustainable growth
embedded in our strategy”



Since 2006, HELLENIC PETROLEUM Group has published an annual Corporate Responsibility & Sustainability Report, the objective of which is to improve communication and share information with the company's social partners (stakeholders). This year's 10th annual edition presents the Group's business performance, taking into account economic, environmental and social perspectives from 01.01.2014 to 31.12.2014.

Our corporate responsibility approach is aligned with the Group's mission and values (§ 1.6) and articulates how we see our responsibilities in the areas of health and safety, ethical and transparent business practices, environmentally sustainable operations, good working environment and value creation for our shareholders.

METHODOLOGY

This Report was prepared taking into account the G4 Global Reporting Initiative guidelines (including Comprehensive Level independent assurance), the principles of the United Nations Global Compact (including Advanced Level independent assurance) and the GRI's-G4 Oil & Gas Sector Disclosures (including independent assurance).

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

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

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

Additionally, unless otherwise stated, no further limitations, exceptions, reviews or changes exist.

Readers of this Report may also find more comprehensive financial and operational information concerning the Group in the Annual Report 2014 (<http://www.helpe.gr/en/media-center/company-publications/annual-report/>), the Annual Financial Report for Fiscal Year 2014 (<http://www.helpe.gr/en/media-center/company-publications/annual-financial-report-for-fiscal-year/>), as well as on the Group website www.helpe.gr. Also, 2014 Sustainability Report's online version, is presented in the following site: <http://sustainabilityreport.helpe.gr/en/>

REPORT'S BOUNDARIES

The data reported in this Report is consolidated at a Group level, with minor exceptions in certain areas. Specific environmental indicators are presented in detail for each of the Group's business units.

In terms of the selection of the Group's companies that are included in this Report, we took into account (a) the list of companies included in the Group's consolidated financial statement (see Annual Financial Report for Fiscal Year 2014, pages 137, 170-173, (<http://www.helpe.gr/en/media-center/company-publications/annual-financial-report-for-fiscal-year/>) and (b) the relevant materiality assessment complemented with a set of selection criteria (such as participation and control, impacts and risks, sales, number of employees). The result is presented in Table 1.1; consequently the information and data contained in this Report refers only to these 10 companies within the Group.

Table 1.1: Group's companies presented in the Report

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



1.1 Message to our Stakeholders



G. Stergioulis
Chief Executive Officer

Dear Stakeholders,

During this time of continuing economic instability in our country, HELLENIC PETROLEUM Group continues to be active in the context of sustainable development, through central axes that focus both on people and the environment.

In line with our vision, principles and values, we operate in a transparent manner, taking into account the important issues our stakeholders face and furthermore seek to solve them.

Although 2014 was another difficult year, during which we faced significant problems in our business environment, we nevertheless worked together effectively, utilizing our high level of expertise and enhancing openness and innovation in all areas of our activities.

- In the area of safety, we made targeted interventions in the organization and training of our employees, investing over €11 m. in safety issues. Safety is our first and foremost priority and our main concern is to eliminate any failure in the context of with zero recorded accidents.
- Following the full operation of the new Elefsina refinery, improvements in the refinery's emissions were significant and exceeded the estimates envisaged by the approved Environmental Impact Study (EIS). Indicatively, emissions of sulfur dioxide (SO₂) decreased by 80% compared with 70%, while nitrogen oxides (NO_x) emissions decreased by 30% against the 11% envisaged by the EIS.
- Air quality in the region also significantly improved. According to the Air Quality Measurement Stations, zero concentrations of SO₂ were recorded, while NO_x concentrations were 78% lower than the legal limit and 12% lower than EIS initial estimates.

- Positive performance in the processing of liquid and solid waste also continued. Indicatively, the average for the three refineries, regarding the hydrocarbons wastewater index in 2014, is 40% lower than the statutory limit.
- We renewed our commitment at a global level, through the dissemination of the principles of the UN Global Compact (UNGC) and operated, and continue to operate, with the principles of transparency, respect for human rights and equal treatment.
- In the area of retail marketing, we improved the quality of our products and services, raising the number of company owned/company operated service stations from 90 to 139, thus winning the consumers' trust.
- We created added value for all of our employees, by investing in their development and progress. HELPE ACADEMY continued to operate, both in Greece and abroad, through a comprehensive education program, in which 75,000 hours of training took place, involving 2,500 employees.
- In the context of Corporate Social Responsibility, we adopted initiatives that ensure for better living conditions for vulnerable social groups and reward capable university and school students, highlighting their academic excellence. We created employment opportunities within our organization, through the "Young Graduates Employment Program" and continued the "Scholarships program" for postgraduate studies in Greece and abroad.

The methodology followed once again in this year's edition of the Corporate Responsibility Report derives from Directive G4 of the Global Reporting Initiative (GRI) in which a particular emphasis has been placed on identifying the material aspects, which are important both for the Group and our social partners.


















The external verification conducted by a third independent body provides an objective certification that this year's Report meets all the requirements under the GRI-G4 framework ("Comprehensive Option") and satisfies the criteria of the Global Compact Advanced Level.

Although the difficulties and the uncertainty, that continue to exist within the country, force us to adopt a somewhat restrained approach, we can also feel optimistic, having completed a major investment program and created the conditions for optimizing synergies in our operations and further utilizing our highly skilled employees. Through our professionalism, our integrity and ambitious strategy, we hope to create new opportunities for employment, sustainable development and economic prosperity.



G. Stergioulis
Chief Executive Officer

1.2 Performance Summary

<p>GROUP</p>	<p>A Group that is active in 7 countries</p>  <p>(GREECE, CYPRUS, BULGARIA, SERBIA, MONTENEGRO, FYROM, EGYPT)</p>	 <p>€9,478 mil. in turnover</p>	<p>65%</p> <p>3 refineries in Greece (covering 65% of the country's refining capacity)</p>	<p>Holds 30% of domestic retail market with</p> <p>1,716 service stations in Greece and 287 abroad</p>
 <p>15 bulk storage and supply terminals</p>	 <p>23 aircraft refuelling stations and 2 LPG bottling plants</p>	 <p>1 lubricants production and packaging unit</p>	 <p>Participation in the cross-border gas pipelines in SE Europe</p>	<p>Crude oil and petroleum product storage facilities (in Greece) with a capacity of 6.65 mil. m³</p>
<p>EMPLOYEES</p>	 <p>2,595 employees in Greece & a total of 3,335 employees in 7 countries</p>	 <p>75,023 training hours</p>	 <p>20% women in the workforce and 6% women in senior management positions</p>	 <p>130 disabled employees</p>
 <p>Average employee loyalty index of 98%</p>	<p>ENVIRONMENT /SAFETY</p>	 <p>€11.36 mil. investments made in H & S</p>	 <p>€4.34 mil. in environmental investments</p>	 <p>7,059 hours of environmental training & 43,328 hours of training in Health and Safety</p>
<p>SOCIETY</p>	<p>Over 100 CSR initiatives</p>	 <p>€3.4 mil. invested in CSR activities, both in Greece and abroad</p>	 <p>Buying locally stands for 12.3% for the industrial complexes and 97% for the marketing companies</p>	 <p>469 employees live in neighbouring areas</p>

1.3 Materiality Assessment

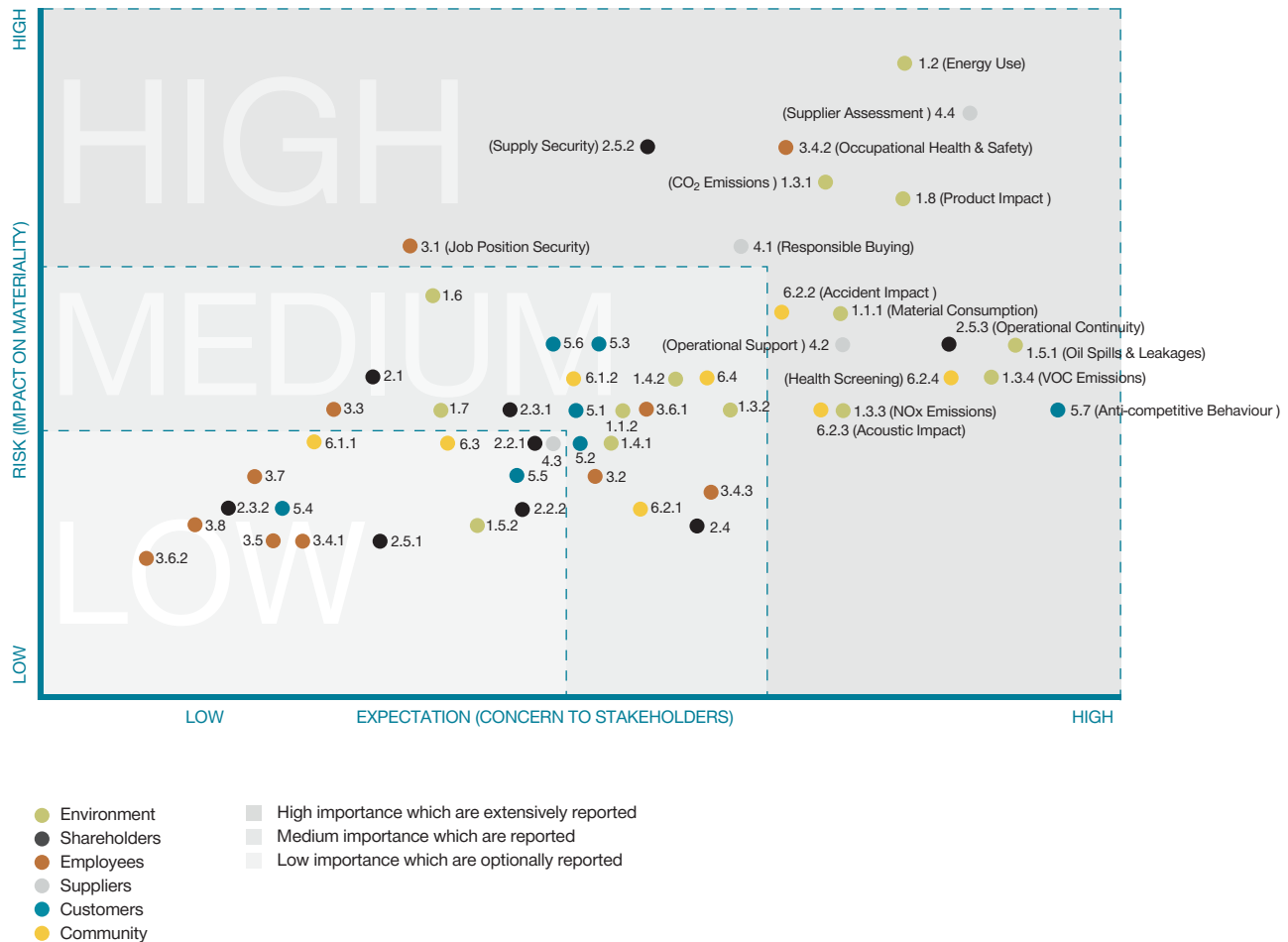
In order to be consistent with our commitment to meeting the needs of all our stakeholders we conducted a corporate responsibility Materiality Assessment in 2013 in order to identify and evaluate the most essential aspects (material aspects) of social responsibility and sustainable development.

The evaluation and prioritization of the material aspects, as presented in Chart 1.2, led us to the decision to directly focus on 18 topics (all with high probability and high risk); while different colors reflect the social partners' groups involved.

For further information concerning Materiality see “Corporate Responsibility Report 2013”, sections 2.3 and 7, at <http://www.helpe.gr/en/corporate-responsibility/sustainability-reports/>.

We intend to review the issues of materiality (material aspects) in 2015.

Chart 1.2: Materiality Matrix



1.4 Stakeholders

Based on our principles and values, strategy, activities, market, neighbouring areas and society, we annually redefine who our social partners (stakeholders) are and how they affect, and in turn are affected by, the Group's business activities.

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

More specifically:

OUR PEOPLE

Our goal is to be a "preferred employer". We want to ensure that we offer an attractive environment to our employees as well as opportunities for them to improve their professional and personal development without discrimination (see sections 2 & 3).

OUR NEIGHBOURS

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

OUR SHAREHOLDERS / INVESTORS

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

OUR PARTNERS / CUSTOMERS

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

OUR ENVIRONMENT

We behave like a responsible corporate-citizen. Through our wide range of activities in S.E. Europe, we contribute towards international efforts aimed at managing "complex globalized challenges" such as climate change, increasing RES and reducing environmental impacts in general (see section 4).

The materiality assessment was an additional tool with which we investigated our stakeholders' opinions and expectations in addition to following conventional modes of continuous two-way communication and dialogue with our stakeholders, as presented in Table 1.3.

Table 1.3: Stakeholder Engagement

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

We strive to exchange information, views and recommendations; share activities and progress against key goals; and work in partnership towards common objectives. Engagement may take the form of one-on-one meetings, expert input forums or roundtable discussions, industry coalitions or formal partnerships.

1.5 Ethics and Transparency

The Group is committed to creating a uniform corporate culture that upholds initiative and responsibility. This in turn, we believe, cultivates ethical, creative and talented employees within an environment based on trust and respect. To this end, relevant policies and practices are adopted.

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

The Group's Code of Conduct was completed, approved and published in 2011. An awareness program, initiated in 2012 and implemented and completed in 2013, ensures for the dissemination of the Code of Conduct at all levels within the Group further ensuring the trust of our stakeholders through transparency in all actions. The Code of Conduct has been translated into the local languages in all the countries that the Group operates in.

HELLENIC PETROLEUM's Internal Labour Code places an emphasis on the Group's operating mode and includes scope, policies, employee development and procedures for compliance with rules and principles governing its employees.

All of our employees have been informed and trained on issues concerning the internal operation of the Group, with particular reference to ethics, corruption, behavior towards colleagues and third parties, etc.

CORPORATE GOVERNANCE

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

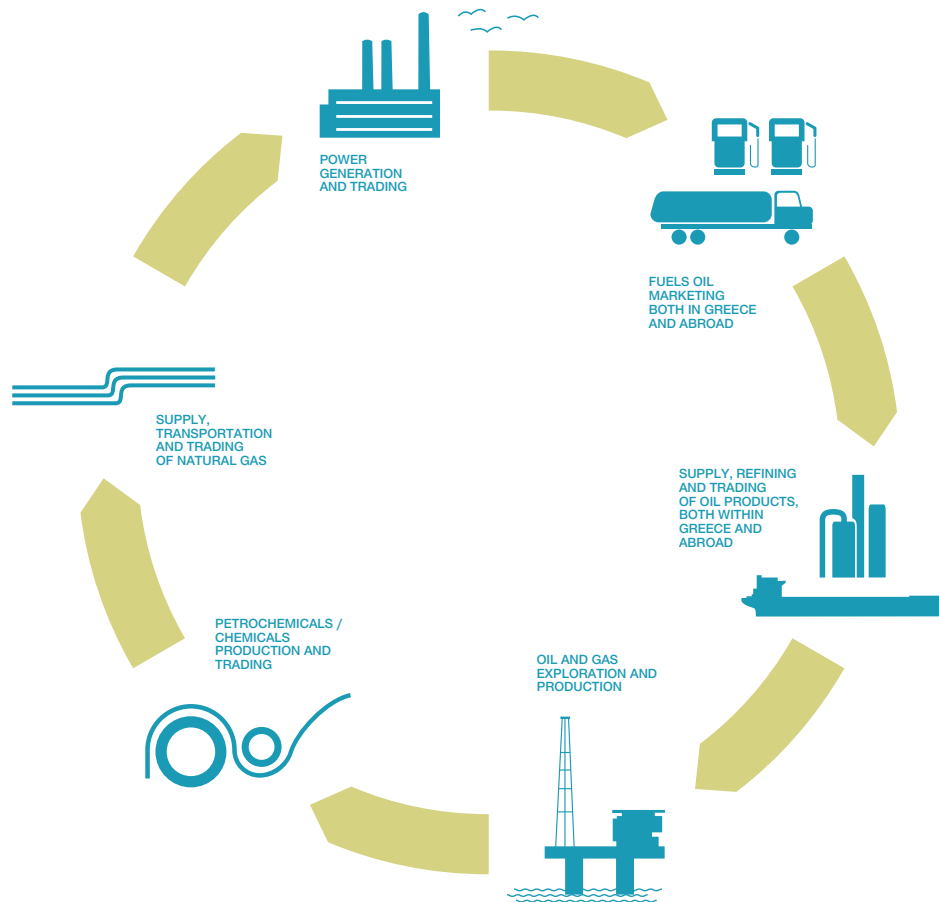
RELEVANT LINKS

For further information regarding the Group's corporate governance structure, including its Board Committees, please see our website: <http://www.helpe.gr/en/investor-relations/corporate-governance/>, or the Annual Financial Report for Fiscal Year 2014, pages 151-161, at (<http://www.helpe.gr/en/media-center/company-publications/annual-financial-report-for-fiscal-year/>).

1.6 Our Business Activities

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

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



Our vision

“TO BE A LEADING REGIONAL ENERGY GROUP WITH SUSTAINABLE GROWTH EMBEDDED IN OUR STRATEGY”.

OUR MISSION

“Energy for Life”

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

Our mission inspires us to optimize our performance for the good of both society and our shareholders.

OUR PRICIPLES

Safety is always our First Priority.

Offering Value to our Customers.

Operating Responsibly towards Society and the Environment.

Respecting our Colleagues and Partners, promoting Meritocracy, Teamwork, Innovation, Continuous Improvement and Results Orientation.

Investing in Sustainable Development.

Continuously enhancing our Competitiveness.

Applying high standards of Corporate Governance.

Creating Value for our Shareholders and focusing on the Continuous Improvement of our Results and Cash Flows.

OUR ATTRIBUTES

- 1) Integrity,
- 2) Professionalism,
- 3) Commitment,
- 4) Sound judgement,
- 5) Initiative,
- 6) Extroversion

1.7 Memberships & Participations in Common Actions

The Group also engages with its stakeholders through its participation in organizations, associations, institutions etc. This involvement enables us to intervene and to contribute to the formulation of proposals that are geared towards a common interest, enhance transparency and facilitate communication.

For a full list of our memberships / participations, please see at [http://sustainabilityreport.helpe.gr/userfiles/6ffd2fe2-e2bc-4741-906d-a48900e96f28/Sustainability%20\[ENG\]_2014_supplement%202.pdf](http://sustainabilityreport.helpe.gr/userfiles/6ffd2fe2-e2bc-4741-906d-a48900e96f28/Sustainability%20[ENG]_2014_supplement%202.pdf)

THE GROUP ALSO:

- Participates in international organizations and Consortia, in cooperation with other European Companies, for the implementation of REACH.
- Participates, since its establishment, in the Emissions Trading Scheme (EU ETS). through the Group's refineries.
- Participates in organizations and committees such as CONCAWE, the HFE's Business Council for Sustainable Development, Environment, the Hellenic Federation of Enterprises (HFE) Health and Safety Committees , the European Petroleum Industry Association (FUELS EUROPE, formerly Europa), the BoD of the Hellenic Association of Chemical Industries, Network for Corporate Social Responsibility.

2. OUR PEOPLE

“The driving force for all the Group’s activities
is our human resources”



Our market leadership depends on our ability to attract, retain and engage the best people, in line with our principles and values.

We strive to provide a safe and motivating work environment where our employees are treated with respect and offered equal opportunities for developing their skills and advancing their career.

We understand that diversity and inclusion are factors that help us improve business results, enhance our reputation and work with talented people.

The relationship with our employees is based on the principle of equal treatment. Both the inclusion and the career path of each employee within the Group, are based on their qualifications, performance and ambitions, without any discrimination.

In 2014, 9% of our senior managers in Greece were female (6% in Greece and abroad overall). We recognize that there is further potential for improvement in placing more women in senior staff level positions.

The 5-year strategy, from 2013 to 2017, was designed and implemented based on our corporate profile. The Group's strategy and implementation plan was drafted following a preplanned “roadmap” with specific goals and implementation phases.

2.1 Working at our Group

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

Our goal is “Excellence” in all fields. With regards to our people, achieving excellence is one of our key strategic priorities and a basic prerequisite for the realization of our objectives for sustainable growth and competitiveness, focusing primarily on developing employees’ skills and know-how.

Table 2.1: **Group’s Employees** *

HELLENIC PETROLEUM SA	1.877
EKO ABEE	271
HELLENIC FUELS SA	201
ASPROFOS	150
DIAXON ABEE	96
OKTA AD SKOPJE	454
JUGOPETROL AD	142
HELLENIC PETROLEUM CYPRUS LTD	53
EKO BULGARIA EAD	56
EKO SERBIA A.D.	35

* Table 2.1 lists companies included in this CSR Report and presents employees with permanent and fixed-term contracts. Additional information, concerning human resources, is provided in Appendix I, indicators G4-10 & G4-LA12.

Chart 2.2: Group's employees breakdown by gender

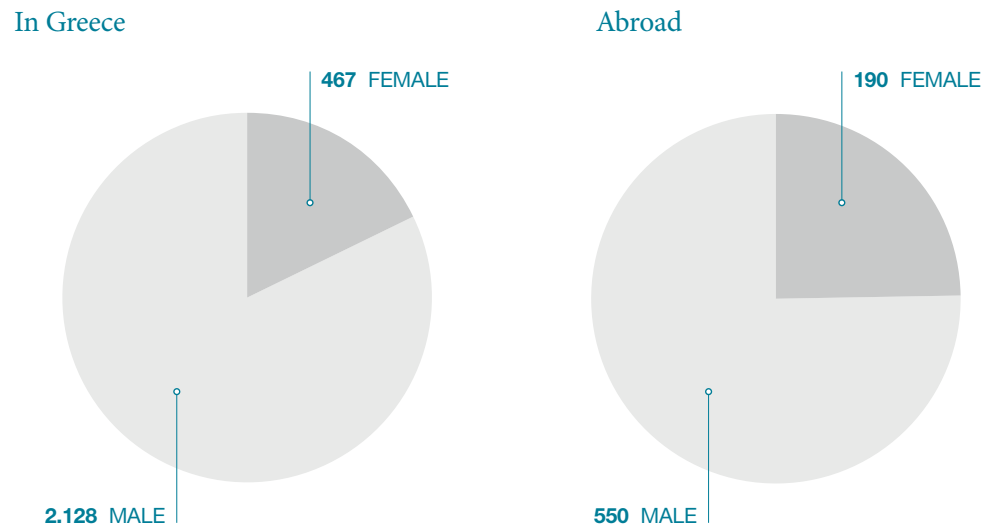
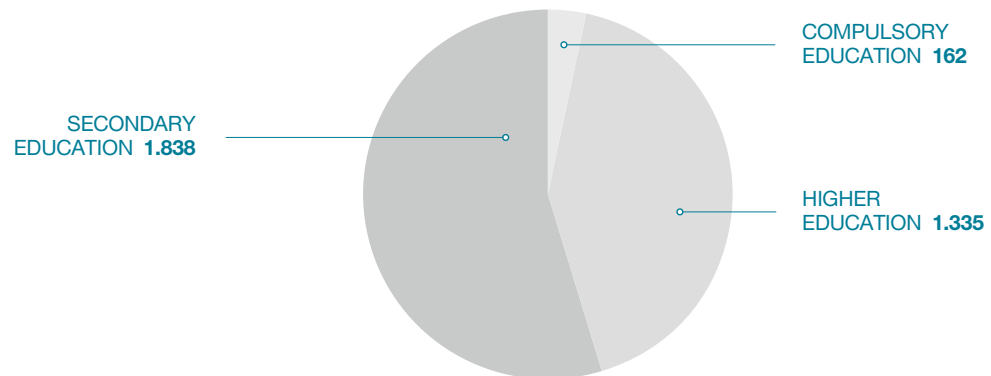


Chart 2.3: Group's employees breakdown by educational level



2.2 Education and Training

Our goal is to support actions in the field of Education and Knowledge Dissemination. Through the continuous training and dissemination of knowledge, we urge each employee to comprehend the Group's strategic objectives, to effectively identify their role in our joint effort and to progress and develop their professional capacity.

At the same time, through training coupled with experience and expertise that are developed within the Group, every employee is given the possibility for further development; to become flexible and adaptable to changes and to the new conditions of the business environment and to contribute to the Group's ongoing success.

PRIORITIES DEFINITION

2014–2015:

- Continuation of the HELPE Academy (a framework for Education and Human Resource Development and Dissemination of Knowledge) designed in 2013
- Enhancing a culture of extroversion and competitiveness

2016–2017:

- Excellent human resources procedures
- Continuous training and development
- Embedding a culture of extroversion, competitiveness and excellence

The Group's total training expenditure for 2014 amounted to €738,520.

As part of its training policy, during 2014, the Group invested €571,838 in enriching its libraries, as well as subscriptions to scientific and professional associations and journals.

Table 2.4: **Training breakdown by gender & company**

	HELPE	EKO	EK	ASPROFOS	DIAXON	OKTA	EKO SERBIA	HP CYPRUS	EKO BULGARIA	JUGO PETROL
Number of women who participated in at least one training course / seminar	141	24	31	45	2	76	16	17	15	21
Number of men who participated in at least one training course/ seminar	1.382	73	82	78	69	341	14	32	13	41

Table 2.5: Training expenditure breakdown

COMPANY	HELPE	EKO	EK	ASPRO-FOS	DIAXON	OKTA	EKO SERBIA	HP CYPRUS	EKO BULGARIA	JUGO PETROL
Expenditure in €	584.249	20.405	17.465	34.744	4.010	21.390	5.692	24.352	19.571	6.643

Table 2.6: Trainees per type of training and company

	HELPE	EKO	EK	ASPRO-FOS	DIAXON	OKTA	EKO SERBIA	HP CYPRUS	EKO BULGARIA	JUGO PETROL
In-house training seminars	1.188	75	99	118	25	0	25	14	0	19
Open seminars	40	10	16	60	45	95	7	50	0	28
Foreign languages	41	6	7	21	1	3	1	0	3	0
Health & Safety	929	18	8	113	41	416	2	25	1	19
Academic education	17	3	0	1	1	1	0	0	0	0
Other type of training / certifications / exams / conferences	37	6	19	27	0	0	1	0	0	0

Table 2.7: Group's Training KPIs

	2013	2014	2015 – 2017 (target)
Percentage of trained employees	75%	75%	At least the same percentage of employee training
Average training hours per trainee	25,7	28,2	Average training hours at the same high levels seen in the last 2 years



2.3 Remuneration & Benefits

At HELLENIC PETROLEUM, we actively recognize the valuable contribution that our people make to the Group's development through a comprehensive compensation and benefits system.

Our compensation programs are designed to recognize and reward employees for their accomplishments and the value that they bring to the Group. The Group is committed to providing competitive pay programs that are designed to help attract, retain and motivate the key talent that we need to succeed in all aspects of our business. We monitor all elements of our total compensation program to ensure that it is competitive with those of other companies and appropriate to the markets in which we compete for talent.

Although employees' benefits may vary by company and country, medical plans, life insurance for total or partial disability, retirement income benefits, crèche allowances, etc. are provided to all employees. All employees' benefits and policies are presented in Appendix I (indicator EC1) and, in 2014, exceeded €18 mil. The average employee retention rate (loyalty indicator) over the same period was 98% (indicator G4-LA1, Appendix I).

Additional insurance (life & health) and pension plans cover 99% and 93% respectively of employees (averages). The current value of pension benefits (defined contribution and benefits plan) is based upon a number of factors which are determined using actuarial methods and assumptions.

The achievement of both the Company's and Employee's objectives is directly linked to the formation of an annual variable remuneration scheme drawn up for the Group's senior level executives.

In particular, the achievement of specific goals in health, safety and environmental protection, as well as HR development goals (which are steadily and continuously included in annual targets), decisively affect the configuration of the variable remuneration of senior level executives.

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

In 2014, all employees (99%-100%) were evaluated according to the standard evaluation system. For further information see indicator G4-LA11, Appendix I.

2.4 Professional & Social Balance (Work-Life Balance)

In ensuring a balance between our employees' professional and social life, we acknowledge the following benefits that promote a holistic professional and personal life relationship:

- Improved cooperation among employees and reduced relations related problems
- Greater employee and customer loyalty
- Reduced sickness absences
- Enhanced reputation in the marketplace
- Higher levels of teamwork and collegiality
- Adoption of innovative organizational structures and synergies.

Today's professionals are not only interested in professionally challenging work and the opportunity to contribute to company goals, but also in finding work environments that are flexible to the needs of their personal lives and interests. In other word, they seek and desire work-life integration.

With this in mind, the Group has developed work-life integration programs that are not only innovative but meet the needs of today's talent and employee pools, while enhancing our reputation as an employer of choice.

In this framework, various indicative corporate policies provide for:

- Flexible working hours for administrative staff (white collars)
- Open door policy between management and employees
- Free provision of light meal for all employees
- A free shuttle service from/to work enabling employees to save on transportation costs and commute time whilst also reducing their carbon footprint

2.5 Labour Environment & Employees Engagement

A positive working environment is not only essential for the advancement of employment relations, but it also provides security and makes employees feel significant and necessary for the achievement of corporate objectives.

BIDIRECTIONAL COMMUNICATION AND COOPERATION

We strive to foster employee engagement in many ways: by promoting a positive work environment, through requiring ethical business practices and by communicating proactively with our employees.

As our employees are our most prominent and valuable ambassadors with the majority of our external stakeholders, we endeavour to communicate important news about the company to employees as quickly as possible and through the most appropriate channels.

Means of communication that we use to this effect are the internal corporate network (intranet), e-mail, departmental announcements, bulletin boards and informative meetings between staff and management.

Employee information feedback is also critical to our success. As is the case with our external stakeholders, we work to understand our employees' concerns, needs and thoughts pertaining to the company's strengths and weaknesses, and incorporate these findings into our strategies, processes and programs so that we can achieve our business goals.

The Employee Suggestion Program (see indicators G4-37 and LA 16, at Appendix I) is a particularly useful and innovative internal communication tool that enables our employees to make anonymous or named queries, submit questions and, in general, promotes a dialogue between all levels of employees with management and/or the Group's appropriate organizational units. When the queries/questions are submitted, the program's administrators ensure and guarantee the confidentiality, speed and process efficiency. All suggestions are then answered in cooperation with the relevant departments and detailed records are kept, for statistical analysis and the monitoring of the suggestion progress.

During 2014, submitted proposals concerned issues that were related to: the promotion of Group subsidiaries, technical and administrative services, internal network (intranet), human resources, IT and internet and participation/ teamwork.

All of the proposals were examined in depth, of which 10% have already been implemented while 20% will be undertaken as future Group actions. The decision and the implementation time of the proposals is linked to criteria such as usefulness and added value, materiality in relation to operational priorities, compatibility with the Group's strategy, the possibility of these proposals being part of the approved budget and, of course, implementation feasibility. In any case, interested parties have factual information.

EMPLOYEE SURVEYS

As part of our mission to maintain a satisfying and productive work environment, we routinely survey our employees to learn more about their perspectives on the business and on how we respond to the needs of our workforce.

The Group participated, for the 2nd time, in the **Best Workplaces 2015** survey, in which all permanent and fixed contract employees from HELPE, EKO and HF participated. The overall participation rate reached 60%, an increase of almost 50% compared to the corresponding participation rate in 2013. Analytical findings from the Great Place to Work Institute are expected in 2015, after which decisions on launching actions – measures for further improvement will be taken.

EMPLOYEE RECOGNITION

For the third consecutive year, the Group rewarded its employees for their excellent performance based on the Group's Principles. Our employees, who with their expertise, efficiency and consistency, achieve their goals and in many cases surpass them, are honored for their achievements by the Group's Management annually. Overall, in 2014, 128 employees and team representatives (from Greece and abroad) were awarded for their outstanding performance at either at an individual or team level.

COMPLIANCE OFFICE

In addition to the employee surveys, our "Compliance Office" provides an avenue for employees to confidentially submit their concerns, regarding transparency and corruption issues. The office also plans for any relevant actions.

2.6 Equal Opportunities Policy

The continuous provision of education and training (lifelong learning), the securing of jobs, performance evaluation, incentives, an equal opportunities policy and health and safety, are all key aspects of our commitment to our employees. The Group, on 31.12.2014, employed 130 persons with disabilities as permanent staff.

In the context of strengthening the Group's culture and homogenizing its human resources management framework, uniform policies and practices have been gradually adopted that are applicable to the Group's employees. Through the use of up to date approaches, and on the basis of qualifications and competences, employees have the opportunity to both grow and advance through the administrative hierarchy due to the fact that consistently filling vacancies through rotating or promoting employees within the Group, is a key objective.

2.7 Human Rights and Labour Relations

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

HELLENIC PETROLEUM's employees possess the right to be involved in trade unions and professional associations, without any limitations. Currently, there are ten employee unions with an average 87% participation rate (indicator G4-11, Appendix I, analytically presents the employees' unions operating within the Group's companies as well as employees' participation rates).

HELLENIC PETROLEUM's representative union signs a collective bargaining agreement which defines the terms for employees' (with permanent contracts) remuneration. Corresponding collective agreements are also in place with regard to EKO's & DIAXON's employees. On average, 92% of employees are covered by collective bargaining agreements.

3. HEALTH AND SAFETY

“Our main concern is the health
and safety of our people”



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

More information on the organization and operation of Occupational Health & Safety may be found at <http://www.helpe.gr/en/health-and-safety/health-and-safety/>

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

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

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

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

OCCUPATIONAL RISK MANAGEMENT

The Group applies a precautionary approach in the field of occupational risk management so that potential health and safety risks can be anticipated and as a result, controlled. Specifically, any such potential risks are identified and consequently controlled according to criteria as set forth in Greek legislation (Law 3850/2010) as well as European and international codes and good practices. Written occupational risk assessment studies feature in all of the Group's facilities and include measures that need to be taken to eliminate or control hazards - thereby keeping them at low and acceptable levels.

The studies themselves are developed (taking employees' opinions and viewpoints into account) through employees filling out questionnaires concerning the nature of their work as well as the environment that they work in and are revised whenever working or environmental changes take place (in the event that no changes arise, every five years at the most). These revisions are communicated to all staff so that each and every employee is aware of the risks that he/she may face as well as the required actions that need to be taken in order to eliminate or minimize them.

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

3.1 Occupational Health

Ensuring employees' health is an integral part of the company's culture. Scheduled medical tests, in connection with the job type, age group and gender, are implemented. Laboratory tests include biochemical blood and urine tests as well as x-rays, eye tests, spirometric testing, hearing and cardiological tests.

Employees' health monitoring is supplemented with additional tests from the occupational physicians. Finally, statistical evaluations of clinical and laboratory tests take place annually in order to draw conclusions on the need for additional measures to improve working conditions and health protection.

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

More information on occupational health may be found at: <http://www.helpe.gr/en/health-and-safety/health-and-safety/>

3.2 Occupational Safety

SAFETY INVESTMENTS

In 2014, more than €10 mil. was invested in safety improvements in the industrial facilities. These fixed investments do not include the supply of personal protective equipment, the supply and maintenance of instruments and safety equipment, the supply of fire fighting materials and other consumables.

The amount of investments in safety implemented in 2014 as well as the approved investment program for the period 2015-2019 are shown in Tables 3.1 and 3.2.

Table 3.1: Group's 2014 safety investments per facility

FACILITY	INVESTMENT (IN M. €)
BEA, BEE, BEΘ	9.87
EKO & HF	1.39
DIAXON	0.1

Table 3.2: Group's approved safety investment program per facility (2015–2019)

FACILITY	INVESTMENT (IN M. €)
BEA, BEE, BEΘ	16.27
EKO & HF	7.59
DIAXON	0.04

GROUP'S DISTINCTIONS IN SAFETY

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

In this regard, the following safety goals were achieved in 2014:

- 1,500,000 hours without lost workday injuries, at the Thessaloniki industrial facility
- 1,000,000 hours without lost workday injuries at the Group's headquarters
- 500,000 hours without lost workday injuries at DIAXON

Furthermore, three gold awards were awarded to the Group for excellence in the fields of education, reward and overall safety efficiency.

3.3 Health & Safety Indices – Installations Performance

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

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

In addition, HELLENIC PETROLEUM participates in the European Organization CONCAWE's annually conducted survey and benchmarking for accidents, through which the Group keeps abreast of international developments in the establishment of additional indicators to measure safety performance.

Over a total of 7,900,000 man hours worked, 22 lost workday injuries occurred during the course of 2014 concerning personnel and contractors either employed in the Group's refineries/ chemical plants or by the EKO/ HF marketing companies

Table 3.3: Number of Incidents based on CONCAWE's guidelines

FACILITY	HELP (BEA, BEE, BEØ)	HQs	EKO & HF	DIAXON	ASPRO- FOS	HP CYPRUS	OKTA	EKO SERBIA	EKO BULGA- RIA	JUGO PETROL
Lost Workday Injuries (LWIs) (Male/Female)	19(18/1)	1(0/1)	2 (1/1)	0	0	0	5 (5/0)	0	0	0
Lost Workday Injuries (employees / contractors)	17/2	1(0/1)	2/0	0	0	0	5 (own staff)	—	0	0
Fatalities (Male/Female)	0	0	0	0	0	0	0	0	0	0
Medical Treatment Cases MTC ¹ (Male/Female)	5(5/0)	0	1(0/1)	0	0	0	0	0	0	0
Restricted Workday Injuries (RWD) (Male/Female)	1 (1/0)	0	0	0	0	0	0	0	0	0
LWIF (Male/Female)	3,45*	2,44 (0/2,44)	1,01 (0,5/0,5)	0	0	0	5,8 (7/0)	0	0	0
LWIS (Male/Female)	26,5*	5(0/5)	9 (15/3)	0	0	0	25,8 (25,8/0)	0	0	0
AIF (All Injury Frequency) (Male/Female)	4,5*	2,44 (0/2,44)	1,51 (0,5/1,01)	0	0	0	5,8 (7/0)	0	0	0
Occupational diseases rate (/ 10 ⁶ hours)	0	0	0	0	0	0	0	0	0	0
% Absenteeism ² (Male/Female)	*		—	1,9 (1,4/4,9)	—	—	(6,5/7,7)	0,5 (0/0,5)	—	—

1. Cases concerning first aid are not included.
2. Absences due to every type of incapacity are included (illness, accident, etc).

* These indices are analytically presented in Appendix I, indicator G4-LA6



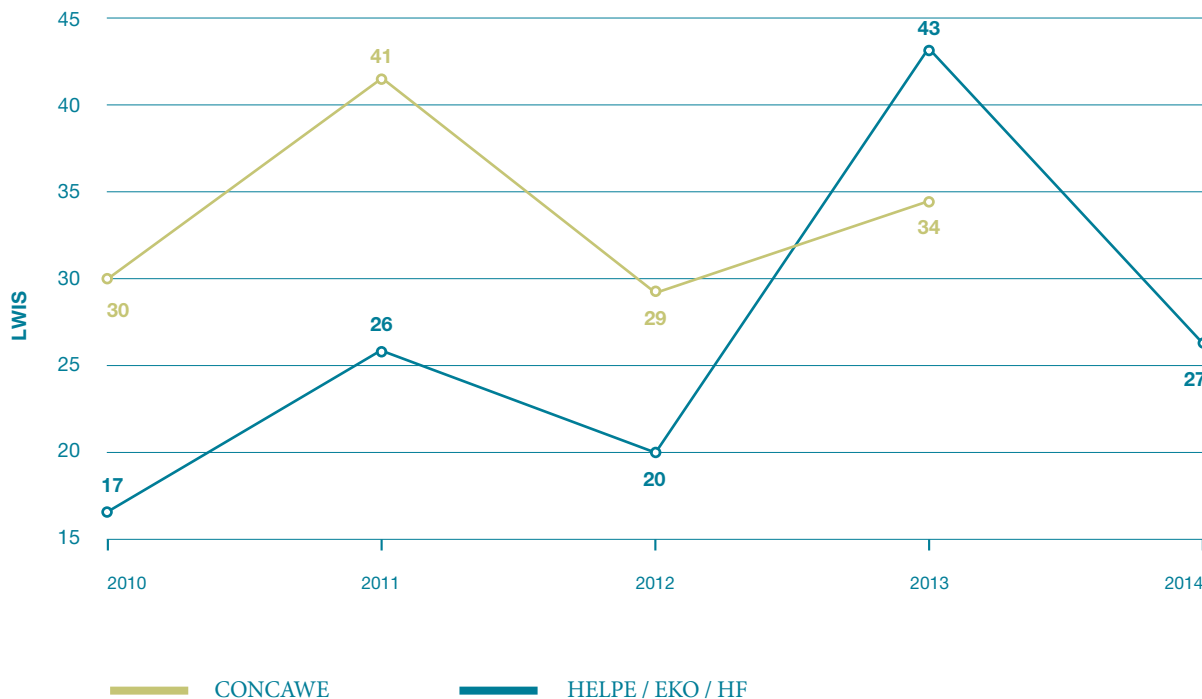
Chart 3.4: AIF index



Chart 3.5: LWIF index



Chart 3.6: LWIS index



Charts 3.4 – 3.6 present the evolution of the most significant incident indicators in the Group’s facilities, compared with the corresponding CONCAWE indices.

54% of lost workday accidents concerning permanent employees were due to slips, trips and falls on the same level.

The reduction of safety indicators in 2014, compared to 2013, was quite evident and developed as follows: LWIF by 22%, AIF by 19.5%, LWIS by 38% and PSER by 48%.

The European statistics for 2014, as is the norm, will not be issued till September of the next year, and as a result were not available at the time this report was released.

In the context of the European refineries’ joint efforts to introduce specific indicators concerning safety processes, HELLENIC PETROLEUM was one of the first companies (globally) to adopt and monitor the new process safety performance indicators, in accordance with CONCAWE’s instructions and in line with API RP 754, 2010 (Recommended Practice 754 “Process Safety Performance Indicators for the Refining and Petrochemical Industries”). The relevant data for 2014 is presented in Table 3.7.

Table 3.7: Process Safety Incidents based on CONCAWE's definitions

FACILITY	HELPE (BEA, BEE, BE@)	EKO & HF	OKTA
Process Safety Event (PSE)	6	0	1
Total PSER index	0.76	0	1.15

Chart 3.8 presents the total Process Safety Event Rate (PSER) trend which depicts all process safety incidents per one million man-hours, compared with CONCAWE's corresponding index. From the chart it is evident that the Group's rate is close to the European average..

To reduce these indicators, all of the Group's facilities strive to achieve an annual target of Process Safety Events minimization; with zeroing as the ultimate goal.

Chart 3.8: Process Safety Incident Frequency, PSER





3.4 Safety Audits

Scheduled safety inspections performed by internal and independent external auditors are conducted at many levels. Depending on the findings that surface, actions for further safety improvement are planned and implemented.

Periodic audits are carried out by:

- The GHSESD in order to spread experience, knowhow and the implementation of good safety practices amongst the Group's refineries and subsidiaries.
- In 2014 particular emphasis was given to the inspection of pending findings from previous audits across LPG storage and trading facilities at the Group's subsidiaries, in Greece and abroad. New safety audits targeted as always in process safety took place at the Group's refineries and subsidiaries, in Greece and abroad. Unscheduled safety audits were also carried out at CALYPSO service stations in preparation for the "Together with the Customer" program.
- Management and engineers from different units within the industrial facilities with the direct objective of identifying and correcting unsafe behaviors, indirectly involving staff executives with regards to improving safety (one safety visit takes place, per week, at each production unit).
- The Departments for Health, Safety and Environment at each facility.
- Special committees at the facilities.
- Independent, internationally recognized and experienced inspectors (third party auditors), at the company's invitation; or experts from companies that provide insurance coverage to the Group's industrial installations.
- The relevant authorities for major accident prevention (SEVESO inspections).

3.5 Training

A common procedure pertaining to basic health and safety training is implemented across all of the Group's facilities so that a uniform safety culture can be applied in all of the industrial complexes.

The training of the Group's personnel is multifaceted and includes the following topics:

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

2014 was yet another year of strengthening education, in amongst other areas, in the area of safety with the objective of continuously developing the skills and expertise of the Group's employees which is a key prerequisite for sustainable growth and competitiveness.

Employees' training needs are evaluated by their immediate supervisor in the context of their annual performance evaluation after which the implementation of actions to meet the needs identified is planned.

Asides from employees, training is also provided to contractors, clients, truck drivers, service station owners and students. Visitors to the facilities are informed on the facilities' safety instructions through printed material.

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

Table 3.9: Health & Safety Training man-hours per facility & gender

	BEA-BEE-BEΘ	EKO & HF	OKTA	DIAXON	HP CYPRUS	EKO's subsidiaries
No. of employees (Male/Female)	1,717 (1,545/172)	345 (241/104)	484 (389/95)	96 (81/15)	N.A.	N.A.
No. of trained employees (Male/Female)	1,479 (1,329/150)	141 (122/19)	515 (443/72)	41 (40/1)	109 (81/28)	278 (221/57)
Training manhours (Male/Female)	20,552 (19,290/1,262)	1,499 (1,399/100)	1,480 (1,300/180)	157 (152/5)	745 (658/87)	1,160 (826/334)
No. of trained contractors & others (Male/Female)	3,661 (3,266/395)	150 (146/4)	309 (298/11)	34 (34/0)	182 (167/15)	235 (159/76)
Training manhours for contractors & others (Male/Female)	13,371 (12,595/776)	2,013 (1,993/20)	225 (216/9)	58 (58/0)	1,529 (1,325/204)	539 (352/187)

EMERGENCY DRILLS

Coordinated Fire Drills, in collaboration with the Fire Department and relevant authorities, were successfully conducted at all of the Group's industrial complexes, in specific extreme scenarios.

Indicative scenarios included:

- Tackling a fire incident on the roof ring of a petrol tank and rescue at the Thessaloniki Refinery
- Remediation of extensive leakage during the unloading of an LPG tanker at the Elefsina port facilities
- Evacuation drills in buildings and facilities in an emergency

4. ENVIRONMENT

“Environmental protection as a fundamental pillar of sustainable development is viewed by the Group as an ongoing priority and commitment”



4.1 Strategy

The Group's environmental strategy focuses on the prevention and minimization of impacts on the environment through the implementation of adequate measures, practices and technologies throughout the product life cycle. These are implemented from the design of the production scheme and the potential implementation of abatement technology, until the end use.

By constantly improving the production process, and our environmental footprint, we consistently strive to achieve:

- increased efficiency in the use of natural resources – energy
- reduction in air emissions, effluents and waste.

The systematic monitoring of technological developments, environmental legislation and our active participation in the relevant information and consultation processes, contribute significantly to the realization of the Group's strategy to pursue sustainable development; along with targeted environmental investments and extensive environmental education programs. All of the above have resulted in the achievement of remarkable performance in areas such as reduction of air emissions, water and waste management, energy efficiency and reduction of carbon footprint.

The completion, in previous years, of the two major modernization - upgrading projects at the Elefsina and Thessaloniki refineries, amounting to €1.7 billion, resulting in a significant improvement of the refineries' environmental footprint and the air quality in neighbouring areas, constitutes the most favorable condition and starting point to harmonize with the new emission levels recently decided at a European level concerning refineries.

4.2 Environmental Goals

The Group's main objective continues to be the continual improvement of environmental performance in areas such as the reduction of the environmental impact throughout the product life cycle and the rational management of natural resources in the production process; as well as their contribution to addressing climate change by improving energy efficiency.

Upon completion of the significant investment to upgrade and modernize the Elefsina refinery, in 2013, (preceded by that of the Thessaloniki refinery, in 2011) the HELLENIC PETROLEUM Group set the year 2014 as the base-year for environmental performance improvement

The long-term environmental targets, in key priority areas for the Group and refineries (as main production activity), are as follows:

- Reduction of tn CO₂ emissions/ tn crude oil index by at least 5% through the next 5 years (refineries)
- Reduction of Carbon Footprint by at least 250,000 tn CO₂ investing in renewable energy (at least 100MW self-produced electricity) through the next 10 years

4.3 Environmental Management

HELLENIC PETROLEUM rigorously implements its environmental policy, a policy that commits our employees and is embedded in every operational activity.

The vision, environmental policy, environmental objectives for each activity, the monitoring of all environmental parameters through European indicators, the benchmarking with the performance of the oil industry sector in Europe, continuously providing environmental education to personnel and stakeholders and the implementation and certification of environmental management systems across the wide spectrum of Group's activities, are all key to the organization and management of environmental issues.

HELLENIC PETROLEUM regularly assesses compliance with the relevant environmental management procedures, at every facility, either through internal audits conducted by qualified and experienced personnel or through inspections made by independent external accredited certification bodies. The Group also monitors the development of environmental key performance indicators (KPIs) which are included in the Group's regular reports and the staff performance evaluation criteria.

Furthermore, the Group, with the objective of continuous updating on the best environmental practices and the development of corporate culture, on environmental protection and management, constantly implements a number of activities concerning ongoing environmental education and awareness for its employees, customers, suppliers, subcontractors, public and local authorities, etc.

Indicatively, in 2014, 86% of our employees at the Group's refineries were trained on environmental issues amounting to 5,163 man-hours. In detail, the training is presented in Table 4.1.

Table 4.1: Environmental training in 2014

	BEA	BEE	BEØ	SUBSIDIARIES
No. of employees	720	470	527	1,361
No. of trained employees	532	470	477	613
Employees' training man-hours	2,431	232	2,500	663
No. of third parties' trained people	129	1,997	765	414
Third parties' training man-hours	129	333	383	388

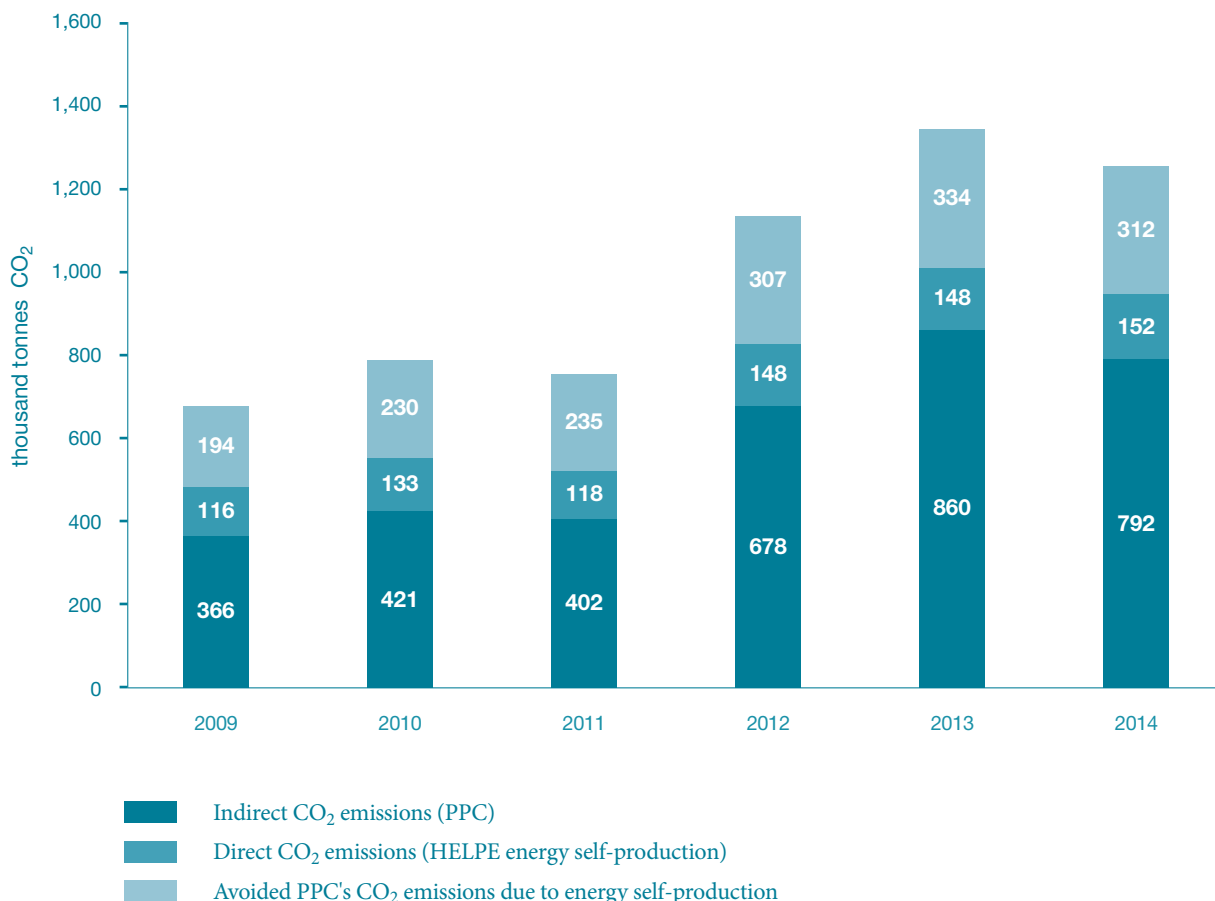
4.4 Climate Change & Energy Efficiency

The policies on energy and climate change constitute significant challenges for the Group, particularly for oil refining, as one of the main productive activity sectors. With the continued increase in energy demand, the refining sector has a vital role in ensuring energy supply. At the same time, greenhouse gas emissions need to be reduced accordingly, in all sectors of the economy, so as to effectively tackle climate change. Moreover, Greece as a country with a large coastal front needs to gradually begin strategic planning for adaptation and tackling the impacts from climate change.

The Group positively contributes to initiatives combating climate change and to the reduction of greenhouse gas emissions through increasing its energy efficiency in production processes and investing in renewable energy sources.

CHP units, for combined heat and power generation, operate at all of the Group’s refineries. These units contribute to the avoidance of significant CO₂ emissions (Chart 4.2), which would be emitted if the self-produced electricity was generated from a provider (such as PPC), using a different fuel mix.

Chart 4.2: Contribution of self-produced electricity at the Group’s domestic refineries and CO₂ emissions avoided due to the self-produced electricity, in line with those of the total consumption



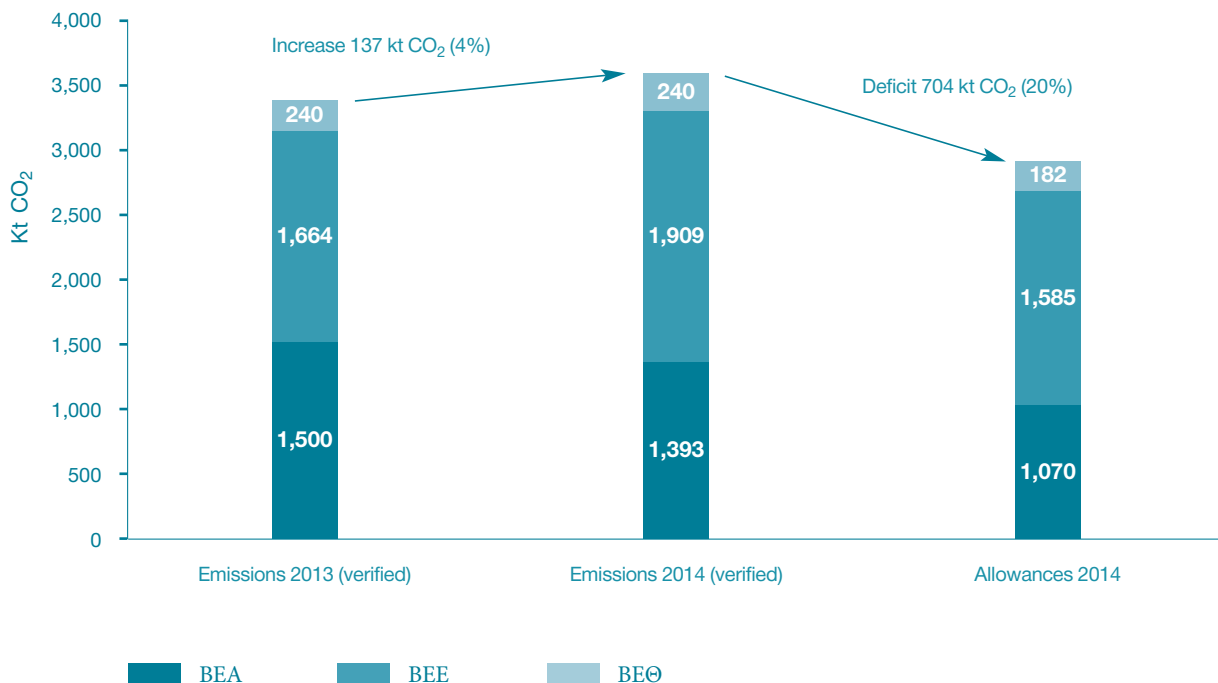
When it comes to the monitoring and reporting of emissions, HELLENIC PETROLEUM Group systematically monitors direct CO₂ emissions (Scope 1) as well as indirect emissions (Scope 2 and 3) to the maximum extent of its activities. Indicatively, the estimated CO₂ emissions from the sea transport of raw materials and products and the estimation of the carbon footprint (carbon footprint project) of all activities in the Group's office buildings (headquarters and Aspropyrgos, Elefsina and Thessaloniki refineries – MyClimate Certification) is reported.

The Group's refineries have participated, since its formation, in the EU's Emissions Trading System (EU ETS), while as of 2013 follow all procedures for monitoring, calculation and verification of emissions according to the regulations of the third phase of the EU ETS 2013 – 2020. It is underlined that, during the EU ETS 3rd Phase, the compliance costs have increased significantly, due to the smaller number of allowances in relation to the actual emissions.

It is noted that the future of the EU ETS will directly depend on its planned structural reform, as well as on overall EU policies concerning energy and climate. The Group closely monitors these developments and participates in the pertinent consultation process, so as to protect the competitiveness of European refining.

Chart 4.3 presents the verified CO₂ emissions of the three refineries, for 2013 – 2014, as well as the allowances for 2014.

Chart 4.3: 2013 – 2014 verified CO₂ emissions of the Group's refineries





BIOFUELS

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

Biofuels are the only direct substitute for fossil fuels currently available on a large scale for transport fuels. Their use contributes to more environmentally friendly transport, without any further need for major modifications required in vehicles and distribution networks. Biodiesel, as a fuel that possesses properties similar to those of diesel, can be used in most conventional diesel vehicles.

Table 4.4: Biodiesel received and used as a conventional diesel additive

YEAR	BIODIESEL (m ³)	% V/V IN DIESEL
2006	46,580	2.01
2007	79,010	3.65
2008	62,788	3.04
2009	68,961	3.84
2010	108,063	6.39
2011	78,623	6.37
2012	100,993	6.49
2013	101,269	6.73
2014	112,891	7.00

RENEWABLE ENERGY SOURCES

HELPE Renewables 100% owned by HELPE is the company developing the RES portfolio of HELPE. A total of 1.4 MW of photovoltaic (P/V) stations installed on HELPE Group property and a 7 MW Wind park at Pylos, Messinia, are already in operation.

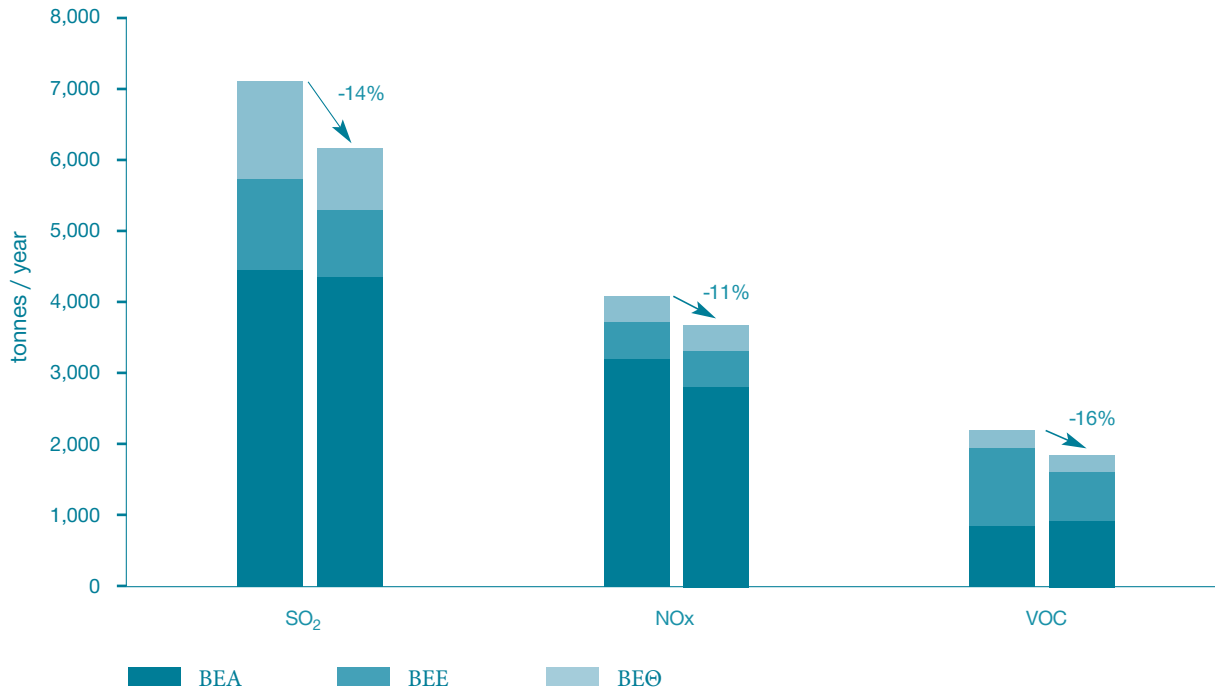
In addition, three photovoltaic projects are at various development stages, with a total installed power of 11 MW and five 25 MW biomass projects using agricultural residues as source of energy are under development.

Moreover, in cooperation with LARCO, a portfolio of 148 MW of photovoltaic, wind and hybrid projects is also under development.

4.5 Air Emissions & Waste

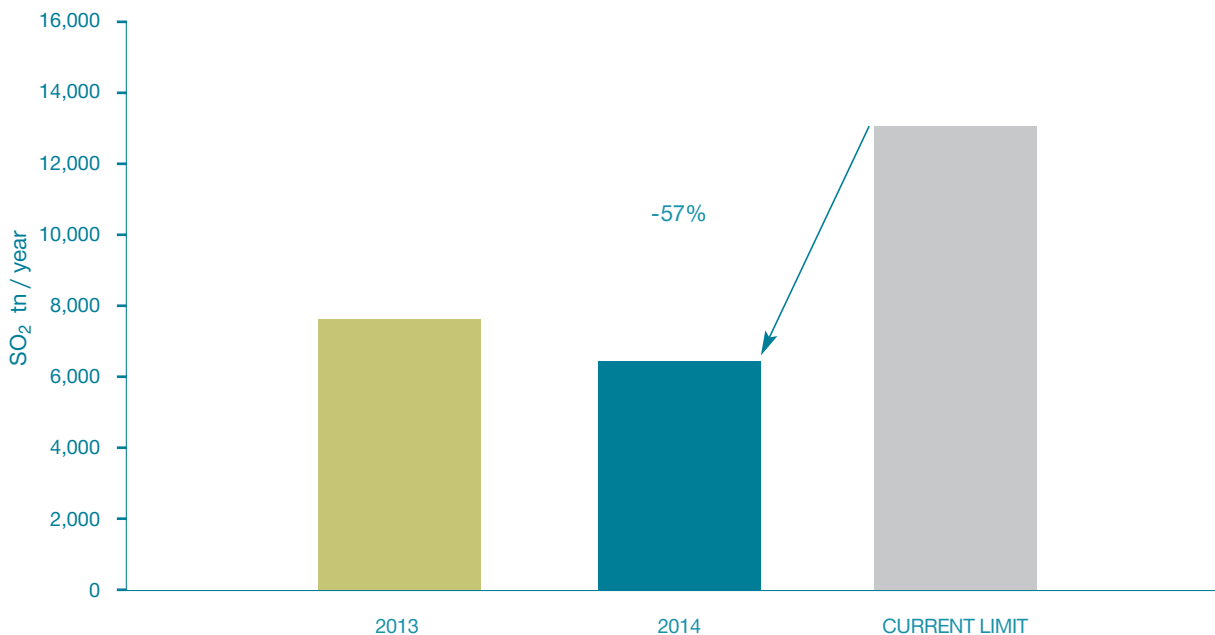
HELLENIC PETROLEUM aims at reducing both air emissions and waste generated, through specific actions; such as maximizing the use of gas fuels, the use of cleaner fuels and the implementation of advanced technologies in the production process. In 2014, at the three Group's refineries, the most significant air emissions for the oil sector were reduced by up to 16%. These figures are presented in detail in Chart 4.5, for emissions of sulfur dioxide (SO₂), Nitrogen Oxides (NO_x) and volatile organic compounds (VOC).

Chart 4.5: SO₂, NO_x and VOC emissions



Indicatively, SO₂ emissions remained much lower (-57%) than the environmental operating conditions' current limit (in tn/year). Note that the above mentioned limit concerning on sulfur compounds emissions decreased in 2013 by 30% compared to the limit in force until 2012.

Chart 4.6: 2013–2014 SO₂ emissions compared to current limit



As part of the broadening of clean fuel options, the Aspropyrgos refinery is already connected (2014) to the Greek gas network; the Elefsina refinery is in the process of being connected to the gas network.

With the full operation of the new Elefsina refinery, in 2014, the improvement at the refinery's emissions was significant and exceeded the estimates of the approved Environmental Impact Study (EIS). Indicatively, emissions of sulfur dioxide (SO₂) decreased by >80%, against 70%, while nitrogen oxides (NOx) emissions decreased by >30%, against the 11% estimated in the Environmental Impact Study. In addition, the air quality in the region significantly improved, according to the measurements recorded at the environmental station and the municipal station, where zero concentrations of SO₂ were recorded and NOx concentrations of 78% below the relevant limit and 12% lower than the initial NTUA's study estimated for the project were recorded.

WASTE MANAGEMENT

With regard to the management of wastewater and solid waste, primary objectives include the prevention and minimization of production, the recycling as possible; and in situ management and treatment in the best possible way for both the environment and human health.

HELLENIC PETROLEUM has invested in modern waste treatment facilities, such as the 3-stage wastewater treatment units and the oily sludge treatment unit, using biodegradation technique, in the Thessaloniki industrial complex. The latter, in 2014, increased its efficiency significantly, by introducing the addition of specific bio-enhancing microorganisms in the process (bioaugmentation).

Chart 4.7: Wastewater per Group's facility, 2013 vs 2014

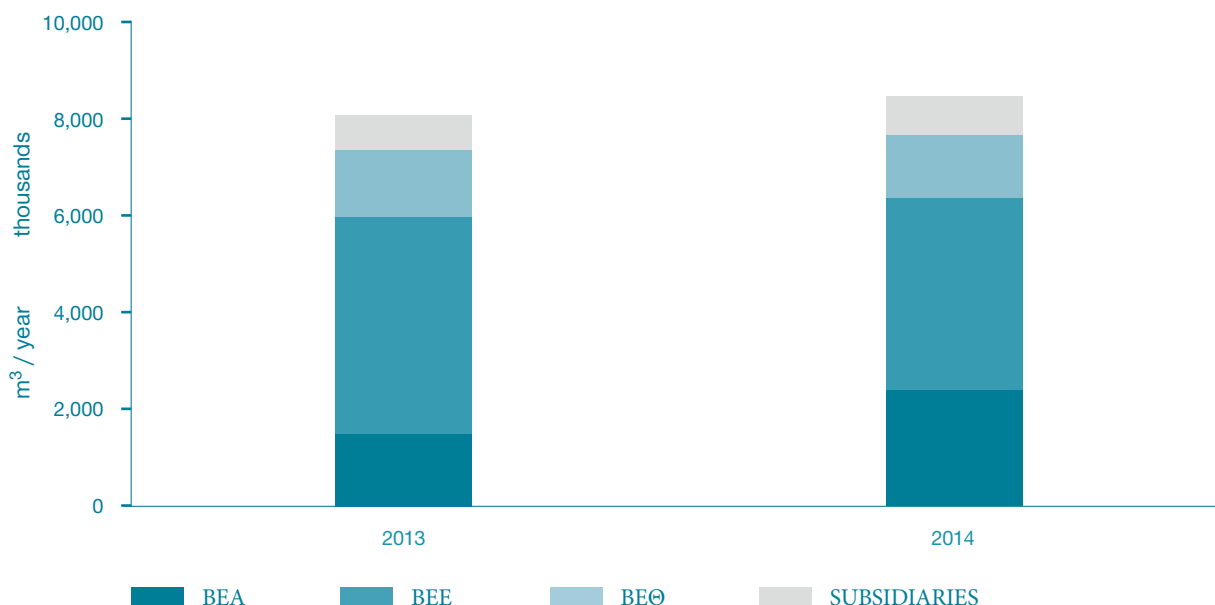
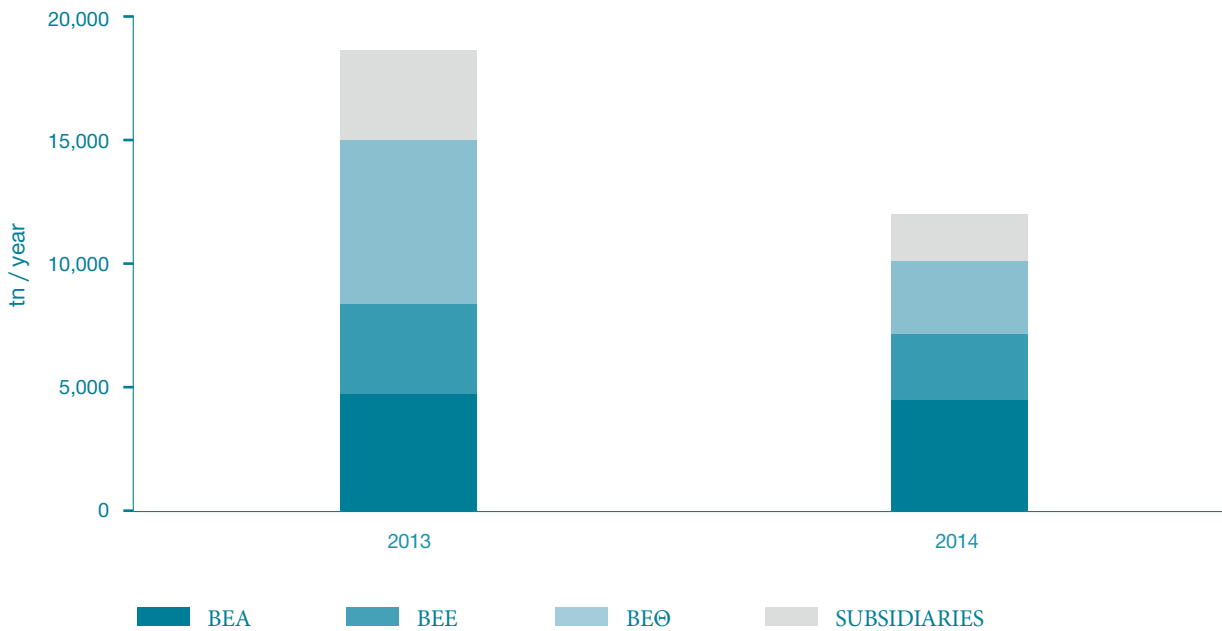


Chart 4.8: Solid waste per Group's facility, 2013 vs 2014



Charts 4.7 and 4.8 present the comparison of the amounts of wastewater and solid waste, respectively. Noticeable is the 36% reduction in solid waste while wastewater showed a slight increase of around 5%, mainly due to the full operation of the Elefsina refinery.

Chart 4.9: Group's waste breakdown by disposal method

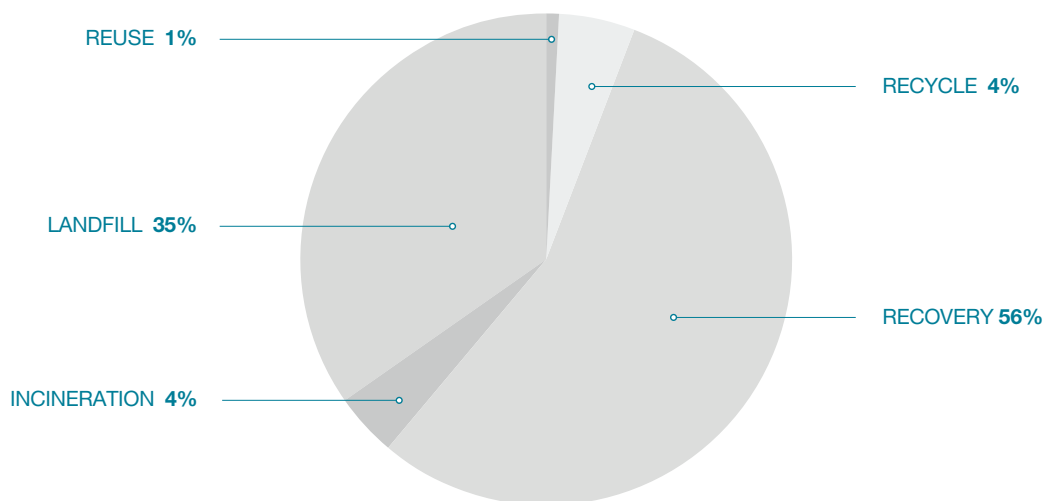
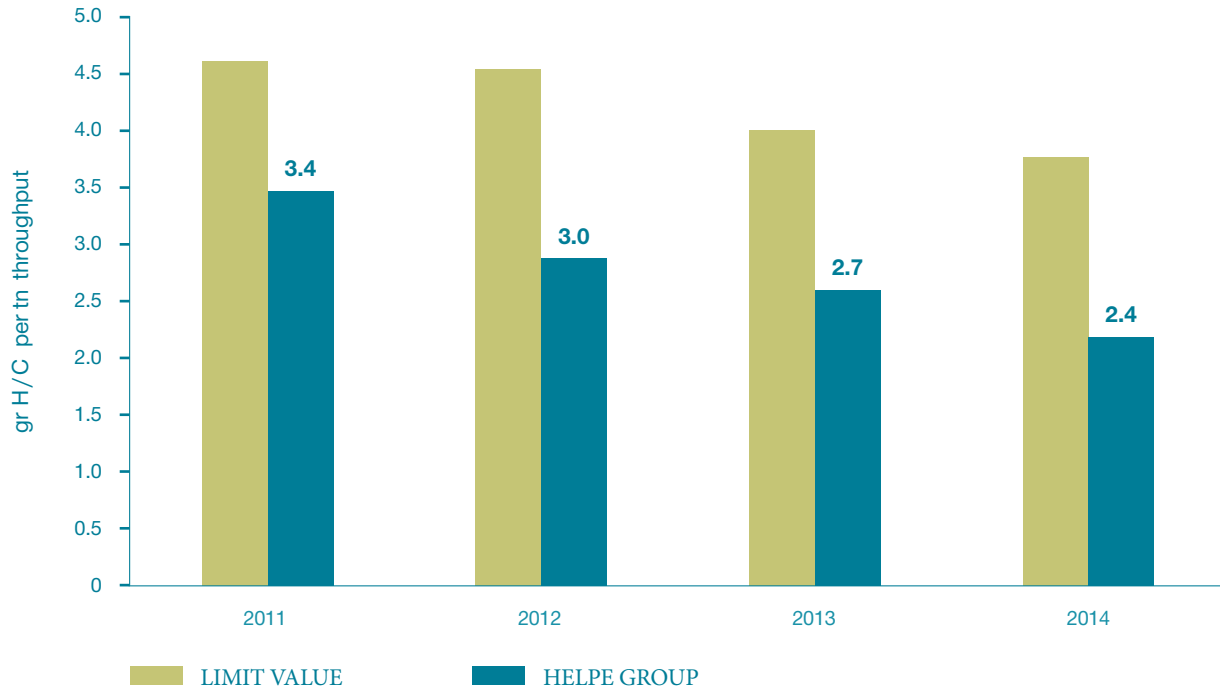


Chart 4.9 presents a detailed overview of the methods of disposal of solid waste. Over 60% of total waste was recycled, exploited through raw materials recovery processes and reused.

Moreover, improved performance in terms of the quality of treated effluents continues, in 2014, when the average index for hydrocarbons for the three Group refineries is calculated 40% lower than the statutory limit. Chart 4.10 presents the reduction trend (30%) over the last 4 years.

Chart 4.10: Group's effluents hydrocarbons index, 2011–2014



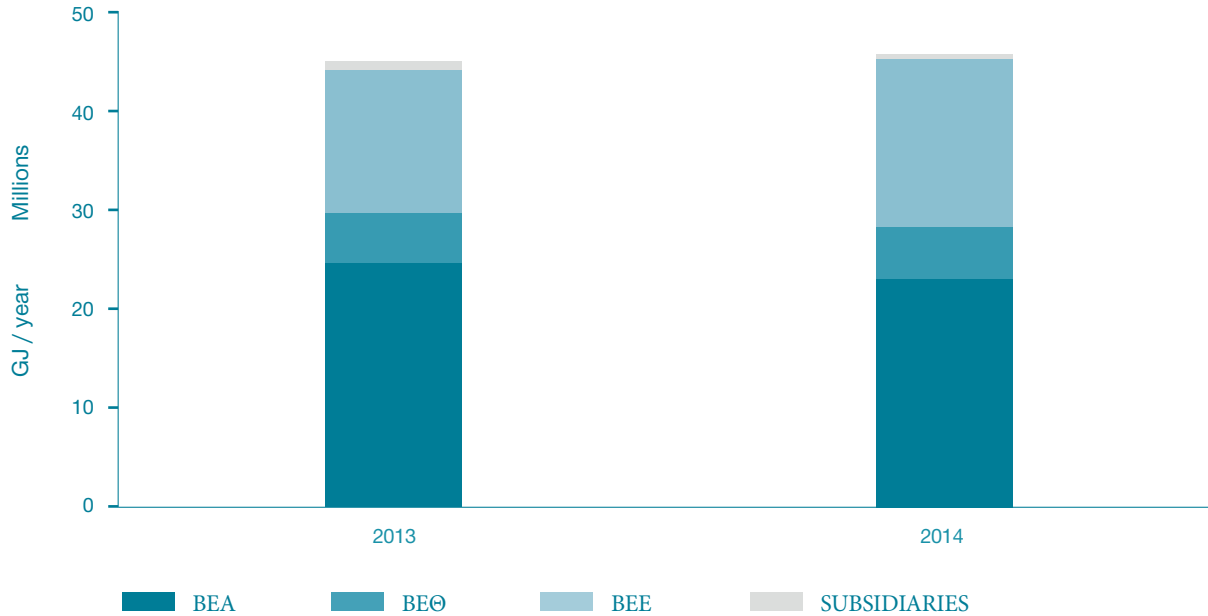


4.6 Management Efficiency

HELLENIC PETROLEUM aims to reduce the consumption of energy, water and raw materials; and invests in the recycling of materials and raw material.

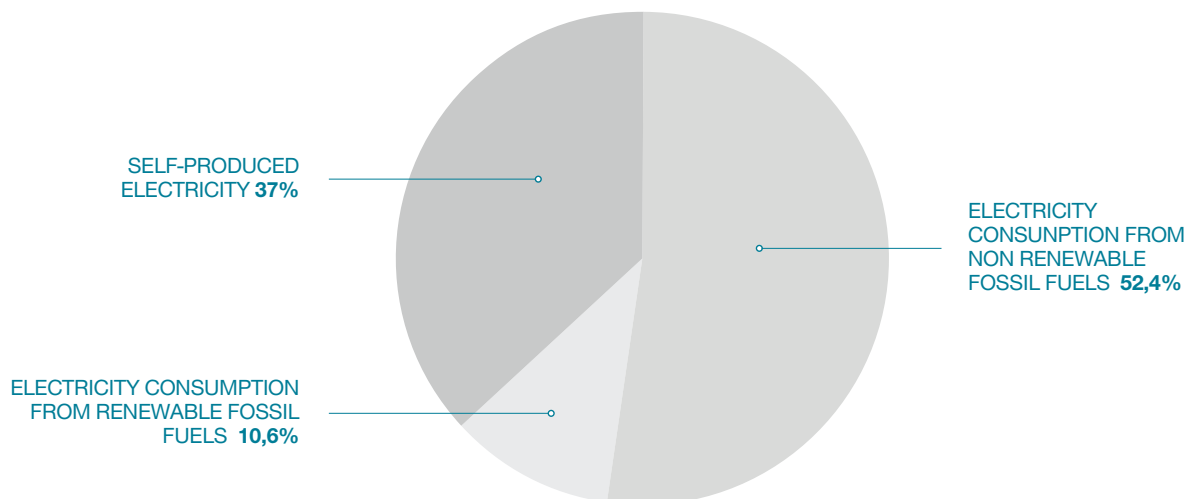
The Group's total energy consumption, as shown in Chart 4.11, appears slightly increased, mainly due to the full operation of the Elefsina refinery.

Chart 4.11: Total energy consumption per Group facility



Despite the increase in total energy consumption, electricity consumption has decreased since 2013, as well as CO₂ emissions derived from electricity consumption, as shown in section 4.1, Chart 4.2. A considerable part of this decrease is attributed to the self-produced electricity which represents 37% of total electricity consumption (Chart 4.12)

Chart 4.12: Total electricity consumption per generation method



Furthermore, Chart 4.13 presents an 11% reduction in water consumption and a particularly high increase in water recycling/reuse from 4% to 17%. Chart 4.14 presents water consumption per water source..

Chart 4.13: Water consumption and water reused/ recycled, 2013 – 2014

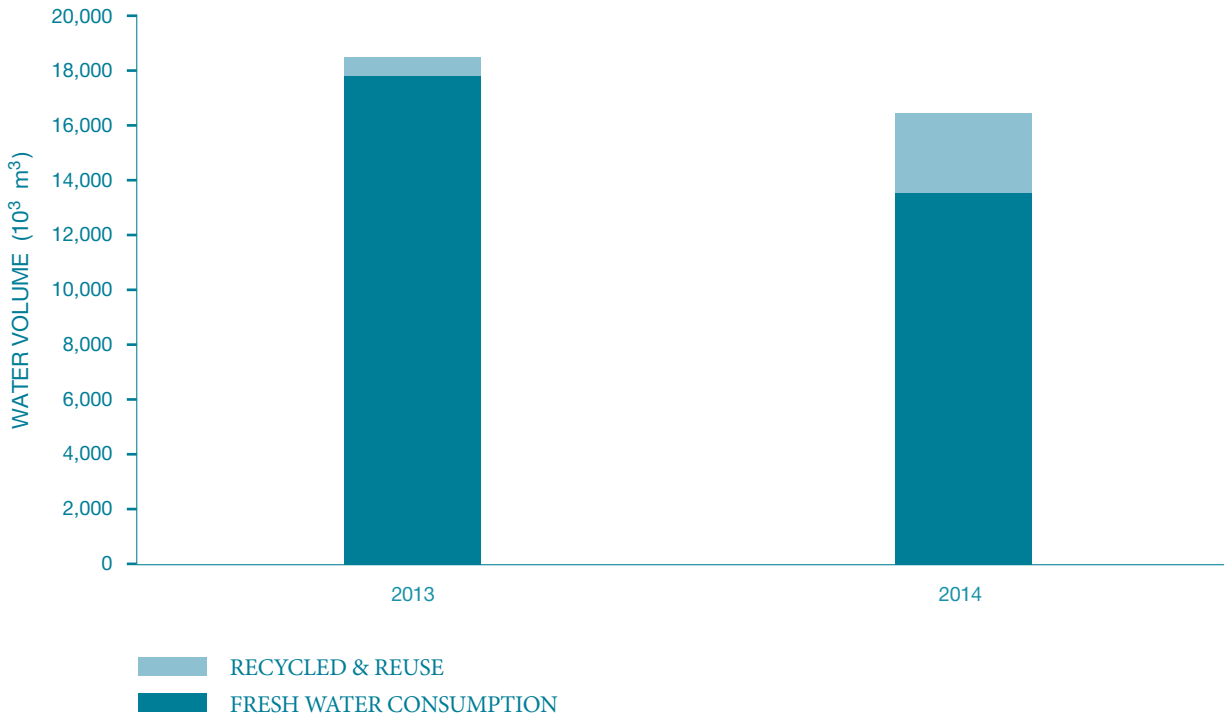


Chart 4.14: Total water withdrawal by source

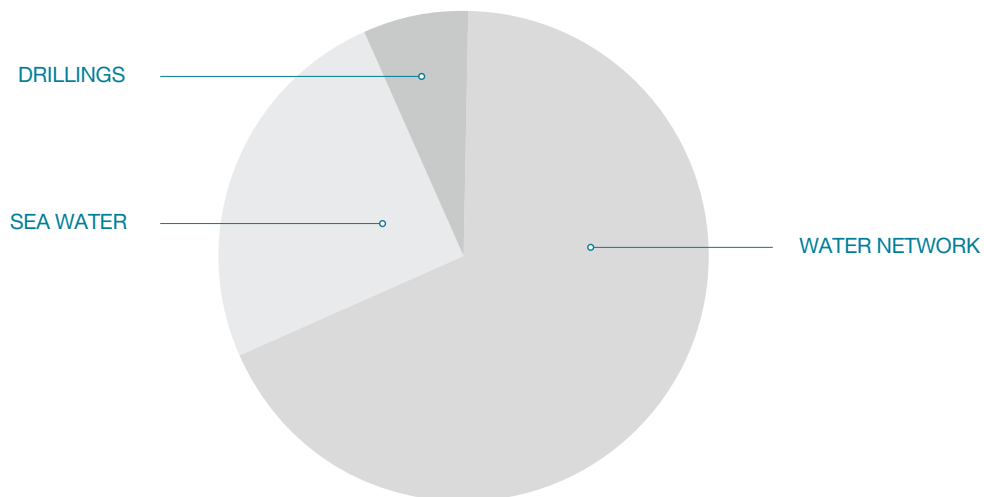


Table 4.15 shows the amount of recovered (recycled) material for each of the three refineries.

Table 4.15: Recovered raw material

REFINERY	% RECOVERED	QUANTITY (TONNES)
Aspropyrgos	0.00%	0
Elefsina	1.14%	58,544
Thessaloniki	0.80%	27,046

Since 2005, HELLENIC PETROLEUM, with the active participation of its employees, has been recycling paper, plastic, small and large batteries, fluorescent lamps, electronic equipment and aluminum, at all of its facilities and offices.

4.7 Installations Certifications

According to the corporate Quality, Safety and Environmental Policy, the Group is committed to supply products and services which fully comply and/ or are better than the legal specifications, provide full technical data on the quality of products/services to all concerned, and offer customers, partners and staff the opportunity to evaluate and contribute to further improving the quality of products and services provided.

The Group has designed and implemented Management Systems which meet the requirements of relevant international standards in order to meet its Health, Safety and Environmental Policies as well as achieve the implied objectives.



Table 4.16: Certification of Group's industrial facilities, storage facilities and service stations in accordance with internationally recognized standards

FACILITY	CERTIFICATION TYPE AND 1ST YEAR OF CERTIFICATION				
	ISO 9001	ISO 14001	OHSAS 18001	ISO 17025**	ELOT1429
BEA	2013	2011	2011	2004	
BEE	2013	2011	2010	2009	
BEΘ	2000	2013	2010	2009	
Polypropylene industrial facility	2003	2013	2010		
DIAXON	2004				
HF's liquid fuel storage facilities at Aspropyrgos, Thessaloniki, Corfu & Heraklion		2001			
EKO's Lubricants industrial facility	1997	2003	2003		
EKO's liquid fuels and chemicals storage facility at Scaramanga & liquid fuels storage facilities at Elefsina		2003	2003		
EKO's aviation fuel service stations at 18 airports	2001	2003	2003		
EKO's CALYPSO Service Stations (Aspropyrgos Service Station)	2011				
Group's HQs (certification of the Hydrocarbon Exploration and Production activity)		2013	2013		
ASPROFOS	1999	2013	2013		2011
HP CYPRUS	2005	2005	2005		
OKTA	2014 *	2014 *	2014*	2006	

* *In certification process*

** *Refineries' laboratories*

CORPORATE STANDARDS AND REGULATIONS

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

Indicatively, these standards and codes included the:

- Global Reporting Initiative (GRI G4 indicators) as well as the specific Oil & Gas Sector Supplement.
- United Nations' Global Compact (UNGC) principles & criteria.
- ISO 9001, ISO 14001 & OHSAS 18001 International Standards.
- International MARPOL convention.
- ISGOTT safety guide.
- ISM Standards.

- EU's regulations (such as REACH), Best Available Techniques (BATs), etc.
- Internal Labour Regulation and the Group's Code of Conduct.

Scheduled inspections and audits (1st, 2nd and 3rd party) are conducted while certifications are assured in order to satisfy the requirements of the above standards and minimize any potential risks.

4.8 Ecosystems – Biodiversity – Sustainability

The Group follows a strategy for the further development of its activities and the continuation of the existing activities with respect to the natural environment.

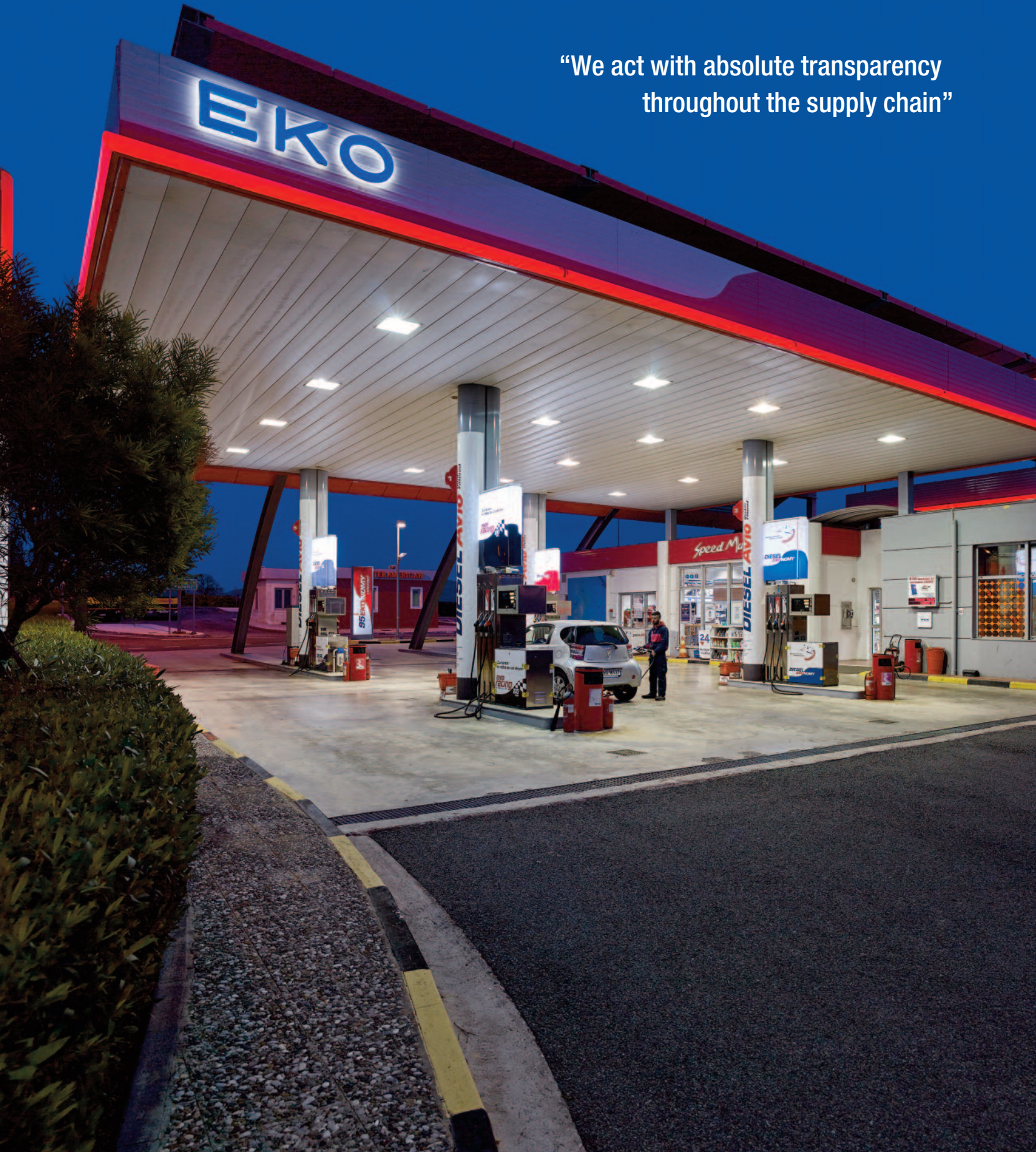
It is underlined that all of the Group's facilities are in areas legislated for industrial use and are located away from protected areas (e.g. NATURA, RAMSAR).

The Group has developed actions to protect and enhance the natural environment and ecosystems which are considered as a priority and a key pillar of sustainable development. Examples include the promotion and monitoring programs of the Lake Koumoundourou ecosystem and the adoption of the Gikas hill, in Aspropyrgos, reforestation program.

HELLENIC PETROLEUM follows closely developments concerning the effective implementation of the national strategy for biodiversity; and, at the same time, has shown its willingness to cooperate with the national authorities to this effect. The monitoring of new European trends and the integration of international recognized tools are expected to contribute significantly to the implementation of innovative conservation practices and biodiversity management.

5. SUPPLIERS & CUSTOMERS

“We act with absolute transparency throughout the supply chain”



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

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

5.1 Markets – Products

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

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

Table 5.1: Percentage of sales by product for each of the Group's companies

PRODUCTS	EKO	EK	EKO SERBIA	OKTA	EKO BULGARIA	HP CYPRUS	JUGOPETROL
Unleaded gasoline 95 octane	17.52%	42.99%	19%	11.20%	10.8%	32.2%	14.7%
Unleaded gasoline 98 octane			5%	1.9%		2.1%	3.1%
Unleaded gasoline 100 octane	0.83%	1.94%			0.9%		
Automotive gas oil	26.21%	36.86%	53 %	56.8%	61.4%	26.6%	61.45%
Heating gas oil	6.40%	14.41%		4.0%	1.4%	8.8%	3.6%
Marine fuel	4.50%					15.7%	1.7%
Lubricants	0.69%	0.02%	0,1%			0.2%	0.05%
Kerosene	0.10%					0.9%	
Mazout (fuel oil)	22.67%	1.09%		14.3%		3.8%	
Bitumen	1.29%	0.81%			5.6%		
LPG	2.82%	1.89%	23 %	4.3%	16.2%	5.3%	2.0%
CNG					1.4%		
Jet A1	16.95%			6.0%	2.3%	4.4%	13.40%
Other (Crude Oil, White Spirit)				1.4%			

In Greece, EKO possesses a petrol stations network of 900 stations, in a market of approximately 6,000 service stations, while Hellenic Fuels (HF) operates 816 service stations under the BP brand.

In 2014, the Group significantly increased the number of “company owned – company managed” service stations, from 90 to 139, while synergies were implemented between the two Greek EKO-HF marketing networks with the aim of effectively and safely bringing competitively priced products to the market, smooth supply of products for the benefit of customers and achieving reduced costs in regard to support services.

For 2015, the objective is to increase the Group's trading companies' market share while improving operating profitability and liquidity. The main pillars of the targeted competitiveness improvement are operations' optimization and further increasing the value offered to consumers through innovative products and high quality services at competitive prices.

Table 5.1 presents the "product mix" in the domestic and international markets where the Group's subsidiaries operate in 2014:

HELLENIC PETROLEUM CYPRUS: is a fuel marketing company that supplies the Cypriot market (consumers and businesses) with EKO's products (fuels and lubricants) through a network of 83 service stations. Retail represents approximately 61% of sales volume.

EKO SERBIA: has a service stations network comprised of 53 petrol stations (51 under COMO and 2 DODO), covering 8% of domestic market; and 4% based on the number of petrol stations. The volume of sales is 10% wholesale and 90% retail.

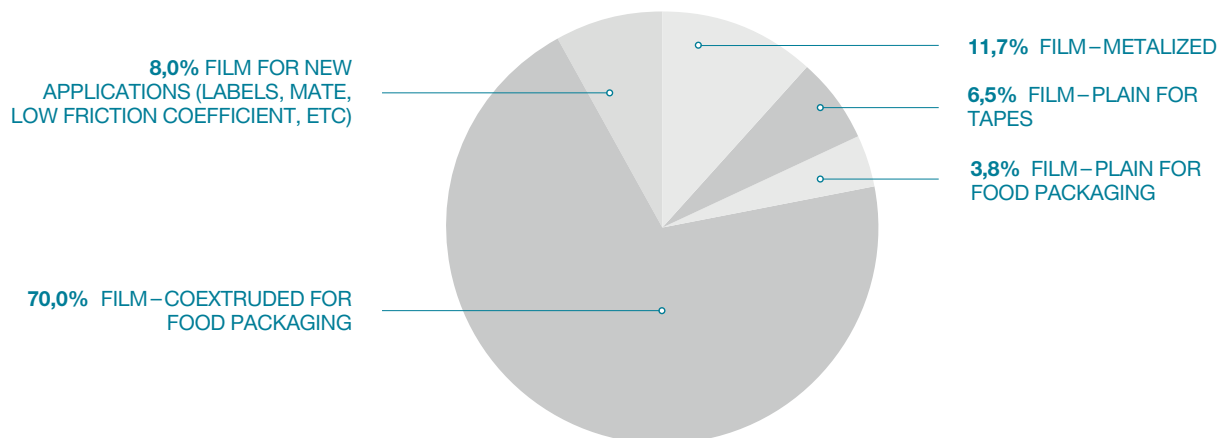
OKTA: covers approximately 50% of the domestic market (FYROM). In addition, its significant storage capacity serves as a safety mechanism for the uninterrupted supply of fuel in the markets where it operates (Kosovo, Serbian and Albanian markets). At the same time, it is a major exporter and a significant employer of transportation, logistics and engineering services. The OKTA retail unit currently has 27 petrol stations, which amounts to approximately 9% of the total number of petrol stations in the country. OKTA's retail has a market share of approximately 10% in reference to sale volumes.

EKO BULGARIA: its service station network covers 90%, in geographical terms, of the country's retail market, while covering (again in geographical terms) 100% of the country's wholesale market. Its market share in retail is 9% (83 service stations, which are supported by two owned LPG depots, one rented depot for light fuels and 27 leased car washing facilities).

JUGOPETROL: has a market share of 55% and based on the number of service stations, a share of 41% in Montenegro. Its service network is comprised of 38 petrol stations, 3 yacht services facilities, one light fuel depot at Bar and two aviation fuel depots in Tivat and Podgorica.

DIAXON is active primarily in the production and marketing of polypropylene film (BOPP FILM). Its products are 39% exported (Chart 5.2).

Chart 5.2: DIAXON's sales breakdown by type of film



5.2 Products & Services Quality

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

In order to keep customers (service stations, drivers, etc.) both informed and satisfied, various, diversified actions are designed and implemented, including: the organization of regular meetings are organized, the provision of consulting services and planned training. Moreover, COMO type service stations are rationalized and performance improvement objectives are set.

The Group's marketing companies, aiming at product quality and customer satisfaction have:

- Established, in cooperation with the Fuels and Lubricants Laboratory of the NTUA, Fuels Quality Control and Measuring Equipment Calibration programs at all service stations operating under their brands.
- Utilize special vehicles equipped with fuel analyzers staffed by personnel from the Fuels and Lubricants Laboratory of the NTUA. These vehicles perform on-site quality fuels and calibration test fuel pumps control testing, in order to ensure the quality and quantity of fuel delivered to the end user.

OUR CUSTOMER SATISFACTION

Regular inspections, conducted at the Group's petrol stations, measure that guidelines on safety, operation and service are implemented effectively. At the same time, customers can communicate their views and mechanisms thus ensuring for appropriate feedback.

This approach includes the following actions and is secretly implemented through scheduled inspections:

- Visits made by mystery customers - mystery motorist
- Auditing of 30 checkpoints in 6 areas (forecourt and equipment, service, safety, shopping, uniforms, WCs).
- Monitoring of results per petrol station, per salesman
- Briefing of service station managers on the results and corrective actions
- Rewards/ incentives to the best station managers and employees

At the end of 2014, in our quest to continuously improve the services provided to our customers, along with mystery customers' daytime visits, similar type inspections were performed at stations during the night-time hours in which checkpoints and auditing process were identical as our main objective is to ensure the optimum service level and provision of service to our customers during the night shift.

Customer surveys evaluate the degree of customer satisfaction, customer loyalty and service station commitment, efficiency and satisfaction. Where appropriate, specific surveys are made, via ques-

tionnaires, to record special issues such as the success of a promotional program or the degree of customer preference for/acceptance of a scheme etc. Furthermore, target groups are often selected for the purposes of more detailed qualitative surveys before introducing crucial programs or offers.

ROUND THE CLOCK SERVICE

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

In 2014, HF's helpline received 196 calls (of which 102 were directly answered by qualified personnel, whilst 94 calls were resolved by the Group's staff). Similarly, EKO's helpline received 1,296 calls (of which 656 calls were directly answered by qualified personnel, whilst 640 calls were resolved by the Group's staff within 24 hours).

PETROL STATIONS REWARD PROGRAM - RETAIL CHAMPIONSHIP 2014

In order to assess the performance of EKO's service stations as well as the relevant sales executives in Greece, Cyprus, Montenegro, Bulgaria, Serbia and FYROM, the "Retail Championship" program is now in its 5th year (a similar assessment takes place in Greece with regards to HF's service network).

The participants (managers, station owners, sales staff) are evaluated and rewarded according to particular, quantifiable criteria with the aim of ensuring that service stations operate safely, that customer service is more efficient and that annual operational targets are achieved.

In particular, the evaluation process was revised as more quantitative criteria were added, leading to more comprehensive and reliable results.

PRODUCT QUALITY & QUANTITY PROGRAM

To ensure that our products reach the end user without any form of alteration/distortion, annual scheduled inspections are conducted throughout the entire service stations network through the collection of product samples (a particular emphasis is placed on large urban centers). The product samples are chemically analysed at independent laboratory. Additional sampling carried out as appropriate.

The Group provides high quality products to all of its customers aiming not only at providing customer satisfaction but also guaranteed mechanical performance and a cleaner environment. Ongoing approaches (such as training, mystery shopping, competitive pricing and promotional activities) ensure that our partners comply with our corporate policy and regulations, thereby confirming the loyalty of our customers and improving sales methods, as reflected in surveys that are periodically undertaken.



With the objective of achieving customer satisfaction, EKO (since December 2012) has implemented a comprehensive fuel quantity and quality control program through its ongoing inspection process which tests product quality from the refinery all the way through to the customer's fuel tank.

In particular, EKO ASSURANCE program includes:

- Ongoing qualitative fuel tests in the refinery and storage facilities
- Sealed tanks for fuel transportation
- Monitoring tanker transport routes through GPS
- Checking petrol pumps and sealing them with visible sealing tape
- Fuel quality on site checks using free on the spot test kits
- Unannounced quantitative audits at service stations using conventional vehicles
- Continuous qualitative and quantitative inspections at service stations performed by the NTUA's mobile laboratories

The implementation of the EKO ASSURANCE Program succeeded in assuring for the quality and quantity of fuel received from our service stations. More specifically, in 2014, our customers successfully used 9,360 free spot test kits at EKO's service stations. During the same period, our partners from the NTUA inspected 1,732 petrol stations and checked 8,739 pump-nozzles.

In the framework of its ongoing efforts to ensure that the consumer receives quality fuel, EKO has created a new diesel fuel named Diesel Avio Double Filtered. The key difference of this new fuel is based on the aircraft filter technology that has been used. Avio Filter is a technologically advanced filter, installed before the fuel pumps, resulting in particulates, rust and water removal which achieves a fuel filtration efficiency of 98%. The new diesel fuel from EKO, Diesel Avio, stands for maximum purity and performance, diversification, innovation and leading technology.

Table 5.3: Marketing KPIs

	2010	2011	2012	2013	2014	2015 target
Number of CALYPSO service stations	34 (EKO only)	38 (EKO only)	54 (48 EKO & 6 HF)	90 (60 EKO & 30 HF)	139 (77 EKO & 62 HF)	170 (93 EKO & 77 HF)
	2012	2014	2015 forecast			
Average number of training manhours (managers, station owners and employees)	499 / 251 1.99 hours	2,237 / 284 7.9 hours	4,686 / 731 6.4 hours			

CUSTOMER INFORMATION

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

Labels and Material Safety Data Sheets – MSDS substantiate the safety of the product, provide information on how to use it, as well as its specifications and ultimately, how to dispose of it. Each product is labelled in accordance with the relevant European legislation whereby the required information is visible on the packaging (with that said, mention of the product's shelf life is not mandatory).

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

5.3 Supply Chain / Responsible Procurements

The Group possesses a wide and diverse supplier base. The supplier base is revised in the context of a sustainable supply chain strategy, tailored to the Group's values, and includes multi-national companies as well as small local businesses, all used for the purposes of purchasing materials, equipment or services.

This suppliers base includes about 10,000 active suppliers and the Group seeks to cooperate with them aiming at environmental awareness and the application of relevant standards, responsible labour practices and respect of human rights. A typical example of the above is the fact that contractors at industrial facilities routinely participate in training on occupational Health & Safety (see Table 3.9).

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

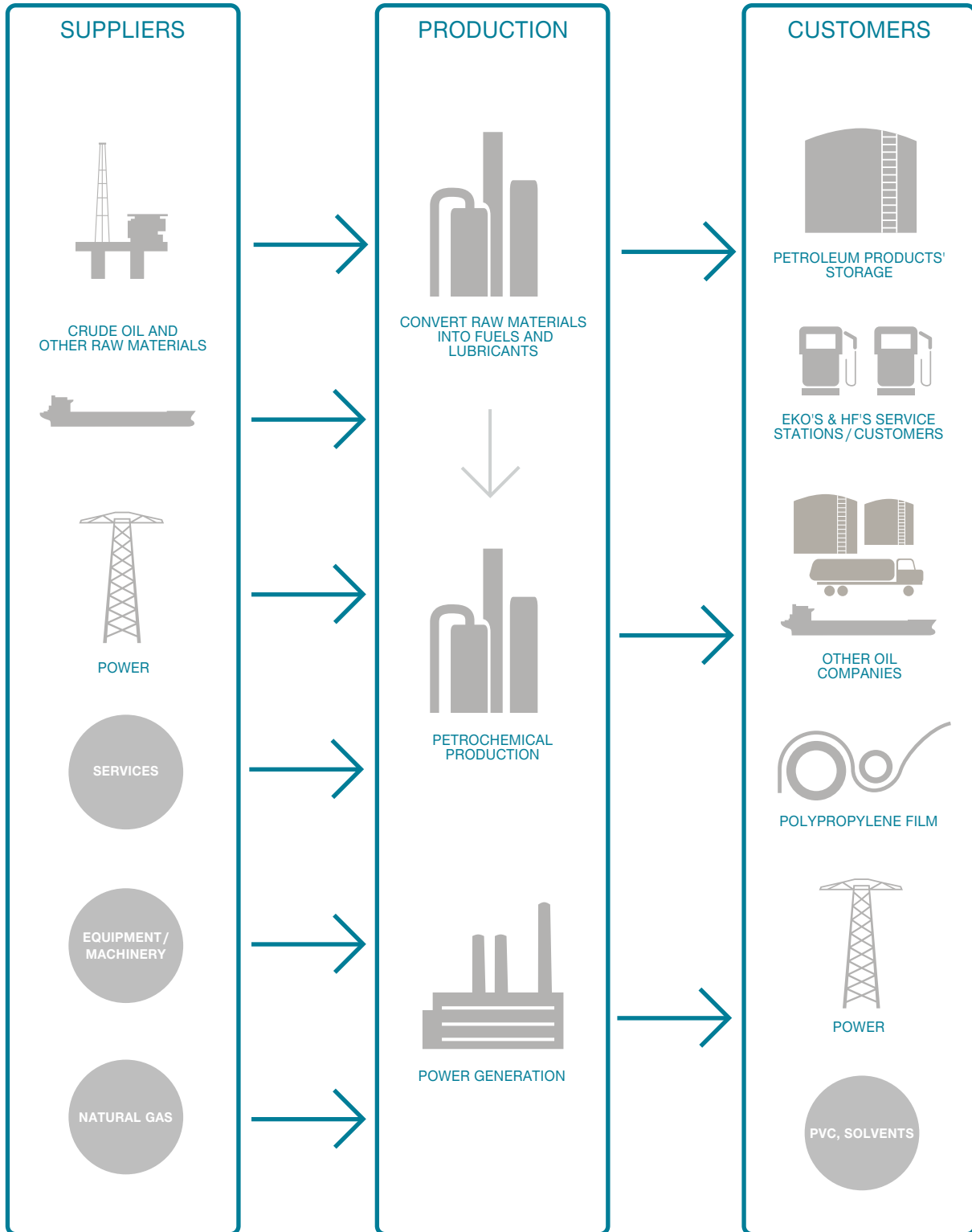
The Group's suppliers are essential partners in the framework of the achievement of our business objectives who ensure not only for competitiveness and sustainable development, but also affect our financial performance, as well as our relationships with other social partners.

For the above reasons, our partners are selected and evaluated with the objective of improving the Group's overall performance and sustainable growth. Besides from our evaluation, based on business criteria, in 2014 the relevant evaluation questionnaires were enriched with questions concerning environmental performance and the impact of suppliers' operations on society. Emphasis is also placed on supporting local communities whereby we prefer to source local suppliers, where possible, and always in accordance with the Procurement Manual, (see section 6.2, Tables 6.2 for specific details).

As of 2nd semester of 2015, a "compliance clause" of our suppliers, with the principles of the UN Global Compact (in the fields of human rights, labour, environment and corruption) shall be incorporated in new contracts and purchase orders.

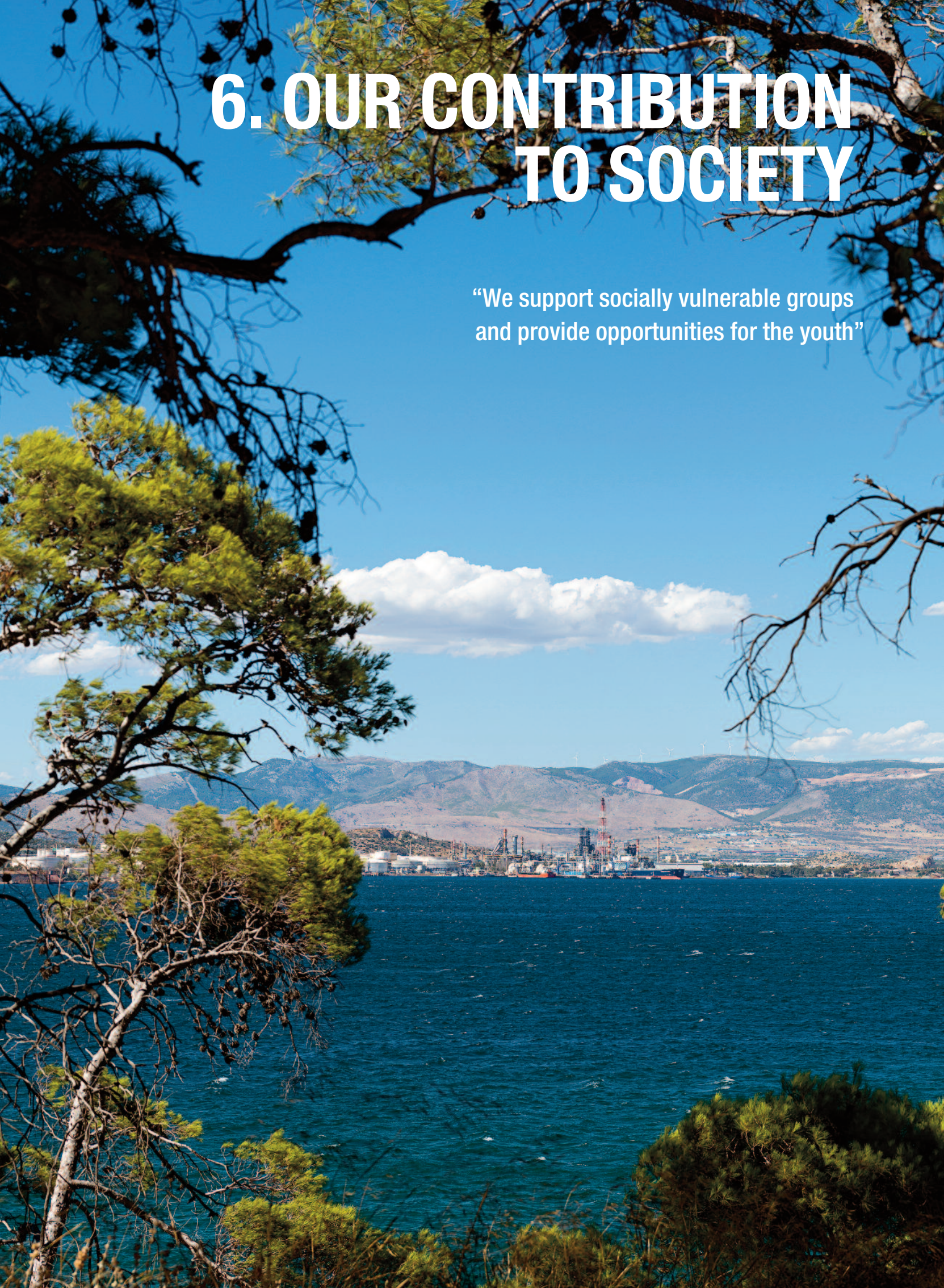
On the other hand, the Group aims to be preferred partner of suppliers, adopting common values and principles, through a defined framework of cooperation, in accordance with our Procurement Manual and Code of Conduct; fostering synergies and long-term relationships, consisting of transparency and respect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

Supply Chain



6. OUR CONTRIBUTION TO SOCIETY

“We support socially vulnerable groups
and provide opportunities for the youth”



Our goal in all of the locations in which we are privileged to operate in, is to contribute positively, in terms of economic value, environmental care and contribution to society.

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

Table 6.1: Group's Social Actions - 2015 – 2019 Strategic Targets

Society – Vulnerable groups	Support programs for vulnerable groups Continuous evaluation of CSR programs in order to meet the needs of society
Youth (all educational levels)	Create opportunities for young people Collaboration with the educational community
Infrastructures/ Environment	Support infrastructure projects in local communities for a better quality of life
Culture	Promotion of cultural heritage Creation of historical archive/museum at Aspropyrgos Central Offices
Athletics	Support sports events to develop team spirit
Voluntarism - Social solidarity	Improve participation (from 4% to 7%) in joint events and social solidarity actions Strengthening of relations with social partners, especially with local communities for harmonious coexistence and contribution to living conditions improvement

“To be an Energy Group that invests and develops in the context of sustainable development, respecting the environment and meeting society's needs.”

6.1 Priorities & Policy

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

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

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

6.2 Investing in the Community

We currently employ 355 individuals who live in the Thriassion region's neighbouring municipalities and a further 114 employees who live in the Western Thessaloniki region's neighbouring municipalities.

We spend around €3 mil. annually on municipal duties and support the local economy through buying goods and services from the various businesses in the neighbouring areas where we operate (Table 6.2).

Purchases from local suppliers account for 12.3% for the industrial complexes (HELPE and DIAXON) and 97% for the Group's marketing companies (not taking into account purchase, storage and transportation of crude oil and petroleum products, chemical products, natural resources, fixed telephony services and intragroup transactions). For a definition of the local supplier see Appendix I, indicator G4-EC9.

Table 6.2a: Purchases made by HELPE and DIAXON from local suppliers

Suppliers	PAYMENTS		SUPPLIERS NUMBER	
	Value in thousands €	Value (%)	Number	%
Thriassio neighbouring municipalities	13,946	6.6%	165	6.4%
Western Thessaloniki neighbouring municipalities	10,709	5.1%	153	5.9%
TOTAL LOCAL	24,655	11.7%	318	12.3%
REST	186,331	88.3%	2,268	87.7%
TOTAL	210,986	100%	2,586	100%

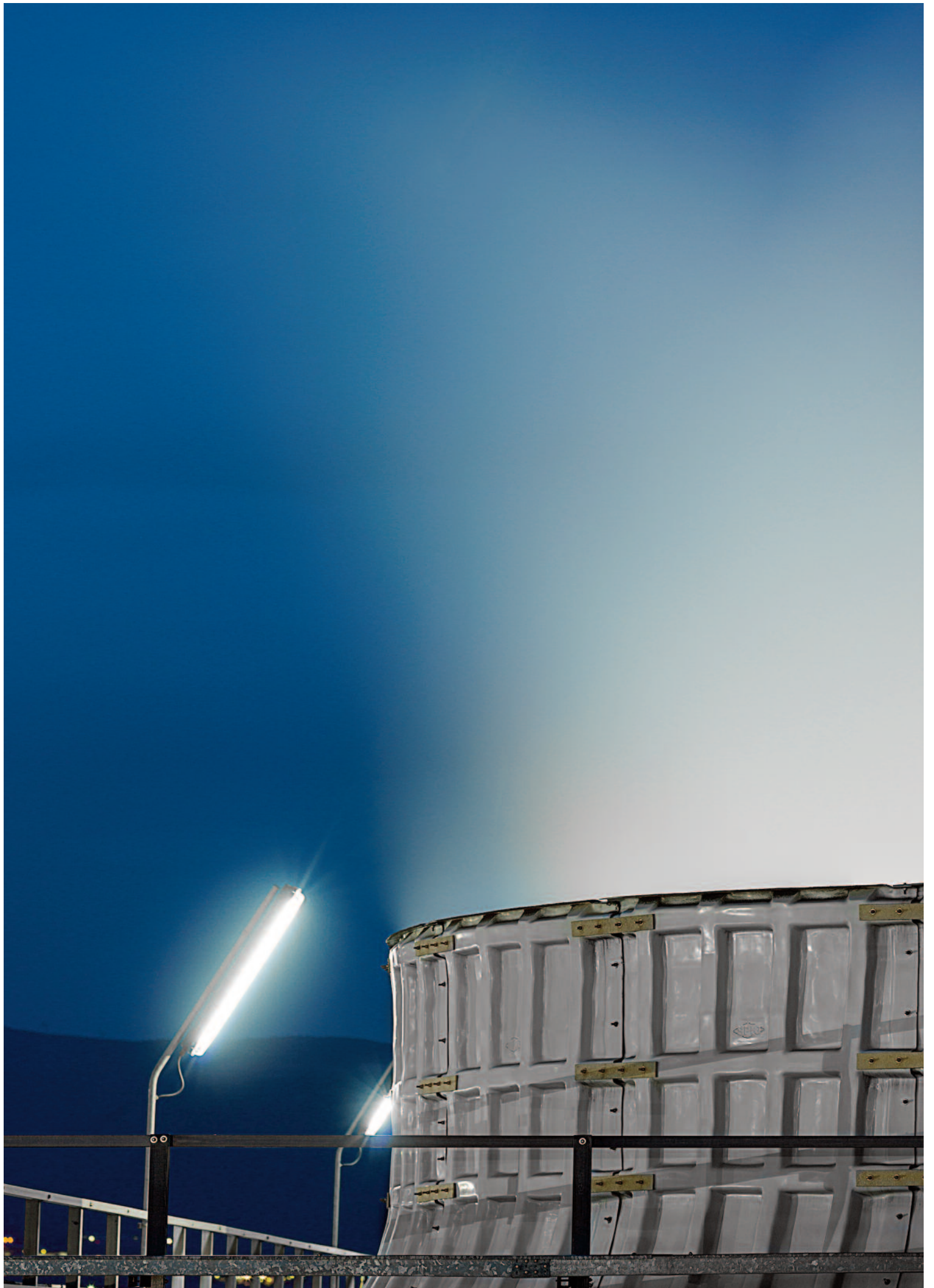
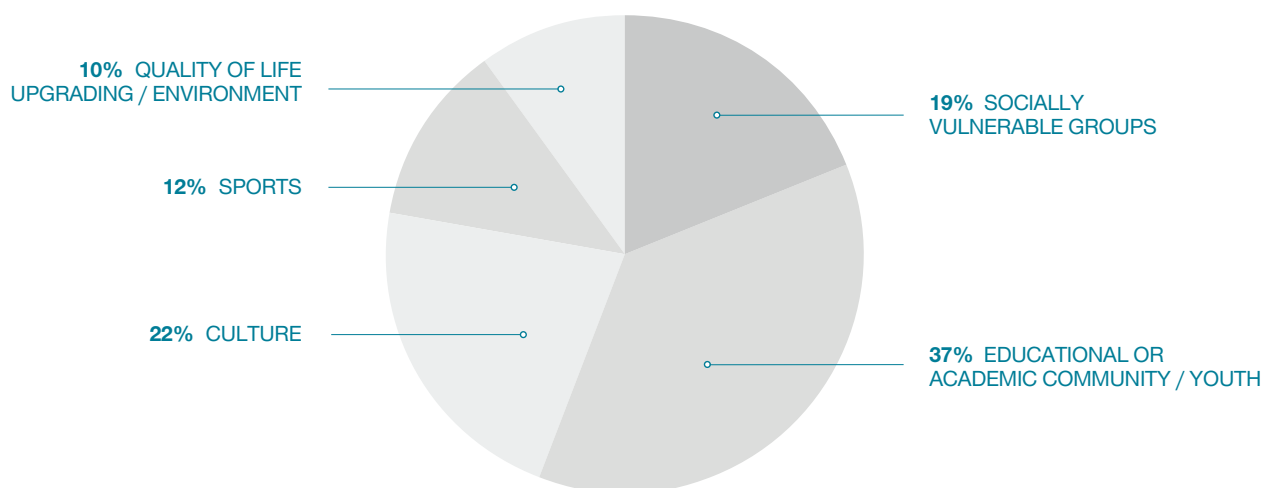


Table 6.2b: Purchases made by marketing companies from local suppliers

	PAYMENTS IN THOUSANDS €		SUPPLIERS NUMBER	
	Total	Local	Total	Local
EKO	87,419	85,201	1,765	1,732
HF	45,376	44,401	1,297	1,287
EKO BULGARIA	39,441	37,904	1,176	1,162
HP CYPRUS	12,527	11,436	625	562
OKTA	9,160	7,447	420	400
EKO SERBIA	9,344	9,335	1,342	1,328
JUGOPETROL	18,066	17,528	467	426
TOTAL	221,332	213,251	7,092	6,897
Local Suppliers %		96%		97%

In 2014, we designed and implemented a broad CSR program having set the priorities presented in Chart 6.3. The Group's investments in CSR initiatives, both within Greece and abroad, amounted to approximately €3.4 mil.

Chart 6.3: CSR expenditures breakdown by category



For the immediate future and through utilizing the relevant surveys, we will focus on areas where there is a greater social demand and improve our performance and contribution to CSR issues, in turn contributing to sustainable development, improved relations with employees, enhanced social solidarity and inspired partnerships, with the local community and society as a whole, built on mutual trust.

PUBLIC OPINION SURVEYS

In June 2014, a qualitative and quantitative public opinion survey was conducted in the municipalities of the Thriassio Region and Western Thessaloniki, i.e. neighbouring areas to the Group's industrial facilities. Objectives of the survey included visualizing significant problems in the regions, perceptions on quality of life in each of the six municipalities and looking at how these regions co-exist with the plants.

Based on the Corporate Reputation overall index (resulting from the combined analysis of the responses to questions that record: overall opinion, trust, recommendation) HELLENIC PETROLEUM occupied first place (amongst 8 companies) in Thriassio and third place (amongst 5 companies) in Thessaloniki.

The local communities' most significant expectations, according to the survey's results, were:

- Respect for the environment
- Job creation
- Recruiting from the region
- Supporting vulnerable social groups

6.3 Our CSR Actions in Greece

The act of giving and maintaining a responsible attitude towards society are both integral elements of the Group's culture and strategy. A reassessment of the CSR actions and focus on two main pillars: society – vulnerable groups and new generation, took place in 2014.

These actions (amounting to €3.04 mil.) were addressed mainly both to local communities, where the Group's business activities take place, and the broader society. Indicatively, these CSR actions include:

SOCIETY - VULNERABLE GROUPS

- Donation of heating oil to schools, centres for the elderly in neighbouring municipalities and NGO all over Greece.
- Supporting the “social groceries” program of the Athens Municipality and neighbouring municipalities.
- Cooperation and support of NGOs, following an assessment on how they operate and contributing to aiding vulnerable groups.



- Hosting children, from poor families in neighboring municipalities, at summer camps.
- Continuation of programs to support the needy (support given to organizations such as ELIX voluntary work programs, Western Attica Disabled, Association of Social Responsibility for Children and Youth, etc.).

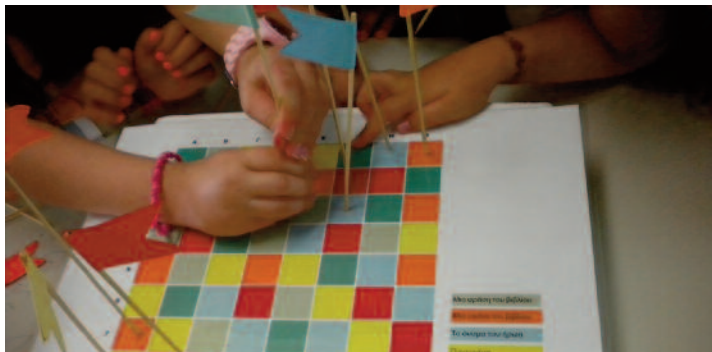
YOUTH

- Supporting schools infrastructure.
- Supporting schools events.
- Training visits - Excursions.
- Organization of competitions – Rewards (Xmas cards).
- Enhancing Youth Entrepreneurship (Global Management Challenge, HUB, etc.).
- Awards granted to outstanding students from neighbouring municipalities for admission to Greek Universities/Colleges.
- Young Graduates Employment Program for one year, with the possibility of exceeding the contract for another year.
- Scholarships for post graduate studies abroad for young people from Greece.
- Scholarships for postgraduate studies at the ALBA Graduate Business School for young people from neighboring municipalities.
- Seminars on Skills Development provided to young people from the local community, in collaboration with the ALBA Graduate Business School.
- Continuously updating young people on issues concerning them. Supporting the participation of young people and students, students participating in contests and training programs (Robotics, Youth Entrepreneurship, Physics Olympiad).



CULTURE

- Support of festivals in neighboring municipalities/ student events and participations.
- Supporting libraries in the Thriassio and Western Thessaloniki regions.
- Distribution of 6,000 books throughout libraries in the country.



SPORTS

- Sponsoring of major sports teams from neighbouring societies.
- Supporting major sporting events in the neighboring regions (such as 3X3 street-ball).
- Supporting athletes with high performance/rewarding/paralympians.

ENVIRONMENT

- Donation of fuel cards for fire protection.
- Supporting the cleaning of archaeological sites.
- Maintenance of atmospheric pollution measurement stations in neighbouring municipalities.
- Supporting the “The Energy for Life...is travelling” environmental education program taking place on 7 islands, with 54 workshops, including 1,350 pupils, in cooperation with 13 NGOs.



INFRASTRUCTURE PROJECTS

- Road paving/ asphaltting works in neighboring municipalities.
- Renovation of playground in the Aspropyrgos Municipality.

SUPPORTING EMPLOYMENT

- Support and participation in actions for Social Entrepreneurship (Amphitrite, local plans for employment adjusted to the needs of local labor markets etc.).

EDUCATIONAL VISITS TO GROUP FACILITIES

In 2014, the Group's industrial facilities, in Aspropyrgos and Western Thessaloniki, welcomed and briefed 3,566 schoolchildren and students from educational institutions of all levels.



In addition, 160 students and 20 teachers from across Europe, participating in the European Science Olympiad EUSO 2014, were hosted at the Aspropyrgos headquarters, and toured the industrial facilities as well as the archaeological site of Eleusis (Elefsina) during their stay in Athens.

Table 6.4: Educational visits (breakdown by educational level)

EDUCATIONAL LEVEL	BEØ COMPLEX	BEA COMPLEX
UNIVERSITIES/ COLLEGES	118	382
VOCATIONAL TRAINING - LYCEUMS	200	1,329
HIGH SCHOOLS	350	830
OTHERS INSTITUTIONS	39	318
TOTAL	707	2,859

6.4 Our CSR Actions abroad

In 2014, the total expenditure incurred with regards to socially responsible activities abroad was approximately €326,507. Indicative examples in corporate social responsibility initiatives in each country, reflecting the breadth of our commitment to society in general, are presented below.

IN FYROM

- Donation of medical equipment to the Intensive Care department at the Children’s Clinic in Skopje.
- Donation of winter clothing to the “Zlatan Sremac” and “Idnina” schools - Skopje for children with special needs.
- Donation to the Municipality of Illinden library, in the framework of the 8th manifestation “Give a book for an Easter egg”.
- Financial support given to a child in a severe health situation.
- Financial support given to the project “Young Book Love: Together we read” through the donation of books to the “SOS Children Village” in Skopje, “11 October” (orphanage in Skopje), “Goce Delcev” and “J.H.Pestaloci”.
- Donation given to the Skopje Gerontology Institute.
- Financial support given to LASTOVICA (the Association for children and young people with special needs).



- Employees voluntarism (donation to the Red Cross in Skopje): on the occasion of “Hunger day” OKTA’s employees donated their daily coupons for food at work to help socially endangered families.
- Donation of New Year packages for 40 children to the Association of persons with body invalidity in Tetovo and Gostivar (MOBILITY TETOVO AND GOSTIVAR).
- Financial support given to cultural events (The children’s festival “Zlatno Slavejce”, the Annual Ohrid Summer Festival), athletic events (Karate Mavashi Open competition, FIA action for road safety car racing) and associations (ZEMAK - Energy Association on the 15th International Symposium ENERGETICS 2014, IN MY WORD for the organization of training to therapists and parents of children with autism).

IN CYPRUS

- Sponsoring the organization of informative and educational events (such as the exhibition «the magic of writing – from aleph to alpha», “save energy 2014”, events in the municipalities of Larnaca & Paphos, program for road safety in schools, Cyprus Conference on Road Safety).
- Fuel donation and financial support given to social institutions and vulnerable groups (such as the Red Cross, Foundations of St George & M. Liasides for disabled children and adults, to the Larnaca Municipality to support flood victims, to the Cathedrals of Limassol, Constance & Famagusta, and to the St. Christoforos foundation for needy).
- Sponsorships given to cultural associations and social institutions (such as Friends of Children Shelter, Association for individuals with autism, Cyprus paraplegic organization, MX Valley Motocross Park, Paralimni Municipal Youth Council, Solidarity Volunteer Club).



IN MONTENEGRO

- Financial support given to institutions for the organization of cultural events and conferences (such as the Hellenic Embassy, the Chamber of Economy of Montenegro, Cetinje, Maritime Museum of Montenegro).
- Sponsorship given to the Marine Biology Institute for the “Survey of the future Marine Protected Area” project.
- Fuel donation given to the Red Cross Montenegro, Kotor Music School & Mountaineering Club KOM Andrijevic, to support their work.
- Sponsoring of athletic and cultural events (such as the Kotor-Lovcen-Kotor Hiking Day, The Bicycle Club "Perun" Niksic, Water-polo Club Primorac).
- Donation of police vehicles given to the Ministry of Interior and financial support provided for tree planting given to Forum MNE and the Municipalities of Pljevlja and Niksic.
- Financial support given to the Kotor Paraplegic Association and Mladost Orphanage Bijela to buy gifts, the organization of a theatrical performance and for 20 children to go on summer holidays.

IN BULGARIA

- Sponsoring sports clubs and events (such as the Globul Racing Team, AutoTzar Rally Service, “Team of hope” – football team made up of homeless people).
- Financial support given to the Hellenic Business Council to organize events.



IN SERBIA

- Financial support provided for the humanitarian and charitable work of NGOs (such as the HRH Crown Princess Katherine Foundation for needy children, the Vlade Divac Foundation to support people who lost their homes during the war, SmallBig people and the Leskovac school for disabled children).
- Sponsorships given to support sports clubs (such as the national football team, 4 year contract sponsorship of the Olympic Team) and the organization of events (such as summer sports events in the Fontana region).
- Sponsorships supporting cultural events (such as the dance festival, documentary movie of Dusan Ivkovic and Zeljko Obradovic).
- Reconstruction of Jefimija elementary school in Obrenovac which was under water for many weeks due to floods.



6.5 Voluntarism

Through their participation in industry associations' working groups and committees, national and international organizations, the Group, management as well as employees actively promote public dialogue on sustainable development. Moreover, they are actively involved in initiatives concerning dialogue and communication with local communities.

In the framework of CSR activities, employees have been made more aware of social and solidarity issues and in 2014 offered their resources, time or skills through participating in the following:

1. Participation in athletic events (117 participations in the Athens Marathon raising €9,250 to support five NGOs).
2. Bazaar to support NGOs.
3. Collection of food, clothes and books.
4. Representation - participation in conferences, events, awards, Group's presentations, on entrepreneurship, discrimination and human rights.
5. Blood donation program.





“Energy for Life” – 117 employees from Greece and abroad, along with their families and HELLENIC PETROLEUM Group’s partners, participated in the 32nd Athens Marathon (trails of 5 km, 10 km and 42 km) and wore our volunteers’ t-shirt with the sign “εθέλω”.

For every kilometer ran by our employees, the Group donated 10 euros to charitable institutions chosen by the participants themselves. As a result, a total of €9,250 was raised for the following organizations and causes: Ark of the World, Life Line, Together for Children, Association of Parents of Children with Down Syndrome and Cystic Fibrosis Association.

6.6 Awards & Distinctions

Over the years, the Group has received numerous awards and recognition for our comprehensive approach to corporate responsibility. Table 6.5 presents a selection of awards and recognition that we received in 2014.

These awards and prizes signify the recognition of the policy and strategy that have been built on the three axes of sustainable development: financial performance - environmental management - respect towards society.

Further information at <http://www.helpe.gr/en/the-group/group-awards/>

Table 6.5: The Group's Awards in 2014

1st Prize (Gold Award) in the category "Excellence in Leadership and Human Resources"	Hellenic Management Association
2nd Prize (Silver Award) in the category "Education and Development"	Hellenic Management Association
2nd High Investment Business Award	Money - Business Awards
3rd Business Award for best company, FTSE LARGE CAP	Money - Business Awards
CR Index Platinum Award, for the Group's performance in Corporate Social Responsibility	Corporate Responsibility Institute (CRI) in cooperation with Business in the Community (BITC)
HELLENIC PETROLEUM in the 'The healthiest growing companies' category - Distinction	STAT BANK
2nd Prize "Famous Brands 2014" to HF (category Petrol Stations)	L.M.G - The Insights Company
3rd Prize "Famous Brands 2014" to EKO (category Petrol Stations)	
Distinction in the category "Labour Relations"	BRAVO QualityNet Foundation
Recognition for the Group's long contribution to the activities of the Cultural Centre and the Municipal Library	Aspropyrgos Municipality
Distinction for the Group's social activity	Together for Children - NGO
Honorary Distinction – NIKE AWARD (European Summer Games Special Olympics, Antwerp 2014)	Special Olympics Hellas
3 Gold Awards, in the categories a. Oil & Petrochemicals, b. Education & Awareness Initiatives and c. Improving Health & Safety System Performance	Boussias Health & Safety Awards
EKO Bulgaria 2nd winner in the "Corporate Marketing with Cause"	Annual Responsible Business Awards of the Bulgarian Business Leaders Forum
3rd Prize in Organization and Management on Environmental Issues	European Business Award for Environment – Greek Business Association for the Protection of Environment

7. OPERATIONAL PERFORMANCE

“We adopt standards and systems for self-improvement and for meeting the needs of our stakeholders”

Net Income

Ending Cash Balance

Total Current Assets

Total Assets

Liabilities

	1	2	3	4	5
Net Income	\$19,300	\$17,900	\$77,300	\$80,200	\$68,100
Ending Cash Balance	\$19,100	\$24,600	\$20,800	\$21,800	\$39,500
Total Current Assets	\$19,200	\$43,300	\$56,500	\$59,300	\$48,600
Total Assets	\$3,500	\$3,900	\$2,100	\$3,000	\$3,800
Liabilities	\$15,700	\$39,400	\$54,400	\$56,300	\$45,000
	\$14,500	\$13,300	\$15,500	\$18,000	\$20,000
	\$7,000	\$7,600	\$9,400	\$8,900	\$7,000
	(\$8,200)	(\$5,400)	(\$6,900)	(\$7,600)	(\$8,900)
	\$13,300	\$15,500	\$18,000	\$20,000	\$18,100
	\$17,600	\$13,800	\$19,800	\$18,500	\$21,800
	\$8,300	\$8,200	\$9,300	\$8,400	\$11,200
	\$5,700	\$8,300	\$5,800	\$3,200	\$2,700
	\$42,900	\$43,800	\$52,900	\$52,100	\$53,800
	\$28,000	\$30,500	\$45,000	\$43,000	\$41,000
	\$70,900	\$74,300	\$97,900	\$95,100	\$94,800
	\$6,400	\$5,500	\$4,800	\$3,700	\$4,200
	\$5,700	\$2,300	\$3,000	\$2,900	\$7,700
	\$2,300	\$14,000	\$17,600	\$15,900	\$18,800
	\$14,400	\$23,700	\$22,600	\$21,800	\$22,400
	\$22,100	\$1,800	\$1,700	\$1,000	\$1,700
	\$1,400	\$25,500	\$56,300	\$58,400	\$52,100
	\$1,400	\$2,900	\$3,900	\$3,100	\$94,800

7.1 GRI-G4 Indicators and UNGC's Criteria

Since 2007, we have utilized the GRI, as well as the United Nations Global Compact (UNGC), as our overall framework for corporate responsibility reporting. Our CSR Report 2014 once again reflects our commitment to the GRI & UNGC and serves as our CoP report, illustrating our performance on environmental, social and governance (ESG) issues.

The Global Reporting Initiative (GRI-G4, Comprehensive Option) indicators are analytically presented at Appendix I as well as at <http://sustainabilityreport.helpe.gr/en/operational-efficiency-performance/GRI-G4-point/>.

The criteria of the United Nations Global Compact (UNGC, Advanced Level), CoP Report, are analytically presented at Appendix II as well as at <http://sustainabilityreport.helpe.gr/en/operational-efficiency-performance/entries-cop/>.

Analytical information concerning financial and operational data may be seen at

- <http://www.helpe.gr/en/media-center/company-publications/annual-report/> and
- <http://www.helpe.gr/en/media-center/company-publications/annual-financial-report-for-fiscal-year/>

7.2 Report's Independent Assurance

To ensure accuracy, completeness and reliability, this Report has been audited and certified – as a whole and in terms of every material issue – by an independent external certification body prior to publication.

We inform our stakeholders that the documentation and certification of this Report was made in order to assure its compliance with the requirements of the guidelines GRI-G4 (in accordance with/ Comprehensive Option). The independent body, that reviewed the Report, also certified that the indicators of the Oil & Gas Sector Supplement have been covered.

The result of this external assurance is presented in Appendix I as well as at <http://sustainabilityreport.helpe.gr/en/operational-efficiency-performance/Report-Certification/> report, while the relevant assurance statement is presented below.

This Report also satisfies the requirements of the CoP Report (Advanced Level) of the UNGC (see Appendix II).

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

TÜV AUSTRIA Hellas**Assurance Statement****for Hellenic Petroleum's Corporate Responsibility Report 2014****Information on the Assurance Statement**

The Assurance Provider TÜV AUSTRIA Hellas ('the Provider') has been engaged to provide external assurance on the disclosures published in the Corporate Responsibility Report 2014 ('the Report') of Hellenic Petroleum Group ('the Company'). The Company is exclusively responsible for the data and information within the Report. The assurance process was conducted by the Provider in terms of sample-based audits of data and information as well as audits of data collection systems and procedures.

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

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2014 annual report and financial statement which have been audited by other third parties.

Scope of Assurance

The Provider undertook the following tasks during June 2015:

1. Reviewed the Report against the requirements of Global Reporting Initiative (GRI) Sustainability Reporting Guidelines G4 and confirmation that the GRI-G4 "Comprehensive option" requirements are fulfilled.
2. Verification of the data included in all the chapters of the Report.
3. Site visits at the Company's Head Offices in Marousi and its refineries located in Aspropyrgos, Eleusina and Thessaloniki, 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 reliability of processes for generating, gathering and managing information included in the Report.



Conclusions

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

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

Opportunities for Improvement

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

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

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

On behalf of TÜV AUSTRIA Hellas,
Athens, 22nd of June 2015

Sifakis Nikolaos
Lead Auditor



Kallias Yiannis
General Manager

TÜV AUSTRIA Hellas
ATHENS: 413 Mesogion Ave. Agia Paraskevi
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KOREA

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TÜV AUSTRIA Hellas

Assurance Statement

for Hellenic Petroleum's Corporate Responsibility Report 2014

Information on the Assurance Statement

The Assurance Provider TÜV AUSTRIA Hellas ('the Provider') has been engaged to provide external assurance on the disclosures published in the Corporate Responsibility Report 2014 ('the Report') of Hellenic Petroleum Group ('the Company'). The Company is exclusively responsible for the data and information within the Report. The assurance process was conducted by the Provider in terms of sample-based audits of data and information as well as audits of data collection systems and procedures.

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

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2014 annual report and financial statement which have been audited by other third parties.

Scope of Assurance

The Provider undertook the following tasks during June 2015:

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



Conclusions

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

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

Opportunities for Improvement

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

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

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

On behalf of TÜV AUSTRIA Hellas,

Athens, 22nd of June 2015

Sifakis Nikolaos
Lead Auditor



Kallias Yiannis
General Manager

TÜV AUSTRIA Hellas
ATHENS - 419, Mesogeion Ave., Agia Paraskevi
Branch Offices in Greece: THESSALONIKI - CRETE - MYTILENE
Abroad: CYPRUS - TURKEY - JORDAN - EGYPT - ALBANIA - ISRAEL - KENYA - PAKISTAN - QATAR - KOREA

7.3 Glossary – Abbreviations

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

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

API American Petroleum Institute

BAT Stands for best available techniques.

BEA These initials stand for the Aspropyrgos refinery.

BEE These initials stand for the Elefsina refinery.

BEΘ These initials stand for the Thessaloniki refinery / Thessaloniki industrial complex

CCPS Centre for Chemical Process Safety

CLP the European Regulation (R1272/2008) for the Classification, Labelling and Packaging of substances and mixtures

COMO Company owned – Manager operated

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

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

CSR Corporate Social Responsibility.

DODO Dealer Owned - Dealer Operated petrol station

EKO Stands for the Group's subsidiary EKO ABEE.

ELOT The Greek Standardization Organization.

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

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

EUROPIA The European Petroleum Industry Association.

EU - ETS European Union's GHG Emission Trading Scheme

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

EXYPP Stands for outsourced occupational health and safety & prevention services. Where appropriate, an organisation may outsource the monitoring of the occupational H & S activities to a properly qualified external partner (EXYPP). This partner (EXYPP) is responsible for the implementation of the relevant labour legislation and reports to the management of the facility.

EYAE Stands for employee committee for occupational health & safety.

GCAD Group's Corporate Affairs Division (includes Group's CSR Division and Group's Communication Division)

GHSESD Group's Health, Safety, Environment and Sustainable Development Division

GHG Green House Gases

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

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

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

HELPE Stands for HELLENIC PETROLEUM.

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

HFE Stands for the Hellenic Federation of Enterprises.

HMA Hellenic Management Association.

HR stands for either human rights or human resources.

HSE stands for Health - Safety - Environment

ISGOTT Internal Safety Guide for Oil Tankers and Terminals.

ISM Institute of Supply Management.

LDAR Leak detection and repair system.

MARPOL Marine Pollution.

MTC Medical Treatment Cases

OHSAS Occupational Health and Safety Accreditation System

PSE Process Safety Event

PSER Process Safety Event Rate

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

RES Stands for renewable energy sources

RWI Restricted Workday Injuries

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

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

VOC Volatile Organic Compounds

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

Contact Information

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

The coordination and responsibility for the preparation of this annual "Corporate Responsibility Report 2014" lay with the Group's Division of Corporate Affairs & CSR. The Human Resources, GEHSD, Internal Audit, Finance, Marketing, Purchasing, Legal Service divisions and the Group's subsidiaries also contributed to the implementation of this Report. Both qualitative and quantitative information is consolidated and validated at Group level, unless otherwise indicated.

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

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

CONTACT DETAILS

HELLENIC PETROLEUM

Group Corporate Affairs Division

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If you would like any further information or clarifications regarding this Report, please contact the Group's CSR Department at the above address or visit the Group's website at <http://www.helpe.gr/en/corporate-responsibility/>

APPENDICES



APPENDIX I. GRI-G4 Indicators

Tables' Reference Symbols

- 📄 the Annual Report 2014, at:
<http://www.helpe.gr/en/media-center/company-publications/annual-report/>
- 📄 the Annual Financial Report for fiscal year 2014, at:
<http://www.helpe.gr/en/media-center/company-publications/annual-financial-report-for-fiscal-year/>
- 📖 this Corporate Social Responsibility Report 2014 at <http://sustainabilityreport.helpe.gr/en/>
- 📄 the Group's Code of Conduct, at: http://www.helpe.gr/uploads/coc_2013_EN/index.html
- * the Group's Internal Labor Regulations (available only at intranet)

GRI Indicators Content Index, with additional references & external assurance

	Brief description	Ext. Assurance	Reference at / Additional comments
GENERAL STANDARD DISCLOSURE			
STRATEGY AND ANALYSIS			
G4-1	Provide a statement from the most senior decision-maker of the organization about the relevance of sustainability to the organization and the organization's strategy for addressing sustainability.	✓	<p>📄 p. 5–6 (Message to Shareholders), 13 (Strategic Objectives), 14 (Focus on CSR)</p> <p>📖 p. 9–10</p> <p>📄 p. 159–160 (Strategic Goals and Prospects)</p>
G4-2	Provide a description of key impacts, risks, and opportunities.	✓	<p>📄 Financial risk management p. 33–39 Business Environment p. 142–145, Business Review p. 146–147 Review by Segment p. 148–151 Risk Management p. 154–157 & 162–164 Strategic Goals and Prospects p. 161–162</p> <p>📄 p. 13–14 (Strategic Objectives 2013–2017), p. 65–69 (Risk Management)</p> <p>Main impacts, risks and opportunities for the Environment: see indicator G4-EC2, for financial implications and other risks and opportunities for the organization's activities due to climate change.</p> <p>The Group's companies, locally, evaluate opportunities and risks:</p> <p>EKO and HF The EKO's and HF's risk management system is designed to identify and manage potential threats and opportunities that arise, promptly and efficiently. One of the risks, both EKO and HF frequently encounter is the competition received from other oil marketing companies, which often make competitive prices alliances. However, both EKO and HF are following their own marketing strategy; based on leading technology fuels and excellent fuel level of service; ensuring competitive advantage and value to their customers.</p>

In 2014, the Group significantly increased the number of COMO petrol stations, from 90 to 139, while, synergies implemented among the two marketing networks, EKO and HF, for the achievement of safe and efficient product transport, with competitive cost; the rational operation of the customers network and the reduction of the cost of supporting services.

In particular, the retail sector made significant improvement in profitability, while the sectors of industrial customers, LPG, aviation and shipping fuels increased their performance, despite the difficult environment, by operating costs reduction and targeted marketing policy.

For 2015, the objective is to increase the market share of the Group's trading companies while improving operating profitability and liquidity. The main axes of the targeted competitiveness improvement is the optimization of operations and the further of the value offered to the consumer, with innovative products and high quality services at competitive prices.

HP CYPRUS

The company was affected by the recessionary environment and the problems of the financial system that had a negative impact on sales volumes. However, profitability improved due to the reduction of operating costs. Enhancing efficiency and reducing exposure to credit risks remain key priorities for 2015.

The new VTTV terminal at Vasilico (on the south coast between Larnaca and Limassol) with a capacity of 550,000m³ of white products has commenced operations in December 2014. Within the 1Q of 2015 the new Petrolina terminal (local oil company – 80,000m³) is also expected to be operational. A decision has been taken to relocate within the next few months about 120,000m³ of Cyprus strategic reserves from Larnaca to VTTV.

It is more than evident that the operation of these two terminals will increase the pressure by the government to the oil companies which own terminals at Larnaca to close down their terminals and relocate to Vasilico. Furthermore the possible storage of product stocks by various international traders at VTTV, may pose a threat to HPC and the other existing marketing companies.

In addition the government is stepping up the pressure for the relocation of the LPG terminals from Larnaca. The four LPG companies with terminals at Larnaca have conducted and submitted to the government a feasibility study regarding the construction and operation of a new LPG terminal facility at Vasilico. No firm decisions have been taken yet.

OKTA supplies approximately 50% of the fuel needs of the domestic market. In addition, its significant storage capacity serves as a safety mechanism for the uninterrupted supply of fuel in the markets where it operates, (Kosovo, Serbia & Albania).

OKTA's sustainable profitability depends on its ability to remain competitive in a market where barriers to entry are low, while at the same time it manages its facilities and installations as efficiently as possible, in order to maintain its role as a secure supplier. OKTA has the possibility to increase its market share by exploiting its infrastructure and the competitive terms it maintains with its supplier. Additionally, OKTA seeks to increase its profitability by completing a number of transformation projects already launched and affecting its operations and organizational structure.

OKTA's transformation to a trading company has emphasized the importance of the commercial targets in its strategy.

EKO BULGARIA

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

Strategic Risks:

- a. Delay with the network expansion for administrative, strategic and geopolitical reasons;
- b. Further aggressive competition on the Retail Market that might bring the volumes and margins further down, which is especially sensitive in the current thin margins framework;
- c. Wholesale Pressure on the part of major competitors (including the LPG market), which might obstruct our plans for future development;
- d. The eventual loss of the EKO Petroleum network after the expiration of the lease period;

Opportunities:

- a. Expansion of the PS network and gaining additional market share;
- b. Gara Yana depot construction, which will improve our presence on the LPG wholesale market and will further boost our Retail margins;
- c. Idle assets disposals, which will support our investment plans by releasing significant amounts of cash;
- d. Further measures against the grey economy share, which will redirect potential customers to our network;
- e. Development and Expansion of the Loyalty programs;
- f. Introduction of new lines of product and further expansion in current business lines like lubricants, petrochemicals and C&I market;

The targets for the next periods include sustainable growth of sales, improvement of profitability, together with network development and increase of market share.

EKO SERBIA

EKO retail network is among 4 strongest in oil industry in SERBIA, considered as innovative and fast reacting to market needs. Market perception of EKO Serbia is that it is international brand, dynamic, modern company, implementing novelties through network of retail sales, providing benefits to customers, value for money products and services.












Main strengths of EKO SERBIA are high level of service, good location of EKO petrol stations, trained personnel, efficient operating procedures, introduction of new diversified products. On the other side, the relatively smaller than main competitors network is EKO weakness.






One of the market weaknesses, for EKO SERBIA and other companies is the dependence on NIS and depot holding importers. Risk also comes from the ban on direct imports by tanker, or any type of wholesale, without owned or leased storage facilities; due to changes in the interpretation and implementation of the new legislation.

Slower economic recovery and high fuel prices resulted in further drop in demand, but at a smaller rate than in previous years. EKO Serbia still has potential to grow, to increase market share and higher margin fuel sales share among product portfolio, as well to become No. 3 in the market through extension of distribution network.

JUGOPETROL

Jugopetrol managed to significantly increase its profitability through successful organic restructuring, which included moving the headquarters

			of the company from Kotor in Podgorica, despite the difficulties facing the local economy. There was a slight decline in volumes of retail sales amid increased competition in the form of service stations of the competing networks. Challenges in Montenegro fuels market is expected to continue in 2015.																		
ORGANISATIONAL PROFILE																					
G4-3	Report the name of the organization	✓	HELLENIC PETROLEUM Group  p. 2, 96  p. 92																		
G4-4	Report the primary brands, products, and services.	✓	 p. 60–62  p. 138–142  p. 43–58																		
G4-5	Report the location of the organization's headquarters.	✓	8A Chimarras str., 151 25 Maroussi, Greece  p. 8  p. 96																		
G4-6	Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	✓	 p. 7 (table 1.1), 11, 60–61  p. 9, 34–58 Group's companies included in this Report and countries with significant operations: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">1. HELPE EKO HF DIAXON ASPROFOS</td> <td style="width: 5%; text-align: center;">}</td> <td style="width: 35%; vertical-align: middle;">(Greece)</td> </tr> <tr> <td>2. OKTA AD SKOPJE</td> <td></td> <td>(FYROM)</td> </tr> <tr> <td>3. HP CYPRUS</td> <td></td> <td>(Cyprus)</td> </tr> <tr> <td>4. JUGOPETROL</td> <td></td> <td>(Montenegro)</td> </tr> <tr> <td>5. EKO BULGARIA</td> <td></td> <td>(Bulgaria)</td> </tr> <tr> <td>6. EKO SERBIA</td> <td></td> <td>(Serbia)</td> </tr> </table>	1. HELPE EKO HF DIAXON ASPROFOS	}	(Greece)	2. OKTA AD SKOPJE		(FYROM)	3. HP CYPRUS		(Cyprus)	4. JUGOPETROL		(Montenegro)	5. EKO BULGARIA		(Bulgaria)	6. EKO SERBIA		(Serbia)
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G4-7	Report the nature of ownership and legal form.	✓	HELLENIC PETROLEUM Group, HELLENIC PETROLEUM SA  p. 25  p. 167 Major shareholders (>5%) (on 31/12/ 2014) %																		
			Greek State 35,48%																		
			Pan-European Oil and Industrial Holdings S.A. 42,57%																		
			Institutional investors (Greek) 8,5%																		
			Institutional investors (Foreigners) 5,35%																		
			Retail investors 8,09%																		

G4- 8	<p>Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).</p>	✓	<p>  p. 35–58  p. 11, 60–61, see also G4-6 </p> <p>The following Table, indicatively for 3 companies, presents sales breakdown per type of customer:</p> <p>Sales breakdown by customer type</p> <table border="1"> <thead> <tr> <th>CUSTOMER</th> <th>EKO</th> <th>HF</th> <th>JUGO-PETROL</th> <th>HP CYPRUS</th> </tr> </thead> <tbody> <tr> <td>Service Stations</td> <td>36.43%</td> <td>91.19%</td> <td>56%</td> <td>60.9 %</td> </tr> <tr> <td>Industrial Customers</td> <td>20.56%</td> <td>8.78%</td> <td>13%</td> <td>13.5 %</td> </tr> <tr> <td>3rd Party Petrol Stations</td> <td></td> <td></td> <td>31%</td> <td></td> </tr> <tr> <td>LPG</td> <td>2.21%</td> <td></td> <td></td> <td>5.3 %</td> </tr> <tr> <td>Aviation Fuels</td> <td>16.95%</td> <td></td> <td></td> <td>4.4%</td> </tr> <tr> <td>Shipping Fuels</td> <td>23.16%</td> <td></td> <td></td> <td>15.7%</td> </tr> <tr> <td>Lubricants</td> <td>0.69%</td> <td>0.02%</td> <td></td> <td>0.2%</td> </tr> </tbody> </table>	CUSTOMER	EKO	HF	JUGO-PETROL	HP CYPRUS	Service Stations	36.43%	91.19%	56%	60.9 %	Industrial Customers	20.56%	8.78%	13%	13.5 %	3rd Party Petrol Stations			31%		LPG	2.21%			5.3 %	Aviation Fuels	16.95%			4.4%	Shipping Fuels	23.16%			15.7%	Lubricants	0.69%	0.02%		0.2%					
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G4-9	<p>Report the scale of the organization, including:</p> <ul style="list-style-type: none"> • Total number of employees • Total number of operations • Net sales • Total capitalization broken down in terms of debt and equity • Quantity of products or services provided 	✓	<p>  p. 11–14, 41, 146–151  p. 11, 12, 39, 85–95  p. 11 </p> <table border="1"> <thead> <tr> <th></th> <th>Employees as of 31.12.2014</th> <th>Net sales</th> <th>Total capitalization</th> <th>Quantity of products provided</th> </tr> </thead> <tbody> <tr> <td>OKTA</td> <td>454</td> <td>€354.4 m</td> <td>equity €64.9 m net debt €15,9 m</td> <td>516,000 MT</td> </tr> <tr> <td>HP CYPRUS</td> <td>53</td> <td>€288.369 m</td> <td>equity €52.453 m net debt €0.0 m</td> <td>365,000 MT</td> </tr> <tr> <td>EKO BULGARIA</td> <td>56</td> <td>€350.5 m</td> <td>equity €30.8 m net debt €28.5 m</td> <td>374,700 MT</td> </tr> <tr> <td>EKO SERBIA</td> <td>35</td> <td>€172.7 m</td> <td>equity €17 m net debt €28.0 m</td> <td>126,140 MT</td> </tr> <tr> <td>JUGO-PETROL</td> <td>142</td> <td>€172.752 m</td> <td>equity €86.983 m net debt €0 m</td> <td>209,070 MT</td> </tr> <tr> <td>HELPE</td> <td>1877</td> <td>€8,750 m</td> <td>equity €1,177 m debt €2,771 m</td> <td>15.091 m MT (Refining & Petrochemicals)</td> </tr> <tr> <td>EKO</td> <td>271</td> <td>€1,665 m</td> <td>equity €156 m debt €170 m</td> <td>2.351 m MT</td> </tr> <tr> <td>HF</td> <td>201</td> <td>€579 m</td> <td>equity €97.6 m debt €88 m</td> <td>0.741 m MT</td> </tr> </tbody> </table>		Employees as of 31.12.2014	Net sales	Total capitalization	Quantity of products provided	OKTA	454	€354.4 m	equity €64.9 m net debt €15,9 m	516,000 MT	HP CYPRUS	53	€288.369 m	equity €52.453 m net debt €0.0 m	365,000 MT	EKO BULGARIA	56	€350.5 m	equity €30.8 m net debt €28.5 m	374,700 MT	EKO SERBIA	35	€172.7 m	equity €17 m net debt €28.0 m	126,140 MT	JUGO-PETROL	142	€172.752 m	equity €86.983 m net debt €0 m	209,070 MT	HELPE	1877	€8,750 m	equity €1,177 m debt €2,771 m	15.091 m MT (Refining & Petrochemicals)	EKO	271	€1,665 m	equity €156 m debt €170 m	2.351 m MT	HF	201	€579 m	equity €97.6 m debt €88 m	0.741 m MT
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- G4-10
- Report the total number of employees by employment contract and gender.
 - Report the total number of permanent employees by employment type and gender.
 - Report the total workforce by employees and supervised workers and by gender.
 - Report the total workforce by region and gender.
 - Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors.
 - Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries).

✓

📖 p. 11, 20

Normally there are no seasonal workers. EKO is an exception because of staff seasonal changes (fixed term contracts) at the premises of airports.

Workforce breakdown by gender & employment contract:

GROUP (Workforce breakdown by gender & employment contract):

CONTRACT TYPE	M	F	TOTAL
Indefinite	2,638	633	3,271
Fixed time	40	24	64
Full time	2,678	656	3,334
Part time	0	1	1

Detailed workforce breakdowns by gender & employment contract:

CONTRACT TYPE	HELPE		EKO		HF		ASPROFOS	
	M	F	M	F	M	F	M	F
Indefinite	1636	227	174	97	123	56	92	57
Fixed time	8	6	0	0	13	9	1	0
Part time	0	0	0	0	0	0	0	1

CONTRACT TYPE	DIAXON		EKO BULGARIA		JUGO PETROL		EKO SERBIA		HP CYPRUS		OKTA	
	M	F	M	F	M	F	M	F	M	F	M	F
Indefinite time	81	15	30	26	90	38	15	20	33	17	364	80
Fixed time	0	0	0	0	7	7	0	0	3	0	8	2
Part time	0	0	0	0	0	0	0	0	0	0	0	0
Contracted personel	81	15	30	26	142	45	0	0	0	0	0	18

The Group's companies, in order to cover specific needs (such as administrative work, financial or technical support) employ contracted / self-employed personnel.

In case of such contracted personnel there is a relevant reference in the above tables. Indicative activities delegated to contracted / self-employed personnel are:

- Ancillary and support work related to packaging
- Industrial facilities cleaning
- Utility maintenance
- Secretarial support
- Cleaning of offices
- Security services
- Gardening
- Informatics support, electrician issues





G4-11	Report the percentage of total employees covered by collective bargaining agreements.	✓	<p>📖 p. 28</p> <p>Number of employee unions (per company) and percentage of employees covered by collective bargaining agreements (on average 87%):</p> <table border="1"> <thead> <tr> <th>COMPANY</th> <th>NUMBER</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>HELPE</td> <td>1</td> <td>86%</td> </tr> <tr> <td>EKO</td> <td>1</td> <td>86%</td> </tr> <tr> <td>HF</td> <td>1</td> <td>55%</td> </tr> <tr> <td>ASPROFOS</td> <td>1</td> <td>95%</td> </tr> <tr> <td>DIAXON</td> <td>1</td> <td>96%</td> </tr> <tr> <td>EKO BULGARIA</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>JUGOPETROL</td> <td>1</td> <td>93%</td> </tr> <tr> <td>OKTA</td> <td>1</td> <td>97%</td> </tr> <tr> <td>HP CYPRUS</td> <td>3</td> <td>75%</td> </tr> <tr> <td>EKO SERBIA</td> <td>N/A</td> <td>N/A</td> </tr> </tbody> </table>	COMPANY	NUMBER	%	HELPE	1	86%	EKO	1	86%	HF	1	55%	ASPROFOS	1	95%	DIAXON	1	96%	EKO BULGARIA	N/A	N/A	JUGOPETROL	1	93%	OKTA	1	97%	HP CYPRUS	3	75%	EKO SERBIA	N/A	N/A												
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G4-12	Describe the organization's supply chain.	✓	<p>📖 p. 41, (see also http://www.helpe.gr/en/media-center/company-publications/annual-report/ Annual Report 2013, p. 20)</p> <p>📖 p. 67</p> <p>We are an energy Group and thousands of suppliers are engaged in our supply chain; regarding products and services required to operate our industrial facilities & serve our customers in our diverse areas of operation. We maintain a complex inflow of materials, equipment, services, transportation and IT, communications and other technology support systems.</p> <p>We try to extend our purchases from local suppliers (see Tables 6.2). Typical partners of our supply chain are: suppliers of: raw material (crude oil, chemicals), industrial equipment and materials, IT equipment and services, industrial services, general goods and services, of land/sea transportation services.</p> <table border="1"> <thead> <tr> <th>Supply crude source</th> <th>2011</th> <th>2012</th> <th>2013</th> <th>2014</th> </tr> </thead> <tbody> <tr> <td>Russia</td> <td>32%</td> <td>32%</td> <td>54%</td> <td>41%</td> </tr> <tr> <td>Iran</td> <td>32%</td> <td>32%</td> <td></td> <td></td> </tr> <tr> <td>Iraq</td> <td>1%</td> <td>5%</td> <td>12%</td> <td>17%</td> </tr> <tr> <td>Caspian Pipeline Consortium</td> <td>9%</td> <td>12%</td> <td>11%</td> <td></td> </tr> <tr> <td>Libya</td> <td>7%</td> <td>7%</td> <td>9%</td> <td>2%</td> </tr> <tr> <td>Egypt</td> <td></td> <td></td> <td></td> <td>9%</td> </tr> <tr> <td>Kazakhstan</td> <td></td> <td></td> <td></td> <td>22%</td> </tr> <tr> <td>Other</td> <td>19%</td> <td>12%</td> <td>14%</td> <td>9%</td> </tr> </tbody> </table>	Supply crude source	2011	2012	2013	2014	Russia	32%	32%	54%	41%	Iran	32%	32%			Iraq	1%	5%	12%	17%	Caspian Pipeline Consortium	9%	12%	11%		Libya	7%	7%	9%	2%	Egypt				9%	Kazakhstan				22%	Other	19%	12%	14%	9%
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G4-13	Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain.	✓	<p>📖 p. 6</p> <p>There have been no significant changes in size, structure or ownership.</p> <p>OKTA Refining operation was stopped in January 2013. The company has managed to transform from an inflexible and inefficient heavy industry into a fast-moving, customer-focused logistics and trading company. The company is listed on the national Stock Exchange.</p>																																													

	<p>HP CYPRUS Opening of three new service stations. Expanded the circle of suppliers through collaboration with the Group's Procurement Division.</p> <p>EKO Serbia There were not significant change comparing to previous report period.</p> <p>Jugopetrol: Company's HQs were transferred from Kotor to Podgorica</p> <p>EKO Bulgaria Since 16.10.2014 the Company has started working with a new supplier Petrol AD Bulgaria. The relationships with suppliers are constant since all the suppliers' contracts provide for a period between 2 to 4 years. The contract with Naftex Petrol expired on 31.12.2014.</p>
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COMMITMENTS TO EXTERNAL INITIATIVES







G4-14	Report whether and how the precautionary approach or principle is addressed by the organization.	✓	<p>📖 p. 57, see also G4-2 for risk management</p> <p>The proactive approach and the precautionary principle are essentially assured by the risk assessment, the implementation of international standards and the resulting inspections, 1st party audits planned by GHSED & Internal Auditing, regular external inspections.</p> <p>Regarding the use of chemicals, the required Risk Management Measures are recorded for each identified use, based on the corresponding exposure scenarios that are developed in order to reduce or avoid direct and indirect exposure of humans (workers and consumers) and the different environmental systems. Risk management measures are implemented within the premises of HELLENIC PETROLEUM and communicated to downstream users through extensive safety data sheets of products.</p> <p>The scheduled public opinion surveys (sections 1.3,6), the employees' — partners' — customers' satisfaction surveys (sections 2, 5), the risk assessment (G4-2) and the quality, environmental, health and safety policies (section 4.7) confirm a proactive approach.</p> <p>Moreover:</p> <p>HP CYPRUS with the adoption of international standards/management systems HPC ensures the safe and professional conduct of its operations. Risk assessments are conducted for all the main operations at the facilities and retail stations.</p> <p>OKTA</p> <ul style="list-style-type: none"> • Implementation of national legislation in HSE issues and Best Available Techniques (BATs) • Approved IPPC Permits • Continuous monitoring of air emissions and ambient air quality • Continuous adaptation and education of personnel in order to attain maximum performance in HSE • Monitoring of the quality of potable, waste and underground waters • Revision of risk assessment of job position • Health preventive medical check-ups (periodical and systematic) according to Risk assessment of job positions
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		<ul style="list-style-type: none"> • Steady organization adaptation and education of the personnel in order to attain maximum effect in HSE through monthly drills in accordance with different fire scenarios • Risk assessment from natural disasters and other accidents — qualitative and quantitative analysis of data and possible risks for occurring natural disasters and other accidents, prediction of further development of events and consequences • Plan for safety and rescue based on the risk assessment for natural disasters, current, operational and technological risks, safety risks including Incident management team and respond forces. • Rulebook for safety from fire and explosions • Seveso Study (in progress) • Cleaning of sludge pools (in progress) <p>Furthermore, HR applies the “precautionary principle” in all its areas of operation (HR planning, selection and recruitment, training & development, succession planning, evaluation, reward) to prevent any risks of its areas of operation.</p> <p>In the area of procurement, “the precautionary principle” is one of the basic principles of operations and included in the formulation of specific procurement strategy, giving particular consideration to smooth and uninterrupted supply under the best economic conditions and always in accordance with the approved procurement manual.</p> <p>EKO BULGARIA Ongoing approaches (such as training, competitive pricing and promotional activities) ensure that our partners comply with corporate policy and regulations, confirm the loyalty of our customers and improve sales methods. Regular test of fuel samples, in independent laboratories, confirm the quality of the products.</p> <p>EKO SERBIA is present on Serbian market for 12 years and in this period beside network building has introduced many novelties in terms of products and services. Before any implementation following steps are required:</p> <ul style="list-style-type: none"> • Defining responsible person/team for certain projects • Deep analysis of the market request and need for product or service • Economic view of the project, investment, ROI, sources needed • Organizing pilot project when and if possible • Evaluation of project results and measurement and revision after it start • Further monitoring and development of a standard operating procedures for new project in order to have business case for next to come
<p>G4-15 List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.</p>	<p>✓</p>	<p>📖 p. 57 Section 4.7 presents standards voluntarily adopted. 📖 p. 72</p> <p>The adoption and implementation of international standards, codes and best practices constitutes a dynamic approach to the study of potential risks. These standards, codes and practices, that are fully aligned with the strategic objectives of the Group, we are committed to apply, diffuse and integrate them into all our operations and policies.</p> <p>Indicatively, these standards and codes include the:</p> <ul style="list-style-type: none"> • “SustainableGreece 2020” initiative – Signing Charter for a Sustainable Greece on April 29, 2014 • Global Reporting Initiative (GRI G4 indicators) as well as the specific Oil & Gas Sector Supplement.

			<ul style="list-style-type: none"> • United Nations' Global Compact (UNGC) principles & criteria. • ISO 9001, ISO 14001 & OHSAS 18001 International Standards. • ISGOTT safety guide. • ISM Standards. • Internal Labour Regulation and the Group's Code of Conduct. <p>Furthermore, the subsidiaries follow national or local standards and initiatives; e.g.</p> <p>HP CYPRUS implements the regulations: LCA SEVESO II Directive studies (Obligatory, since 2005), LCA Oil Spill Response (Obligatory, since 1991). Also, a continuous cooperation (since 1960) with Cyprus Employers & Industrialists Federation (OEB) is in place.</p> <p>ASPROFOS implements systems and procedures for data safety.</p> <p>DIAXON implements the standard BRC/IOP Issue 4: Global Standard for Packaging and Packaging Materials.</p>
G4-16	List memberships of associations (such as industry associations) and national or international advocacy organizations	✓	<p>The Group, in the context of its operation and the implementation of its strategy for sustainable development, funds and /or participates in administrative bodies of associations and organisations, see section 1.7.</p> <p>Environmental and Sustainability Organizations:</p> <ul style="list-style-type: none"> • CONCAWE • Sustainable Development Council of HFE • HSE Committees of HFE and Industry Organizations • Fuels Europe (ex Europia) • BoD of the Hellenic Association of Chemical Industries
IDENTIFIED MATERIAL ASPECTS & BOUNDARIES			
G4-17	<p>a. List all entities included in the organization's consolidated financial statements or equivalent documents.</p> <p>b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.</p>	✓	<p> p. 170–173</p> <p> p. 6–7 (boundaries)</p>
G4-18	<p>a. Explain the process for defining the report content and the Aspect Boundaries.</p> <p>b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.</p>	✓	 p. 6–7, 12
G4-19	List all the material Aspects identified in the process for defining report content.	✓	 p. 12

G4-20	For each material Aspect, report the Aspect Boundary within the organization	✓	<p>📖 p. 12 and 94, Appendix I, Table I.b DMAs</p> <p>All Material Aspects presented in Appendix I apply equally to all of our operations and entities as shown in Table 1.1.</p> <p>Moreover, Appendix I presents whether the selected material aspects are material within and/or outside the Group.</p>
G4-21	For each material Aspect, report the Aspect Boundary outside the organization	✓	<p>📖 p. 12 and 94, Appendix I, Table I.b DMAs</p> <p>All Material Aspects presented in Appendix I apply equally to all of our operations and entities as shown in Table 1.1.</p> <p>Moreover, Appendix I presents whether the selected material aspects are material within and/or outside the Group.</p>
G4-22	Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.	✓	<p>📖 p. 6</p> <p>No information restatements.</p>
G4-23	Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.	✓	<p>📖 p. 6–7</p> <p>No significant changes.</p>
STAKEHOLDER ENGAGEMENT			
G4-24	Provide a list of stakeholder groups engaged by the organization.	✓	<p>📖 p. 13–14</p> <p>Furthermore, Chart 1.2 presents the stakeholders involved in the “Materiality Analysis 2013”, while Table 1.4 presents approaches to interface with stakeholder groups.</p>
G4-25	Report the basis for identification and selection of stakeholders with whom to engage.	✓	<p>📖 p. 13–14</p>
G4-26	Report the organization’s approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	✓	<p>📖 p. 13–14</p> <p>Furthermore, Chart 1.2 presents the stakeholders involved in the “Materiality Analysis 2013”, while Table 1.4 presents approaches to interface with stakeholder groups.</p> <p>These approaches are consistently integrated into the Group’s strategy for sustainable development.</p> <p>Moreover indicative approaches of Group companies are:</p> <p>OKTA <u>With suppliers:</u> Regular communication through personal contacts and discussions are part of the Procurement Department’s operation aiming to enhance cooperation through a constructive dialogue and exchange of information and experience from the existing cooperation.</p>

	<p>With customers/fuel stations owners: Scheduled communication through the sales consultants at least once a month. During the visit, potential deficiencies are identified or corrective actions noticed at previous audits are monitored. On an annual basis especially in areas concerning image, safety, products promotion etc., station owners are rewarded.</p> <p>With employees: Through the OKTA's web page the employees are daily updated with business news related to the activities of the company and Group, (information, announcements, articles). Also, the most important news & announcements are posted on bulletin boards on specific landmarks in all buildings of the company. The employees' approach is mainly through electronic invitations/ information; individual or group invitation depending on the audience and the type of event.</p> <p>Moreover:</p> <ul style="list-style-type: none"> • Periodical meetings with employees' representatives. • Periodical meetings with relevant authorities (stock exchange etc.) • Open and transparent communication with media, publishing regular press releases, interviews and PR articles on internet portals, business magazines, daily newspapers, etc. • Online and door-to-door surveys were conducted in order to inspect the public and local community opinion about OKTA. <p>HP CYPRUS</p> <ol style="list-style-type: none"> 1. Written communication to all employees is performed through email and also with posting on notice board. 2. As per purchasing procedures every year all suppliers/vendors are re-evaluated <p>EKO BULGARIA</p> <p>Customers' communication takes place through qualitative and quantitative surveys (such as Brand Vitality Tracking, loyalty driving assessment).</p> <p>JUGOPETROL</p> <p>Customers' communication takes place through qualitative and quantitative surveys (such as GFK' survey in 2014 focused on drivers and particularly on guests of service stations).</p> <p>EKO SERBIA</p> <ul style="list-style-type: none"> • Press conferences • Direct contact with media answering questions about fuels, products and services • Organization of discussions with various Focus group • Events organization • On line, on site and phone customer service 24/7 • ATL, BTL and other promo activities
<p>G4-27 Report key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns.</p>	<p>✓ The key topics that stakeholders raised are reflected in the material issues we have chosen to report this year, (§1.3).</p> <p> p. 12</p>

REPORT PROFILE			
G4-28	Reporting period for information provided.	✓	Calendar year January – December.  p. 6
G4-29	Date of most recent previous report.		Posted on Group's web site in Jul. 2014, concerning the period Jan.–Dec. 2013.  p. 6
G4-30	Reporting cycle.	✓	Annual (01.01 – 31.12)  p. 6
G4-31	Provide the contact point for questions regarding the report or its contents.	✓	Ms Rania Soulaki, Group CSR Manager E-mail: rsoulaki@helpe.gr Tel: +30 210 6302894, Fax: +30 210 6302573  p. 92
GRI CONTENT INDEX			
G4-32	<p>a. Report the 'in accordance' option the organization has chosen.</p> <p>b. Report the GRI Content Index for the chosen option</p> <p>c. Report the reference to the External Assurance Report.</p>	✓	<ul style="list-style-type: none"> in accordance with the G4 Comprehensive option  p. 84, 94 Appendix I, Tables I.a, I. c & I.d
ASSURANCE			
G4-33	<p>a. Report the organization's policy and current practice with regard to seeking external assurance for the report.</p> <p>b. If not included in the assurance report accompanying the sustainability report, report the scope and basis of any external assurance provided.</p> <p>c. Report the relationship between the organization and the assurance providers.</p> <p>d. Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report.</p>	✓	<p>This Report was checked and assured — as a whole and every index — from an independent external certification body, prior to its publication.</p> <p>The certification process involved all Departments / Companies that provided information and senior executives of the Group.</p> <p>The Report has been signed by the Group's CEO.</p> <p> p. 84, 94 Appendix I</p>

GOVERNANCE

G4-34	<p>Report the governance structure of the organization, including committees of the highest governance body.</p> <p>Identify any committees responsible for decision-making on economic, environmental and social impacts.</p>	✓	<p>http://www.helpe.gr/en/the-group/group-management/ http://www.helpe.gr/en/the-group/group-management/management-structure/</p> <p>📖 p. 72–81 📖 p. 151–161</p> <p>The Executive Committee has responsibilities on sustainable development issues. The other committees are advisory in support of the Board.</p>
G4-35	<p>Report the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.</p>	✓	<p>The management of the Group’s companies reports directly to the Group’s BoD.</p> <p>GCAD reports directly to the Group’s CEO.</p> <p>CFO reports directly to the Group’s CEO and is an executive member of the BoD.</p> <p>GHSESD reports directly to the Group’s CEO.</p> <p>The Executive Committee has responsibilities on sustainable development issues.</p> <p>Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.</p> <p>Sustainability is part of how managers and employees do their day-to-day jobs. It is addressed, for example, at regular work discussions and performance reviews. In this way, implementing sustainability is shared across all levels of the Group, from BoD to local level.</p> <p>The submission of sustainability issues to the Board is made in 2 steps: (a) the responsible General Director submits a memorandum to the CEO, (b) the CEO recommends to the Board accordingly. The issue is discussed in the relevant Committee, which also makes recommendations to the Board.</p>
G4-36	<p>Report whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.</p>	✓	<p>The managing posts of GCAD and GHSESD are positions with responsibilities on planning, recommendations and implementation.</p> <p>CFO Director is an executive member of the BoD.</p> <p>The GCAD reports directly to the Group’s CEO.</p> <p>The GHSESD reports directly to the Group’s CEO.</p>
G4-37	<p>Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.</p>	✓	<p>📖 p. 14</p> <p>There are many mechanisms that facilitate two-way communication between management and shareholders - employees. Such mechanisms are the General Assembly, employee representatives and representatives of minority shareholders in the Board, the investors & shareholders information office and the unions of employees.</p>

		<p>* In chapter I of the Internal Labor Code, the Committees on Personnel Issues (Hiring Committee, Health & Safety and Industrial Affairs Committee) are defined.</p> <p>At each facility Committees for Occupational Health and Safety (E.Y.A.E.) are established. Health & Safety Committees have been operating at all Group's facilities.</p> <p>All these committees contribute to the exchange of views between employees and management.</p> <p>📖 p. 27 (Employee Suggestion Program)</p> <p>Other Actions:</p> <ul style="list-style-type: none"> • Quarterly meetings of the Group executives (from department head level and above) for presentation, analysis and discussion on the financial and operating results of the Group. • Roadshows / participation in conferences (5–6 times per year), quarterly meetings with analysts, meetings with institutional investors, refinery's field trips with financial analysts & institutional investors, ensure 2-way communication with the investment community. • Information meetings - discussions with the engineers of industrial plants. • Regular meetings with the elected union representatives. 															
<p>G4-38 Report the composition of the highest governance body and its committees</p>	<p>✓</p>	<p>📖 p. 74–81 📖 p. 12, 152–154, 157–161</p> <p>The statutes of the company provide for a 2 Board Members representing the employees and 2 Board Members representing the minority shareholders. The breakdown of the BoD members — of the Group's companies included in this report — is as follows:</p> <p>Breakdown of the 55 BoD members, 10 companies, by gender and age group:</p> <table border="1" data-bbox="786 1324 1500 1476"> <thead> <tr> <th rowspan="2">GENDER</th> <th colspan="3">AGE GROUP</th> </tr> <tr> <th><30</th> <th>30–50</th> <th>>50</th> </tr> </thead> <tbody> <tr> <td>M</td> <td>0</td> <td>19</td> <td>34</td> </tr> <tr> <td>F</td> <td>0</td> <td>2</td> <td>0</td> </tr> </tbody> </table> <p>The percentage of women in senior management positions ranges: HELPE 17.8%, EKO 19.4%, HF 3.8%, ASPROFOS 1.75%, OKTA 16.67%, (no participation in other subsidiaries).</p>	GENDER	AGE GROUP			<30	30–50	>50	M	0	19	34	F	0	2	0
GENDER	AGE GROUP																
	<30	30–50	>50														
M	0	19	34														
F	0	2	0														
<p>G4-39 Report whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement).</p>	<p>✓</p>	<p>The Chairman of the Board was executive member until January 2014. From February 2014 onwards, by decision of the BoD, the Chairman of the Board appointed as non-executive member.</p> <p>📖 p. 158</p> <p>In addition, the role, functions and related responsibilities of the President are outlined in the Bylaws of the Company, which are approved by the Board, within the frame and in full coherency with the applicable provisions of company law 2190/1920, as amended, apply today.</p>															


G4-40	<p>Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members</p>	✓	<p>☞ p. 153</p> <p>For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders.</p> <p>For the not elected and not appointed members of the BoD there is not a documented procedure today but their competences, qualifications and expertise are taken into consideration. The independent Board members selected based on experience and qualifications.</p> <p>The GA audits and approves the BoD's performance.</p>
G4-41	<p>Report processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders</p>	✓	<p>📄 p. 11 ☞ p. 152–156 ☞ p. 70, 74–75</p> <p>The current ratio 3 executive and 10 non-executive board members assures avoidance of “conflicting interests”.</p> <p>The BoD subscribed to the principles and best practice provisions of the Hellenic Corporate Governance Council (HCGC), http://www.helex.gr/web/guest/esed</p> <p>Also, in the Code of Conduct there is specific provision to prevent conflicts of interest, with reference to indicative cases which constitute such a conflict and establishment of an obligatory reference, to the Compliance Office, of financial transactions concerning the spouses or relatives up to second degree of the BoD members.</p> <p>Moreover indicative “tools” to ensure conflicts of interest are avoided and managed are: the Code of Conduct, the list of approved suppliers and their relationship with the officials, and the corporate governance statement.</p>
G4-42	<p>Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.</p>	✓	<p>HELLENIC PETROLEUM aspires to being open and transparent about how we operate, in order to earn and retain the trust and confidence of our customers, employees, shareholders and other important stakeholders. Our reporting and governance structure is an integral part of this commitment.</p> <p>HELPE's corporate responsibility performance is dependent on all employees—from Chairman and CEO to staff in each business unit, subsidiary, industrial facility and research laboratory. All of us at HELPE are aware of our corporate responsibilities through the Group's Code of Conduct, but we also recognize that a central coordinating function is necessary in order to ensure a comprehensive approach to corporate responsibility.</p> <p>The GCAD coordinates the development, implementation and communication of our global corporate responsibility approach and, with the strategic guidance of the Executive Committee, is responsible for reporting on the Group's corporate responsibility performance.</p> <p>To support the Group's strategy, Key Performance Indicators (KPIs) for sustainable development have been developed and implemented.</p> <p>The Executive Committee defines the Group's Sustainability Policy. The GCAD & GHSESD recommend the approval of sustainable development issues and are responsible for their implementation.</p>


			<p>Definition of sustainability issues, prioritisation of objectives, monitoring of activities and reporting results are discussed in senior management meetings.</p> <p>In addition to the Executive Committee, other Board Committees oversee issues related to corporate responsibility, such as audit and compliance, executive compensation and risk management, (http://www.helpe.gr/en/investor-relations/corporate-governance/board-committees/).</p>
G4-43	<p>Report the measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics.</p>	✓	<p>📖 p. 78–81 📖 p. 99–105, 162–164, 173–176</p> <p>The risk management system (see also indicator G4-2) provides a platform for sharing knowledge and expertise among the operating companies BoD members in a structured manner, making risk management a key enabler in achieving the strategic objectives.</p> <p>The Group's CEO has the position of Vice President in the Council for Sustainable Development of HFE.</p>
G4-44	<p>a. Report the processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.</p> <p>b. Report actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics, including, as a minimum, changes in membership and organizational practice.</p>	✓	<p>📖 p. 153, 173–176 📖 see also at indicator G4-51</p> <p>For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders.</p> <p>For the not elected and not appointed members of the BoD there is not a documented procedure today but their competences, qualifications and expertise are taken into consideration. The independent Board members selected based on experience and qualifications.</p> <p>Apart from the BOD's evaluation, through the Annual Report, from the Annual General Assembly, the Board monitors and reviews the implementation of its decisions on an annual basis.</p> <p>Moreover, the introduction of an evaluation system for the members of the BoD and its committees is under consideration, in the context of the aforementioned Code of Corporate Governance of the Hellenic Corporate Governance Council (HCGC), at: http://www.helex.gr/web/guest/esed</p>
G4-45	<p>a. Report the processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.</p> <p>b. Report actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics, including, as a minimum, changes in membership and organizational practice.</p>	✓	<p>📖 p. 74–75 📖 p. 158–161, 162–164</p> <p>Supporting the BoD the following relevant Committees operate:</p> <ol style="list-style-type: none"> 1. Audit Committee (Article 37 Law 3693/2008) 2. Committee on Finance and Economic Planning, which, among other things, "informed by the CEO, the General Directorate of Finance and auditors about significant risks or exposures and assess the measures taken or to be taken to minimize the risk about". 3. Further information about the BoD Committees at: http://www.helpe.gr/en/investor-relations/corporate-governance/board-committees/

			<p>The drawing up of the Corporate Crisis Management Plan has been completed and approved.</p> <p>2 members of the Board elected by employees and two members appointed by the Special General Meeting of minority shareholders.</p> <p>The BoD approves reports & budgets of the Companies and the Group, as well as the 3-month, 6-month and annual reports and announcements of the Group. The Executive Committee approves reports & budgets of the Divisions and Departments.</p>
G4-46	Report the highest governance body’s role in reviewing the effectiveness of the organization’s risk management processes for economic, environmental and social topics.	✓	<p>¶ p. 74–75</p> <p>The BoD approves reports & budgets of the Companies and the Group, as well as the 3-month, 6-month and annual reports and announcements of the Group. The Executive Committee approves reports & budgets of the Divisions and Departments.</p> <p>GHSED submits a report on environment, health and safety issues to the BoD at least 2 times a year.</p>
G4-47	Report the frequency of the highest governance body’s review of economic, environmental and social impacts, risks, and opportunities.	✓	<p>The BoD approves reports & budgets of the Companies and the Group, as well as the 3-month, 6-month and annual reports and announcements of the Group. The Executive Committee approves reports & budgets of the Divisions and Departments.</p> <p>GHSED submits a report on environment, health and safety issues to the BoD at least 2 times a year.</p>
G4-48	Report the highest committee or position that formally reviews and approves the organization’s sustainability report and ensures that all material Aspects are covered.	✓	<p>The CEO approves and signs this Sustainability Report.</p> <p>The Group CSR Manager is authorized to ensure that all material issues are presented with clarity and objectivity.</p>
G4-49	Report the process for communicating critical concerns to the highest governance body.	✓	<p>The Executive Committee defines the Group’s Sustainability Policy. The GCAD & GHSED recommend the approval of sustainable development issues and are responsible for their implementation.</p> <p>The GCAD works with business units and functional areas to integrate HELPE’s corporate responsibility principles into business policies, strategies and practices, and brings the voice of external stakeholders into decision-making processes.</p> <p>The GCAD is accountable for producing an annual corporate responsibility report. To contact members of the Division, please see section 8.1.</p> <p>The Corporate Responsibility Report Working Group: Representatives from business units and functional areas are members of the Corporate Responsibility Report Working Group, in order to promote further integration of corporate responsibility into the business. Individual members have been chosen to be active advocates for corporate responsibility within their respective areas. In addition, the members of the working group, a diverse selection of employees from all divisions of the company, serve as content experts in their respective areas and work with the</p>

			<p>GCAD to help set goals and develop metrics that support and measure Group's overall corporate responsibility strategy and objectives.</p> <p>Meetings with senior management are used to define sustainability issues and reach agreement on prioritising objectives, monitoring activities, and reporting results.</p> <p>The Divisions, as appropriate, inform the CEO on critical issues as soon as they are identified. He, in turn, recommends to the BoD.</p> <p>Moreover, critical issues communicated through consultation of the BoD with stakeholders (during General Assemblies). See also index G4-37 above.</p>
G4-50	Report the nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them.	✓	<p>The critical issues presented to the Board are the material aspects that were recorded and evaluated through "Materiality Analysis 2013" (§ 1.3), the trends and expectations recorded in the internal (§ 2.5) and external (§ 5.2, 6.2) satisfaction surveys.</p>
G4-51	Report the remuneration policies for the highest governance body and senior executives	✓	<p>☞ p. 153, 169</p> <p>For the 7 members of the Board evaluation as to their performance, supervision and control, is made by the services of the organization they represent (Greek State). 2 Board members elected by employees and 2 members appointed by the Special General Assembly of minority shareholders. For non-elective and non-appointed members of the Board there is currently no statutory assessment process, but the assignment of tasks is based on ability, qualifications and experience.</p> <p>For senior and top management, the evaluation is made annually based on KPIs, while the performance of the Company is associated with the objectives of the staff on issues such as sustainable development (safety, environment, etc.). Furthermore, a percentage of the employees' goals concerns health, safety, environmental and HR issues. This weighting factor varies depending on company/department mission.</p> <p>DIAXON: BoD members (CEO included) are senior management staff of HELPE and their remuneration is in accordance with the relevant policy of the Group. Senior management is either covered by the relevant HEPL's policy or the relevant collective bargaining agreement; which includes bonus connected with achieved goals.</p> <p>HP Cyprus: the individual goals of executives have a certain percentage related to health, safety and environmental issues. A policy is in place covering the remuneration of the senior executives for both fixed and variable pay. Variable pay is based on yearly objectives.</p> <p>EKO Bulgaria: the remuneration policy includes fixed pay and variable pay (Performance-based pay & Bonus) and termination payments.</p> <p>Jugopetrol: BoD members assigned by majority stakeholder are entitled to a predefined amount of yearly remuneration if the Company has reported a profit in previous year.</p>
G4-52	Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are inde-	✓	<p>☞ p. 153, 169</p> <p>No consultants are involved in the process of determining employee compensation.</p>

	<p>pendent of management. Report any other relationships which the remuneration consultants have with the organization.</p>		<p>Remuneration is set based on the Collective Agreement and annual employee evaluation, as agreed between management and unions. To configure remuneration policy the best remuneration practices in the domestic labor market and the most important aspects affecting the competitiveness of remuneration and motivation of executives are taken into account.</p> <p>At HP Cyprus:</p> <ol style="list-style-type: none"> 1. For personnel covered by collective agreement — salary scales (collective agreement) as per position 2. For executives — salary surveys studies 																						
G4-53	<p>Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable.</p>	✓	<p>Through recommendation, voting and approval by a majority in the General Assembly, for the remuneration and allowances of members of the Board.</p> <p>Collective bargaining agreements are used to determine the remuneration of the company's employees, and two social partners, the management and the employees' unions, play a key role. Usually, before the expiration of the existing Collective Agreement, the Union submits proposals for changes, increases, amendments, etc., and negotiations are following until mutual consensus is reached.</p>																						
G4-54	<p>Report the ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.</p>	✓	<p>Countries where there is significant activity are shown in Table 1.1 of this Report.</p> <table border="1"> <thead> <tr> <th>Company/Country</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>HELPE</td> <td>5.23</td> </tr> <tr> <td>EKO</td> <td>3.31</td> </tr> <tr> <td>HF</td> <td>2.7</td> </tr> <tr> <td>ASPROFOS</td> <td>2.15</td> </tr> <tr> <td>DIAXON</td> <td>1.88</td> </tr> <tr> <td>JUGOPETROL</td> <td>4.18</td> </tr> <tr> <td>OKTA</td> <td>4.9</td> </tr> <tr> <td>EKO BULGARIA</td> <td>5.0</td> </tr> <tr> <td>EKO SERBIA</td> <td>4.8</td> </tr> <tr> <td>HP CYPRUS</td> <td>2.81</td> </tr> </tbody> </table>	Company/Country	Ratio	HELPE	5.23	EKO	3.31	HF	2.7	ASPROFOS	2.15	DIAXON	1.88	JUGOPETROL	4.18	OKTA	4.9	EKO BULGARIA	5.0	EKO SERBIA	4.8	HP CYPRUS	2.81
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G4-55	<p>increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country.</p>	✓	<p>Countries where there is significant activity are shown in Table 1.1 of this Report.</p> <table border="1"> <thead> <tr> <th>Company/Country</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>HELPE</td> <td>N/A</td> </tr> <tr> <td>EKO</td> <td>N/A</td> </tr> <tr> <td>HF</td> <td>N/A</td> </tr> <tr> <td>ASPROFOS</td> <td>0%</td> </tr> <tr> <td>DIAXON</td> <td>1.47%</td> </tr> <tr> <td>JUGOPETROL</td> <td>1.03%</td> </tr> <tr> <td>OKTA</td> <td>N/A</td> </tr> <tr> <td>EKO BULGARIA</td> <td>0%</td> </tr> <tr> <td>EKO SERBIA</td> <td>0%</td> </tr> <tr> <td>HP CYPRUS</td> <td>N/A</td> </tr> </tbody> </table>	Company/Country	Ratio	HELPE	N/A	EKO	N/A	HF	N/A	ASPROFOS	0%	DIAXON	1.47%	JUGOPETROL	1.03%	OKTA	N/A	EKO BULGARIA	0%	EKO SERBIA	0%	HP CYPRUS	N/A
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ETHICS & INTEGRITY		
G4-56	Describe the organization’s values, principles, standards and norms of behavior such as codes of conduct and codes of ethics	<p>✓</p> <p>  p. 11–12  p. 17, 57–58 * Internal Labour Regulation </p> <p>The Code of Conduct was approved and notified in 2011 (in Greek and English) with full implementation throughout the Group and its external partners.</p> <p>The Competition Policy and Compliance Program, as to the competition legislation, are in the process of approval.</p> <p>List of procedures for Health, Safety, Quality and Environment - according to international standards - and corresponding policies are available on the corporate network, intranet and internet. These apply across the Group.</p> <p>Group’s values address all employees at all Group’s subsidiaries in Greece and abroad.</p> <p>The statements, codes or policies concerning procurement activities fall under the existing Purchasing Regulations, paying special attention to co-operation with suppliers.</p> <p>All of the aforementioned apply across the Group and the relevant continuous training ensures knowledge and application. Deviations from their application have not been detected.</p> <p>In addition, the companies develop, ad hoc, local policies depending on the nature of activity and the place. For example:</p> <p>At ASPROFOS: policy for the proper use of IT infrastructure</p> <p>At DIAXON: Policy for Quality, Health & Safety, Internal Labour Regulation, Policy for the proper use of interconnected IT systems.</p> <p>At HP Cyprus:</p> <ul style="list-style-type: none"> • Policy for box for suggestions / comments / complaints • Policy for clean workspace (offices only) • Policy for non intrusive work environment (offices only) • Policy for Casual Friday (offices only) <p>At EKO SERBIA: The company supports the vision “To be customer’s number one choice, offering value for money services and products, caring for our people and respecting the environment”. This vision is inspiring all employees for innovations implementation, network operations, environment friendly projects and CSR activities.</p> <p>At EKO BULGARIA :</p> <ul style="list-style-type: none"> • Communication Procedure • Procedure for Investments / Disposals • Internal Labor and Conduct Code • Procurement Manual • Public and Media Relations • Risk Assessment Procedure
G4-57	Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as help-lines or advice lines.	<p>✓</p> <p>We are committed to be a responsible Group. This means that we conduct our activities in accordance with relevant ethical, professional, and legal standards. We consider corruption, bribery, and unfair competition to be unacceptable.</p> <p>Risks related to sustainability such as personnel, safety, environment, business conduct, and supply chain management form an intrinsic part of</p>

		<p>Group's Risk Management. For each of the risk categories within all operating companies as well as on group level an assessment of the risk is done together with determining improvement potential. This improvement potential is input for the execution agendas and on operating and functional level.</p> <p>In the Code of Conduct, HELLENIC PETROLEUM stipulates that every employee must behave honestly, transparently, and responsibly towards customers, business partners, shareholders, and colleagues. The Code also provides the opportunity for ethical and lawful conduct counselling; as well as for anonymous reports towards the Compliance Office.</p>
<p>G4-58 Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistle-blowing mechanisms or hotlines.</p>	<p>✓</p>	<p>In order to further ensure that our business integrity policy is actively and properly implemented, the Policy and Corporate Compliance Office are under approval. Employees can contact this office with any questions about integrity or reports of alleged wrongdoing. These will be made in the context of confidentiality and discretion.</p> <p>The Code of Conduct has been translated in all the languages of the countries where the Group operates; it is applicable since 2011.</p> <p> p. 63 (Round the clock service)</p> <p>OKTA: We have implemented mechanism for protection of the personal data of our clients and employees, as well as our employees' rights in accordance with the Law.</p> <p>We have implemented measures and procedures for security of the company assets.</p> <p>Regular trainings for our new contractors and employees are being performed in reference to health, safety, environmental issues and internal procedures.</p> <p>Independent internal audit function is in operation.</p> <p>HP CYPRUS: The Group' Code of Conduct has been implemented since 2012. The code handles all aspects and has been communicated to all employees, suppliers and customers and is part of the contracts.</p> <p>EKO BULGARIA: Reporting mechanisms and the overall reporting responsibility procedures are established by the Group's Code of Ethics provisions. Obligation for observance of Group's Code of Conduct is included in each partner's agreement. Concerns are treated confidentially. The Company has a non-retaliation policy. Cases of concerns have not been raised for the reporting period.</p> <p>EKO SERBIA: The Group Code of Conduct has been implemented. In cooperation with outsourced agency an open line (email and free of charge phone number) 24/7 is in operation.</p> <p>Depending on the communication issue , staff in charge is making investigation and preparing final answer.</p> <p>According to law all forms of communication (concerns, questions, thanks, congratulations or complaints) officially received have to be resolved in 15 days.</p> <p>For the communication with stakeholders several channels of communication are used: corporate Web site, Loyalty Portal, android application, newsletters,, bulk sms, Memo letters, customer service line, petrol stations employees. By law all customer complaints recorded should be resolved in 15 days.</p>

Appendix I: DMAs - Management Approach Disclosures on Material Aspects					Ext. Certification Report's section & GRI indicators
Table I.b of Material Aspects and Aspect Boundaries					✓
Material Aspects	Aspect Boundaries		Report's Section	GRI indicator	
	within	outside			
ENVIRONMENT					
			4		
Material Consumption	x		4.6	Appendix I: DMA: Material Consumption, G4-EN1-2	
Energy Use	x		4.6	Appendix I: DMA: Energy Use, G4-EN3-7	
CO ₂ Emissions	x	x	4.4, 4.5	Appendix I, DMA: GHG Emissions, G4-EN15-19	
NOx Emissions	x	x	4.5	Appendix I, DMA: GHG Emissions, G4-EN15-21	
VOC Emissions	x	x	4.5	Appendix I, DMA: GHG Emissions, G4-EN15-21	
Oil Spills & Leakages	x	x	DMA: (Oil Spills & Leakages)	Appendix I, DMA: Biodiversity, G4-EN24	
Product Impact	x	x	4.7, 5.2	Appendix I, DMA: Product Impact G4-EN11-14, EN26, PR1-3	
SHAREHOLDERS					
Supply Security	x		5.3	Appendix I, DMA: Raw Materials Supply Security G4-12	
Operational Continuity	x	x		Appendix I, DMA: Operational Continuity	
SUPPLIERS					
Supplier Assessment	x		5.3	Appendix I, DMA: Supplier Assessment Table 7.6c: G4-EN32-33, LA14-15, HR4-6, HR10-11, SO9-10	
Responsible Buying	x		6.2	Appendix I, DMA: Procurement Practices, G4-EC9	
Operational Support	x			Appendix I, DMA: Procurement Practices	
EMPLOYEES					
			2		
Job Position Security	x	x	2, 2.2	Appendix I, DMA: Job Position Security, G4- LA1	
Occupational Health & Safety	x		3	Appendix I, DMA: Occupational H & S, G4- LA5-8	
CUSTOMERS					
			5, 5.1, 5.2		
Anti-competitive Behaviour	x		1.5	Appendix I, DMA: Anti-competitive Behaviour G4-SO3-5, SO7	

SOCIETY		6		
Accident Impact	x	x	3.3–3.4	Appendix I, DMA: Accident Impact G4-EN11-14, EN26
Health Screening	x	x	6.3	Appendix I, DMA: Health Screening
Acoustic Impact	x	x	3.1, 3.2	Appendix I, DMA: Acoustic Impact
ENVIRONMENT				✓
Material Consumption				§ 4.6
<p>This refers to the total amount of basic and auxiliary material resources directly used by the Group to conduct operations and activities. Basic raw materials are crude, chemicals and water.</p> <p>To reduce raw material losses the refineries have appropriate collecting and recovery systems. Where technically feasible Best Available Techniques are applied for the recovery of raw materials from various waste streams. The recovery rates for 2014 are presented in Table 4.15.</p> <p>Considerable measures are also taken on the reuse of the water consumed. Part of the production process of the refinery is the pre-treatment of polluted water-streams and their reuse within the process. Among the benefits is the significant reduction of fresh water consumption and the reduction of effluents. The reuse of water for 2014 is presented in Table 4.13.</p> <p>The Group cooperates with other European companies participating in International Organisations and Consortia for the implementation of REACH Regulation. The requirements of the European Chemicals Agency (European Chemicals Agency-ECHA, http://echa.europa.eu/) at all phases of the regulation are kept and the registration dossiers of chemical substances are updated, according to the Regulation or the ECHA. Emphasis is given to interactive and effective communication in the supply chain with primary tool the updated products' Safety Data Sheets.</p> <p>The use of auxiliary materials identified as substances of very high concern is avoided in all processes.</p> <p>The subsidiaries of the Group receive expert guidance on their obligations concerning REACH Regulation.</p> <p>Finally, initiatives are taken for the efficient use of natural resources, renewable energy and recycled materials throughout the spectrum of activities and processes.</p>				<p>G4-EN1 G4-EN2 G4-EN8- G4-EN9 G4-EN10</p>
Energy Use				§ 4.4, 4.6
<p>This refers to the use of non-renewable energy sources, such as fossil fuels and electricity consumption from the public power corporation.</p> <p>Our energy consumption contributes to a significant amount of our costs and is an indicator of the efficiency of our processes. As a large company in an industry sector with relatively high energy consumption, our energy usage has a great impact on society. We have set targets for relative reduction in energy usage; and we monitor and benchmark progress on these targets.</p> <p>All the Group's refineries are energy optimized and feature cogeneration CHP units, which cover about 37% of the electric energy needs of the Group. Due to the operation of these units the emission of 312 thousand tonnes of CO₂ in 2014 was avoided (based on PPC's weighted average emission factor of 1.11 kg CO₂/kWh for 2013), significantly contributing to the reduction of nation-wide levels of greenhouse gases emissions.</p>				<p>G4- EN3 G4- EN4 G4- EN5 G4- EN6 G4- EN7</p>

<p>GHG Emissions (CO₂ emissions)</p> <p>This refers to the overall GHG emissions (both direct and indirect, mainly CO₂) due to Group's operations. The Group's strategy is to reduce greenhouse gas emissions through increased energy efficiency and investments in renewable energy projects.</p> <p>At all Group's refineries cogeneration units (Combined Heat and Power or CHP) are in operation; which contribute to the avoidance of a significant proportion of CO₂ emissions that would be emitted if the self-produced electricity came from a provider (such as PPC) with a different fuel mix.</p> <p>Regarding monitoring and reporting of emissions, the HELLENIC PETROLEUM Group systematically monitors both the direct CO₂ emissions (Scope 1) and the indirect emissions (Scope 2 and 3), to the maximum extent of its activities. Indicatively, the estimated CO₂ emissions from sea transport of raw materials and products as well as the estimated carbon footprint (carbon footprint project) of all activities in the Group's office buildings (headquarters and refineries of Aspropyrgos, Elefsina and Thessaloniki) are presented; (certification MyClimate).</p> <p>The Group's refineries participate in the Emissions Trading Scheme (EU ETS) since its establishment; whereas, since 2013, follow all procedures relevant to monitoring, calculation and verification of emissions; according to the 3rd phase regulations of the EU ETS 2013-2020.</p>	<p>§ 4.5</p> <p>G4-EN15 G4-EN16 G4-EN17 G4-EN18 G4-EN19 G4-EN20 G4-EN21</p>
<p>Oil Spills & Leakages</p> <p>The Group follows a strategy for further development of its activities and the continuation of existing operations with respect to the natural environment.</p> <p>It is underlined that none of the Group's industrial complexes is near protected areas (NATURA, RAMSAR). All complexes are at established industrial areas.</p> <p>The Group has developed protection and enhancement actions of the natural environment and ecosystems as a priority and a fundamental pillar of its sustainable development strategy.</p> <p>HELLENIC PETROLEUM follow closely developments concerning effective implementation of the national strategy for biodiversity while they are at the disposal of the national authorities for cooperation in this direction.</p> <p>Maritime transport fuels are made with modern technology ships inspected regularly by shipping registers in accordance with international standards. The Group's privately-owned and chartered vessels meet all of the applicable MARPOL regulations and conventions (International Convention for the Prevention of Pollution from Ships), EU regulations and ISGOTT & ISM (International Safety Guide for Oil Tankers and Terminals and International Safety Management Code) international standards. The vessels are also covered (by P & I clubs) for pollution incidents. In the discharging / loading areas there are means of protection and restriction of pollution whereas frequent drills (in collaboration with authorities like the Fire Department, Port Police & Hellenic Police) ensure the readiness of human resources.</p> <p>In addition, actions such as the training of tanker drivers in defensive driving minimize risks of road accidents.</p>	<p>§ 4.8</p> <p>G4-EN24</p>
<p>Product Impact (i.e. use by end consumer)</p> <p>This refers to product consumption by the end consumer and its impact on the environment mainly in terms of air emissions.</p> <p>In the context of our Quality Policy and care for our customers, the Group is committed to supply products and services which fully comply and / or are better than the agreed specifications, to provide complete</p>	

technical data on the quality of products / services to all concerned and to offer its customers, partners and staff the opportunity to evaluate and contribute to the further improvement of the quality of products and services.

Increasingly stringent fuel specifications (zero sulphur fuels), for the fuel supplied to the final consumer, contribute to the reduction of gaseous emissions such as sulphur dioxide (SO₂) and particulate matters. Best available techniques, such as the LDAR program, are also applied to the storage and distribution of products in order to reduce VOC emissions. These include: installation of secondary barriers in the floating roof tanks, painting tanks storing volatile products in white (high reflectivity), bottom-loading of tank-trucks and vapour recovery systems at the fuel loading facilities.

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

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

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

SHAREHOLDERS

✓

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

G4-12

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

The crude oil supplies are coordinated centrally by the Group and are covered by frame agreements (term-contracts) and with spot-contracts. The Group procures crude oil primarily from Russia, the Middle East and North Africa. Political instability in the Middle East and North Africa varies the last 50 years and depends on various factors, such as frequent change of governments, military regimes, social disruptions, sanctions from other states or terrorist actions. The political unrest in these areas are able to disrupt the smooth supply of the Group with crude oil. Also, in Russia, possible structural changes in the oil sector, tax and legislative changes, political unrest and problems of transporting crude from Russian terminals can affect crude supply.

The conditions in the crude oil market in 2014 were very unfavourable, mainly due to the continued, since 2012, EU's embargo on trade with Iran and the political unrest in Libya and Iraq; which affected the smooth supply of refineries. The Group has adjusted accordingly the mixture of oil supplies adding supplies from Russia (41%) and Kazakhstan (22%). Despite the political developments in the above mentioned countries and reduced exports, HELPE purchased crude oil from Iraq and Egypt, (17% and 9% respectively).

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

Operational Continuity (e.g. plans to ensure continuation of operations)

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

The activities and results of the Group may be affected by supply disruptions, a variety of external or internal factors (such as military actions in supplying countries), emergency downtime into production units, shut-downs for maintenance etc. The number of Group's facilities and their geographic dispersion impart considerable flexibility in emergency situations. In addition, the Group has developed considerable expertise and

<p>experience of successfully handling logistics crises, such as the events in Libya, the embargo on Iran and shutdowns at different units. In all cases, contingency supply plans were prepared and immediately carried, thus minimizing any operational impact.</p> <p>For further information see G4-2 in Appendix I.</p>	
<p>SUPPLIERS</p>	<p>✓</p>
<p>Supplier Assessment</p> <p>The Group's Procurement Division. has the primary responsibility for the evaluation of suppliers (for products and services) in accordance with the procedures of the Group and the Procurement Manual.</p> <p>To develop our supply chain and incorporate our values and principle we seek added value, long term, mutually preferred relationships with partners who can help us to improve the total performance and sustainable development of the Group . In addition, labour practices of our suppliers affect not only our financial performance, but also our relationships with other social partners. For the above reasons, their evaluation is based on business criteria (safety issues, performance, compliance with contractual agreements etc) and also criteria for sustainable development. The assurance that Group's suppliers properly manage issues such as human rights and labour practices is among the suppliers evaluation criteria.</p> <p>The evaluation of suppliers (and new suppliers) is complimented by questionnaires which include relevant questions. The completed questionnaires were assessed by the Procurement Division . No significant findings in 2014.</p> <p>Moreover, starting on 05/2014, active suppliers are evaluated using questionnaire which also includes criteria on impact on society and environmental performance (based on ISO 14001).</p> <p>In several cases of selection of suppliers of equipment the sustainable solution offers a lower Total Cost of Ownership (TCO) due to, for instance, lower energy consumption during operation or waste efficiency.</p>	<p>G4-12 G4-EN32 G4-EN33 G4-LA14 G4-LA15 G4-HR4-6 G4-HR10 G4-HR11 G4-SO9 G4-SO10</p>
<p>Procurement Practices (Responsible Buying & Operational Support)</p> <p>The Group's procurement procedures are included in the Procurement Manual and describe the following points:</p> <ul style="list-style-type: none"> • Who buys: roles and responsibilities of buyers are documented. • Selecting suppliers: continuous training of buyers on procurement techniques and their application. The introduction and assessment of criteria for selecting suppliers (including sustainable development criteria) takes place in cooperation with relevant Departments • Responsible procurement policy: Purchases from local suppliers are 12.3% at HELPE and DIAXON (industrial facilities) and 97% at marketing companies (EKO, EK, EKO BULGARIA, OKTA, HP CYPRUS, EKO SERBIA, JUGOPETROL). For HELPE & DIAXON, as local suppliers are defined those operating in municipalities neighbouring Group's industrial facilities. For the Group's trading companies (EKO, HF, EKO BULGARIA, OKTA, HP CYPRUS, EKO SERBIA, JUGOPETROL), as local suppliers are defined those operating within the same country. The Code of Conduct of the Group covers topics such as conflicts of interest, gifts, working relationship with a supplier, etc. • Environmentally friendly procurement: Starting on 05/2014 active suppliers are evaluated using questionnaires which also include criteria on environmental performance.. <p>Interaction with suppliers, ie activities and procedures that include issues such as compliance with payment terms, purchase order cancellation, support for SMEs, etc, are described in Procurements Manual, Code of Conduct and Internal Labour Regulation. The relevant suppliers' information is provided with clarity, transparency, respect of competitiveness and equal opportunities.</p>	<p>§ 5.3, 6.2 (Table 6.1)</p> <p>G4-EC9</p> <p>Code of Conduct</p> <p>http://www.helpe.gr/uploads/coc_2013_EN/index.html</p>

<p>Noted that the implementation of Procurement Manual in commercial, construction and transportation contracts, as well as the relevant contractual obligations were among the issues audited by the Internal Audit Department.</p> <p>As of 2nd semester of 2015, a “clause of compliance” of our suppliers, with the principles of the UN Global Compact (in the fields of human rights, labour, environment and corruption), shall be incorporated in our contracts and purchase orders.</p>	
<p>EMPLOYEES</p>	<p>✓</p>
<p>Job Position Security</p> <p>This refers to the level of security of present and the estimation of future job positions within the Group taking into account the volatile economic situations.</p> <p>The Group designs and implements strategies and adopt modern policies of Human Resources. In this way it seeks to be “an employer of choice and employees the competitive advantage”, to achieve the business objectives and confirm the values & principles.</p> <p>The Group places particular attention in shaping a dynamic policy framework, for the management of human resources, in order to best meet business objectives while meeting the goals and expectations of employees.</p>	<p>G4-LA1</p>
<p>Occupational Health & Safety</p> <p>This refers to utilising policies, practices and initiatives on behalf of the Group, to ensure the health, safety and welfare of employees.</p> <p>HELLENIC PETROLEUM feels responsible for all people involved in or affected by the activities of the Group. This includes our employees, customers, partners, suppliers, trainees, subcontractors and the general public.</p> <p>Health and safety performance is a true reflection of operational excellence. Occupational health and safety contributes to the satisfaction of our employees and our reputation.</p> <p>The continuous care for the health and safety of employees and the concern for their families as well as the residents of neighbouring municipalities, is a prime consideration for the Group. For this policies, actions and programs have been adopted that contribute to this direction.</p> <p>Section 3 presents policies and practices used to ensure occupational health and safety. In section 3.5 the specific training in health & safety is presented as well as emergency drills held annually in the facilities of HELPE. In § 3.3, the systematically monitored indices LWIF,AIF, LWIS and PSER (process safety index) are presented as well as the targets set.</p> <p>The Group’s occupational health & safety services aim to identify, prevent, and ultimately eliminate all work-related occupational diseases or accidents at work.</p> <p>To further raise awareness of employees in accident prevention and safe plant operation, the implementation of the Rewarding Policy for Safety Performance is continued, among other practices. In this context, employees’ teams that achieve safety objectives, based on working hours without lost workday accident, are rewarded.</p> <p>It is our aim to provide a safe, inspiring, and flexible work environment.</p>	<p>§ 2, 3.1, 3.3, 3.5</p> <p>G4-LA5 G4-LA6 G4-LA7 OG-13</p> <p>http://www.helpe.gr/en/health-and-safety/health-and-safety/</p>

<p>Asset integrity and process safety</p> <ul style="list-style-type: none"> • To ensure the reliability of the equipment - as a key element in the safe operation of facilities — several procedures have instituted and implemented by the companies' staff. These are: <ul style="list-style-type: none"> - Management of Change - Safe Design Committees - HAZOP studies • Equipment inspection and checks are made periodically by the Equipment Inspection Departments of the facilities, in accordance with their respective programs. • Also, inspections focused on process safety are carried out weekly, by management staff, in order to identify and correct unsafe behaviours of employees and contractors' staff. • The monthly CCPS bulletin (Beacon), concerning process safety, is distributed to all staff. • Procedures, especially in safety issues, are in place for the prequalification of contractors and their safety performance assessment after completion of the work. • Any unplanned or uncontrolled leakage of substances is measured as process safety event rate, in accordance with the definition and criteria of CONCAWE. 	OG13
CUSTOMERS	✓
<p>Anti-competitive Behaviour (i.e. monopoly conditions, price agreements with competitors).</p> <p>This refers to business practices and policies that potentially prevent or reduce competition within the market such as monopoly conditions and price agreements with competitors.</p> <p>Our reputation and license to operate are strongly related to anti-corruption, anti-competitive behaviour, and compliance.</p> <p>Anti-corruption strengthens efficiency by reducing transactions and transaction costs for us and for our stakeholders. We believe that doing business honestly is vital to increasing competitiveness for us and for our partners. Competitive behaviour contributes to innovation and mutual cooperation. It creates an environment where the best products will win, and where our stakeholders will get the best products for the best price.</p> <p>We are committed to being a responsible company. This means that we conduct our activities in accordance with relevant ethical, professional, and legal standards. Corruption, bribery and unfair competition are unacceptable in our organisation.</p> <p>Our business integrity policy is based on our Code of Conduct, which all employees are aware of. In the Code of Conduct, we stipulate that every employee must behave honestly, transparently, and responsibly towards customers, business partners, shareholders, colleagues and other stakeholders.</p> <p>In 2014 no legal actions were taken for anti-competitive behaviour, anti-trust, and monopoly practices. In addition, there have been no known instances of corruption or of non-compliance with laws and regulations.</p> <p>Regarding competitive practices in the market, both EKO and HF (BP) follow their own marketing strategy and not make price wars or conciliations for their control. It is also clear from the course and their presence in the market that although EKO is a company that has built its brand not based on price but high quality of fuel (which is assured through continuous on-site inspections at the pump) and on the excellent level of service, offering its customers products and services with value for money.</p> <p>On the other hand, HF (ex BP) is a company which is clearly placed by consumers as a premium brand, timeless, inspiring confidence and enjoying high acceptance and recognition for the superior quality of its products; without need of price wars or price controls to sell.</p>	<p>§ 1.5</p> <p>Code of Conduct</p> <p>http://www.hellenicpetroleum.gr/uploads/coc_2013_EN/index.html</p>

LOCAL SOCIETY

✓

Accident Impact (e.g. explosions)

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

Impact assessment is carried out in accordance with the requirements of European and Greek legislation Seveso, and reported to the authorities as a safety assessment. Based on this assessment, contingency plans for the protection of local residents and employees are implemented.

Techniques and measures, above and beyond those that are imposed by the regulations and legislation, are implemented at all Group's facilities, in order to ensure for Occupational Health and Safety.

In this context, a study to analyze operational risks (HAZOP or Hazard & Operability Study) is a prerequisite for any new facility or for the extensive modifications of existing units. The operation and maintenance of the facilities rely on well-trained and experienced personnel that comply with safe operating procedures.

Particularly important for the prevention and addressing of accidents are:

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

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

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

In this context, the Group sponsors programs providing primary care services (in collaboration with bodies such as MDM and local authorities), particularly in communities neighbouring industrial facilities.




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

Acoustic Impact

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

Scheduled noise measurements are carried out at all Group's installations to ensure that employees are not exposed to noise and vibration levels higher than the acceptable limits of the law. In addition, all industrial complexes monitor the noise level within the limits of the facility, so as to be in accordance with relevant legislation, with specific noise levels and vibration limits. Consequently, it is considered that there is no noise pollution as far as local residents are concerned.

Table I.c: Specific Standard Disclosures – INDICATORS

ECONOMIC INDICATORS	Ext. Assurance	Reference at / Additional comments																														
G4-EC1	✓	<p>  p. 64  p. 56–57 </p> <p>In 2014, Group's turnover was €9,478 mil. (2013: €9,674 mil.) and the distributed social product amounted to €526 mil., (2013: €492 mil.) as follows:</p> <p> 37% to employees (salaries & benefits) 8% To the state (duties, taxes, insurance contribution) 13% To shareholders (dividends) 43% To financial institutions (loans interest) </p> <p>Employees' remuneration and benefits</p> <table border="0"> <tr> <td>Group's payroll</td> <td style="text-align: right;">€160,594,545</td> </tr> <tr> <td>Payroll taxes</td> <td style="text-align: right;">€36,004,479</td> </tr> <tr> <td>Insurance contribution</td> <td style="text-align: right;">€40,313,041</td> </tr> <tr> <td>Employees' insurance plan</td> <td style="text-align: right;">€4,707,801</td> </tr> <tr> <td>Employees' pension plan</td> <td style="text-align: right;">€1,545,244</td> </tr> <tr> <td>Staff commuting</td> <td style="text-align: right;">€5,162,209</td> </tr> <tr> <td>School allowance</td> <td style="text-align: right;">€308,897</td> </tr> <tr> <td>Employees' university studies allowance</td> <td style="text-align: right;">€180,304</td> </tr> <tr> <td>Support to employees' family members with special needs</td> <td style="text-align: right;">€59,131</td> </tr> <tr> <td>Wedding/birth/death allowance</td> <td style="text-align: right;">€94,256</td> </tr> <tr> <td>Crèche allowance</td> <td style="text-align: right;">€731,614</td> </tr> <tr> <td>Employees' children camping</td> <td style="text-align: right;">€192,213</td> </tr> <tr> <td>Awards to top students</td> <td style="text-align: right;">€88,578</td> </tr> <tr> <td>Other benefits</td> <td style="text-align: right;">€722,682</td> </tr> <tr> <td>Vouchers / gifts on Easter & Christmas</td> <td style="text-align: right;">€777,374</td> </tr> </table>	Group's payroll	€160,594,545	Payroll taxes	€36,004,479	Insurance contribution	€40,313,041	Employees' insurance plan	€4,707,801	Employees' pension plan	€1,545,244	Staff commuting	€5,162,209	School allowance	€308,897	Employees' university studies allowance	€180,304	Support to employees' family members with special needs	€59,131	Wedding/birth/death allowance	€94,256	Crèche allowance	€731,614	Employees' children camping	€192,213	Awards to top students	€88,578	Other benefits	€722,682	Vouchers / gifts on Easter & Christmas	€777,374
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Other benefits	€722,682																															
Vouchers / gifts on Easter & Christmas	€777,374																															
G4-EC2	✓	<p>  p. 44–45, 47 </p> <p>The potential risks and related financial-economic impacts are an integral part of the feasibility report for each project and investment. Participation in committees & actions with other companies in the sector (see section 1.7) facilitates the monitoring of the forthcoming regulatory changes.</p> <p>The Group's commitment to sustainability issues is confirmed by the participation of Group's CEO to the Board Council for Sustainable Development, the commitment to the UNGC and the Charta for sustainable development (Sustainable Greece 2020) and the participation & cooperation with Networks for Corporate Social Responsibility.</p> <p>Financial impacts as well as other possible risks and opportunities for corporate activities related to climate change are included in any feasibility study for future investments.</p> <p>The company's strategic choice for tackling climate change is the energy saving, both in production activity and administrative functions.</p> <p>The obvious financial impacts have to do with the costs associated with the projected deficit of the rights concerning emissions of greenhouse gases (GHG), as the three refineries in Greece participate in the</p>																														

European Emissions GHG Trading Scheme. The developments concerning the relevant Directive 2003/87/EC are monitored, at European level for the sector (participation in FUELS EUROPE group) and the impacts are evaluated at country and company level.

For the first two trading phases (2005–2007 and 2008–2012) almost all of the rights allocated for free to industries, based mainly on past emissions. Especially for Greek refineries, this was done without taking into account the investment for the environmental improvement of fuel, which lead to increased energy consumption, and ignoring their early action to save energy, resulting in a deficit.

For the period 2013–2020 (third trading phase), during which the rules of rights allocation are changing and only 50% of total allowances will be free distributed while the remaining 50% will be auctioned - because of the exposure of the refining industry at the significant risk of “carbon leakage” — the refineries will receive 100% free allocation of allowances to be derived on the basis of the price benchmark resulting from the average of the 10% most efficient installations of the oil sector (in the years 2007–2008), which is 29.5 kg CO₂/CWT. This leads the industry benchmark at European level reductions of 23%, a higher percentage than the EU target of 21% applicable to other industry sectors.

It had been estimated that HELLENIC PETROLEUM, for the period 2013–2020 would have a deficit of around 25% of emissions, taking into account the modernization of the Elefsina refinery. Recent decision of the European Community deemed necessary to implement a cross-sectoral correction factor (CSCF), which resulted in a significant increase in the rights deficit (about 30%) and consequently the associated operating costs.

Additionally, based on recent decisions of the EU on the implementation of a mechanism for Market Stability Reserve and the expected structural restructuring of the ETS, a significant increase of the rights price (€ / ton) is expected; which will directly affect the cost of compliance.



Given that the technical options available for effective reduction of CO₂ emissions are limited at existing facilities; because refineries have a high degree of energy optimization by implementing for many years energy saving projects, there will be costs to purchase the required emission allowances from 2013.

It is also noted that because power generation activities are not allocated free allowances (since 2013), refineries incur additional increased cost concerning electricity purchases; as the cost of buying allowances for electricity is partially passed on to consumers.


Other potential risks include increased costs for fuel and raw materials, reduced demand for energy-intensive products as well as additional measures to control and reduce GHG, which are related for the sector at European level.

The evaluation of potential opportunities for natural gas & advanced biofuels is continuous. Moreover,

investments are implemented for the improvement of the energy efficiency and in the field of RES.

G4-EC3	Coverage of the organization's defined benefit plan obligations.	✓	<p>  p. 20  p. 43, 101, 129 </p> <p>The Group does not use defined benefit plan, but defined contribution plan.</p> <p>The obligations of the company are covered by the company's general resources. For total expenses see G4-EC1.</p> <p>The pension and medical insurance plans cover the following proportion of employees:</p> <p>% of employees participating in:</p> <table border="1" data-bbox="822 630 1500 936"> <thead> <tr> <th>Company</th> <th>Company's pension plan</th> <th>Company's medical insurance plan</th> </tr> </thead> <tbody> <tr> <td>HELPE</td> <td>96</td> <td>99</td> </tr> <tr> <td>EKO</td> <td>99</td> <td>100</td> </tr> <tr> <td>HF</td> <td>78</td> <td>89</td> </tr> <tr> <td>DIAXON</td> <td>96</td> <td>100</td> </tr> <tr> <td>ASPROFOS</td> <td>63</td> <td>100</td> </tr> <tr> <td>HP CYPRUS</td> <td>94</td> <td>94</td> </tr> <tr> <td>EKO BULGARIA</td> <td>0</td> <td>100</td> </tr> </tbody> </table> <p>The employees participate in meeting the cost, and more specifically the health and pension plan.</p> <p>Indicative examples are following:</p> <p>DIAXON and HELPE: Employee insured after 1993: Employer contribution 2.5%, Employee contribution 0.5%–5%</p> <p>Employee insured before 1993: Employer contribution 6.5% Employee contribution 1.5% – 5%</p> <p>ASPROFOS: Employee contribution: 2–3%, Employer contribution: 1.5%</p> <p>HP CYPRUS: Participation 100%, Define Benefit Plan 12.4% Employer Define Contribution 5% Employer Define Contributions 5%–15% Employee</p> <p>The scheme's liabilities are estimated to be covered by the assets at around 86%. The basis on which this estimate has been arrived as per the Actuarial Report prepared by Professional Actuaries (AON HEWITT), on December 2014.</p> <p>JUGOPETROL: 15% Employee contribution 5.5% Employer contribution</p> <p>Retirement contributions are legal obligations, set up by State laws and regulations.</p>	Company	Company's pension plan	Company's medical insurance plan	HELPE	96	99	EKO	99	100	HF	78	89	DIAXON	96	100	ASPROFOS	63	100	HP CYPRUS	94	94	EKO BULGARIA	0	100
Company	Company's pension plan	Company's medical insurance plan																									
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			<p>EKO BULGARIA: Obligatory stable scheme which is determined by national legislation.</p> <p>EKO SERBIA: Contribution to pension & health are in accordance with the law 11% of gross earnings</p>
G4-EC4	Financial assistance received from government.	✓	No direct financial support from the State.
G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	✓	<p>With the assumption that “local minimum” are the national collective bargaining agreements, then, HELPE’s employees are compensated over and above them; without any discrimination or differentiation.</p> <p>No permanent employee is remunerated at the minimum / basic salary in HELPE, EKO, DIAXON, EKO BULGARIA, EKO SERBIA and JUGOPETROL.</p> <p>The typical average employee’s wage in the Group is significantly higher than the equivalent salary in Greece; respectively abroad is up to 300% higher than the corresponding national average.</p> <p>Significant locations of HELPE’s operations are the industrial sites Aspropyrgos, Elefsina & Thessaloniki. Indicative examples of salaries are:</p> <p>OPERATOR earns 32% higher than the “local minimum” and ENGINEER earns 62% higher than the “local minimum”.</p> <p>ASPROFOS: (based on 100 sector’s collective agreement) the deviation from the standard minimum wage is: 96% engineers, accountants, 98%, office workers 114%, technicians 105%. There is no minimum wage differentiation by gender, but by location of operation (eg employees at construction sites receiving worksite allowance).</p> <p>EKO: The minimum wage in force at local level is approximately 79% of basic salary for a typical newly recruited by the company.</p> <p>EKO BULGARIA: local minimum €184, company’s basic salary €450.</p> <p>EKO SERBIA: newly recruited get salary higher than the local minimum.</p> <p>JUGOPETROL: the lower company’s salary is 2.28-2.65 times higher than the local minimum.</p> <p>OKTA: the lower company’s salary is 2.4-3.8 times higher than the local minimum.</p> <p>HP CYPRUS: There is a collective bargaining agreement, which regulates the wage scale in relation to the respective job. On the basis of these standards the payroll of new recruits is adjusted. The collective agreement is common to the 3 major oil companies (HELPE, BP, Exxon Mobil) operating in CYPRUS. The permanent staff is paid based on levels of collective agreement. The seasonal staff is paid based on the minimum wage defined by law.</p>

G4-EC6	<p>Proportion of senior management hired from the local community at significant locations of operation.</p>	✓	<p>Staff with rank higher than that of the Assistant Director are included in the category of senior management.</p> <p>The proportion, of this staff, from local communities varies from 25% to 100% (see following table).</p> <p>Moreover, HELPE, in the process of recruiting staff allocates additional merit to residents of the neighboring to the refineries municipalities (definition of significant locations of operation).</p> <table data-bbox="811 562 1179 773"> <tbody> <tr> <td>HELPE, HF, EKO</td> <td>100%</td> </tr> <tr> <td>DIAXON</td> <td>100%</td> </tr> <tr> <td>EKO BULGARIA</td> <td>25%</td> </tr> <tr> <td>EKO SERBIA</td> <td>67%</td> </tr> <tr> <td>HP CYPRUS</td> <td>94%</td> </tr> <tr> <td>JUGOPETROL</td> <td>83%</td> </tr> <tr> <td>OKTA</td> <td>33%</td> </tr> </tbody> </table>	HELPE, HF, EKO	100%	DIAXON	100%	EKO BULGARIA	25%	EKO SERBIA	67%	HP CYPRUS	94%	JUGOPETROL	83%	OKTA	33%
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G4-EC7	<p>Development and impact of infrastructure investments and services supported.</p>	✓	<p> p. 74–79</p> <p>A survey on Materiality Analysis & Stakeholders engagement was conducted in 2013 (see section 1.3) and a Qualitative & Quantitative Survey (Company Reputation Monitor), in local communities, took place in 2014 (see section 6.2).</p> <p>Such approaches are used to determine investments in infrastructure and other activities for the benefit of local communities. All projects are made in consultation with local communities. Indicative examples are:</p> <ul data-bbox="811 1204 1490 2007" style="list-style-type: none"> • Donation of 54,856 lt bitumen (€33,000) for road construction projects in the Municipality of Elefsina. • Donation of materials and covering expenses for the maintenance of municipal roads of the Mandra-Idillia municipality (€99,000). • Playground upgrading project in the Municipality of Aspropyrgos (€9,800). • Support the operation of municipal libraries — in local communities — by equipping them with modern equipment, while creating updated databases and enhancing their functionality. In parallel with the voluntary participation of employees of the Group, we enrich the libraries' content and increase the educational opportunities of the public offering books, (€2,200). In addition, more than 6,000 books were donated to libraries all over Greece. • Deforestation works at Elefsina Municipality (€1,800). • Donation of 2 isoboxes to meet the needs of the 1st & 3rd Primary School and Municipal Stadium at Magoula Municipality. • Tyre donation to Elefsina Fire Department (€7,300). • Fuel donation for surveillance and fire protection needs of the Municipality of Mandra-Idillia (€5,000). 														

			<ul style="list-style-type: none"> • Fuel Subsidy in 3 voluntary organizations for surveillance and fire protection needs of the Municipalities of Megara & Thessaloniki (€6,000). • Anti-mosquito program at Municipality Ampelokipi–Menemeni (€6,100). • Replacing tires in a vehicle of the fire department of Thessaloniki Municipality, for urban forest fire prevention (€4,500). • Repair of vessel of Thessaloniki’s Coast Guard (€4,400). • Fuel sponsorship for roads maintenance at the Region of Attica (€3,000). • Reconstruction of the elementary School Jefimija in Obrenovac (which was under water due to floods in Serbia) and support to the local community (€50,000). • OKTA invested in new steam boilers with five times lower capacity, located close to the users. This investment resulted in less oil consumption and reduction of air emissions by approximately 40%.
G4-EC8	Significant indirect economic impacts, including the extent of impacts.	✓	<p>📖 p. 12</p> <p>The financial crisis has escalated expectations for multinational enterprises to create more social value, beyond compliance with regulations and philanthropy. Corporate responsibility has emerged as an important element of the private sector’s response to these expectations and demands.</p> <p>For additional information about our contribution to society, please see Section 6.</p> <ol style="list-style-type: none"> 1. Economic development in areas of high poverty: see indicator EC7 for projects in W. Attica, Serbia & FYROM as well as at § 6.3-6.4 for CSR projects. 2. Economic impact of improving or deteriorating social or environmental conditions: See § 4 for actions aiming at improving environmental conditions. 3. Availability of products and services for those on low incomes: See §6.3 & 6.4 for fuel donations and prepaid cards provision for fuel purchases. 4. Enhancing skills and knowledge amongst a professional community or in a geographical region: A modern skills development program was implemented at Elefsina, in collaboration with ALBA Graduate Business School. The program offered an opportunity for young people from Thriasio to learn and "draw" valuable knowledge in areas such as entrepreneurship, strategy, techniques of negotiation and emotional intelligence. A common finding is the need of young people to get answers to critical questions, through access to modern ways of thinking and information in order to acquire the right skills, enrich their CV and claim a place in the highly competitive work environment. The program, which was available at no charge, provided a certificate of attendance.

		<p>At HP CYPRUS, training of university students at the terminal or Head Office.</p> <p>5. Jobs supported in the supply chain or distribution chain: See Table 6.2 for purchases from local suppliers.</p> <p>6. Economic impact of change in location of operations or activities: In the process of staff recruitment, at HELPE, there a procedure in favour of the permanent residents of the municipalities neighbouring to our refineries.</p> <p>During OKTA's reorganization process an increase for new job positions locally was noted. We increased road transportation, thereby supporting truck transportation sector. Internship programs helped sharing of knowledge and experience among students from local universities. We outsourced product quality checking and confirming by specialized independent company Saybolt, which operates in synergy with our technical department.</p> <p>We have intensified the reparation of the reservoirs of our tank farm in cooperation with the local construction companies.</p> <p>7. Significance of the impacts in the context of stakeholder priorities, such as national and international standards, protocols, and policy agendas:</p> <p>In 2013, an opinion survey was conducted, on materiality analysis and stakeholder engagement (see §1.3) and a Qualitative & Quantitative Survey (Company Reputation Monitor), in local communities, took place in 2014 (see section 6.2).</p> <p>Such surveys, regular communication and consultation are used to determine the investment in infrastructure and other actions for the benefit of local communities and to understand the significant indirect effects locally. Assessing the findings resulted in relevant activities planning. It has been recorded that local communities anticipate actions with a focus on supporting the unemployed, health services, in support of elderly and vulnerable groups in general. Moreover, during the planning phase of new investment care is taken of the direct and indirect impacts.</p>
<p>G4-EC9</p> <p>Proportion of spending on local suppliers at significant locations of operation.</p>	<p>✓</p>	<p>📖 p. 71–73</p> <p>The spending proportion on locally-based suppliers at significant locations of operation is 12.3% for HELPE and DIAXON (industrial facilities) and 97% for the Group's marketing companies (EKO, HF, EKO BULGARIA, OKTA, HP CYPRUS, EKO SERBIA, JUGOPETROL) and is presented in Tables 6.2.</p> <p>As local suppliers, for HELPE and DIAXON, are defined those based in municipalities adjacent to industrial facilities of the Group. For the marketing companies of the Group (EKO, HF, EKO BULGARIA, OKTA, HP CYPRUS, EKO SERBIA, JUGOPETROL) as local suppliers are defined those based in the same country.</p> <p>As significant locations are defined the municipalities neighbouring to the Group's refineries and DIAXON's industrial complex.</p>

		<p>Group policy is to support the local market and local contractors, always in accordance with suppliers' selection criteria, such as safety, quality standards, competitiveness etc. In this context the Group (along with other large companies) is investing in proper training of subcontractors to ensure their ability to participate in Group's projects.</p>
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Ext. Certification	Environmental Indicators per Facility		BEA	BEE	BEØ	Subsidiaries (OKTA=A, EKO=B, HF=C, DIAXON=D, HPC=E, EKO SERBIA=Z, EKO BULGARIA=H, JUGOPETROL=G)	Units	Comments	
G4-EN1	✓	Materials used by weight or volume	Crude oil	6,110.9	3,595.8	1,801.3	N/A	ktn	
			Throughput (crude oil + other feeds processed)	7,706.0	5,115.4	3,396.6	N/A	ktn	
			Total Distribution	8,473.9	5,116.0	3,438.9	2610.9	ktn	
			Catalysts	2,690	421	–		ktn	
			Lubricants	20	5.3	33.1	70.2	tn	
			Additives & other chemicals	2,207	4,528	2,841	1,061 / 12,656	tn	
			Solvents	–	–	–	1.1	tn	
			Packaging materials	–	–	–	2,535	tn	
			Materials used at hydraulic fracturing, (such as acids, biocides, breakers, clay stabilizers, corrosion inhibitors, crosslinkers, friction reducers, gelling agents, iron controllers, scale inhibitors, surfactants)	N/A	N/A	N/A	N/A	tn	
			Total of non renewable materials	8,478.8	5,121.0	3,441.8	2,627.2	ktn	
Renewable materials (biodiesel)	70,741	–	42,150	N/A	m3				
G4-EN2	✓	Materials used that are recycled input materials	Slop oil / throughput	0	1.1	0.8	7.6 (D)	%	
G4-EN3	✓	Energy consumption within the Group	Energy from non renewable fossil fuels	22,305,82	15,858,269	4,570,872	167,000	GJ	The purchased electricity derived from the suppliers' invoices; while the self-generated electricity is measured by power meters on site. The source for the net calorific value of fuels is the National Inventory Report 2014.
			Consumed energy from renewable fuels	0	0	0	3.9 (B & C)		
			Consumed electricity from non renewable sources (from external provider)	643,276	933,403	560,320	229,443		

			Consumed electricity from renewable sources (from external provider)	129,614	188,071	112,899	25,856			There are no electricity, heating, cooling and steam sold; neither is self-generated energy for heating, cooling and steam.
			Self-generated electricity	1,099,984	407,233	0	0			
			Total electricity consumption	1,872,874	1,528,707	673,219	255,299			
			Energy consumed for steam generation	–	5,298,070	1,823,817	–			
			Total energy consumption within the Group	23,078,710	16,979,742	5,244,092	422,300			
G4-EN4	✓	Energy consumption outside of the Group	Transportation and distribution (Upstream)		4,004		63.4			<p>The calculations were based on data from Carbon Footprint 2014. The source for the net calorific value of fuels is the National Inventory Report 2014. The Business travel (Upstream) considered to be 30% of the total and they were verified using the small emitters tool (https://www.eurocontrol.int/articles/small-emitters-tool).</p> <p>“Transportation” and “distribution” were calculated from sea transports. The emission factors are from Second IMO GHG Study 2009.</p> <p>For the “employee commuting”, the average net calorific value of petrol and diesel was used.</p>
			Business travel (Upstream)		1.1		9.3			
			Employee commuting (Upstream)		8.6		0.6			
			Total Upstream		4,014		73.3			
			Downstream (transportation and distribution)		1,926		65.7			
G4-EN5	✓	Energy Intensity		2.72	3.32	1.52	0.16	GJ/tn total distribution		Energy in Giga Joule per ton of total distributed products. The index concerns total energy consumed within the organization.
G4-EN6	✓	Reduction of energy consumption in 2014 (Fuel)		50,550	0	33,856	0	GJ		The saving is calculated in relation to the previous year.
		Reduction of energy consumption in 2014 (Electricity)		0	0	0	200			For BEA, BEE: estimation based on records of fuel and steam consumption, interventions to increase energy efficiency and reduce steam losses.
		Reduction of energy consumption in 2014 (Heating)		0	0	0	15,282			
		Reduction of energy consumption in 2014 (Steam)		117,950	561,206	262,515	0			For BE@ (calculation): Steam savings due to reduction of losses (eg improving insulation) and fuel savings from improved efficiency of furnaces and boilers.
		Total reduction of energy consumption in 2014		168,500	561,206	296,371	15,482			No energy savings concerning cooling.

G4-EN7	✓	Reductions in energy requirements of products and services	<p>The end products (fuels) of the commercial companies HF and EKO contribute significantly to lower emissions and reduced fuel consumption. EKO's petrol '95 Economy' assures fuel economy up to 2% and EKO's diesel Economy assures up to 4% less fuel consumption. Moreover, gasoline 'EKO Racing 100' reduces emissions, cleans and protects the engine and the fuel circuit and achieves up to 4% higher motor efficiency by significantly reducing friction.</p> <p>Also, the new EKO's fuel Diesel Avio assures zero engine power loss throughout the engine's operation and over the whole range of engine's revs (according to the motor test CEC F-98-08, which is standard for the modern common rail diesel engines). Additionally, the use of BP's gasoline Ultimate 95 provides, on average, 12 extra kilometers per filling as compared to conventional fuel; while BP's Ultimate Diesel assures, on average, 42 extra kilometers per filling as compared to conventional fuel.</p> <p>Finally, the improved BP's heating oil 'BP Super Heat' has unique characteristics that contribute to environmental protection.</p> <p>More information on standards, assumptions and calculation methodologies are available at the official site of the marketing companies EKO and HF, at http://www.eko.gr & http://www.hellenicfuels.gr/default.asp?pid=3&lag=en</p>						
G4-EN8	✓	Total water withdrawal by source	Total	4,457,431	9,115,818	1,724,589	1,262,163	m ³	<p>The water consumption is calculated using the invoices of the water utilities; and the records of relevant meters for surface and ground water.</p> <p>Estimated consumption takes place in case of a subsidiary with no water consumption meters.</p> <p>The Group does not consume water from rainwater, wastewater of other organizations or other sources.</p>
Water utility			3,566,338	4,792,043	1,724,589	1,223,388			
Surface water (Sea water)			891,093	3,294,455	0	1,400			
Ground water (Drilling)			0	1,029,320	0	37,375			
G4-EN9	✓	Water sources significantly affected by withdrawal of water	There are no significantly affected water sources						
G4-EN10	✓	Water recycled and reused	Percentage	13.52	24.26	2.71	0.26	%	Results either directly from gauges or by estimation (eg. for BEA is estimated that 10% of the water from the wastewater treatment unit is utilized for internal operations - cleaning, hydraulic tests, etc.).
Volume			602,828	2,211,726	46,747	3,326 (A, B, E)	m ³		
G4-EN11	✓	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	None of the Group's refineries is near protected areas (NATURA, RAMSAR). All installations are located in established industrial areas.						

G4-EN12	✓	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	Significant work has been done for the minimization of the impacts to the environment and the ecosystem. The refineries, in Greece, are the industrial sector with the wider application of the Best Available Techniques for the environmental protection. The management of wastewater and solid waste is based on BATs resulting in zero impact on living organisms while air emissions are monitored based on the Guidelines for air quality and therefore the effect on living organisms is estimated to be negligible.						
G4-EN13	✓	Habitats protected or restored	There are no such habitats. See also G4-EN11.						
G4-EN14	✓	Total number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	0	0	0	0	–	–	
G4-EN15	✓	Direct GHG emissions, Scope 1. (EU ETS integration year: 2005).	Verified CO ₂ emissions (for the 3 domestic refineries participating in EU ETS)	1,393,017	1,908,758	239,535	11,900 (A, B, C, D)	tn CO ₂ eq	Third party emissions verification according to EU regulations 600 & 601/2012. Differentiation of emissions compared to the base year is presented in detail in Chart 4.3, Section 4.4.
		See EN17 for indirect emissions due to personnel commuting and product transport.	Direct GHG emissions besides CO ₂ . Emissions of HCFCs, CH ₄ , N ₂ O	5,763	1,328	5,257	–		Calculation based on GWP from IPCC, 2013: Climate Change 2013: The Physical Science Basis.
			Total	1,398,780	1,910,086	244,792	11,900	tn CO ₂ eq	There are no emissions of biogenic CO ₂ . Emissions are monitored since 2005 within the framework of EU ETS (Phase 1: 2005–2008, Phase 2: 2008–2012, Phase 3: 2013–2020). As base year is chosen the first year of the current period, ie. 2013 (base year emissions = 3,461,438 tn CO ₂). Consolidated approach of emissions' reports based on operational control.
G4-EN16	✓	Indirect greenhouse gas (GHG) emissions (Scope 2)	Electricity consumption at facilities	238,308	345,788	207,576	63,646	tn CO ₂ eq	Only CO ₂ emissions are included. Emissions were calculated using electricity consumption and CO ₂ emissions factors.

		Electricity consumption at HQs offices	HQ's office building (at Chimaras str, Marousi): 1,806 tn CO ₂ eq. The sum of indirect emissions (Scope 2) for the Group is 857,124 tn CO ₂ eq.		PPC's EF for 2013 is 1.11 kg CO ₂ /kWh Elpedison's EF for 2014: 0.385 kg CO ₂ /kWh IEA: BULGARIA EF 2009–2011: 0.558 kg CO ₂ /kWh MONTENEGRO EF 2009–2011: 0.454 kg CO ₂ /kWh SERBIA 2009–2011: 0.745 kg CO ₂ /kWh). OKTA: calculation based on UNDP's data. CYPRUS EF from "Mayors' Covenant". Base year is 2012 when the 4 main buildings of the Group were included. It is underlined that Gravias bulding was included for first time in 2014. The detailed calculations are included in Carbon Footprint 2014. The total indirect emissions of the base year were calculated 705,573 tn CO ₂ . Consolidated approach of emissions' report is based on operational control.	
G4-EN17	✓	Other indirect greenhouse gas (GHG) emissions (Scope 3)	Total amount of indirect CO ₂ emissions, from all activities (air trips, private transportation, paper consumption) at the administration buildings (HQs, Aspropyrgos, Elefsina & Thessaloniki)	1,974	tn CO ₂ eq	Only CO ₂ emissions are included. There are no emissions of biogenic CO ₂ . Emissions related to air travel come directly from travel agencies; emissions due to transportation are calculated based on the records of fuel cards; estimates of private means of transportation are in accordance with questionnaire in 2012 and emission factors are from Defra and MyClimate (Carbon Footprint 2014 project).
			Emissions related to deliveries of crude and raw materials / products, intermediate transport & exports	465,855		Only CO ₂ emissions are included. Method of calculation based on trips and transported quantities. Emission factors from Second IMO GHG Study 2009.
			Total of other indirect GHG emissions	467,829		Base year 2013 when emissions related to deliveries of crude and raw materials / products, intermediate transport & exports were included in the calculation. Total other indirect emissions of the base year emissions were calculated 283,038 tn CO ₂ .

G4-EN18	✓	GHG Emission Intensity	Emission Intensity Index	0.21	0.47	0.18	N/A	tn CO ₂ eq/tn total distribution	Tons CO ₂ eq per ton of total distributed products. It includes emissions related to CO ₂ , CH ₄ , N ₂ O, HFCs and concerns direct (Scope 1), indirect (Scope 2) and other indirect (Scope 3) emissions.
G4-EN19	✓	Reduction of greenhouse gas (GHG) emission (in 2014)	Scope 1: Direct GHG emissions from sources owned or controlled by the Group, eg CO ₂ from fuel consumption.	5,586 (A)	43,009 (A)	22,698 (C)	79 (A: OKTA) (C)	tn CO ₂ eq	It refers only to CO ₂ emissions, whose reduction is calculated based on the amounts of consumption compared to 2013 (base year). Reductions reported by the three refineries only related to direct and indirect emissions (Scope 1 & 2). No reductions in Scope 3.
			Scope 2: Indirect greenhouse gas emissions resulting from the production of electricity, heating, cooling and steam which is purchased or acquired for own consumption by the Group.	223.052 (D)	89.365 (D)	0	1.393 (A:OKTA) (C)	tn CO ₂ eq	(Scope 3: Other indirect GHG emissions, which is the result of the organization's activities, but from sources not owned or controlled by the organization and use of products and services). The following table presents the actions that these reductions may occur.. The symbol next to the number in each cell corresponds to the symbol of this table. A Fuel switching B Use of RES C Improved energy efficiency D Co-generation E Other
G4-EN20	✓	Emissions of ozone-depleting substances (ODS)	HCFCs	0.025	0	0	-	tn CFC-11 eq	Substance R-22. EFs are from IPCC, 2013: Climate Change 2013: The Physical Science Basis. Calculation based on the material-losses of these substances.

G4-EN21	✓	NOx, SOx and other significant air emissions	NOx	2,802	496	346	16.9 (A, D)	tn	Calculation based on annual reports PRTR.		
			Nox Emission Intensity Index	0.36	0.10	0.10	N/A	Kg/ tn through-put	EFs from 3/15 report of CONCAWE.		
			SOx	4,359	928	843	49.4 (A, D)	tn	SOx emissions resulting from the percentage of sulfur in fuel, through calculations.		
			SOx Emission Intensity Index	0.57	0.18	0.254	N/A	Kg/ tn through-put	There are no emissions of Persistent Organic Pollutants (POP).		
			VOC	906	700	217	12.2 (A, B, C, D)	tn	HAP: estimations, mainly benzene emissions and concentrations of heavy metals in particles (such as Ni, As, Cd, Hg).		
			VOC Emission Intensity Index	0.11	0.14	0.06	N/A	Kg/ tn total distribution			
			PMs	181	28.8	38.2	1.6 (A, D)	tn			
G4-EN22	✓	Total water discharge by quality and destination	Volume	2,420,035	3,954,880	1,269,577	857,672	m ³	The measured quantities derived from flow-meters. There were no planned discharges. No reuse by other organization.		
			Destination	Saronikos Gulf	Saronikos Gulf	Thermai-kos Gulf	N/A				
			Treatment method	The Group's facilities effluent treatment units include treatment of 1st, 2nd and, occasionally, 3rd level.							
			H/C index	1.57	3.99	1.15	N/A	gr HC/ th through-put	Calculated on the basis of regular chemical analysis by the facilities' laboratories which are accredited to ISO 17025.		
G4-EN23	✓	Total weight of waste by type and disposal method	Total	4,380	2,709	2,927	1,841	tn	Priority is the waste management in situ (within the premises).		
			Hazardous (total)	979	1,109	226	132		If this is not possible; specialized waste management companies take care of the waste management.		
			Non-Hazardous (total)	3,401	1,600	2,701	1,709				
			Reused Hazardous	20	0	0	-		The treatment and handling method is selected in accordance with the Article 4 of		
			Reused Non-Hazardous	0	0	0	114				
			Recycled Hazardous	2	4.7	2.3	21.3				


			Recycled Non-Hazardous	275	36.9	0	197		the European Directive 2008/98 / EC “waste management hierarchy”.
			Recovered Hazardous	957	1,104	13.2	111		
			Recovered Non-Hazardous	2,690	1,563	0	175		
			Incinerated Hazardous	0	0	16.2	0		
			Incinerated Non-Hazardous	436	0	0	0		
			Landfill Hazardous	0	0	194.2	0		
			Landfill Non-Hazardous	0	0	2,701	1,223		
G4-EN24	✓	Total number and volume of significant spills	Total number of significant spills to soil surface and ground water.	0	0	0	0	#	Significant spill is a hydrocarbon spill greater than 100 bbls; or any H/C spill released into a sensitive environment (eg protected area, habitat, river, lake, etc.); or any non-H/C spill that has significant environmental impact due to eg the toxicity of the substance, elevated salinity, acidity etc.
G4-EN25	✓	Weight of exported waste deemed hazardous	Quantity	63.1	35.0	194.2	76.4 (A, B)	tn	There no transported, imported, treated waste came from abroad.
			%	1.44	1.29	6.63	4.15	%	
G4-EN26	✓	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization’s discharges of water and runoff		No affected ecosystems. See also EN11 and EN13.					
G4-EN27	✓	Extent of impact mitigation of environmental impacts of products and services		<p>It is underlined that fuels launched before 2014 still have lower sulfur content compared with specifications.</p> <p>In addition, EKO’s petrol 95 Economy and EKO’s diesel Economy assure a reduction of fuel consumption of 2% and 4% respectively.</p> <p>Moreover, BP’s petrol Ultimate 95 and BP’ diesel Ultimate Diesel provide, on average, extra 12 and 42 kilometers per filling, respectively, compared to conventional fuel.</p> <p>The new fuel Diesel Avio, launched in 2014, offers:</p>				Parameters such as liquid waste, noise, and solid waste do not apply to the kind of the Group’s products – liquid fuels.	

				<ul style="list-style-type: none"> • Excellent engine cleaning results and thus reduction of fuel consumption. • Complete restoration of the smooth operation of the motor, with two fillings. After 5 fillings, internal deposits in injectors completely disappear. • Effective antifoam, anticorrosive and antioxidant protection due to special, technologically advanced, improver additives (admixture). <p>EKO with DIESEL Avio, for the first time in Greece applies the technology of aviation fuel filters in diesel for cars. The Avio Filter installed immediately before the fuel pumps, is a technologically advanced filter, which ensures the purity of the fuel at the level of purity of aviation fuel.</p> <p>With Avio Filter the following are accomplished:</p> <ul style="list-style-type: none"> • Removal of particles • Removal of rust and water • Fuel filtering Yield 98% 					
G4-EN28	✓	Percentage of products sold and their packaging materials that are reclaimed by category.		N/A for refineries products. Packaging materials are not in use since fuels are transported via pipelines, tank trucks and ships.					
G4-EN29	✓	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Significant fines for non-compliance with environmental laws and regulations (total).	0	0	0	0	€	<p>There was no case of non-monetary sanction.</p> <p>There was no case resolved by dispute resolution mechanisms.</p> <p>There was no case where the Group did not identify any non-compliance with laws or regulations.</p>
G4-EN30	✓	Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce		<p>The company, in order to quantify the environmental impact caused by personnel commuting, studied its employees' commuting approaches related to the administrations buildings (HQs, BEA, BEE & BEΘ).</p> <p>The study showed that approximately 33% of the above mentioned employees use either public transportation or company's buses instead of private cars (total emissions from road travel 2,089 tCO₂-eq).</p> <p>Based on Euro 5 specifications, emissions of other pollutants because of these commuting approaches (besides public transport) are:</p> <p>CO 4.38 tn PM 0.03 tn NOx 0.51 tn Total H/C 0.35 tn</p>					

				<p>In addition, the Group is sponsor of the initiative “Save more fuel” and contributed to the edition of a catalogue with guidelines on ecodriving, http://www.savemorethanfuel.eu/uk/index.html</p> <p>The most significant impact of the transportation of the products results from sea-transport (exports). It has been calculated that, for the transport by ship, the energy consumed is 1,926 TJ and the related emissions are 147,564 tn CO₂.</p>				
G4-EN31	✓	Total environmental protection expenditures and investments by type	Total	902,826	1,236,278	418,751	1,781,359	€
			Waste treatment and disposal	538,792	644,684	305,979	467,936	
			Abatement technologies for air emissions, eg. filters	22,184	5,000	–	738,000	
			Certification fees (EMAS, ISO 14001, CO ₂ verification, etc)	3,494	4,094	3,910	8,340	
			Equipment maintenance cost, contractor personnel	25,443	10,000	97,275	542,083	
			Clean up and remediation cost following leaks, etc	263,736	513,000	–	25,000	
			Other costs – Chemical Analysis	49,176	59,500	11,587	N/A	
G4-EN32	✓	Percentage of new suppliers that were screened using environmental criteria	Starting on 05/2014 all new suppliers are evaluated using questionnaire which includes criteria on environmental performance. No significant findings in 2014.					
G4-EN33	✓	Significant actual and potential negative environmental impacts in the supply chain and actions taken	Starting on 05/2014 active suppliers are evaluated using questionnaire which includes criteria on impact on society and environment performance. In 2014, more than 600 questionnaires were completed; their evaluation presented no significant findings.					
G4-EN34	✓	Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms	3	1	2	0	#	Complaints reported in 2014 and resolved within the same year, according to the standard procedure.
		Number of grievances addressed in 2014	3	1	2	0	#	
		Number of grievances resolved in 2014	3	1	2	0	#	

LABOR PRACTICES & DECENT WORK	Ext. Assurance																																																																																																																																																																																																				
G4-LA1	✓	<p data-bbox="674 356 773 387">📖 p. 20</p> <p data-bbox="674 417 1045 449">New hires by age group and gender</p> <table border="1" data-bbox="674 471 1493 1052"> <thead> <tr> <th colspan="2"></th> <th data-bbox="1120 478 1174 505"><30</th> <th data-bbox="1276 478 1348 505">30-50</th> <th data-bbox="1433 478 1488 505">>50</th> </tr> </thead> <tbody> <tr> <td data-bbox="674 512 756 539">HELPE</td> <td data-bbox="971 512 987 539">M</td> <td data-bbox="1136 512 1158 539">10</td> <td data-bbox="1293 512 1314 539">19</td> <td data-bbox="1466 512 1471 539">1</td> </tr> <tr> <td></td> <td data-bbox="971 546 987 573">F</td> <td data-bbox="1144 546 1158 573">4</td> <td data-bbox="1301 546 1314 573">4</td> <td data-bbox="1475 546 1480 573">0</td> </tr> <tr> <td data-bbox="674 580 797 607">ASPROFOS</td> <td data-bbox="971 580 987 607">M</td> <td data-bbox="1144 580 1158 607">0</td> <td data-bbox="1301 580 1314 607">3</td> <td data-bbox="1475 580 1480 607">2</td> </tr> <tr> <td></td> <td 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G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	✓	<p>HELPE: The benefits provided in Collective Agreements and Internal Labour Regulations concern employees with an indefinite time contract and not employees under fixed-term contract, full or part-time regardless of where they work.</p> <table border="1"> <thead> <tr> <th>Type of employee benefit</th> <th>Fixed term contract, Full time</th> <th>Indefinite time contract</th> </tr> </thead> <tbody> <tr><td>Pension plan through group contracts</td><td>–</td><td>✓</td></tr> <tr><td>Medical plan through Life & Health Group Contract</td><td>–</td><td>✓</td></tr> <tr><td>Financial support for serious health situations</td><td>–</td><td>✓</td></tr> <tr><td>Employees’ children camping</td><td>–</td><td>✓</td></tr> <tr><td>Wedding/birth/death allowance</td><td>–</td><td>✓</td></tr> <tr><td>School allowance</td><td>–</td><td>✓</td></tr> <tr><td>University studies allowance</td><td>–</td><td>✓</td></tr> <tr><td>Vouchers / gifts on Easter & Christmas / financial support for families with many children</td><td>–</td><td>✓</td></tr> <tr><td>Support to employees’ family members with special needs</td><td>–</td><td>✓</td></tr> <tr><td>Financial aid awards for distinguished pupils-students (employees’ children) successful in Universities & Colleges</td><td>–</td><td>✓</td></tr> <tr><td>Crèche allowance</td><td>–</td><td>✓</td></tr> <tr><td>Long service anniversary gifts</td><td>–</td><td>✓</td></tr> <tr><td>Employees’ loans</td><td>–</td><td>✓</td></tr> <tr><td>Free staff commuting</td><td>✓</td><td>✓</td></tr> <tr><td>Free light lunch</td><td>✓</td><td>✓</td></tr> </tbody> </table> <p>ASPROFOS: Company’s benefits are provided to all employees.</p> <p>DIAXON: Benefits to indefinite contract employees (discount vouchers are provided to temporary employees and): summer camps, childcare allowance, loans, school allowance, students’ allowance, award to employees’ children for excel school or university performance, financial support to learn foreign languages, monetary allowances (marriage, child, spouse or child death), financial support to employees with children with special needs.</p>	Type of employee benefit	Fixed term contract, Full time	Indefinite time contract	Pension plan through group contracts	–	✓	Medical plan through Life & Health Group Contract	–	✓	Financial support for serious health situations	–	✓	Employees’ children camping	–	✓	Wedding/birth/death allowance	–	✓	School allowance	–	✓	University studies allowance	–	✓	Vouchers / gifts on Easter & Christmas / financial support for families with many children	–	✓	Support to employees’ family members with special needs	–	✓	Financial aid awards for distinguished pupils-students (employees’ children) successful in Universities & Colleges	–	✓	Crèche allowance	–	✓	Long service anniversary gifts	–	✓	Employees’ loans	–	✓	Free staff commuting	✓	✓	Free light lunch	✓	✓
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			<p>JUGOPETROL: Full time and part time employees have equal rights according to law.</p> <p>EKO SERBIA: Lap top, mobile, private health insurance and EKO discount card only to employees with indefinite time contract.</p> <p>HP CYPRUS: Medical and life insurance program to all employees</p> <p>OKTA: Financial support for employees' children who are pupils/students, Xmas – Easter gifts, holiday allowance.</p> <p>EKO & EK: Benefits for fixed-term employees: Preventive medical tests Marriage / birth allowance Discount vouchers Crèche allowance Gifts on safety goals achievements Children summer camps</p> <p>Significant location of operation is an area neighboring to Group's industrial facilities.</p>
G4-LA3	Return to work and retention rates after parental leave, by gender	✓	<p>Complying with the relevant legislation all employees are entitled to maternity / paternity leave.</p> <p>During 2014, 45 (F) employees (23 from HELPE, 4 from EKO, 6 from HF, 2 from OKTA, 2 from JUGOPETROL, 1 from HP Cyprus, 3 from EKO SERBIA and 4 from EKO Bulgaria) and 2 (M) employees from DIAXON got parental leave.</p> <p>Moreover, 21 (F) employees who got parental leave in 2013–14 returned in 2014 (HELPE 8 + EKO 2 + HF 6 + OKTA 2 + EKO Bulgaria 3).</p> <p>Return to work rate = 100% (67% for EKO Bulgaria)</p> <p>Retention Rate = 100%</p>
G4-LA4	Minimum notice periods regarding operational changes, including whether these are specified in collective agreements	✓	<p>Minimum 1 month and maximum 3 months.</p> <p>For changes involving groups of individuals management issues relevant announcements. Information means include personal letters, memos, management decisions, councils notifications, etc.</p> <p>Any change in conditions of individual contract is disclosed to interested parties under the provisions of PD 156/94 within one month of the upcoming change.</p> <p>Depending on the local/national legislation, the minimum notice period might vary, eg in Bulgaria, Montenegro and Skopje the minimum period is 30 days, in Serbia 10 days, while in Cyprus adequate time and support are provided.</p>
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	✓	<p>All staff (100%) is represented. The committees participate in regular meetings with the facility management and make recommendations for improvement in the workplace with regard to Health and Safety.</p> <p> p. 30–31</p>

G4-LA6

Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work related fatalities, by region and by gender

✓

📖 p. 32–33, (Table 3.3)

Injuries breakdown by gender is not recorded at all facilities. The safety indicators, by gender, for the BEA, BEE & BEΘ complexes are:

MALES/FEMALES	BEA	BEE	BEΘ
LWIF (own staff)	13.96/0	2.34/0	0
LWIF (contractors)	0/0.76	1.11/0	0
AIF (own staff)	13.96/0	3.51/0	0
AIF (contractors)	1.52/0.76	2.22/0	2.14/0
IR (own staff)	2.62/0	0.47/0	0.14/0
IR (contractors)	0/0.15	0.22/0	0
LWIS (own staff)	31.86/0	9.5/0	0
LWIS (contractors)	0/2	1/0	0
ODR (own staff)	0	0	0
ODR (contractors)	–	–	–
LDR (own staff)	93.9/0	4.32/0	0
LDR (contractors)	0/0.29	0.22/0	0
Absentee rate (own staff)	Not available	1.5/0.56	1.87/1.77

Clarifications::

- The used system of rules is in accordance with the CONCAWE’s definitions and OSHA’s “Recordkeeping guidelines”.
- The Absentee rate (AR) is monitored at specific facilities and only for HELPE’s personnel. See also Table 3.3.
- There are no recorded occupational diseases for contractor’s employees.

For lost work days incidents (LWI) the days of absence are calendar. First day of absence is considered the day after the accident.

The accidents classification, this year too, took place in accordance with the definitions of CONCAWE (LWI, RWI, MTC, PSE). According to CONCAWE, LWIs, in 2014, were further analyzed in the following categories:

HELPE, EKO, HF	Injury Type	No. of LWIs
Group’s employees		19
Contractors’ employees		3
Road accident	Road accident	0
Height / Falls	Falls from height	2
	Staff hit by falling objects	2
	Slips & trips (same height)	12
Burn / Electric shock	Explosion or burns	2
	Electric shock	0
Confined Space	Confined Space Injury	0
Other accident type	Assault or violence	0
	Drowning or water related accident	0
	Cut, puncture, scrape	0
	Blow	1
	Exposure to noise, chemical, biological, vibration	0
	Trapped under or between	2
	Overexertion, strain	1
	Pressure release	0
	Other	0

G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	✓	<p>There are no workers with high incidence or high risk of diseases related to their occupation.</p> <p>In cases of serious disease or loss of a family member, the company provides support by a psychologist or social worker.</p> <p>At the facilities' infirmaries, the physicians and other external experts train the shift working employees on First Aid provision, handling of respirators (recovery from major accidents), means of rescue from confined workplaces, etc.</p> <p>The Group's companies, ad hoc, inform their employees in case of diseases or whenever seasonal viral outbreak is observed, (by emails, bulletin boards, announcements on notice boards, etc).</p>
G4-LA8	Report whether formal agreements (either local or global) with trade unions cover health and safety.	✓	<p>📖 p.57–58 (Table 4.16), facilities certification in accordance with OHSAS 18001/EAOT 1801.</p> <p>H & S issues, agreed in collective agreements with employees' unions, refer to the Internal Labour Regulations, which is accessible on the corporate network. An agreement is signed among the Group's companies and the relevant employee unions concerning safety personnel in case of strike.</p> <p>Internal Protection and Prevention Service (ESYPP) operates under PD95/1999; aiming at employees' occupational health monitoring and taking protective measures to avoid accidents.</p> <p>Occupational Health and Safety Committees (EYAE) operating at each facility, consisting of elected representatives of employees and representing all employees, under PD1568/1985. Any employee (100%) may participate in the elections for EYAE at the facility where he/she is working. The committees participate in periodic meetings with the facility management making suggestions for improvements in their workplace, as far as occupational health and safety are concerned.</p> <p>Related reference at:</p> <ul style="list-style-type: none"> • HELPE Internal Labour Regulation, Articles 8, 24, 40, 45 • EKO & HF Internal Regulation, Articles 9, 12, 23, 28 • Group's Code of Conduct, chapter 7.1 <p>Outsourced Protection & Prevention Services (EXYPP): Where appropriate (eg DIAXON, EKO SERBIA) the monitoring of the occupational H & S activities are outsourced to a properly qualified external partner (EXYPP). This partner is responsible for indicators monitoring and the implementation of the relevant labour legislation.</p> <p>The H & S issues are covered 100% by local agreements or regulations or official procedures, the Commission for Health and Safety, and the participation of Safety Technician at periodic H & S meetings with his colleagues at other Group's facilities.</p> <p>There are also formal agreements covering issues such as:</p> <ul style="list-style-type: none"> • Provision and use of personal protection equipment • Participation of employee representatives in inspections • Education and information on H & S • Submission of complaints • Right to refuse dangerous work <p>Two safety committees operate at HP Cyprus; their establishment and role are in accordance with the relevant legislation. The committees' members are elected</p>

			<p>from employees every 3 years. The members of the two safety committees (one for Nicosia and one for Larnaca) represent employees on all health and safety issues. At OKTA, the local agreements cover issues such as: Personal protective equipment; Participation of worker representatives in health and safety inspections, audits, and accident investigations; Training and education; Right to refuse unsafe work; Periodic inspections.</p>																																																																		
G4-LA9	<p>Average hours of training per year per employee by gender, and by employee category.</p>	✓	<p>📖 p. 43 (environmental training), 39 – 40 (Health & Safety training).</p> <p>Statistical information concerning training expenses, training hours and breakdown by number of trainees, gender and training issue are presented in Tables 2.4–2.5.</p> <p>The Group’s total expenditure on education amounted to 738,520 € and the total number of training hours was 75,023.</p> <p>Indicatively, in-house seminars of 14,581 hours, on Health, Safety and Fire Prevention, were conducted during 2014.</p> <p>Average hours of training per employee by employee category</p> <table border="1"> <thead> <tr> <th>Company</th> <th>Management</th> <th>Operators</th> </tr> </thead> <tbody> <tr><td>HELPE</td><td>25.31</td><td>29.65</td></tr> <tr><td>EKO</td><td>15.26</td><td>7.29</td></tr> <tr><td>HF</td><td>22.35</td><td>19.29</td></tr> <tr><td>DIAXON</td><td>45.7</td><td>2.5</td></tr> <tr><td>ASPROFOS</td><td>29.5</td><td>22.5</td></tr> <tr><td>OKTA</td><td>9.2</td><td>7.17</td></tr> <tr><td>EKO SERBIA</td><td>27.42</td><td>14</td></tr> <tr><td>HP CYPRUS</td><td>28</td><td>35</td></tr> <tr><td>EKO BULGARIA</td><td>74</td><td>64</td></tr> <tr><td>JUGOPETROL</td><td>1.45</td><td>1.63</td></tr> </tbody> </table> <p>Average hours of training per employee by gender</p> <table border="1"> <thead> <tr> <th>COMPANY</th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr><td>HELPE</td><td>29.63</td><td>27</td></tr> <tr><td>EKO</td><td>9.01</td><td>6.75</td></tr> <tr><td>HF</td><td>19.72</td><td>19.62</td></tr> <tr><td>DIAXON</td><td>3.5</td><td>5.6</td></tr> <tr><td>ASPROFOS</td><td>23.5</td><td>23.4</td></tr> <tr><td>OKTA</td><td>7.52</td><td>6.58</td></tr> <tr><td>EKO SERBIA</td><td>25.27</td><td>13.6</td></tr> <tr><td>HP CYPRUS</td><td>39</td><td>23</td></tr> <tr><td>EKO BULGARIA</td><td>56.4</td><td>77.38</td></tr> <tr><td>JUGOPETROL</td><td>1.58</td><td>1.71</td></tr> </tbody> </table>	Company	Management	Operators	HELPE	25.31	29.65	EKO	15.26	7.29	HF	22.35	19.29	DIAXON	45.7	2.5	ASPROFOS	29.5	22.5	OKTA	9.2	7.17	EKO SERBIA	27.42	14	HP CYPRUS	28	35	EKO BULGARIA	74	64	JUGOPETROL	1.45	1.63	COMPANY	M	F	HELPE	29.63	27	EKO	9.01	6.75	HF	19.72	19.62	DIAXON	3.5	5.6	ASPROFOS	23.5	23.4	OKTA	7.52	6.58	EKO SERBIA	25.27	13.6	HP CYPRUS	39	23	EKO BULGARIA	56.4	77.38	JUGOPETROL	1.58	1.71
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G4-LA10	<p>Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings</p>	✓	<p>The HR Department, supporting lifelong learning, aims for continuous improvement of skills of employees by implementing long in-house education & training programs to ensure the “continuous employment”. Indicative topics covered by these programs are: learning English, economics for non-economics, legal for non-legal persons, principles of management, basic management skills and techniques of effective presentations. See also section 2.2.</p>																																																																		

			<p>In case of employee resignation or retirement:</p> <ul style="list-style-type: none"> • a compensating payment is provided, taken into account the age and experience. • a supporting program helping to find another job is available <p>The Group brings to an end labour contracts, usually, when employees meet the conditions for full retirement.</p>																				
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	✓	<p>For senior and top management, the evaluation is made annually based on KPIs and links the performance of the company with the objectives of the staff, on issues such as sustainable development (safety, environment, etc.).</p> <p>% of employees receiving regular performance and career development review, per company</p> <table border="1"> <tr><td>HELPE</td><td>100</td></tr> <tr><td>EKO</td><td>100</td></tr> <tr><td>HF</td><td>100</td></tr> <tr><td>ASPROFOS</td><td>99.33</td></tr> <tr><td>DIAXON</td><td>99</td></tr> <tr><td>EKO SERBIA</td><td>100</td></tr> <tr><td>JUGOPETROL</td><td>100</td></tr> <tr><td>OKTA</td><td>100</td></tr> <tr><td>EKO BULGARIA</td><td>100</td></tr> <tr><td>HP CYPRUS</td><td>100</td></tr> </table>	HELPE	100	EKO	100	HF	100	ASPROFOS	99.33	DIAXON	99	EKO SERBIA	100	JUGOPETROL	100	OKTA	100	EKO BULGARIA	100	HP CYPRUS	100
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G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	✓	<p>📖 p. 88–89</p> <p>Ratio of executive / no-executive members of the BoD was 4/9, in 2014.</p> <p>The breakdown of the 55 board members (of the Group’s companies included in this Report) by gender and age group is as follows :</p> <p>55 BoD members in 10 companies:</p> <table border="1"> <thead> <tr> <th rowspan="2">GENDER</th> <th colspan="3">AGE GROUP</th> </tr> <tr> <th><30</th> <th>30-50</th> <th>>50</th> </tr> </thead> <tbody> <tr> <td>M</td> <td>0</td> <td>19</td> <td>34</td> </tr> <tr> <td>F</td> <td>0</td> <td>2</td> <td>0</td> </tr> </tbody> </table> <p>On average 6% of women are in senior management, (HELPE 17.8%, EKO 19.4%, HF 3.8%, ASPROFOS 1.75%, OKTA 16.67%, no participation for the rest).</p> <p>📖 p. 21 (Tables 2.2, 2.3) for employees breakdown</p> <p>At the end of 2014, the Group employed, as permanent employees, 130 people with special needs.</p>	GENDER	AGE GROUP			<30	30-50	>50	M	0	19	34	F	0	2	0					
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Employees breakdown per gender, age group, nationality:

AGE GROUP	HELPE		EKO		HF		ASPROFOS	
	M	F	M	F	M	F	M	F
<30	7.1%	0.6%	0.4%	0%	8%	8.5%	0%	0%
30-50	57.6%	9.7%	28.8%	40.9%	48.2%	20.9%	29.3%	28.7%
>50	22.9%	2.1%	6.7%	23.2%	11.4%	3%	32.7%	9.3%

AGE GROUP	DIAXON		EKO BULGARIA		JUGO-PETROL		EKO SERBIA		HP CYPRUS		OKTA	
	M	F	M	F	M	F	M	F	M	F	M	F
<30	0%	0%	7%	11%	1%	4%	2,8%	0%	4%	4%	7%	2,4%
30-50	80.2%	15.6%	36%	30%	32%	20%	34%	49%	41.5%	26%	15%	6.4%
>50	4.2%	0%	11%	5%	35%	8%	5.7%	8.5%	22.5%	2%	60%	9.2%

Employees breakdown by nationality & gender

	M	F
Greek	2,126	467
fyROM	340	77
Serbian	33	23
Cypriot	37	17
Bulgarian	31	26
Montenegrin	99	44
Albanian	8	1
Croatian	0	2
German	1	0
Romanian	1	0
Turkish	1	0
Slovenian	1	0

G4-LA13 Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation

✓

Non-material issue because the Group does not follow any differentiation between men and women on the payroll.

The salary is based on annual evaluations and follows the Greek and EU legislation on equal pay. Based on the principle of equality there is no discrimination or other economic differentiations in any company.

G4-LA14 Percentage of new suppliers that were screened using labor practices criteria

✓

The evaluation of all new suppliers is based on questionnaire that also includes criteria for workplace practices. No significant findings in 2014.

G4-LA15 Significant actual and potential negative impacts for labor practices in the supply chain and actions taken


✓

Active suppliers are evaluated by questionnaire that also includes criteria for labor practices in the supply chain.

In 2014, the evaluation of more than 600 filled in questionnaires did not reveal any significant findings.

G4-LA16	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms	✓	<p>Through the Employee Suggestion Program (Section 2.5) grievances are filed and resolved (approximately 5 per year are related to labour practices).</p> <p>OKTA 1 grievance about labor practices filed, addressed and resolved through formal grievance mechanism,</p> <p>1 grievance filed through formal grievance mechanism during the reporting period, 1 grievance was addressed during the reporting period,</p> <p>0 grievances filed prior to the reporting period that were resolved during the reporting period</p>
HUMAN RIGHTS			
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	✓	<p>The Code of Conduct (sections 7.2 & 7.3) and the Internal Labour Regulations (article 2.3) provide guidance on the protection of human rights throughout the supply chain.</p> <p>Both documents make clear references to the respect of the human rights. Furthermore, all employees have been trained on both documents, which are accessible by all employees in the corporate network. Copies of them have been distributed throughout the Group.</p> <p>A new article making reference to the Sustainable Procurement is planned to be included in the revision of the Procurement Manual in 2015. Moreover, a new relevant clause is going to be incorporated in new contracts/purchase orders.</p> <p>In 2014, the screening percentage was zero.</p> <p>The Group's companies, where appropriate, use evaluation questionnaires, covering topics such as child labour, respect to human rights, labour rights, equal opportunities, H & S, etc.</p>
G4-HR2	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	✓	<p>100% of employees were trained to HR issues through the company's Internal Labour Regulation (articles 22, 23, 26, 38 & 39) and the Code of Conduct (section 7), which are available to all employees via intranet.</p> <p>The following actions are indirect ways of training on human rights:</p> <ul style="list-style-type: none"> • Employee participation in awareness workshops on CSR, Sustainability Reporting, GRI certification • Educational Seminars for CSR (Edge & Edge-Commercial in Athens and Thessaloniki) to groups of employees • The Corporate Responsibility Report Working Group, (see G4-49) on issues of Sustainability Reporting
G4-HR3	Total number of incidents of discrimination and corrective actions taken	✓	<p>The HR Division monitors such phenomena and acts accordingly in cooperation with the union of employees.</p> <p>No relevant reports in 2014.</p>

G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights	✓	<p>The HR & Procurement Divisions (in cooperation with the union of employees, where appropriate) monitor such phenomena and act accordingly.</p> <p>In 2014 there were no reports on violations of the right to freedom of association.</p> <p>The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2014.</p>
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor	✓	<p>The HR & Procurement Divisions (in cooperation with the union of employees, where appropriate) monitor such phenomena and act accordingly. In 2014 there were no relevant reports.</p> <p>The recruitment policy of the Group has a lower limit for recruitment the age of 18 years.</p> <p>The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2014.</p>
G4-HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor	✓	<p>The HR & Procurement Divisions monitor such phenomena and act accordingly (in cooperation with the union of employees and the work councils, where appropriate).</p> <p>In 2014 there were no relevant reports.</p> <p>The evaluation of the received questionnaires from suppliers did not reveal any significant findings for 2014.</p>
G4-HR7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations	✓	<p>All Group's security personnel is properly trained.</p> <p>The permanent personnel (60) are trained, immediately after its recruitment, on HR through the Internal Labour Regulation and the Code of Conduct.</p> <p>The security personnel provided by the companies we work with, have a formal certification and license to practice. To acquire certification & license they are trained to procedures related to the protection of human rights.</p> <p>The Center for Security Studies and the National Organization for the Certification of Qualifications & Vocational Guidance certified, as security personnel, all employees (100%) working at the Group Security Division.</p> <p>The certification process included a special module concerning human rights and related issues.</p> <p>There are no armed guards at the premises of the Group.</p>
G4-HR8	G4- HR8 Total number of incidents of violations involving rights of indigenous peoples and actions taken	✓	<p>Not material issue. There are no such cases.</p>
G4-HR9	Total number and percentage of operations that have been subject to human rights reviews or impact assessments	✓	<p>There were no reviews or assessments as there has been no reported or related problem.</p>

G4-HR10	Percentage of new suppliers that were screened using human rights criteria	✓	All new suppliers are evaluated via questionnaire which also includes criteria on respect for human rights. No significant findings in 2014.
G4-HR11	Significant actual and potential negative human rights impacts in the supply chain and actions taken	✓	Active suppliers are evaluated by questionnaire that also includes criteria on human rights impacts in the supply chain. In 2014, the evaluation of more than 600 filled in questionnaires did not reveal any significant findings.
G4-HR12	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	✓	The HR Division monitors phenomena of human rights violation and acts accordingly. No grievances in 2014.
SOCIETY			
G4-SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs	✓	In 2013, an opinion survey was conducted, on materiality analysis and stakeholder engagement (see §1.3) and a Qualitative & Quantitative Survey (Company Reputation Monitor), in local communities, took place in 2014 (see section 6.2). The materiality analysis and stakeholder engagement survey will be repeated in 2015. Such surveys, regular communication and consultation are used to determine the investment in infrastructure and other actions for the benefit of local communities and to understand the significant indirect effects locally. Assessing the findings will lead in planning activities for 2015. It has been recorded that local communities anticipate actions with a focus on supporting the unemployed, health services, in support of elderly and vulnerable groups in general.  p. 71–74: actions taken in the framework of surveys, consultation and communication with local communities. Analytical presentation, by country (100% operations). Furthermore, during the design phase of a new investment, provision is made for direct and indirect impacts. Moreover, the operational planning of any investment pays attention to the study of direct and indirect impacts on the local community.
G4-SO2	Operations with significant actual or potential negative impacts on local communities	✓	By its very nature, our work has an impact on the local community and society as a whole. Community engagement affects our social license to operate. Our impact on our surroundings immediately affects our employees and local suppliers. And our community engagement improves jobs and education in our environment — it contributes to society as well. This requires a constant focus on everything we do to minimise our negative impact and create value for local communities. Significant impacts may occur in the stages of: entry of a new activity, running or exit from it. Based on the strategy of the Group only the second stage (operation) considered as significant, for the next 5 years. The operation of the facilities may have environmental impacts (analytically presented at Section 4: emissions, climate change, pollutants, education, investments, protection of biodiversity), impacts on health and safety (section 3) or to the local communities (section 6).

G4-SO3	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified	✓	<p>All business units are audited for risks associated with corruption; following standard internal auditing procedure.</p> <p>The procedure is consistent with the Group's Code of Conduct.</p> <p>No relevant report or complaint in 2014.</p> <p>Internal Auditing KPI</p> <table border="1" data-bbox="669 510 1508 646"> <thead> <tr> <th></th> <th>2013</th> <th>2014</th> <th>2015 forecast</th> </tr> </thead> <tbody> <tr> <td>coverage of the annual internal audit program (min=90%)</td> <td>130%</td> <td>110%</td> <td>100%</td> </tr> </tbody> </table>		2013	2014	2015 forecast	coverage of the annual internal audit program (min=90%)	130%	110%	100%
	2013	2014	2015 forecast								
coverage of the annual internal audit program (min=90%)	130%	110%	100%								
G4-SO4	Communication and training on anti-corruption policies and procedures	✓	<p>📖 p. 15</p> <p>100% of the employees (5% management employees, with minor differentiation per company) are trained on anticorruption policies and procedures through the Internal Labour Regulation and the Code of Conduct (copies of the documents are available to all employees).</p> <p>Specifically, in 2014, 63 employees of HELPE, EKO and HF participated in training programs on anticorruption (including the Code of Conduct, cybercrime fraud methods). The percentage of the total workforce is 2.7%.</p> <p>In December 2014, all employees received a letter from Group's CEO, which recalls the Group's principles and behaviors (section 1.6), with reference to integrity, as behavior, and business objectives achievement in full harmony with legislation and rules.</p> <p>Moreover, all employees (100%) are aware of Group's commitment on UNGC principles, the corporate policy and values; through the annual Group's Corporate Responsibility & Sustainability Report (all reports are posted at the Group's site and intranet). Procurement personnel attend relevant seminars and are the guardians of the Procurement Regulation.</p>								
G4-SO5	Confirmed incidents of corruption and actions taken	✓	<p>No actions addressing incidents of corruption took place in 2014; as no incident was reported to the relevant committee, the companies' BoDs or the employees' union representatives</p> <p>There is also the possibility to report incidents of corruption to the Office of Compliance.</p> <p>However, provision there is for administrative and legal measures in accordance with Internal Labour Regulation. Moreover, regular audits are planned by the relevant auditing departments.</p>								
G4-SO6	Total value of political contributions by country and recipient/beneficiary	✓	Zero contribution, (such contribution is prohibited by the Group's Code of Conduct).								

G4-SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	✓	<p>HP CYPRUS The Competition Protection Commission has decided to reopen the investigation against the oil companies. In its earlier decision, dated 24.05.2009, a fine of €14,629,000 was imposed to the company. That decision was annulled by the Supreme Court of Cyprus on 25.05.2011. The case is reviewed by the newly established Committee on the basis of documents obtained in the previous investigation. The investigation is still ongoing.</p> <p>The above investigation is independent and separate from the new sectoral inquiry conducted by the CPC; during which a large number of documents and information has been collected from oil companies and petrol stations.</p> <p>JUGOPETROL A) In October 2012 the Competition Authority initiated proceedings against JUGOPETROL based on a complaint lodged by the Association of Free Trade Unions of Montenegro, in relation to the system applicable to petrol stations (COMO) of its network. On January 28, 2013, the JUGOPETROL received findings of the Competition Authority on the completion of the process started with the above application. These findings are still subject to appeal.</p> <p>B) Process for the annulment of the fine (approximately 5m. €), imposed by the Greek Competition Commission, is pending before the Supreme Administrative Court (Conseil d 'Etat).</p> <p>The hearing took place on 22.6.2011 and the decision is pending. Possible dismissal of the action will not have a negative impact on the company, given that the respective fine (€5.8 mil.) has been paid since 2008.</p>
G4-SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	✓	No irrevocable fines in 2014.
G4-SO9	Percentage of new suppliers that were screened using criteria for impacts on society	✓	<p>All new suppliers are evaluated using questionnaire which also include criteria on impact on society.</p> <p>No significant findings in 2014.</p>
G4-SO10	Significant actual and potential negative impacts on society in the supply chain and actions taken	✓	<p>Active suppliers are evaluated by a questionnaire that contains criteria for impact on society.</p> <p>In this context, in 2014, more than 600 questionnaires were filled in. Their evaluation did not reveal significant findings.</p>
G4-SO11	Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms	✓	<p>📖 p. 63 (Round the Clock Service)</p> <p>OKTA: In 2014, four grievances about impacts on society were filed and resolved.</p> <p>EKO BULGARIA: A small number of customer complaints (97) were reported through the formal grievance mechanisms for the reporting period. All these were addressed and resolved during the period of reference. No complaints about the impact on society during the reporting period.</p>

PRODUCT RESPONSIBILITY

<p>G4-PR1</p>	<p>Percentage of significant product and service categories for which health and safety impacts are assessed for improvement</p>	<p>✓</p>	<p>📖 p. 66 (Customer Information)</p> <p>Impact assessment is made for the entire lifecycle of each substance and includes the exposure scenarios for every use. For this purpose, accordance with Regulation REACH, there is communication throughout the entire supply chain.</p> <p>Potential risk assessment for safety, human health and environment has been conducted for all the products of the Refineries and Chemical Plants. This assessment has been done for all product phases (production, storage, transport, distribution, use, disposal).</p> <ul style="list-style-type: none"> • The aim is to assess the permissible level of dose/concentration to which humans and environment may be exposed; in order to conclude the proper Risk Management counter Measures (RMMs). • The risk assessment is conducted for the entire life cycle of each substance and includes the exposure scenarios for every use. For this purpose, as REACH Regulation requires, there is continuous communication throughout the entire supply chain. • Products are properly classified and labelled for hazards, in accordance with the European CLP Regulation. The users are provided with guidance on safe use through the extended Safety Data Sheets (e-SDSs). 																														
<p>G4-PR2</p>	<p>Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes</p>	<p>✓</p>	<p>No incidents of non-compliance</p>																														
<p>G4-PR3</p>	<p>Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements</p>	<p>✓</p>	<p>📖 p. 66</p> <p>Copies of Product Material Safety Data Sheet are provided with packaged products such as lubricants; (Table 5.1 presents the main products). For the non-packaged products there is no such requirement.</p> <p>The material safety data sheets (MSDS) for lubricants and fuels are also available to customers and at (http://www.eko.com.cy/Text.aspx?menuitemid=107&lan=1)</p> <table border="1" data-bbox="660 1655 1500 2088"> <thead> <tr> <th></th> <th>The sourcing of components of the product or service</th> <th>Content, particularly with regard to substances that might produce an environmental or social impact</th> <th>Safe use of the product or service</th> <th>Disposal of the product and environmental / social impacts</th> </tr> </thead> <tbody> <tr> <td>OKTA</td> <td>YES</td> <td>YES</td> <td>YES</td> <td>YES</td> </tr> <tr> <td>HP CYPRUS</td> <td>YES</td> <td>YES</td> <td>YES</td> <td>YES</td> </tr> <tr> <td>EKO BULGARIA</td> <td>NO</td> <td>NO</td> <td>YES</td> <td>NO</td> </tr> <tr> <td>EKO SERBIA</td> <td>YES</td> <td>YES</td> <td>YES</td> <td>YES</td> </tr> <tr> <td>JUGOPETROL</td> <td>YES</td> <td>YES</td> <td>YES</td> <td>YES</td> </tr> </tbody> </table>		The sourcing of components of the product or service	Content, particularly with regard to substances that might produce an environmental or social impact	Safe use of the product or service	Disposal of the product and environmental / social impacts	OKTA	YES	YES	YES	YES	HP CYPRUS	YES	YES	YES	YES	EKO BULGARIA	NO	NO	YES	NO	EKO SERBIA	YES	YES	YES	YES	JUGOPETROL	YES	YES	YES	YES
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G4-PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	✓	<p>No incidents of non compliance.</p> <p>Section 5.2 presents audits and inspections at petrol stations on the products quality and quantity.</p>
G4-PR5	Results of surveys measuring customer satisfaction	✓	<p>📖 p. 63 (Round the clock service)</p> <p>Moreover, important findings from the annual customer satisfaction survey Brand Vitality Tracking, by country:</p> <p>HP CYPRUS</p> <ul style="list-style-type: none"> Survey's (GFK's annual surveys organized by IMA) results indicate that HPC maintains its leading position in the Cypriot market. Brand name appeared enhanced compared to last year with Top Of Mind score increased from 37% (in 2013) to 39% this year. Key conclusion is that HPC should continue communicating its values related to quality and superior service and further invest on promotional activities in a market which is becoming more price sensitive. Annual Retail Mystery Shopper Survey where all HPC's service stations and some of competitors' are visited 4-times a year. Mystery shoppers assess the HPC's stations & competitors' stations in terms of "Effective Service offered", "Staff Appearance & Wearing of Uniforms" and "Politeness" of personnel. In 2014, overall score for HPC is at 76% vs 67% of the competitors. <p>EKO BULGARIA</p> <p>Top of Mind awareness increased by 5% (1st spontaneous mention of fuel brand / company in certain question of survey). Brand's choice was the first option with an increase of 3%. Customer satisfaction 93%, according to Mystery Motorist Survey, (criteria: politeness, service and appearance).</p> <p>EKO SERBIA</p> <p>EKO appears strengthened in all indices. Good service and promotional activities / loyalty scheme are considered its main strengths.</p> <p>OKTA</p> <p>The results of GFK's annual survey, organized by IMA, show significant improvement, in 2014 relative to 2013, in all indicators (Views & Attitudes, Awareness & Usage, Purchase Criteria & Brand Evaluation and Habits on car usage & Fuel purchases).</p> <p>JUGOPETROL</p> <p>EKO remains the clear leader in the fuel market. The brand is evaluated high in all areas, but its main strength is the convenient locations. Promotional activities are also a great advantage over the competition. Users are extremely loyal to the brand. Regarding its positioning evolution, EKO is also characterized by its "promotional activities" and "products differentiation".</p>
G4-PR6	Sale of banned or disputed products	✓	No such cases

G4-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	✓	<p>No incidents of non compliance.</p> <p>Full compliance with relevant regulations/codes (eg unfair competition and consumer protection).</p>
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	✓	<p>No complaints.</p> <p>Records of personal customer data fully comply with relevant legislation and are fully harmonized with EU law.</p>
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	✓	<p>No significant fines / non-compliances.</p> <p>Full compliance with the relevant legislation on unfair competition and consumer protection.</p> <p>EKO BULGARIA: €12,782 paid fines for violation of articles of the law on measures against money laundering (LMML / Regulations on its application RAMML).</p>

OG	Sector Specific indicators (Oil & Gas G4 Sector Disclosures)		Ext. Assurance
OG1	Volume and type of estimated proved reserves and production	Not applicable because the hydrocarbons exploration and production activity is out of the scope of this Report.	✓
OG2	Total amount invested in renewable energy	<p>📖 p. 47</p> <p>Undisclosed information.</p>	✓
OG3	Total amount of renewable energy generated by source	<p>📖 p. 47</p> <p>Electricity produced by wind farm: 14,500 MWh</p> <p>Electricity produced by P/V: 1,950 MWh .</p>	✓
OG4	Number and percentage of significant operating sites in which biodiversity risk has been assessed and monitored	<p>📖 p. 58</p> <p>There are no such areas near industrial facilities of the Group. The Group undertakes voluntary initiatives to protect biodiversity in consultation with local communities and within its annual program of CSR activities. None of the Group's refineries is near protected areas (NATURA, RAMSAR). All installations are in established industrial areas.</p>	✓
OG5	Volume of formation or produced water	Not applicable because the hydrocarbons exploration and production activity is out of the scope of this Report.	✓
OG6	Volume of flared and vented hydrocarbon	<p>Gaseous fuel (hydrocarbons) flared at the refineries, based to the verified ETS reports:</p> <p>Aspropyrgos refinery: 4,299,628 Nm3 Elefsina refinery : 25,623,042 Nm3 Thessaloniki refinery : 8,637,515 Nm3</p> <p>Based on the GRI's definition for vented hydrocarbon (ie intentional controlled release of uncombusted gas) there was no such release in 2014.</p>	✓
OG7	Amount of drilling waste (drill mud and cuttings) and strategies for treatment and disposal.	Not applicable because the hydrocarbons exploration and production activity is out of the scope of this Report.	✓
OG8	Benzene, lead and sulphur content in fuels	<p>📖 indicator GR-EN27</p> <p>Supply of "cleaner" fuels (zero sulfur), addition of bio-diesel to fuels, use of cleaner self-consumption fuels, as following (actual values less < or much less << than the specs):</p>	✓

		<p>Reduction of fuels sulfur content</p> <p>Gasoline & diesel 0.001%w/w (2014)</p> <p>Aviation fuel < 0.30%w/w (2014) <<0.30%w/w (2012)</p> <p>Gas oil (heating) <<0.30%w/w (2014)</p>	
OG9	Operations where indigenous communities are present or affected by activities and where specific engagement strategies are in place	No Group's operations in/adjacent to indigenous peoples' communities.	✓
OG10	Number and description of significant disputes with local communities and indigenous peoples	None.	✓
OG11	Number of sites that have been decommissioned and sites that are in the process of being	None / No such plans.	✓
OG12	Operations where involuntary resettlement took place	None.	✓
OG13	Number of process safety events, by business activity	<p>📖 See section 3.3 (pages 36–37), Table 3.7, Chart 3.8</p> <p>The most important PSE 2014 cannot be grouped, derived from different possible causes such as: leaking gasket from valve during draining, due to failure etc. The corrective actions taken, to address them and to avoid repetition, consist of better employee training to address multiple scenarios, and the adoption of a new procedure (Reporting and investigating safety incidents, ESO A3.0036.00). According to this procedure the investigation of safety incident takes place sooner and in greater depth following “why-tree” method.</p> <p>Also, at the level of coordinators and foremen, specific seminars (Supervising for Safety) took place in order to improve employee safety culture.</p>	✓
OG14	Volume of biofuels produced and purchased meeting sustainability criteria	<p>📖 p. 47, Table 4.4</p> <p>See also State Gazette, 2nd issue, no. 2432, 02.11.11, tables 1–5.</p>	✓

APPENDIX II. CoP Report (United Nations Global Compact Criteria)



Table II: UNGC, Advanced Level, COP Self-Assessment of each bullet of the 21 criteria with reference to GRI indices of Appendix I and the relevant sections of this Report. The independent body also certified each bullet of the 21 criteria.

Criteria Summary	Best Practices	Self-Assessment / Ext. Certification	GRI Indices, Appendix I and/or Report's Sections
Strategies & Operations			
<p>1</p> <p>The CoP describes main-streaming into corporate functions and business units</p>	<p>Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives</p> <p>Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy</p> <p>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts</p>	<p>✓</p>	<p>G4-1, G4-34, G4-38, G4-41 Moreover, sustainability responsibilities are assigned to Directorates of Procurement, HR, Environment, H & S.</p> <p>G4-34, G4-38, G4-51, G4-56, DMAs (Appendix I)</p> <p>G4-34, G4-37 till G4-41, G4-44, G4-45, G4-47, G4-49, G4-51, G4-53</p>
<p>2</p> <p>The CoP describes value chain implementation</p>	<p>Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts</p> <p>Communicate policies and expectations to suppliers and other relevant business partners</p> <p>Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence</p> <p>Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners</p>	<p>✓</p>	<p>G4-2, G4-16, G4-24, G4-25, G4-26</p> <p>G4-26 (sections 5.2, 5.3)</p> <p>G4-2, G4-15, G4-45, G4-47, G4-56</p> <p>Sections 3.5, 5.3</p>
<p>Robust Human Rights Management Policies & Procedures</p>	<p>Our Commitment</p> <ul style="list-style-type: none"> We respect human rights within our area of influence and operate our businesses in such a way as to make us an exemplary employer. 	<p>Systems</p> <ul style="list-style-type: none"> Code of Conduct Corporate H & S Policy Internal Labour Regulation Procurements' Regulation 	

		<ul style="list-style-type: none"> We aim to be the preferred employer with a respectful corporate culture and support for our employees' well-being. 	<p>Actions</p> <ul style="list-style-type: none"> Integrated relevant parts of our Codes, Policy or Regulations into new supply contracts Corporate Health Policy (campaign and expanded measurement) Group wide awareness and training programs on Corporate Values / Human Rights / Code of Conduct <p>Performance</p> <ul style="list-style-type: none"> relevant GRI indicators
3	The CoP describes robust commitments, strategies or policies in the area of human rights	<ul style="list-style-type: none"> Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties 	<p>✓</p> <p>HR DMA, Sections 1.5 & 2.7</p> <p>G4-14, G4-15, G4-16, G4-45, G4-47, G4-56</p> <p>G4-14, G4-15, G4-16, G4-45, G4-47, G4-56</p> <p>The annual edition of this Sustainability Report</p>
4	The CoP describes effective management systems to integrate the human rights principles	<ul style="list-style-type: none"> Process to ensure that internationally recognized human rights are respected On-going due diligence process that includes an assessment of actual and potential human rights impacts Internal awareness-raising and training on human rights for management and employees Operational-level grievance mechanisms for those potentially impacted by the company's activities Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action 	<p>✓</p> <p>G4-15, G4-56 (sections 1.5, 2.7)</p> <p>G4-HR1, G4-HR10, G4-HR3 till HR6, G4-HR8, G4-SO1</p> <p>G4-HR2, G4-HR7, HR DMA</p> <p>G4-HR8, G4-SO1</p> <p>HR DMA, G4-HR1 till G4-HR12, G4-SO1, G4-SO2</p>

5	<p>The CoP describes effective monitoring and evaluation mechanisms of human rights integration</p>	<ul style="list-style-type: none"> • System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain • Monitoring drawn from internal and external feedback, including affected stakeholders • Leadership review of monitoring and improvement results • Process to deal with incidents the company has caused or contributed to for internal and external stakeholders • Outcomes of integration of the human rights principles 	✓	<p>G4-37, G4-49, G4-53, G4-HR1 till HR10</p> <p>G4-27</p> <p>G4-34, G4-38, G4-37, G4-49, G4-53, G4-45, G4-47</p> <p>G4-2, G4-HR8 till HR12, G4-SO1</p> <p>G4-HR9, G4-HR10, G4-HR12</p>
	<p>Robust Labour Management Policies & Procedures</p>	<p>Our Commitment We respect the Declaration on Fundamental Principles and Rights at Work of the ILO, in accordance with national & European legislation.</p> <p>Systems</p> <ul style="list-style-type: none"> • Code of Conduct • Internal Labour Regulation • Procurements' Regulation • Corporate Governance Code • Embedding a common corporate culture • Working with employee representatives UNGC & CSR networks 		<p>Actions</p> <ul style="list-style-type: none"> • Maintained an ongoing dialogue with the concerned parties • Reached wage agreements in Greece • A competitive edge through diversity • Employees development • Vocational training • Code of Conduct presentation and awareness program • Regular dialogue with Unions <p>Performance</p> <ul style="list-style-type: none"> • Group wide presentation and awareness program of the Code of Conduct (including reference to ILO core labor standards) • Scheduled conduct of Employee Opinion Surveys • Relevant GRI indicators
6	<p>The CoP describes robust commitments, strategies or policies in the area of labour</p>	<ul style="list-style-type: none"> • Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies • Reflection on the relevance of the labour principles for the company • Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide , and engage in dialogue with representative organization of the workers (international, sectoral, national). • Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation 	✓	<p>G4-1, G4-2, G4-56, G4-15, G4-16, G4-27</p> <p>G4-27</p> <p>G4-15, G4-16, G4-56, see also Group's Internal Labor Code, http://www.helpe.gr/userfiles/8a53b155-76e9-4d45-9773-a27000e44a36/Corporate-HSE-NEW-policy.pdf</p> <p>G4-LA1 till LA13, G4-10, G4-11</p>

7	<p>The CoP describes effective management systems to integrate the labour principles</p>	<ul style="list-style-type: none"> • Risk and impact assessments in the area of labour • Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards • Allocation of responsibilities and accountability within the organization • Internal awareness-raising and training on the labour principles for management and employees • Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers 	✓	<p>G4-2, G4-27</p> <p>G4-11, see sections 1.5, 2.7</p> <p>G4-34, G4-38, G4-41, G4-45, G4-47, G4-56</p> <p>G4-LA9 till LA12</p> <p>G4-37, G4-49, G4-53</p>
8	<p>The CoP describes effective monitoring and evaluation mechanisms of labour principles integration</p>	<ul style="list-style-type: none"> • System to track and measure performance based on standardized performance metrics • Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future • Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards • Outcomes of integration of the Labour principles 	✓	<p>G4-11, G4-34, G4-38, G4-45, G4-47, G4-LA2, G4-LA4 till LA7, G4-LA10 till LA11, G4-LA13</p> <p>Section 2.7</p> <p>G4-2, G4-HR1, G4-HR10</p> <p>G4-11, G4-34, G4-38, G4-45, G4-47, G4-HR3 till HR6</p>
<p>Robust Environmental Management Policies & Procedures</p>		<p>Our Commitment</p> <ul style="list-style-type: none"> • We recognize that our production, transport and storage activities have an impact on the environment. • We are constantly minimizing our business' impact on the environment, focusing on emissions, carbon efficiency and climate protection. <p>Systems</p> <ul style="list-style-type: none"> • Group-wide Environmental Policy and dedicated guidelines to improve environmental performance (ISO 14001) • Emissions measuring systems • Carbon accounting and controlling system • Member of relevant organizations for Sustainable Development and climate protection 	<p>Actions</p> <ul style="list-style-type: none"> • Efficiency optimization within our fleet and buildings, tests and implementation of alternative technologies and fuels • Network and capacity optimization • Mobilization of employees with awareness campaigns, activities and rewards • Target to increase the percentage of employees working under ISO 14001 audited systems • Extension of the green product portfolio including efficient logistics solutions and carbon-neutral shipping services with the introduction of the Group's first self-initiated climate protection project in Lesotho <p>Performance</p> <ul style="list-style-type: none"> • Average Emission Intensity Index value: 0.28 (G4-EN18) • Relevant GRI environmental indicators 	

9	The CoP describes robust commitments, strategies or policies in the area of environmental stewardship	<ul style="list-style-type: none"> • Reference to relevant international conventions and other international instruments • Reflection on the relevance of environmental stewardship for the company • Written company policy on environmental stewardship • Specific commitments and goals for specified years 	✓	<p>G4-56, G4-15 till G4-16 (section 4.7)</p> <p>G4-1, G4-2, G4-27</p> <p>G4-56, Link to Environmental Policy, http://www.helpe.gr/en/health-and-safety/environmental-protection/</p> <p>G4-EN1 till EN31</p>
10	The CoP describes effective management systems to integrate the environmental principles	<ul style="list-style-type: none"> • Environmental risk and impact assessments • Assessments of lifecycle impact of products, ensuring environmentally sound management policies • Allocation of responsibilities and accountability within the organisation • Internal awareness-raising and training on environmental stewardship for management and employees • Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts 	✓	<p>G4-14, G4-PR1, EN DMA</p> <p>G4-PR1</p> <p>EN DMA, G4-34, G4-38, G4-41, G4-45, G4-47, G4-56</p> <p>G4-LA9</p> <p>G4-37, G4-49, G4-53, G4-SO1</p>
11	The CoP describes effective monitoring and evaluation mechanisms for environmental stewardship	<ul style="list-style-type: none"> • System to track and measure performance based on standardized performance metrics • Leadership review of monitoring and improvement results • Process to deal with incidents • Outcomes of integration of the environmental principles 	✓	<p>G4-34, G4-38, G4-45, G4-47</p> <p>G4-EN1-3, G4-EN6-8</p> <p>G4-EN10, G4-EN12 till EN13, G4-EN15 till EN16</p> <p>G4-EN19 till EN21, G4-EN26 till EN28</p>
	Robust Anti-Corruption Management Policies & Procedures	<p>Our Commitment</p> <p>We do not tolerate corruption and are committed to compliance with international anti-bribery standards, as stated in the Global Compact and regional anti-corruption and bribery legislation.</p>	Actions	<ul style="list-style-type: none"> • Efficiency optimization within our fleet and buildings, tests and implementation of alternative technologies and fuels • Network and capacity optimization • Mobilization of employees with awareness campaigns, activities and rewards • Target to increase the percentage of employees working under ISO 14001 audited systems

		<p>Systems</p> <ul style="list-style-type: none"> • Code of Conduct • Corporate Governance Code • Internal Labour Regulation • Procurements' Regulation • Third-party compliance standards 		<ul style="list-style-type: none"> • Extension of the green product portfolio including efficient logistics solutions and carbon-neutral shipping services with the introduction of the Group's first self-initiated climate protection project in Lesotho <p>Performance</p> <ul style="list-style-type: none"> • Average Emission Intensity Index value: 0.28 (G4-EN18) • Relevant GRI environmental indicators
12	The CoP describes robust commitments, strategies or policies in the area of anti-corruption	<ul style="list-style-type: none"> • Support by the organization's leadership for anti-corruption • Publicly stated formal policy of zero-tolerance of corruption • Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes 	✓	<p>Code of Conduct http://www.helppe.gr/uploads/coc_2013_EN/index.html</p> <p>G4-56, G4-15, code of conduct</p> <p>Corporate Governance, Code of Conduct</p>
13	The CoP describes effective management systems to integrate the anti-corruption principle	<ul style="list-style-type: none"> • Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees • Internal checks and balances to ensure consistency with the anti-corruption commitment • Management responsibility and accountability for implementation of the anti-corruption commitment or policy • Internal accounting and auditing procedures related to anticorruption 	✓	<p>Code of Conduct, G4-SO3 till SO5</p> <p>sections 1.5, 1.6, G4-SO3, G4- SO5</p> <p>G4-34, G4-38, G4-41, G4-56, G4-14, Code of Conduct</p> <p>G4-SO5, Corporate Governance</p>
14	The CoP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	<ul style="list-style-type: none"> • Leadership review of monitoring and improvement results • Process to deal with incidents • Public legal cases regarding corruption • Use of independent external assurance of anti-corruption programmes • Outcomes of integration of the anti-corruption principle 	✓	<p>G4-34, G4-38, G4-56, G4-SO3, G4-SO5</p> <p>G4-SO3 till SO5</p> <p>G4-SO7 till SO8</p> <p>G4-SO3</p> <p>G4-SO3 till SO5</p>

Taking Action in Support of Broader UN Goals and Issues			
15	The CoP describes core business contributions to UN goals and issues	<ul style="list-style-type: none"> Align core business strategy with one or more relevant UN goals/issues Develop relevant products and services or design business models that contribute to UN goals/issues Adopt and modify operating procedures to maximize contribution to UN goals/ issues 	<p>✓</p> <p>The following initiatives are embedded in the Group's business strategy & implemented in daily operations :</p> <ul style="list-style-type: none"> Human Rights Children's Rights Gender Equality Health Education Humanitarian Assistance Employment & Decent Working Conditions Anti-Corruption Biodiversity
16	The CoP describes strategic social investments and philanthropy	<ul style="list-style-type: none"> Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups Other established or emerging best practices 	<p>✓</p> <p>G4-SO1, Sections 1.2 & 6.2</p> <p>Section 1.6</p> <p>Deemed immaterial, taking into account the locations of the Group's facilities</p> <p>Sections 6.3, 6.4</p>
17	The CoP describes advocacy and public policy engagement	<ul style="list-style-type: none"> Publicly advocate the importance of action in relation to one or more UN goals/issues Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues 	<p>✓</p> <p>CEO's message at section 1.1</p> <p>section 1.6</p>
18	The CoP describes partnerships and collective action	<ul style="list-style-type: none"> Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges 	<p>✓</p> <p>G4-SO1</p> <p>G4-16, see also section 1.6</p>

		and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain		
Corporate Sustainability Governance and Leadership				
19	The CoP describes CEO commitment and leadership	<ul style="list-style-type: none"> • CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact • CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards • Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team 	✓	CEO's message section 1.1 G4-51
20	The CoP describes Board adoption and oversight	<ul style="list-style-type: none"> • Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability. • Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress) 	✓	G4-45, G4-47 This report is approved & signed by the CEO
21	The CoP describes stakeholder engagement	<ul style="list-style-type: none"> • Publicly recognize responsibility for the company's impacts on internal and external stakeholders • Define sustainability strategies, goals and policies in consultation with key stakeholders • Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance • Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers' 	✓	G4-2, see also sections 1, 1.3, 1.4 G4-26, G4-27 G4-37, G4-49, G4-53, G4-26 G4-37, G4-49, G4-53, G4-24, G4-25

ANNEX: Business & Peace		
22	The CoP describes policies and practices related to the company's core business operations in high-risk or conflict-affected areas	Neither HELLENIC PETROLEUM nor its subsidiaries are operating in high-risk or conflict-affected areas.
23	The CoP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas	
24	The CoP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas	