



HELLENIC
PETROLEUM

CORPORATE RESPONSIBILITY REPORT 2012



The Corporate Responsibility Report

Since 2006, as the HELLENIC PETROLEUM Group, we have published an annual Corporate Responsibility Report in order to improve our communication and share information with our social partners (stakeholders). This year's eighth annual report presents the Group's business performance taking into account economic, environmental and social perspectives from 01.01.2012 to 31.12.2012.

Reporting Guidelines

This Report was prepared by taking into account the GRI guidelines (Global Reporting Initiative, G3.1), the ten principles of the UN Global Compact (United Nations Global Compact, UNGC) and the GRI's Oil & Gas Sector Supplement.

Both the UNGC and the GRI are voluntary initiatives with a complementary role in promoting internationally accepted principles through corporate accountability and performance.

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

During the preparation of the report, we took into account the following: dialogue with our stakeholders, conclusions drawn from surveys conducted in local communities and with our customers, suppliers and employees, requirements for disclosure from financial analysts and the wider public, as well as observations made by inspection and auditing bodies. With this approach, the Group will continue to implement activities under its commitment to Sustainable Development.

Report's Content

The information provided in this report covers the influence and impacts that the operation of an energy group, such as HELLENIC PETROLEUM, has on sustainable development.

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.

Neither changes in measurement methods in relation to previous reports nor any revisions of information included in previous publications, have been made. Additionally, no further limitations, exceptions or changes exist, unless otherwise stated.

This report refers to the HELLENIC PETROLEUM Group's multifaceted Social Responsibility program. Financial information is summarized whilst detailed information is presented on the Group's sustainable development strategy whereas a particular emphasis is placed on:

- health & safety (section 5.3)
- human resources policy (section 5)
- environmental performance (section 4)
- climate change concerns and energy saving (section 4)
- transparency and risk management (section 3.2)
- support programs in local communities, especially socially vulnerable groups (section 6.4)

Assurance

To ensure accuracy, completeness and credibility, this Report was audited and validated in its whole by an independent external certification body prior to its publication.

We inform our stakeholders that the design and verification of this report took place in order to ensure that the Group achieved an A rating based on GRI criteria indicators. The third party which assessed the Report, certified its A rating, according to G3.1 guidelines and the specific Oil & Gas Sector Supplement.

This report was also assessed as having fulfilled COP requirements for the GC Advanced Level. The results of these assessments are presented in Section 7.4.

Furthermore, the accuracy of the report is assured through internal audits, control procedures and annual inspections performed by accredited certification associations. These inspections and audits ensure that the report is credible, properly balanced and relevant to the expectations and interests of the Group's stakeholders.

Reporting Boundaries

The information contained in the report relates to the following Group companies which we have selected on the basis that they represent the Group's basic and strategic activities both in Greece as well as abroad.

We decided not to include activities concerning hydrocarbons' exploration and production as they are conducted through joint ventures involving several companies.

The following companies were also included in the previous reports (2006-2010). Both improvements and relevant information are constantly made, without revising any information.

- HELLENIC PETROLEUM S.A.
- EKO A.B.E.E.
- HELLENIC FUELS S.A.
- OKTA AD SKOPJE
- HELLENIC PETROLEUM CYPRUS LTD
- JUGOPETROL AD KOTOR
- EKO BULGARIA EAD
- EKO SERBIA AD
- GLOBAL S.A.
- DIAXON A.B.E.E.
- ASPROFOS S.A.

The reported data is consolidated at Group level unless presented differently in certain areas. Environmental indicators, especially, are presented in detail, per each of the Group's business segments.

Materiality & Stakeholders Inclusiveness

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

Our People

Our goal is to be a "preferred employer" who ensures an attractive environment for its employees as well as opportunities for them to improve their professional and personal development without discrimination (see sections 5 and 5.4).

THE CORPORATE RESPONSIBILITY REPORT

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 both create an atmosphere of trust and meet their needs in the best possible manner (see section 6.4).

Our Shareholders / Investors

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

Our Partners

Our goal is to be in a position where our business partners, customers and suppliers actually prefer to work with our company through cultivating synergies which create value for all our stakeholders (see section 6.3).

Our Environment

We behave like a responsible corporate-citizen. Through a 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).

Our goal is to seek the views of our social partners and to try to broaden the way to meet them. In this context, we seek consensus and mutual understanding which is achieved via bilateral communication and dialogue that aims to highlight:

- our cooperation with our stakeholders to develop and achieve accountability as well as a sustainable development strategy,
- reporting and identifying issues which are particularly relevant to the Group and our stakeholders, and
- the Group's response and presence in all important issues, through decision making, investments, collaborations and communication.

In both the implementation of this report and the planning of the next one, we considered the conclusions from two important opinion surveys which we undertook during 2011-2012: a) the materiality analysis (involving employees) and b) the consultation with local communities. Similar actions will

be implemented every two years.

The materiality assessment process takes into account the fact the reported information covers areas, potential risks and indicators which could substantially influence stakeholders' decisions and assessments, both internal and external, including management. These include:

- An energy Group's typical operational impact on society and the environment.
- Management's requirements for information.
- Conclusions from dialogue with stakeholders.
- International initiatives and guidelines for sustainable development, especially the GRI & UNGC - where reference is made to the corresponding indicators, principles and protocols.
- Good practice and Best Available Techniques by industry peers.
- Disclosure requirements required by financial analysts, rating agencies, institutional investors and other interested parties.

We gather both our internal and external stakeholders' views through dialogue, public debates, public opinion surveys, publications in the Press, road shows, meetings, electronic communication etc. Our goal is to prioritize these views according to how much importance both the community and the Group places upon them, evaluate them and subsequently plan for further actions.

From the materiality evaluation process (implemented in 2011-2012 which will be repeated every two years), a wide range of topics of interest (to our stakeholders) arose. These are summarized as follows:

- ✓ Corruption and ethical conduct
- ✓ Health and safety
- ✓ Human resources
- ✓ Local communities
- ✓ Climate change (RES, biofuels)
- ✓ Corporate governance
- ✓ Risk management

The present report - as well as the links to the Group's website - serve to illustrate how we handled the issues presented above.

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"As a responsible corporate citizen, we are in constant dialogue and co-operation with all of our stakeholders -employees, customers, local communities and shareholders- and we aim to satisfy their expectations in a balanced manner".

2012 was a difficult year marked by the weak recovery in the global economy, high volatility in the markets and numerous fluctuations in crude oil prices. In the

Eurozone, due to the recession, the observed large decrease in fuel demand combined with the existing oversupply in refining capacity, resulted in decreased margins, thereby affecting the industry's profitability as a whole.

As a result of the ongoing recession, the economic situation in Greece continued to be difficult. The country's gross domestic product has shrunk by 25% over the last five years worsened the financial liquidity conditions and unemployment has spiralled to new heights. These factors have led to a further reduction in the domestic market's fuel demand, amounting to 17%, compared with 2011, creating unfavorable conditions in the Industry, particularly in the retail sector.

Within this extremely difficult economic environment, our Group completed a five-year development and transformation program, incorporating Sustainable Development into its strategy. During this period, investments were realised that amounted to over € 3 bil., the most important being the Elefsina refinery upgrade, which became operational in 2012. The project, amounting to € 1.4 bil. is an investment incorporating high environmental standards, which among other benefits, reduces local emissions by up to 85%. For its construction 20 mil. man hours were required and 3,400 workers were employed. The complex construction phase was completed without recording any serious accident. This fact confirms our high performance standards in the area of safety practices. In addition, all relevant safety indicators showed improvements, in some cases of over 20%, in relation to the previous year.

Transformation programs continued pertaining to the improvement of our performance in areas such as refining, procurement, retail marketing and human resources, yielding financial benefits in the amount of € 227 mil. in the five year period 2008-2012.

Our contribution in protecting the environment and striving for sustainable development will be further enhanced by the implementation of specific investment programs, which will exceed € 100 mil. over the coming years. Our goal is to further reduce greenhouse gas emissions, develop our position in the Renewable Energy industry, expand the use of alternative management and recycling programs, systematically monitor and reduce our carbon footprint throughout all our organizational units, implement projects for energy conservation and continue our efforts in tackling climate change.

As a responsible corporate citizen, we are in constant dialogue and cooperation with all of our stakeholders -employees, customers, local communities and shareholders- and we aim to satisfy their expectations in a balanced manner.

For our employees ...

We look towards our employees' systematic and merit-based development through integrated educational and management development programs. In 2012, over 120 thousand hours of training were completed, with 1,750 employees attending training programs. We are intensifying our efforts to optimize all processes, ensuring a good working environment and embedding a culture of extroversion, competitiveness and excellence.

For our customers ...

We constantly aim at improving competitiveness and the manner in which we operate, through adopting principles and implementing procedures, that ensure full transparency throughout the supply chain. Our goal is to create added value for our customers by providing innovative products, high quality services and making these available to the market at competitive prices.

For local communities ...

We are pursuing systematic efforts to adopt initiatives, that will ensure better living conditions for vulnerable social groups and support and encourage young people, who aim

to attain educational and professional excellence. We create employment opportunities for young people, who wish to gain experience, hence contributing to the efforts made to curtail unemployment. We have established scholarships schemes for postgraduate studies at leading universities abroad and furthermore, we support youth entrepreneurship.

For our shareholders ...

The successful completion of the Group's development investments has created the necessary conditions for improved competitiveness and an increased export orientation. In parallel, we have implemented and continue to drive through a number of transformation programs that support flexible structures and competitive operating costs throughout our Group. The combination of the above aims at delivering higher profitability and superior returns for our shareholders.

The effort to achieve our goals and improve our performance in every area of our business is collaborative and multifaceted, which is why we have expanded our partnerships with international organizations. As a member of the United Nations, we have renewed our commitment to uphold the 10 principles of the Global Compact (UNGC, Advanced level), with a particular emphasis on transparency. In this context, this report was prepared in accordance with the Global Reporting Initiative guidelines, GRI-G3.1, Oil & Gas Sector Supplement and was verified by an independent international certification body to ensure it fully complies with the requirements of Level A.

The tough business environment, in which we have been operating in recent years, has not constituted an obstacle to the achievement of one of the largest investment projects in the country and this is primary due to the efforts and contributions of our employees, the support of local communities and society at large and our shareholders' support and confidence. With the same level of responsibility and consistency, we are committed to continuing along this course for the years to come, so that we can consistently improve our efficiency and effectiveness in all sectors, while remaining committed to the principles of sustainable development.



John Costopoulos
Chief Executive Officer



02

REPORT OVERVIEW

2 | Report Overview

This report gives a detailed depiction of our Group's policy and initiatives in delivering on our Sustainable Development objectives. Additional information is also available on the Group's website (www.helpe.gr) as well as in published format:

- Annual Financial Report 2012
http://admin.elpe.gr/Uploads/pdf/Annual%20Report%20of%20Board%20of%20Directors%20and%20Financial%20Statements_2012.pdf
- Annual Report 2012 http://www.elpe.gr/Uploads/ANNUAL%20REPORT%202012_EN_new.pdf

For us, sustainable development is absolutely essential for ensuring competitive advantage in an era where the markets are characterized by intense pressure and global competition. At HELLENIC PETROLEUM, we are absolutely committed to making every effort to achieve tangible results through the implementation of our strategy and developing a sustainable management system. While the management function is in

a state of transiency, in that focus is shifting from profitability to sustainability, our target is to achieve sustainable development through an approach which includes not only excellent financial performance but accountability to society (section 6) and the environment (section 4). Only then can we really achieve a win-win outcome whilst minimizing our environmental impact.

In **2012**, significant progress was made in the field of "sustainable performance" in areas including:

Significant improvements in safety performance. The relevant safety indices reflect a 20% improvement compared with 2011. The accident severity index was 50% lower than the average European index rate in the sector.

Improved measured air emissions (GHG emissions).

A total of 22 internal audits were conducted, covering 100% of the annual internal auditing program, (17 audits were related to financial & management issues, 5 to technical issues). 10 of these audits were related to the full implementation of processes in the supply chain across the Group. There were no significant findings.

The Group's Corporate Responsibility & Sustainability Report was audited and assured - by an independent body - based on G3.1 guidelines and the GRI's Oil & Gas Sector Supplement. The Report also fulfilled the UNGC (COP active level) criteria.

The Group's Code of Conduct (ethics) was made public - all employees were also briefed. The group-wide awareness program is underway.

The DIAS project came to completion, the BEST 80 program brought about significant financial benefits.

Streamlining the fuels marketing network (project EDGE).

The Elefsina refinery upgrading project was completed (the refinery became operational in the fourth quarter) making it one of the most modern and profitable refineries in the Mediterranean, with a Nelson complexity index Nelson (NCI) of 8.1. Safety improved and the refinery's environmental impact was reduced (by up to 85% in local emissions).

Forthcoming initiatives (2013) in sustainable development include:

The full operation of the Elefsina Refinery will ensure for the supply of the highest standard of products into the Greek market.
Group-wide awareness/training of all of the Group's employees with regards to the Code of Ethics and Sustainable Development.
Risk assessment.
Continuing improvements in Health and Safety indices.
Further reducing GHG emissions and improving energy efficiency.
Research and development in RES and bio-fuels.
Preparing for the adoption of the new GRI G4 guidelines. Broadening our dialogue with our stakeholders.
Continuous performance improvement in Health & Safety indicators (indices: PSIF \leq 2.0 & LWIF \leq 2.5). Continuously improving employee satisfaction.
Evaluating the Group's annual CoP report, in the frame of our commitment to the UNGC principles, with reference to the CoP advanced level requirements.
Planning of a public opinion survey.

Corporate Responsibility & Sustainable Development Priorities - Objectives and Approach

	economic	social	employees	environment
Objective	Further strengthening position in domestic market and enhancing extroversion Development, social benefit, profitability	A socially responsible company based on its cooperation with stakeholders	A "preferred employer"	Strengthening environmentally friendly methods and processes through measurements, indicators and risk management
Approach Strategy	<ul style="list-style-type: none"> ■ Supporting R&D activities ■ Improving domestic and international marketing businesses' performance ■ Reducing business risk (debt) ■ Innovation & Creativity 	<ul style="list-style-type: none"> ■ Dialogue with stakeholders ■ Supporting partnerships ■ Ethical & transparent management ■ Social contribution ■ Support of local communities, vulnerable social groups, deserving young people ■ Evaluating CSR activities 	<ul style="list-style-type: none"> ■ Employees' training ■ Meritocracy and employee development ■ Continuous H&S system improvements ■ Consolidation of all HR policies and processes at a Group level ■ Rationalisation and reduction of operating costs 	<ul style="list-style-type: none"> ■ Measuring environmental performance ■ Tackling climate change ■ Monitoring international environmental trends

The ultimate goal is "Excellence Across All Sectors"

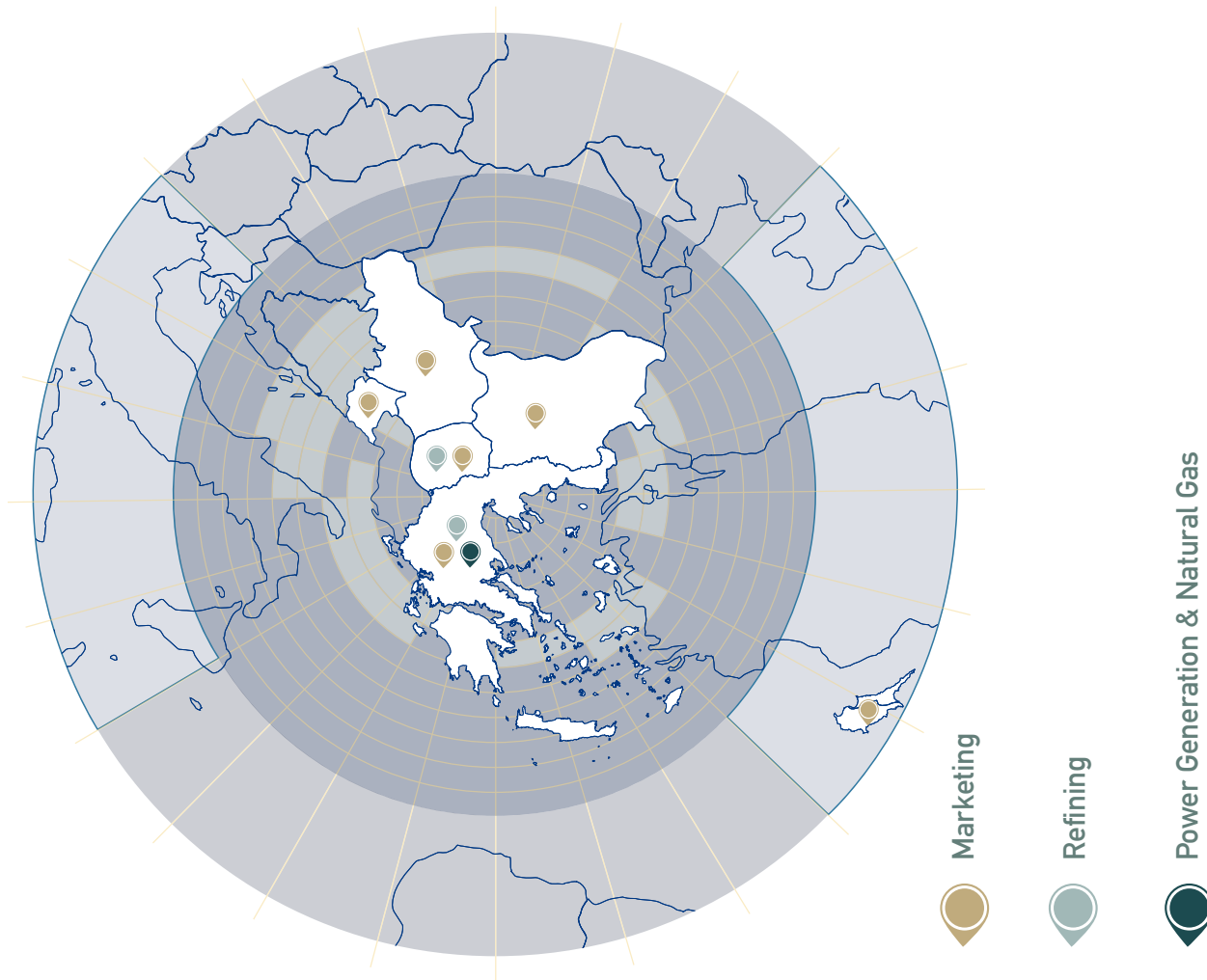
	2013 SURVIVAL	2014-2015 EVOLUTION	2016-2017 EXCELLENCE
Business Activities	<ul style="list-style-type: none"> ■ Optimal Technical & Commercial operation of BEE ■ Optimization / synergies between BEA - BEE ■ Strengthening export activity ■ Refinancing ■ Sale of DEPA ■ Launching the "EDGE" project ■ Optimizing OKTA's operation 	<ul style="list-style-type: none"> ■ DIAS (achieving Solomon Q1/Q2) ■ Optimizing supply chain ■ Completion of the "EDGE" projects and achieving its goal ■ BEA - BEE optimization / synergies ■ Development and further vertical integration of international activities ■ Optimization - development of a portfolio of other activities - RES, ASPROFOS, Electricity, Natural Gas ■ Completing BEST80 program ■ Deleveraging 	<ul style="list-style-type: none"> ■ Dynamic implementation of strategy for further development ■ Completion of deleveraging ■ Promoting Innovation / New technologies ■ Evolution into an energy supplier of the future
Procedures	<ul style="list-style-type: none"> ■ Credit Risk Management ■ Liquidity & capital management ■ Optimizing domestic marketing procedures (project EDGE) 	<ul style="list-style-type: none"> ■ Implementation of program for the optimization of Group's structures and procedures ■ Leveraging technology / informatics ■ Focus on supply chain and customer service 	<ul style="list-style-type: none"> ■ Optimizing all internal procedures ■ Fully exploiting technology / informatics for competitiveness
People	<ul style="list-style-type: none"> ■ Launching a comprehensive human resources training & development program (AIAS, HELPE Academy, EDGE project) ■ Promoting procedures with a focus on development 	<ul style="list-style-type: none"> ■ Continuation of the human resources training & development program ■ Strengthening culture encompassing extroversion & competitiveness 	<ul style="list-style-type: none"> ■ Excellent H.R. procedures ■ Continuous Development & Training ■ Embedding culture for Extraversion, Competitiveness and Excellence
Permanent Priorities	<ul style="list-style-type: none"> □ Safety Always & Everywhere: Our first priority □ Excellent management of environmental issues □ Promotion of Corporate Social Responsibility 		

03

THE HELLENIC PETROLEUM GROUP



The Privately Owned Tanker for the Transportation of LPG



3 | The HELLENIC PETROLEUM Group

HELLENIC PETROLEUM is one of the leading energy groups in Southeastern Europe with total capital employed of € 4,350 mil. and total equity of € 2,495 mil., on 31.12.2012, while turnover and adjusted net profit in 2012, amounted to € 10,469 mil. and € 232 mil. respectively.

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.

Group Companies and Participations per activity sector

Refining	HELLENIC PETROLEUM S.A.
Fuels Marketing	EKO A.B.E.E. CALYPSO LTD HELLENIC FUELS S.A.
Chemicals	HELLENIC PETROLEUM S.A. DIAXON A.B.E.E.
International operations (Refining & Marketing)	OKTA AD SKOPJE HELLENIC PETROLEUM CYPRUS LTD RAMOIL CYPRUS LTD EKO BULGARIA EAD EKO SERBIA AD JUGOPETROL AD KOTOR
Oil & Gas Exploration & Production	HELLENIC PETROLEUM S.A. MELROSE EGYPT EGYPT - W. OBAYED
Power Generation & Trading	ELPEDISON BV
RES	HELLENIC PETROLEUM - RES S.A.
Engineering	ASPROFOS S.A.
Crude / Products Transportation & Pipeline Networks	A.A.F.P.C. S.A. VARDAX S.A. HELLENIC PETROLEUM - APOLLON MARITIME COMPANY HELLENIC PETROLEUM - POSEIDON MARITIME COMPANY
Natural Gas	DEPA S.A.

The Group in numbers



3.1 | Vision - Mission - Values

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 Strategic Priorities in 2013-2017

Business Objectives	Financial Objectives
Optimization Operations <ul style="list-style-type: none"> Optimize Southern Refineries' operation Adapting Marketing to the prevailing, current environment Maintaining dynamic improvement of competitiveness 	Improving Profitability <ul style="list-style-type: none"> Increasing EBITDA to € 750-800 mil. medium term € 300-400 mil. in Net Cash Flows
Reducing exposure to the Greek market <ul style="list-style-type: none"> Developing export and marketing activities Strategy for regional vertical integration 	Group's deleveraging <ul style="list-style-type: none"> Reduction of ratio debt/EBITDA <2, within 2 years Reduce Leverage (Debt/Equity) <0.75
Increase in portfolio value activities <ul style="list-style-type: none"> Maximise benefits from the sale of 35% of the DEPA Group Optimising the contribution of all our activities 	Diversifying funding mix <ul style="list-style-type: none"> Issuing bonds on the international financial markets
Developing our people and continuous shaping of a culture of excellence.	

Business Principles - Attributes

The Group's statement of business principles sets out the core values and principles, which define attributes and modes of actions that we believe are essential parameters for creating sustainable value.

Our Principles

- Safety is always our First Priority.
- We offer Value to our Customers.
- We operate Responsibly towards Society and the Environment.
- We respect our Colleagues and Partners promoting Meritocracy, Teamwork, Innovation, Continuous Improvement and Results Orientation.
- We invest for Sustainable Development.
- We continuously enhance our Competitiveness.
- We apply high standards of Corporate Governance.
- We create Value for our Shareholders and focus on the Continuous Improvement of our Results and Cash Flows.

Our Attributes:

1 Integrity	2 Professionalism	3 Commitment	4 Judgement	5 Initiative	6 Extroversion
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The aforementioned principles and values are perfectly aligned with the strategic objectives as well as the standards, regulations and directives that we have committed to applying and integrating into the entire range of our activities.

The integration of these principles and behaviors into the Group's operation is achieved through the adoption of the:

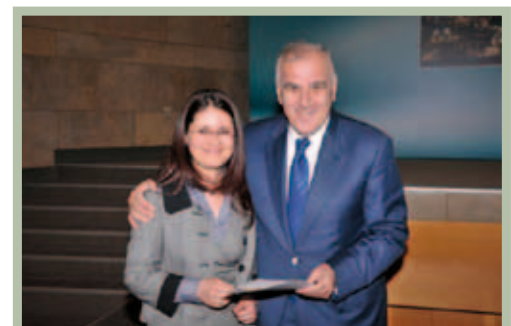
- Code of Conduct
- Principles of Corporate Governance
- Internal Operation Regulation
- Operational Collective Labor Agreements
- Internal Labor Regulations
- Policies, Procedures, Systems
- Performance Evaluation Systems for executives and employees (embodying the principles and behaviors into the performance criteria)
- Procedures for rewarding, promoting and employee development (principles and behaviors are linked to employees' development and professional advancement)
- Employees' development and training programs
- Dissemination of Principles
- Adoption of Principles in team management - role modeling
- Embedding Principles into team operations (individual behaviors and relations with colleagues)
- Coaching employees into behaviours that adopt the Principles
- Connecting Principles with specific reference to the roles and responsibilities of employees.

In 2012, for the first time, 81 of the Group's employees were awarded in recognition of their exceptional performance based on the Group's values and sustainable development.

The awards and commendations were awarded to employees from HELLENIC PETROLEUM, EKO and HELLENIC FUELS in Greece, as well as foreign subsidiaries EKO Bulgaria EAD, HELLENIC PETROLEUM Cyprus ltd and EKO Serbia AD.

The total of six award categories are based on the Group's business values and include:

Safety, Competitiveness, Customer Care, Developing People, Focusing on Results through Initiative & Openness and Corporate Social Responsibility.



3.2 | Risk Management

The Internal Audit and Risk Management System includes safeguards and monitoring mechanisms at various levels within the organization, as described in detail in the Annual Financial Report for the Fiscal Year 2012 (pages 94-99, 143-145 & 151-153), available on the Group's website at: http://admin.elpe.gr/Uploads/pdf/Annual%20Report%20of%20Board%20of%20Directors%20and%20Financial%20Statements_2012.pdf.

In addition, further details on risk management can be found in the Annual Report 2012 (Risk Management section) available on the Group's website at: http://www.elpe.gr/Uploads/ANNUAL%20REPORT%202012_EN_new.pdf.

The Group's Internal Auditing Department is part of the Internal Auditing System.

The Department contributes to the improvement of Environmental Risk Management, Internal Control Systems and Corporate Governance; so that the Group's strategic objectives can be achieved. The Group's Internal Auditing Department reports to the Audit Committee (composed of 3 non-executive Members of the Board) which in turn ensures that the Department operates effectively and presents the results to the Board. The Internal Auditing Department's main characteristics in terms of its organization and operation include:

- Operating under the Regulation approved by the Board. The Board defines the purpose, duties and responsibilities of the Department and is part of the internal regulation of HELLENIC PETROLEUM S.A.
- Conducting audits, at Group level, including its subsidiaries that operate in the Balkan region. The Department is staffed with qualified personnel, with financial and technical backgrounds to ensure that the Group's administrative, financial and technical operations are audited as effectively as possible.
- Periodically prepares or outsources the preparation of risk evaluation studies (existing and potential) that affect the Group's operations. Ranking these risks as high, medium or low risk.
- Preparing an annual audit program utilizing the classification of activities resulting from risk assessment studies.
- Developing an audit program, per business unit, that determines the depth and width of the audit in the corresponding region, in order to guide the auditors in their work.
- The design of the audit program takes into account the precautionary principle. Generally, the Department's audits are preventative (segregation of duties, banning unauthorized personnel's access to computer applications, implementing appropriate authorization of transactions, etc.) or repressive.
- The Department monitors the implementation of improvement proposals which have emerged from the audits of the previous year (follow-up) at least twice a year.

Activities during 2012

An external auditor evaluated the Internal Auditing Department's performance in order to identify opportunities for improvement.

A structured review of the risk assessment (prepared in 2010 by an external third party organization) as well as consequent classification of operating businesses according to their business risk were both conducted. The purpose of the review was to adapt the evaluation to the rapidly changing internal and external environment so then next year's audit program can focus on high risk areas.

New and experienced auditors attended an extended training program which was implemented in order to meet the Group's further audit requirements. A total of approximately 700 hours of training were provided in areas including:

- auditing skills
- technical activities within the facilities, and
- IT applications and auditing tools.

A total of 22 audits were conducted, covering 100% of the annual audit plan for 2012 (17 audits were related to financial & administrative matters whilst 5 were related to technical issues). From these audits, based on the risk assessment of 2010:

- 50% were conducted in high-risk areas
- 40% were conducted in medium risk areas
- 10% were conducted in low risk areas

Out of the total of 22 audits, 10 concerned the full implementation of procedures in the supply chain across the Group (land, sea transportation, at the petroleum products marketing facilities and network of service stations marketing facilities and retail network, including the Group's managed stations network). In the limited cases where deviations were found, corrective measures for full compliance with procedures were implemented.

The Department's Operating Regulation was revised and further developed in order to reflect changes in the relevant professional standards. At the same time, an Internal Audit Manual was developed which includes the basic auditing principles, practices and auditing practiced methods; their proper and systematic application ensures that the department carries out its work both effectively and objectively. The revised Regulation and Manual are pending approval by the Board of Directors.

The relevant disciplinary procedure was activated in one case where a conflict of interests was detected.

Objectives for 2013

In 2013, the findings arising from audits will be evaluated and possible improvement initiatives will be designed.

The Department's personnel acquiring vocational certification, is a high priority for the period 2013-2014.

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

Local Communities - Assessment of impacts

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

By means of regular public opinion surveys (stakeholder engagement), the views and opinion of local communities are looked into and recorded, for both projects in their planning phase as well as those that have been implemented (such as the modernization of industrial facilities). Furthermore, the best available technologies are adopted which burdens the project's budget, to ensure that environmental impacts are minimized.

Corporate standards and regulations

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

These specifically include

- The Global Reporting Initiative (GRI v3.1 indicators) as well as the specific Oil & Gas Sector supplement.
- The United Nations' Global Compact (UNGC) principles & criteria.
- ISO 9001, ISO 14001 & OHSAS 18000 International Standards.

- The international MARPOL convention.
- The ISGOTT safety guide.
- ISM Standards.
- The EU's regulations (such as REACH), Best Available Techniques (BATs), etc.
- The 2004 Internal Labour Regulation and the Group's Code of Conduct.

Scheduled inspections and audits (1st, 2nd and 3rd party) are performed and certifications are provided with reference to the above standards and codes in order that these standards are complied with and to minimize potential risks.

Occupational Risk Management

A precautionary approach is applied in the field of occupational risk management so that potential health and safety risks can be anticipated and therefore controlled. Potential risks are identified and 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 which also include the measures that are taken to eliminate or control hazards keeping them at low and acceptable levels. These studies are developed whilst taking employees' opinions and viewpoints into account through the completion of questionnaires concerning the nature of their work as well as the environment that they work in. The occupational risk assessment studies are revised whenever working or environmental changes take place; otherwise, every five years at the most. These revisions are communicated to all the staff so that each employee is aware of the risks that he/she may face and the required actions that need to be taken in order to eliminate or minimize these risks.

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

The Group's Internal Safety & Prevention Services (ESYPP) reviews and audits the occupational risk assessment studies in all of HELLENIC PETROLEUM's facilities to ensure that the application of the Group's common basic principles are taken into account.

Stakeholder Relationships

An important parameter defining the way in which the Group evolves, is the process of recognizing, understanding and applying these principles, values, initiatives and standards which exhibit personal, business and corporate responsibility and reflect our respect for the views, suggestions and needs of our stakeholders. Our approach includes satisfaction and opinion surveys, public dialogue, debates, meetings, publications, etc. This approach towards our stakeholders - as a means of minimizing the potential risks - is presented in more detail in the introduction of this report (section: Materiality and Stakeholders) and section 5.4.

Inaccurate Information Dissemination Risk

Inaccurate information dissemination risk (reputational risk) may have a potential impact on the stock or adversely affect any of the Group's interested parties.

The Group is in regular contact with the investment community both in Greece and abroad through information initiatives such as teleconferencing for quarterly results and road shows/participation in industry international conferences. Related material (presentations, transcripts, webcasts) are available to the general investing public on the Group's website (www.helpe.gr).

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

Risk of Failure to Implement Legislation

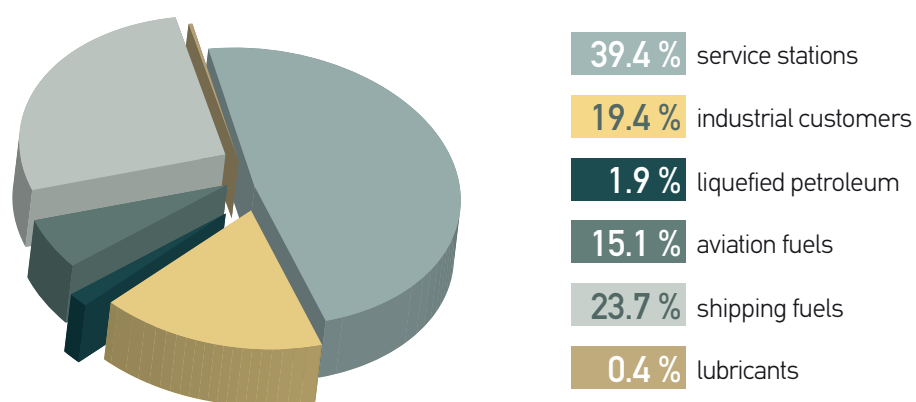
The risk of failure in implementing legislation or complying with internationally accepted norms and standards (Compliance Risk) is controlled and monitored by many safeguards for each critical area (such as IT, handling sensitive information, the environment, customer information and public opinion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

3.3 | Main Products & their Breakdown

Customer service and looking after the environment constitute two parameters that are closely connected to all of our products and 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, in creating mutual trust and seeking customer satisfaction, from the product's entry onto the market till the end of its use.

Chart 3.1: EKO's Greece sales breakdown by customer type



The Group is operational in Greece, Cyprus, Bulgaria, Serbia, Montenegro, Albania (till November 2012) 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 domestic and 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 3.2: Product breakdown by type and market in each of the Group's companies

PRODUCTS	EKO	HF	EKO Serbia	OKTA AD SKOPJE	EKO Bulgaria	HP Cyprus	JPK Montenegro
Unleaded gasoline 95 octane	29.9%	41.9%	22.66%	13.75%	17%	30.7%	17.2%
Unleaded gasoline 98 octane			1.97%	1.73%		2.3%	3.4%
Unleaded gasoline 100 octane	0.8%	1.4%			1%	0.4%	
LRP gasoline	0.4%	0.7%					
Automotive gas oil	37.7%	28%	50.06%	48.68%	57%	29.3%	53.8%
Heating gas oil	19.3%	25.2%	1.61%	3.98%	2%	10.3%	9.9%
Marine gas oil						12.2%	3.1%
Lubricants	0.5%					0.3%	
Kerosene	0.4%					1.5%	
Mazout (fuel oil)	6%	1.2%	0.25%	26.04%		3.8%	
Bitumen	1.1%	0.7%	0.34%	0.25%	3%		
LPG	3.8%	0.7%	23.11%	1.97%	16%	5.2%	2.1%
CNG					2%		
Jet A1				3.6%	2%	4%	10.5%

Table 3.3: Fuel percentages as sold by HELLENIC PETROLEUM Cyprus per business sector

<i>Business sector</i>	<i>Market share</i>
<i>Commercial (service stations)</i>	<i>63.1 %</i>
<i>Commercial and Industrial Customers</i>	<i>15.2 %</i>
<i>LPG Commercial</i>	<i>5.2 %</i>
<i>International Sales (marine & aviation fuels)</i>	<i>16.2 % (12.2% + 4%)</i>
<i>Lubricants Commercial</i>	<i>0.3%</i>

The Group's subsidiary **Hellenic Petroleum Cyprus** is a Fuels Marketing Company that serves Cypriot Consumers and Businesses through the sale of EKO products. Table 3.3 presents the market sectors that the company covers and their respective sales volumes.

EKO Serbia operates a model of pricing and marketing micro strategy in order to satisfy the specific demands in the local market. Marketing initiatives have enabled the company to retain its market share despite changes in the market. The service stations network consists of 48 stations that covers 8% of the domestic needs and 4% of the domestic market (based on service station numbers). The fuel sales volume is distributed through wholesale (11 %) and retail (89%).

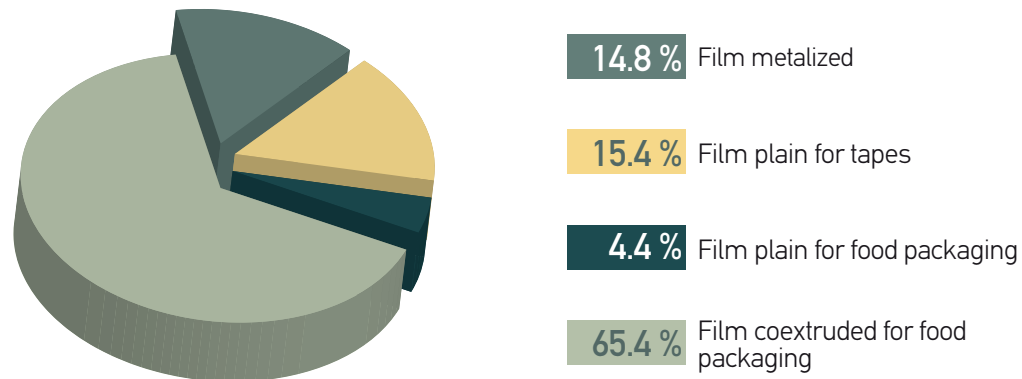
Through its network of 28 fuel stations in FYROM, **OKTA** covers 76% of domestic needs. It is also active in Kosovo (covering 60% of the local market), Serbia and Albania.

EKO Bulgaria, through its network of 82 service stations, covers 10% of the domestic needs and covers 4% of the domestic market (based on service stations numbers).

With a network of 44 stations, **JPK** is active in Montenegro and Bosnia - Herzegovina covering 72% of the domestic needs, while the service stations network covers 53% of the domestic market (based on volume sales).

DIAXON produces polypropylene film of which 30% is exported. (see Chart 3.4).

Chart 3.4: DIAXON's sales breakdown by type of film



3.4 | Social Product

HELLENIC PETROLEUM has defined its "interested parties" (social partners or stakeholders) with which it communicates, converses or cooperates or who have a direct/indirect interest in its operations.

The interested parties include:

- Shareholder / Investors
- Customers
- Employees
- Suppliers
- Society

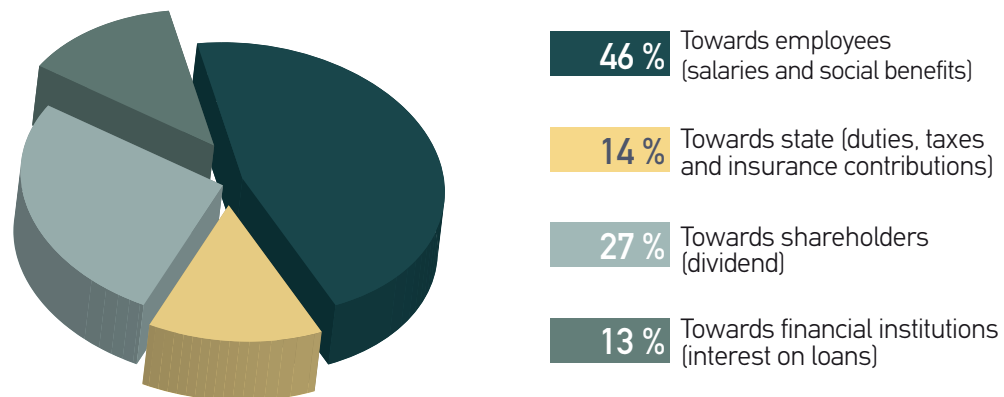
The Company's strategy and all of its actions aim at establishing relationships with the above stakeholders, so the company can respond to their needs and minimize the risks associated with its reputation and operation, whilst exploiting the competitive advantages created by these synergies.

HELLENIC PETROLEUM defines a social product as the financial contribution made to our key stakeholders and towards society. The Group, while implementing its strategy and operations, invests significantly and helps improve the country's

economics, creating additional secondary and tertiary income. This creates jobs, improves personnel skills, upgrades human resources, reduces dependence on foreign companies -through major investments in new products- and provides funds for social security and the public sector.

In 2012, the Group's turnover was € 10,469 mil. (2011: € 9,308 mil.) and social product worth € 508 mil., (2011: € 577 mil.) was distributed as follows:

Chart 3.5: Breakdown of the social product



Note that the above figures do not include the levies and duties for product purchases of the marketing companies EKO and HELLENIC FUELS.

Including taxes and duties the Group's social product for 2012 amounted to € 1,713 mil. (2011: € 1,866 mil.).



04

OUR CONTRIBUTION TO THE ENVIRONMENT

A View of the Aspropyrgos Refinery

4.1 | Environmental Management

... where our main objective is to continuously improve environmental performance and environmental protection as a key component of sustainable development.

4.1.1 | Environmental Policy

Over the last few years, HELLENIC PETROLEUM has rigorously implemented its environmental policy just as it binds all of its employees and integrates the policy in each of the Group's activities.

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

In this context, HELLENIC PETROLEUM is continuing with the preparations for the implementation of the new Directive on industrial emissions (Industrial Emissions Directive - 2010/75/EE), which should be incorporated into national law and gradually implemented at a national level over the next few years. Furthermore, the Group made suggestions and interventions in the consultation on the revision of BREF (Best available techniques REFerence documents) through CONCAWE, which participates actively in the said consultation and formulation of the final texts representing European refineries.

4.1.2 | Environmental Investments

Environmental investments constitute the most solid evidence of HELLENIC PETROLEUM's interest and substantial intention. Additionally, it is contributing to the efforts made in protecting the environment as well as sustainable development.

HELLENIC PETROLEUM's strategic planning includes significant environmentally focused investments, using the Best Available Techniques and ensuring for the modernization of the production process.

2012 was a milestone year for HELLENIC PETROLEUM, as the significant investment, amounting € 1.4 bil., regarding the modernization of the Elefsina refinery came to an end with the new refinery becoming operational.

The most important factor in this investment, incorporating high environmental standards, is its innovative process with only 5 applications worldwide, the thermal cracking of heavy oils (e.g. asphalt) in continuous fluid bed (Flexicoking Conversion Technology). The flexicoking technology is a sufficiently flexible conversion process, producing both clean, lighter, more valuable products (diesel) as well as a clean fuel gas substitute, for self consumption, contributing significantly to emissions reduction and positively to the industrial facility's energy balance.

The aforementioned environmental features, along with the significant social benefits, constituted the core criteria which resulted in the Group winning first prize award of the category "Process" at the European Commission's Greek Business



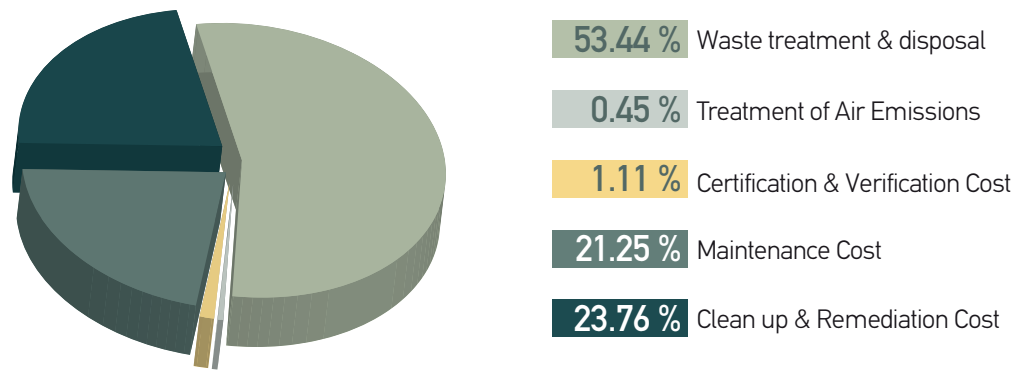
Awards for the Environment, for the year 2012.

Additional environmental investments were made for the improvement, modernization and upgrading of processes affecting environmental performance of the industrial complexes. The investments, in 2012, amount to € 4.257 mil. while for the

Table 4.1: Group's environmental investments per facility

Facility	Environmental investment (k€)	
	2012	2013-2017
Aspropyrgos Refinery (BEA)	1,199	7,365
Elefsina Refinery (BEE)	729	3,271
Thessaloniki Refinery (BEΘ)	1,335	4,305
FYROM Refinery (OKTA)	104	1,497
Subsidiaries (EKO, EK, EKO INTERNATIONAL, DIAXON)	890	1,493
TOTAL	4,257	17,931

Chart 4.2: Group's Environmental Investments breakdown for 2012



4.1.3 | Environmental Training

With the objective of improving its environmental performance and its corporate culture in environmental protection and management issues, the Group, steadily and systematically, implements a series of actions concerning environmental education and employees' awareness.

Table 4.3 illustrates training man-hours that the Group's employees attended concerning environmental issues in 2012. Customers, suppliers, sub contractors, citizen groups etc. attended similar environmental programs.

Table 4.3: Environmental Training (number of trainees & man-hours) per facility

	BEA	BEE	BEØ	OKTA	SUBSIDIARIES	TOTAL
No. of employees	794	528	592	633	1,165	3,712
No. of employees trained	97	35	10	290	250	682
Training man-hours	97	35	30	145	1,031	1,338
No. of non employees trained	297		537	94	273	1,201
Training man-hours	297		268.5	47	765.5	1,378

4.2 | Energy Management & Climate Change

... constitutes a real challenge for the industrial sector, the main two aspects of which are, to maintain a secure energy supply and to reduce greenhouse gas emissions (greater energy efficiency and promotion RES).

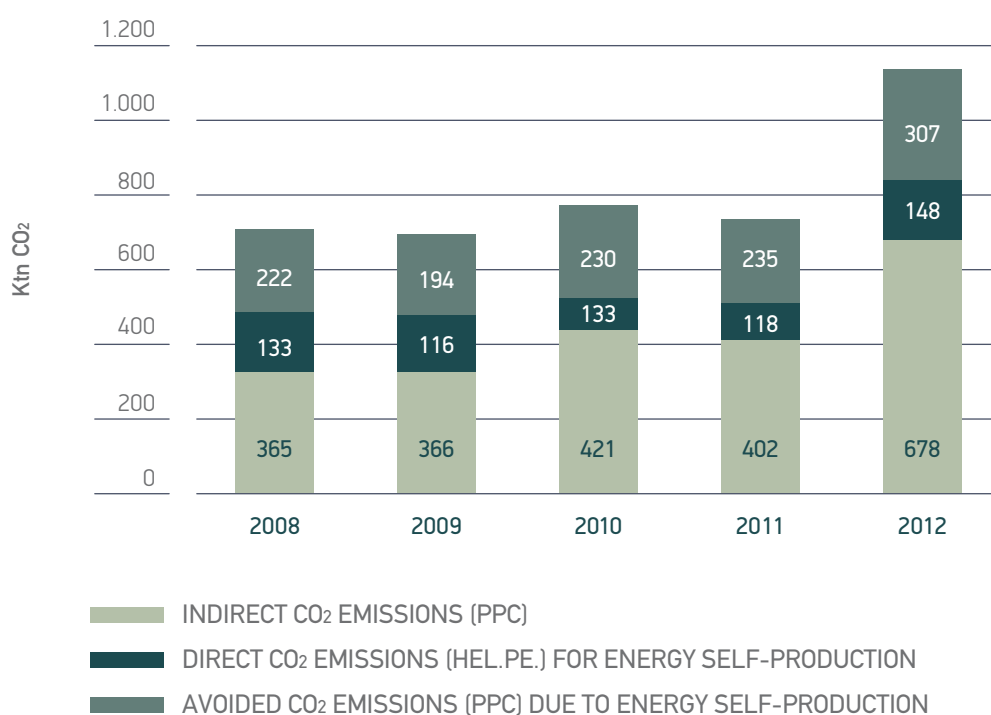
4.2.1 | Energy Saving

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

The Group's refineries have managed to produce cleaner fuels and are highly efficient in terms of energy consumption, despite the increased energy requirements that are needed during the production of fuel. Increasingly stringent fuel specifications (zero sulfur fuels) which are now available to consumers, on the one hand help in reducing gaseous emissions, such as sulfur dioxide (SO₂) and particulates, on the other hand, require increased energy consumption.

All of the Group's refineries are energy optimized, with CHP units for combined heat and power, covering about **40% of the Group's facilities electricity needs**. **The emission of approximately 300 thousand tons of CO₂** (based on PPC's weighted average emission factor of 1.13 kg CO₂/kWh for 2011) in 2012, **has been avoided because of the operation of these CHP units; thus significantly contributing to the reduction of nation - wide levels of greenhouse gases emissions.**

Chart 4.4: Contribution of self-produced electricity and CO₂ emissions in the Group's domestic refineries



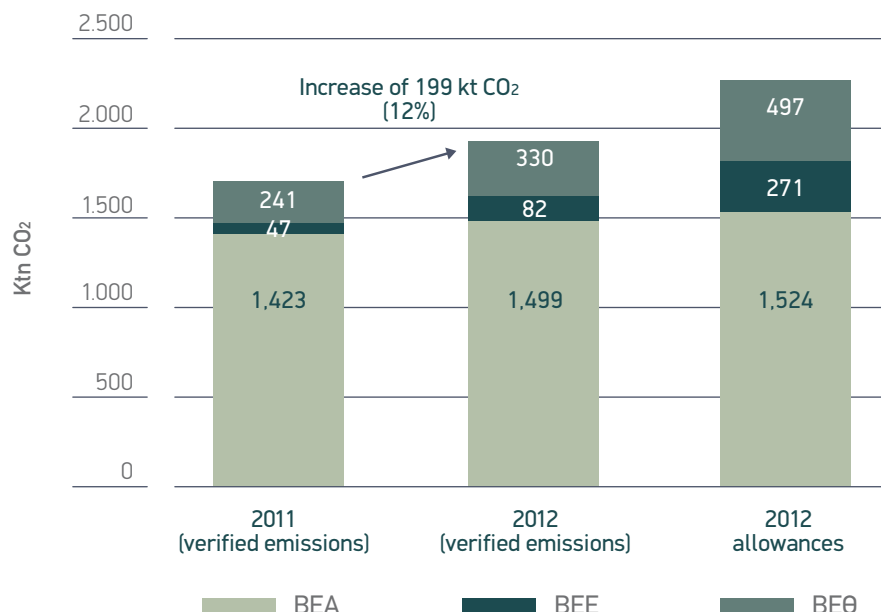
This benefit, in regard to reducing emissions, is depicted graphically in Chart 4.4. The light green bars represent CO₂ emissions corresponding to the consumption of electricity purchased from PPC, using a weighted average emission rate equal to 1.13 kg CO₂/kWh for each year (the rate used for 2012 was that of 2011), whilst the dark green bars represent the CO₂ emissions corresponding to the self generated electricity, using the corresponding weighted average emission factors (0.38 and 0.37 kg CO₂/kWh) for the Elefsina and Thessaloniki refineries, respectively.

4.2.2 | CO₂ Emissions & Allowances Trading Scheme

Chart 4.5 shows the verified emissions of carbon dioxide (CO₂) from the Group's facilities, over the last two years 2011 and 2012, according to the relevant European Directives and Decisions, under the European Emissions Trading System for Greenhouse Gas Allowances (ETS). Note that the increase in the verified emissions between 2011 and 2012 is mainly due to the temporary shutdown of the Elefsina and Thessaloniki refineries for a long period in 2011 due to planned upgrading and modernization works.

Note that the three refineries' total direct CO₂ emissions constitute less than 2% of total greenhouse gas emissions (GHG) nationwide (1.81% in 2010 based on the national GHG emissions inventory).

Chart 4.5: Verified CO₂ emissions and CO₂ allowances for the three domestic refineries (kt CO₂)



In the context of the implementation of the third phase of the ETS (2013-2020), HELLENIC PETROLEUM's refineries submitted the revised emissions' monitoring plans to the competent authorities (Ministry of Environment, Energy and Climate Change). The Group is also preparing for its participation in the system, based on the new rules regarding the allowances allocation, which will result in increased operating costs.

Specifically, in the third phase of the ETS, the installations will have to buy an increasing proportion of emission allowances rather than acquire a large proportion of them for free, as was the case up until 2012. Also, additional expenses will arise due to increased electricity costs, since the electricity supply industry, which will no longer be allocated free allowances, is going to pass on the cost of buying emission allowances to consumers.

4.2.3 | Carbon Footprint at Administration Offices

In 2012, in the framework of our efforts to reduce our carbon footprint, even in the area of the company's support services, we continued monitoring the carbon footprint of both at the Group's headquarters and at the administration building of the Aspropyrgos refinery. Data recording and an assessment of our carbon footprint was also initiated at the administration buildings at the Elefsina and Thessaloniki refineries. The study was conducted by the Group's Department of Environmental Management and Sustainable Development and the final calculations were confirmed by an independent organisation (third party).

Indicatively can be mentioned that the consumption of electricity for the building needs, the transportation of employees to and from the workplace, the corporate transportation means, the corporate flights among the recorded measurements, are in accordance with international standards for this type of cal-

culations. The results of emissions calculations were certified by the organization "myClimate".

In the framework of the above calculations, and in order to improve the culture of staff who work in the abovementioned buildings, a survey on the manner employees arriving at work has been conducted using intranet. The study results showed that ~33% of these employees do not use private cars but company's buses and public transportation.

Furthermore, through "myClimate" and its "ClimateNeutral" program, greenhouse gas emissions were offset, the equivalent to the consumption of 76 tons of printing paper in terms of total carbon dioxide emissions. As a result of the offset, support was given to "energy efficiency" project "Qori Q'oncha - Improved Cook Stove Diffusion Program in Peru" in the An-cash region in Peru.



4.3 | Sustainable Management of Natural Resources

... to minimize the impact of our activities on the natural environment, including reusing water, waste recovery, protecting biodiversity and reducing gas emissions.

4.3.1 | Management of Raw Material and Water

The Group's refineries consume natural resources (crude oil, water) for the production of the end products that reach the consumer. In order to mitigate raw material waste, the refineries have the appropriate systems in place by which we are able to collect the waste that is produced and re-use it.

Wherever it is technically feasible, Best Available Techniques are implemented in order to recover raw materials from various waste streams. Recovery amounts for 2012 are presented in Table 4.6.

Table 4.6: Raw Material Recovery

Facility	Recovery Percentage	Quantity
Aspropyrgos Refinery	0.11%	9,408 tn
Thessaloniki Refinery	1.10%	39,958 tn
OKTA Refinery	3.68%	9,712 tn

Significant measures are also implemented in order to reuse consumed water. Part of the refinery production process is the pre-treatment of the polluted wastewater streams and their reuse within processes, resulting in a significant reduction in the consumption of fresh water and the reduction of wastewater. Amounts of reused water in 2012 are presented in Table 4.7.

Table 4.7: Water Reused

Facility	Percentage Reused	Volume Reused
Aspropyrgos Refinery	3.76%	208,381 m ³
Elefsina Refinery	1.01%	72,938 m ³
Thessaloniki Refinery	2.10%	50,981 m ³
OKTA Refinery	5.84%	73,600 m ³

The benefit of this process is twofold, saving water and energy.

Charts 4.8 - 4.10 show the breakdown of water and energy consumption, by category and company, for the HELLENIC PETROLEUM Group.

Chart 4.8: Group's total water withdrawal per source of origin

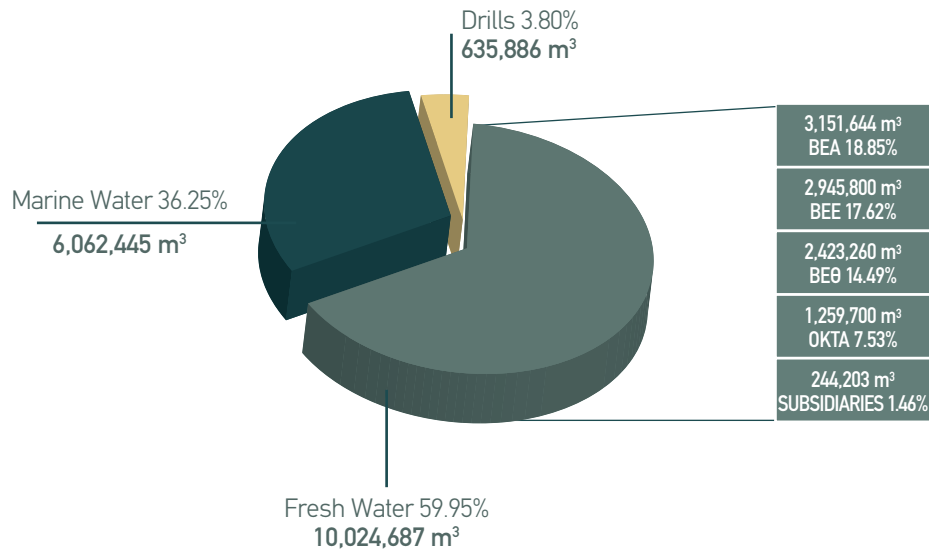


Chart 4.9: Total energy consumption per Group's facility

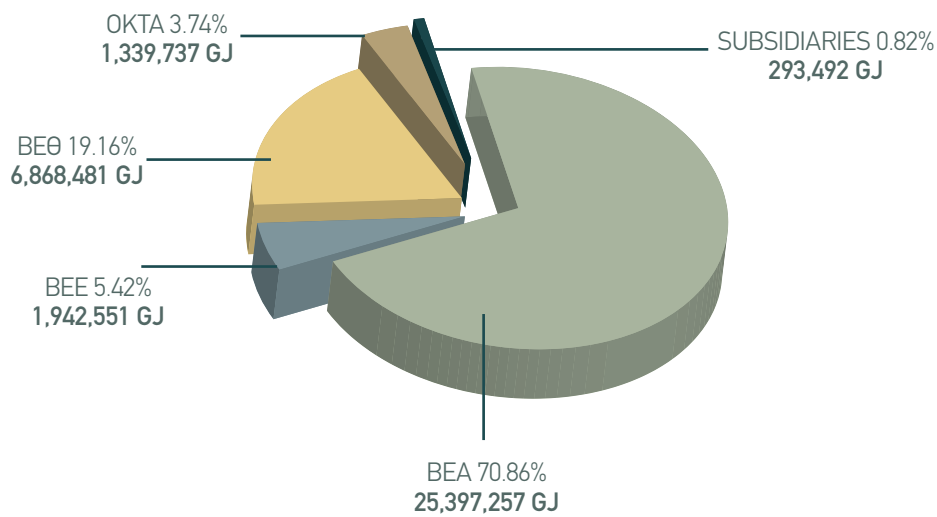
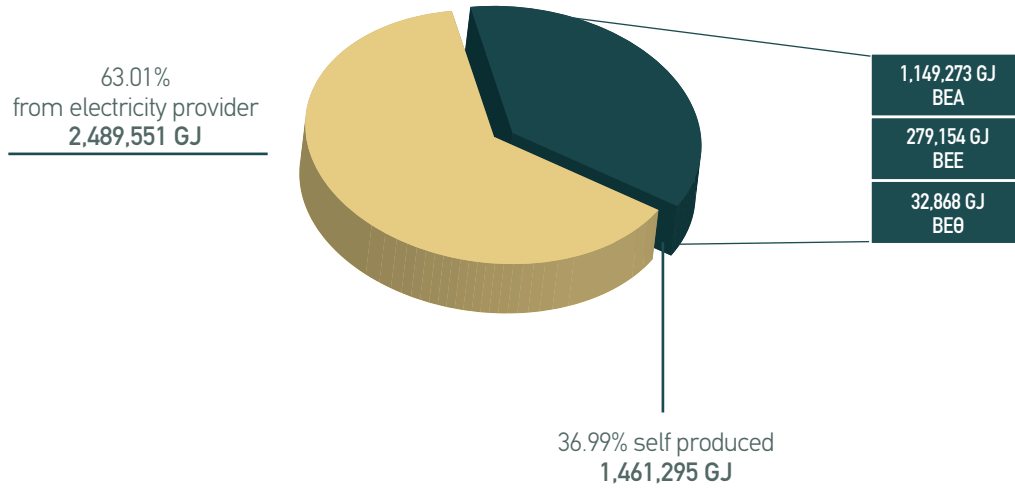


Chart 4.10: Total Group electricity consumption per facility



4.3.2 | Waste Management

Best Available Techniques are implemented for the refinery’s liquid and solid waste management and treatment process; the goal is to minimise the waste production and to confirm that the measured values are well below the imposed limits before their final discharge or disposal.

Wastewater

The three refineries already have operational modern wastewater treatment units (WWTP) in place which include first and second level treatment and in some cases third level treatment. The effectiveness of the treatment is continuously monitored by the facilities’ specialized laboratories, based on the physicochemical characteristics of the discharged wastewater.

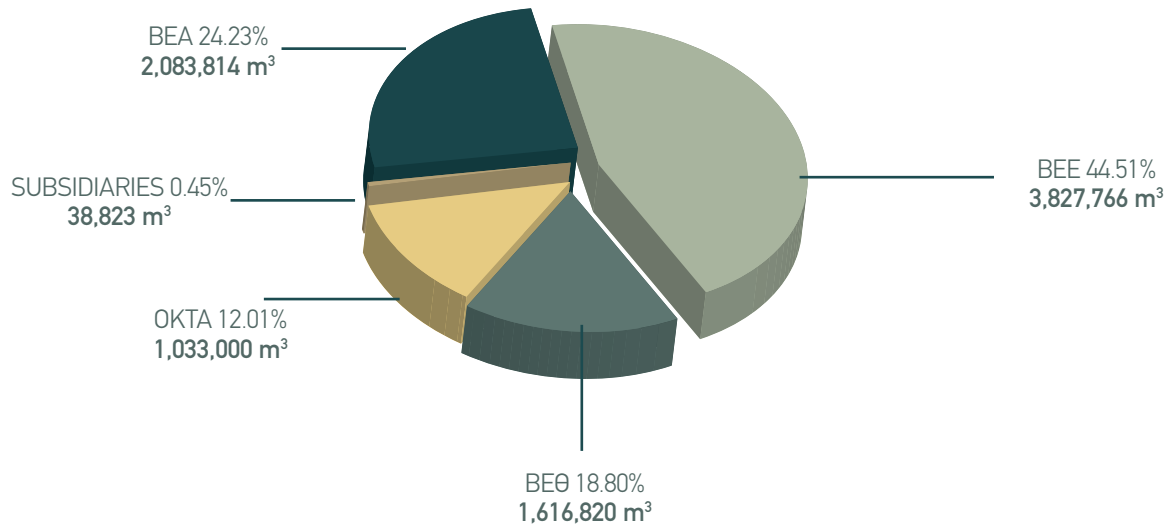
Moreover, priority is given to recycling where technically possible, case in point being the re-refining of recovered hydrocarbons from the wastewater treatment units and the use of treated wastewater for auxiliary uses and for firefighting.

As a result of the treatment and recycling, there is a significant reduction in the volume of discharged treated waste.

“Up to 50% lower than the corresponding legislative limits, a fact that constitutes a corporate target,,

Regarding the Group's performance, for the year 2012, the volume of wastewater, per facility, is presented in Chart 4.11.

Chart 4.11: Group's wastewater percentage per facility



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

Solid Waste

With regard to solid hazardous waste, environmentally friendly hazardous waste treatment methodologies are used, in order to assure that they are disposed safely. In situ treatment is used wherever it is possible, e.g. the bioremediation of oily sludge from wastewater treatment units. Wherever this cannot be performed on site, licensed and qualified hazardous waste management companies perform the pre-treatment of waste and safe disposal.

Significant efforts in recycling in old metal and plastic materi-

als, as well as wood, tires and lubricants, are ongoing in the industrial complexes as well as in the Group's offices. Recycling programs exist, covering all relevant waste streams (such as paper, plastic, batteries, light bulbs, electrical and electronics, printer cartridges and cooking oil). For this reason, at various points in the workplaces, there are dedicated recycling bins.

The relevant Group's performance, concerning the volume of solid waste in 2012, is presented in Charts 4.12 & 4.13.

Chart 4.12: Group's Solid Wastes per disposal method

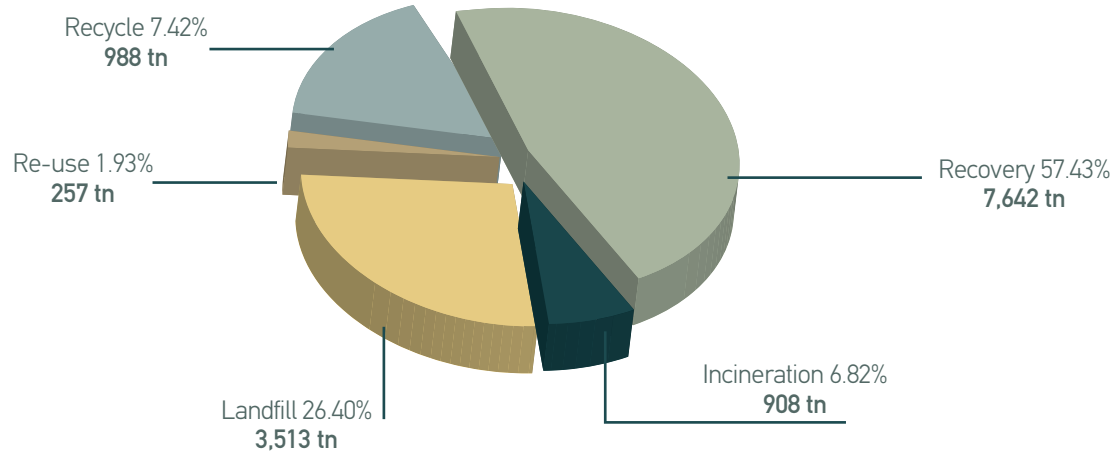
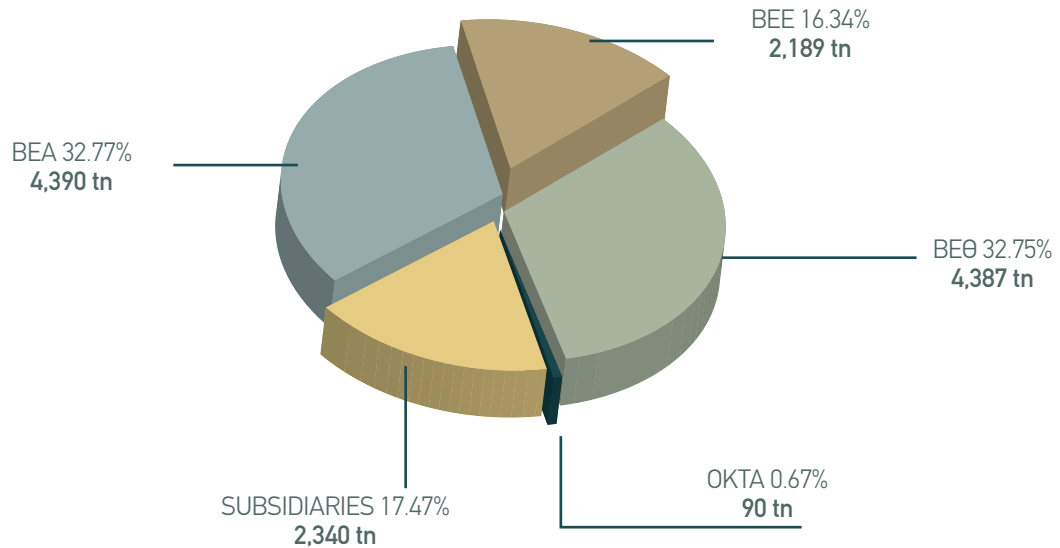


Chart 4.13: Group's Solid Wastes per facility



4.3.3 | Air Emissions

Apart from supplying the market with cleaner fuels, HELLENIC PETROLEUM uses cleaner fuels for energy (own consumption) required by the production process (such as furnaces, boilers) in order to reduce gaseous emissions. Antipollution technologies are also used. The refineries also maximize the use of gaseous fuels, which they derive primarily from process gases undergoing purification (zero sulfur concentration). This limits the use of liquid fuels, even though they are low in sulfur. As a result, significant reductions in emissions of sulfur dioxide (SO₂) have been achieved.

Charts 4.14 - 4.16 present the total pollutants emissions from the Group's four refineries. The volume of these emissions is either the result of measurements based on international and European standards or the result of estimations using methodologies recognized by international and European organizations. Note that the reported emissions are much lower than the statutory limits.

During 2012, the total emissions of sulfur dioxide from the three domestic refineries (BEA, BEE and BEΘ) remained approximately 75% lower than the quantitative emissions limits specified in the environmental conditions for operation. The desulphurization project of gaseous fuels, implemented at the facilities, combined with the use of burners with low nitrogen oxide emissions (in the majority of furnaces) contributed significantly in the reduction of emissions. The big difference between the last two years is mainly due to the temporary shutdown of the Elefsina's refinery and prolonged closure of the Thessaloniki refinery in 2011 due to planned works of upgrading and modernization.

Chart 4.14: Sulphur dioxide (SO₂) emissions

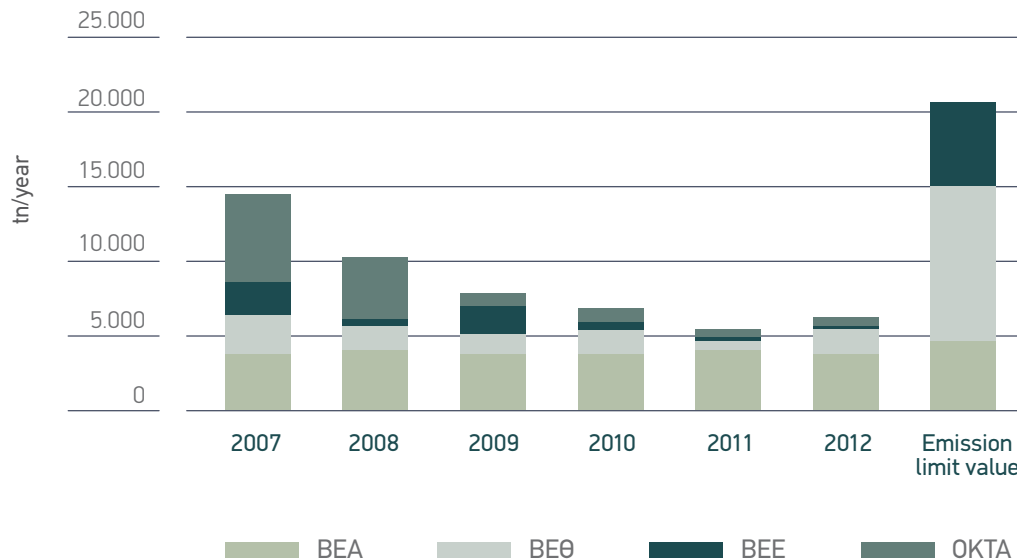


Chart 4.15: Nitrogen oxide (NOx) emissions

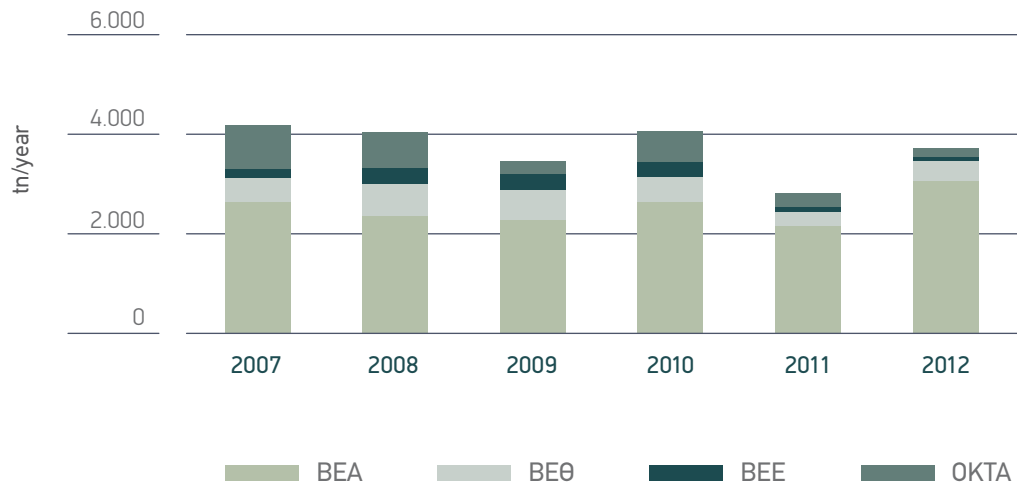
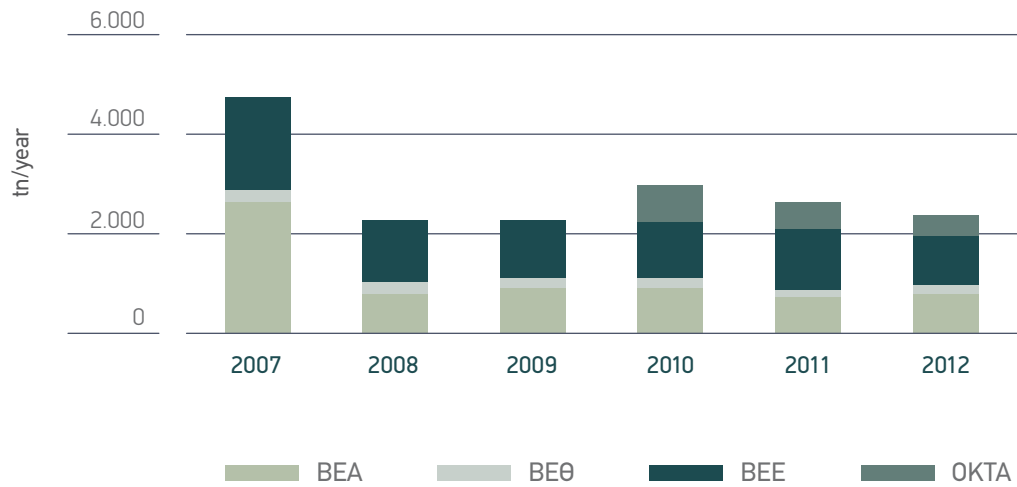


Chart 4.16: Volatile Organic Compound (VOC) emissions



With regard to limiting VOC (volatile organic compounds), the highly successful implementation of programs for early detection and remediation of leaks (Leak Detection and Repair-LDAR) is continuing with visibly improved results. VOC emissions represent a percentage of the refineries' losses and their reduction results in overall environmental as well as financial benefits for the company.

Best available techniques, such as the LDAR program, are also applied to the storage and distribution of products where the aim is to reduce VOC emissions. These include: installing secondary barriers in the floating roof tanks, painting tanks storing volatile products in white (high reflectivity), bottom-loading of tank-trucks and vapor 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 (in owned or at the renovated controlled stations).

Significant progress to reduce greenhouse gas emissions has been made, in recent years, also at the OKTA refinery. The new sulfur recovery unit has scored significant reductions in nitrogen dioxide emissions over the last two years.

4.4 | Biodiversity Protection

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

In this context, in 2012, the Group continued to implement various voluntary actions. The most significant project is the completion of the "Monitoring of Ecological Quality of Lake Koumoundouros and Planning of Management, Restoration and Promotion Actions", implemented by the Hellenic Centre for Marine Research's (HCMR) Institute of Inland Waters. The project is now in the development and implementation stage of actions concerning the lake's rehabilitation.

The project's preliminary results show a significant improvement in the ecosystem compared with previous years, for which analytical data is available. Note that the specific project is under the auspices of the Ministry of Environment, Energy and Climate Change - which will also be the user of future results.

Within the scope of its CSR policy initiatives, it is important to emphasise that the Group has undertaken the endeavour to protect and highlight the "Lake Koumoundouros" wider region. The adoption and reforestation of the "Gikas Hill" area which was damaged in a fire, the improvement of water quality in Lake Koumoundouros itself, the monitoring, promotion and protection of biodiversity in the lake and the study of the formulation and highlighting of the archaeological importance "Reton hill", are all important aspects of an integrated program for the region.

All of these initiatives are aimed solely at protecting and promoting the region to the benefit of local communities and residents of the Thriassion area.

In addition, the Group contributes to environmental protection and the regeneration of areas neighboring its industrial complexes areas with activities such as:

- Extensive tree planting to create fire separation zones for land use and upgrade the areas surrounding the refineries.
- Avoiding the use of auxiliary materials classified as eco-toxic, throughout refinery operations.

4.5 | Compliance with the REACH Regulation

The compliance with REACH Regulation remained one of the top priorities of the Company during 2012. In brief:

The Company continued to actively participate with other European Companies in the REACH Consortia, the requirements of the European Chemicals Agency during the evaluation process were fully implemented and the registration dossiers were successfully updated according to the regulation's

requirements. The preparation for the authorisation process is based on the living list of ECHA which includes the substances candidate for authorisation (candidate list) and the relative consortia guidance. Emphasis was given for the sufficient communication up and down the supply chain with the extended safety data sheets of the products - in greek and english version - being the main tool. The subsidiary Companies were provided with specific guidance for their own obligations un-

4.6 | Biofuels

The term biofuels (first generation) is used to describe fuels that are produced using raw materials from crops - such as sunflower, rapeseed, wheat or sugar beet - and organic waste such as used oil.

There are two main types of biofuels:

- Biodiesel, a fuel which possesses similar properties to diesel, which can be used in most conventional diesel vehicles mixed with conventional diesel. Biodiesel is made from vegetable oils such as rapeseed, sunflower or even used oils.
- Bioethanol, which can be mixed directly, or as a component, with gasoline and used in conventional gasoline vehicles. It is produced through the fermentation of sugars from raw plant materials such as beet or cereals (wheat, maize).

HELLENIC PETROLEUM voluntarily explores bioethanol's use as a gasoline component through a relevant research program conducted in cooperation with the National Technical University of Athens' Fuels and Lubricants Laboratory. The program is looking into the pilot introduction of bioethanol, as a raw material for bio-ETBE (ethyl-tertio-butyl-ether) production which will be used as a component of gasoline.

Biofuels constitute the only direct substitute for fossil fuels that are available today as transport fuels and their use contributes to more environmentally friendly transport, without requiring significant changes to vehicle engines and distribution networks.

Table 4.1.7: Biodiesel received and used as conventional diesel additive

Year	Biodiesel (m ³)	% v/v in biodiesel
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

Improving vehicles' energy efficiency is now the most important low-cost means of reducing CO₂ emissions. Biofuels will play an important role in replacing fossil fuels in airplanes, ships and other heavy means of transportation, where electrification is not possible. The production and use of biofuels can also provide greater energy safety due to reduced dependence on oil imports (and the large variation in its prices). Moreover, biofuels contribute to the diversification of agricultural production and rural economic development, that lead to the strengthening of local communities.

The HELLENIC PETROLEUM Group uses biodiesel as a blending component in diesel fuel, proving its commitment to sustainable development, in practice (Table 4.1.7).

In cooperation with Greek universities and research institutions, the Group contributes with targeted support towards 2nd and 3rd generation biofuels' research projects through financing and participating in research projects such as:

1. "IMPROVING SUSTAINABILITY IN BIODIESEL PRODUCTION TECHNOLOGY", a project on the development of new hybrid fuels with 2nd generation biofuels.
2. "SUSTAINABLE PRODUCTION OF HIGH ADDED VALUE BIOFUELS AND BIOCHEMICALS USING MICROALGAE", a project for the development of 3rd generation biofuels.

These two programs are co-financed with European funding with respective budgets of approximately €1 mil. each. Apart from HELLENIC PETROLEUM, the NTUA and Aristotle University of Thessaloniki are also involved, as well as the CERTH (The Centre for Research & Technology Hellas) Research Institute.

4.7 | Renewable Energy Sources

HELLENIC PETROLEUM RENEWABLE ENERGY SOURCES S.A. (HELPE Renewables) was founded in 2006 and is a 100% Group-owned subsidiary. The purpose of the company is the production, distribution and trade of renewable energy products as well as the design, construction and installation of renewable energy systems (wind, solar, biomass etc.).

HELPE Renewables' target is the development of a significant renewable energy portfolio by 2015 (wind, solar, biomass etc.) through projects on land owned by the Group and elsewhere. This will help balance greenhouse emissions, through reducing the Group's carbon footprint by at least 250,000 tons annually.

HELPE Renewables currently operates 1.4 MW in PV capacity. Another three PV projects amounting to 10.5 MW as well as two biomass plants of 4.7 MW and 5 MW are in various stages of development.

Moreover, in partnership with LARCO, HELPE Renewables is developing a PV portfolio of 147.5 MW in total, as well as wind and hybrid projects.

In Cyprus, EKO's first installed PV station, operational since December 2012, is located in the Aglantzia, in Nicosia. The total installed power is 20 kW and the expected 26,300 kWh annual production is the equivalent to 5 households' annual electricity consumption. The annual CO₂ emissions avoided amount to 26 tons which is the equivalent to the planting of 1,400 trees.



Employee at Elefsina Industrial Installations

05

OUR PEOPLE

5 | Our People

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

In order to ensure that our employees enjoy a healthy balance between work and their social life, a program of social benefits has been designed and implemented. The program covers, among others, health issues, financial support and in general better living standards.

Benefits provided to employees of HELLENIC PETROLEUM:

Infirmaries staffed with medical and nursing staff competent to handle emergency cases.

Preventative Medical Insurance (free annual check-ups, specialised medical examinations, preventative vaccinations).

Health insurance scheme covering treatment and hospital care which includes 100% of employees and their families.

Life insurance/pension schemes.

Performance-related bonuses.

Small loans with low interest rates for emergencies.

Foreign language courses.

Free transport services to/from the workplace and compensation based on distance of kilometers traveled for business-related purposes.

Financial assistance for employees in particular need.

Additional financial support (gift certificates, vouchers) for Easter and Christmas.

The covering of expenses for employees' children summer camp fees for children aged six (6) to sixteen (16).

Financial assistance for crèche and childcare at the beginning of the school year.

Extra financial support for families with more than 3 children.

Gifts to employees who have devoted many years of service to the company.

Free use of the restaurants at the industrial facilities.

Financial awards to employees' children who have excelled in their school studies / children who have passed their examinations and have entered either a university or technical college.

Financial assistance to employees for weddings, birth of a child etc.

In 2012, the expenses for remunerations and other employee benefits exceeded the amount of € 26 mil. The employee retention rate (loyalty indicator) was 98.1% (indicator LA2).

The additional insurance and pension plans cover 95.5% of employees. The current value of pension benefits (defined contribution and benefits plan) is based upon a number of factors which are determined using actuarial methods and assumptions.

Table 5.1.1: Group's employees*

Company *	No. of Employees
HELLENIC PETROLEUM S.A.	2,086
EKO ABEE	364
HELLENIC FUELS S.A.	186
ASPROFOS ENGINEERING	180
DIAXON ABEE	98
OKTA CRUDE OIL REFINERY A.D.	633
GLOBAL ALBANIA	5
JUGOPETROL AD KOTOR	177
HELLENIC PETROLEUM CYPRUS LTD	56
EKO BULGARIA EAD	60
EKO SERBIA A.D.	38

*The abovementioned information about companies & employees concerns only companies included in this Corporate Responsibility Report and only workers with permanent contracts.

Additional information, concerning the Group's human resources, is provided through indicators LA1 & LA13, Table 7.3.2.

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

A part of the implementation of its non-discrimination principle, the Group employs 148 permanent employees with disabilities (end of 2012).

Table 5.1.2a: Group employees' breakdown by gender

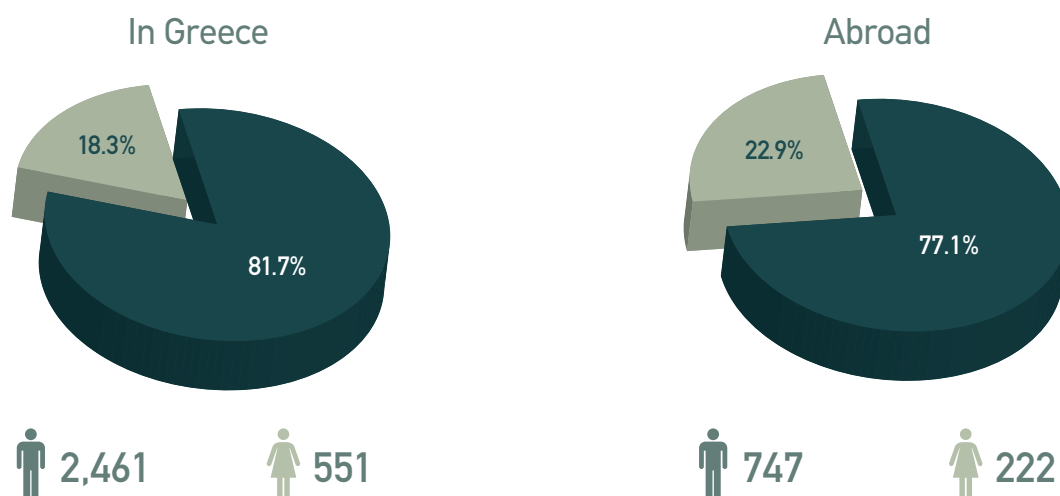
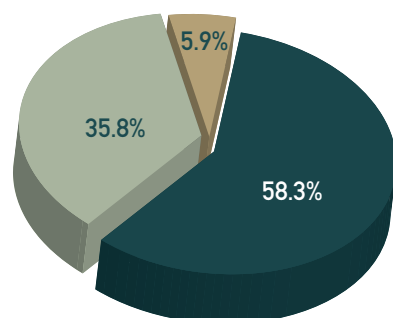


Table 5.1.2b: Group employees' breakdown by educational level



Secondary Education: 2,320

Higher Education: 1,425

Compulsory Education: 237

Table 5.1.3: Employee resignations and recruitment, per gender and age group - HELLENIC PETROLEUM - in 2012

(*recruited as permanent employees **voluntary departures)

EMPLOYEE RECRUITMENT *			
Age	<30	30-50	>50
Male	33	17	0
Female	1	1	1
EMPLOYEE RESIGNATIONS **			
Age	<30	30-50	>50
Male	1	7	92
Female	0	6	12

5.1 | Human Resources Management

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.

In utilizing modern approaches, such as the Performance Appraisal System, employees are given opportunities for growth and advancement in the administrative hierarchy as a key objective is to consistently fill the vacancies through rotating or promoting employees within the Group. All employees have been informed of the Internal Labour Regulation and can access it through the company's Intranet.

Executives of the Group in Greece and abroad are paid according to the "Senior Executive Remuneration System", which is directly linked to the achievement of predefined annual Group, Company and individual objectives (KPIs).

All of the Group's objectives originate from the Group's Annual Business Plan which, in turn, results from the medium - long term Business Plan, the Group's annual budget as well as areas in which the Group seeks to pay special attention. The Group's objectives apply to all of its executives at all levels of the hierarchy.

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

In 2012, after the reorganization of the Group, all employees were evaluated according to the standard evaluation system. For further information see indicator LA12 (Table 7.3.2).

During 2012, the Group's systems, procedures and policies were integrated and re-launched, including the:

- System for employee evaluation
- Policy for employees traveling for business
- Group's Educational Policy
- Rewarding exceptional performance

The interweaving of some systems, procedures and policies of the Group with the Collective Bargaining Agreement, that has been signed between the management and the worker's union, requires their gradual revision and their integration into new, uniform format. So, in this context, in 2013, concerted efforts will continue with a view to strengthening the Group's internal culture and homogenizing the human resources management framework.

The Group participated in the employee satisfaction survey "Best Workplaces 2013", by sending questionnaires to all permanent employees of HELLENIC PETROLEUM, EKO and HF.

Questionnaires were handed out to all aforementioned employees throughout Greece, during the period November-December 2012. The participation rate in the survey was 40.4%, thereby providing an opportunity for participants to assess their working environment and identify strengths and areas for improvement.

The final results of the survey will be presented to the Group's management and employees during the course of 2013 whereby they will be evaluated. Relevant actions will be planned according to this evaluation.

5.2 | Training - Education

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

In 2012, continued, significant investments were made in education. Training and education programs included:

- New technologies (refining, maintenance, etc.)
- Safety
- Labour and insurance
- Management skills (management, coaching, marketing)
- Marketing and Finance studies
- Quality Management, Health, Safety and the Environment
- Fire safety training
- Intragroup "Finance for non-financiers" seminars in Athens and Thessaloniki
- Intragroup "Topaz Management Simulation" seminars
- Specialized SAP seminars
- Training of service stations' staff (EKO CALYPSO)
- Intercompany program for English as a foreign language, enriched with business issues
- Project Management
- Basic Management Skills (B.M.S.)
- First Aid training
- Specific seminars according to the needs of each Division

Table 5.2.1: Training breakdown by Gender & Company

	HEL.PE.		EKO		HF	
	No. of employees	No. of trainees	No. of employees	No. of trainees	No. of employees	No. of trainees
Male	1836	1533	237	32	140	13
Female	267	142	126	11	52	4

Table 5.2.2: Training expenses (K€) breakdown per Company

	HEL.PE.	EKO	HF	TOTAL	%
IN-HOUSE TRAINING	189	26.8	16.3	232.1	38%
OPEN SEMINARS	113.5	0.7	2.4	116.6	19%
FOREIGN LANGUAGES	36.6	9.7	3	49.3	8%
LONG-TERM EDUCATION	14.7	3.5	2.2	20.1	3%
TRAINING ABROAD	9	0	0	9	1%
MISCELLANEOUS EXPENSES	68.7	108.3*	11.1	188.1	31%
TOTAL	432	149	35	611	

* concerns training at EKO CALYPSO service stations

Table 5.2.3: Training activity breakdown by participation (HEL.PE.)

FACILITIES' SAFETY	4,851
IN-HOUSE SEMINARS	6,949
OPEN SEMINARS	57
TRAINING ABROAD	4
FOREIGN LANGUAGES	61
OPEN UNIVERSITY - POST GRADUATE COURSES	11
TOTAL	11,933

The Group's total investment for the above topics for 2012 amounted to € 721,000 with a total of 121,855 hours of training.

In house seminars on Health, Safety and Fire Safety involved 1,426 employees (4,851 participations with a corresponding 11,451.5 training hours).

As part of its training policy, in 2012, the Group invested € 435,000 in:

- Enriching its libraries
- Subscriptions to scientific journals and newspapers
- Subscriptions to various scientific and professional associations

The assessment of employees' training and development needs are summarized annually through the "Education and Training Needs Program". This is specialized according to the relevant training and educational methods which include:

- Formal training - Scheduled seminars (either per employee or program training module).
- Long term educational programs, either Graduate or Postgraduate and Foreign Language Learning Programs.
- General Catalogue, Newspapers, Magazines.
- Subscriptions to Professional Organisations/Associations.

5.3 | Occupational Health & Safety

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

5.3.1 | Health & Safety Policy and Management System

HELLENIC PETROLEUM Group's particular interest in its employees' occupational health and safety is based on:

- Its policy, which considers the issues of health and safety as an integral part of its Management's commitment. The policy explicitly states that safety, health and environmental protection are always first priority, even if they have to count against production.
- Implementing the policy through a complex and multifaceted safety management system. The Safety Management Systems in all the industrial refining and petrochemicals complexes have been certified in accordance with the OHSAS 18001 internationally recognized standard. The facilities are subject to annual recertification inspection. Other facilities that have been certified in accordance with the above standard are the DIAXON plant, the Group's facilities in Cyprus, the EKO Lubricants facility, the Liquid Fuels and Chemicals storage facility at Scaramanga, the Elefsina and Aspropyrgos' liquid fuels storage facilities and EKO's Aviation Fueling Stations. For other EKO's & HF's activities, not included in the above mentioned certification schemes, relevant written Health & Safety procedures and instructions are implemented, in accordance with the requirements of international standards.

Further information, concerning occupational Health & Safety, may be seen at: <http://www.hellenic-petroleum.gr/online/generic.aspx?mid=214>

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

- A Corporate Occupational Health, Safety, Environment & Sustainable Development Division.
- Directions for Health, Safety and Environment at each facility.
- Appointed safety technicians, in-house physicians and nurses, over and above the requirements of the relevant legislation for occupational health and safety (L 3850/2010).
- Internal Service for Safety and Prevention (ESYPP), according to P.D. 95/1999, to oversee the health of employees, compliance with sanitary conditions, protection measures and accident avoidance actions. In 2012, the ESYPP held additional meetings, i.e. more than those specified in the rules of its operation. Fire safety issues were included in the discussion topics.
- Employee Committee for Occupational Health & Safety (E.Y.A.E.) at each facility, consisting of the employees' elected representatives (according to Law 3850/2010) representing all employees. Every employee has the right to be elected in these committees (100% participation). The committees participate in scheduled meetings with the management of the facility in which they belong, and make suggestions for Health & Safety improvements in their workplace.

5.3.2 | Operations' Safety - Change Management

Techniques and measures are implemented that are above and beyond the measures and regulations of the legislation, throughout the Group facilities. Within this framework a prerequisite for any new facility or for the extensive modifications of existing units is to analyse operational risks (HAZOP or Hazard & Operability Study).

The operation and maintenance of the facilities rely on well-trained and experienced personnel that comply with safe operating procedures.

Procedures particularly important for the installations' safety include:

1. Issuing of work permits, in order to protect staff, contractors and equipment when performing maintenance works.
2. Managing changes safely.
3. Addressing an emergency (power failure, loss of utilities, steam, air, etc.), in which employees are periodically trained in theory and through exercises.
4. Reporting and investigating accidents.
5. 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.

Safety Audits

Scheduled internal and external safety audits are conducted at different levels. Depending on the findings, actions to further improve safety are planned and implemented through:

- The Corporate Division for H-S-E & Sustainable Development; its objective is transferring experience, know-how and the application of good safety practices amongst refineries and subsidiary companies.
- In 2012, the focus was on auditing of subsidiaries' storage facilities and LPG handling (EKO's facilities in Thessaloniki and Bulgaria) and on monitoring the completion of previous audits at the Elefsina, Aspropyrgos and Thessaloniki refineries. Unscheduled inspections were also carried out at the upgrading works pertaining to the Elefsina refinery.
- Directors, section heads and engineers of different units of a facility with the direct objective of identifying and correcting unsafe behaviors and (indirectly) the effective involvement of managers in improving safety (safety visits). On a practical level, a safety visit takes place every week at each production unit.
- The Directions of Health & Safety at each industrial complex.
- The special safety committee (EYAE) at each facility.
- Independent globally recognized and experienced third party auditors, at the invitation of the company or experts from the companies that provide insurance coverage.
- The responsible authorities for major accidents prevention (Seveso audits).
- During 2012 an audit took place at the Thessaloniki Chemical Plant without any findings.

The "Enceladus 2012" drill

In December, in cooperation with Cyprus' Civil Defense, an earthquake drill was carried out at HELLENIC PETROLEUM's main depot in Larnaca. The drill which took place in the presence of the Fire Brigade, Police and Civil Defense's officials was carried out successfully.

Corporate Health & Safety Common Policies and Procedures

The establishment of uniform corporate policies and procedures continues, as part of the effort to strengthen the Group's common culture and develop the experience of industrial facilities in the adoption of best H & S management practices.

In 2012, common procedures were established in the issues presented below:

- Safety pre-qualification and safety evaluation for contractors.
- Safe isolation of equipment for work.
- Rewarding successful safety interventions.
- Safe electrical work.
- Safe work at height.

Finally, a number of selected safety procedures were translated into English so that they can be used by both English speaking contractors and at the Group's facilities abroad.

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

For further information concerning Occupational Health & Safety you may visit the site:

<http://www.elpe.gr/online/generic.aspx?mid=155>

5.3.3 | Health & Safety training

In the context of its efforts to have a uniform safety culture in place in all of its industrial facilities, common procedures are conducted in health and safety issues.

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

- Fire safety - use of firefighting equipment.
- First aid - burns treatment.
- Use of personal protective equipment (respirators, masks, etc.).
- Presentations of international accidents (causes - conclusions).
- It is worth mentioning that the monthly safety bulletin CCPS Process Safety Beacon is distributed to all staff. The Group is the official translator of the bulletin into the Greek language which is widely read in Greece.
- Periodic review, refreshing of important safety and emergency procedures.
- Participation in drills.
- Material Safety Data Sheets.

Employees' training needs are evaluated by their immediate supervisor on an annual basis and an implementation program is scheduled in order to meet the needs that are identified.

The scope of the training extends beyond employees to include contractors, customers, truck drivers, petrol station personnel and students. Facilities' visitors are informed on safety instructions provided through the facilities' relevant informative leaflets.

Specifically with relation to training contractors, the training is based on extensive training material provided by HELLENIC PETROLEUM to the contracting companies. The trained workers have to successfully pass written exams in order to be granted an access card to enter the premises for work.

Moreover, in 2012, the company participated in a 2 days contractors' training workshop in the Thessaloniki region, organized by the company Titan, presenting the safety procedures followed at HELLENIC PETROLEUM's facilities.

Table 5.3.1: Health & Safety Training man-hours per facility

	BEA- BEE- BEO	EKO & HF	OKTA	DIAXON	ASPROFOS	HP CYPRUS	EKO's SUBSIDIARIES
No. of employees	1,914	551	633	98	180	56	280
No. of trained employees	1,473 (77%)	551 (100%)	633 (100%)	62 (63%)	127 (71%)	50 (89%)	41 (15%)
Training man-hours	23,547	2,469	2,618	512	274	241	290
No. of trained non-employees	3,769	776	94	17	-	240	299
Training man-hours	11,686	1,428	188	42	-	1,914	721

5.3.4 | Safety Investments

In 2012, approximately € 11.34 mil. was invested in safety issues. This investment program includes the procurement of personal protective equipment, supply and maintenance of instruments and safety equipment, upgrading of firefighting equipment, safety studies, etc.

This investment, implemented in 2012, and the approved investment program for the period 2013-2017 is shown in Tables 5.3.2 a & 5.3.2 b. Note that significant safety investment programs concerning general maintenance, major projects and refinery upgrades, amounting to tens of millions of euros, are not included in tables 5.3.2.

Table 5.3.2a: Group's safety investments per facility (2012)

FACILITY	K€
BEA, BEE, BEØ	9,117.0
EKO & HF	969.2
DIAXON	482.9
ASPROFOS	4.3
OKTA	534.0
HP CYPRUS	100.0
EKO's subsidiaries in Bulgaria, Serbia & Montenegro	134.5
TOTAL	11,341.9

Table 5.3.2b: Group's approved safety investment program per facility (2013-2017)

FACILITY	K€
BEA, BEE, BEØ	12,590.0
EKO & HF	4,796.0
DIAXON	63.0
ASPROFOS	10.0
OKTA	150.0
EKO's subsidiaries in Bulgaria, Serbia & Montenegro	484.0
TOTAL	18,093.0

5.3.5 | Health & Safety Targets and Indices

Each industrial facility sets annual measurable targets for improving its performance in terms of Health and Safety. The performance against targets is considered in monthly and annual basis and a relevant report is presented to Management.

Since 2012, amongs other goals, individual safety goals are set for all senior and middle managers of industrial facilities.

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

In 2012, the significant Elefsina refinery upgrading & modernizing project (20,000,000 man-hours), was completed whereby the refinery became operational. The project was carried out with exemplary safety without any serious accidents.

The project lasted for approximately three years and, at the peak of the construction phase, employed up to 3,400 persons and 45 safety technicians (simultaneously). Despite the great difficulties and challenges faced during construction (many contractors performing similar work within a confined space, mixed crews, time constraints), the level of safety achieved was commendable for the size of the project compared to the corresponding European standards.

This project was preceded by the upgrading of the Thessaloniki refinery project where 4,000,000 hours were worked without the occurrence of a serious accident.

The monitoring of all safety indicators reflects a decrease of 20% compared to 2011. It is also worth mentioning that the accident severity index was 50% lower compared to the average European rate in the sector, i.e. we had less severe injuries (days absence per injury were half than those of the European average) and HELLENIC PETROLEUM ranked in the second best quarter of all European companies in the sector.

Overall, in 2012, 22 lost workday injuries that have occurred personnel and contractors, employed either in the Group's refineries and chemical plants or marketing companies. These injuries are equivalent to 2.8 lost workday injuries per million man-hours (index LWIF - Chart 5.3.3). 50% of the permanent staff's lost workday accidents were due to trips, slips and falls at the same level, in areas with increased construction activity where several work-crews were working simultaneously. To reduce these kind of accidents from occurring again, organized special campaigns and preventive measures were scheduled.

Table 5.3.3: Incidents in 2012, concerning employees & contractors, based on CONCAWE's guidelines

GROUP'S FACILITY	HELPE (BEA, BEE, BEΘ)	HQs	EKO & HF	DIAXON	ASPROFOS	HELPE CYPRUS	OKTA	EKO Serbia	EKO Bulgaria	JUGOPETROL AD KOTOR	GLOBAL PETROLEUM ALBANIA
Lost Workday Injuries - LWIs	19	2	1	2	0	1	8	0	0	0	0
Lost Workday Injuries (employees / contractor's staff)	16/3	2/0	0/1	0/2	0	1/0	-	-	0	-	0
Fatalities	0	0	1	0	0	0	0	0	0	0	0
Medical Treatment Cases - MTC ¹	6	0	0	2	0	0	1	0	0	0	0
Restricted Workday Injuries - RWI	0	0	0	0	0	0	0	0	0	0	0
LWIF	3.6	2.7	0.5	8.6	0	1.6	6.6	0	0	0	0
LWIS	20	27.5	2	14.5	0	3	18.8	0	0	0	0
AIF (All Injury Frequency)	4.7	2.7	1.1	17.3	0	1.6	7.5	0	0	0	0
Occupational diseases rate (/10 ⁶ hours)	0	0	0	0	0	-	-	0	0	0	0
Absenteeism ² (%)	2.0	-	-	3.5	-	-	7.3	2.0	-	3.4	-

¹ Cases concerning first aid are not included.

² Absences due to every kind of incapacity are included (illness, accident, etc).

It is noted that indicators concerning facilities with a small number of employees and man-hours, such as DIAXON, are drastically affected even by a single accident.

The evolution of incident indices LWIF, LWIS & AIF, at the Group's facilities, over the period 2005-2012, is presented in Charts 5.3.3 a - 5.3.3 c, compared with the corresponding CONCAWE indices. Since 2010, injuries concerning the marketing companies HF & EKO and contractors' staff have been also included in the Charts; in order to facilitate comparison with the corresponding CONCAWE's data.

The European statistics for 2012 will not be issued till September of the next year and were not available at the time this report was released.

Chart 5.3.3a: AIF Index

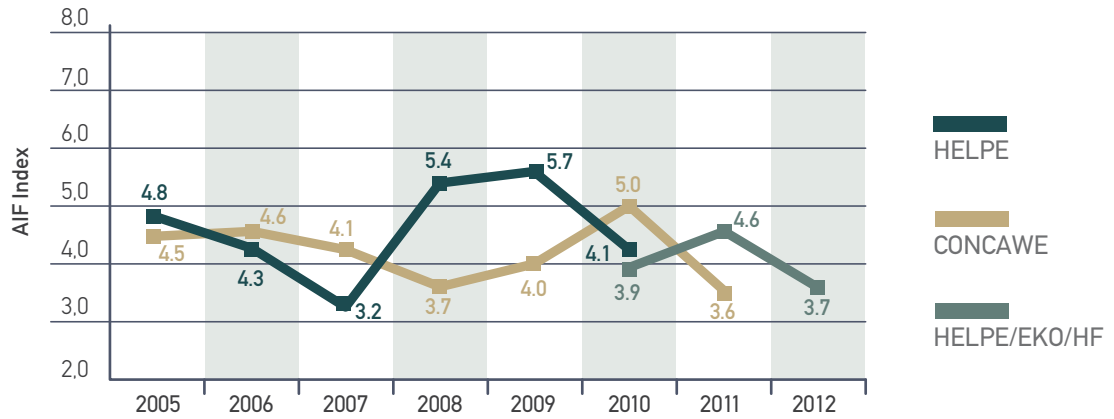


Chart 5.3.3b: LWIF Index

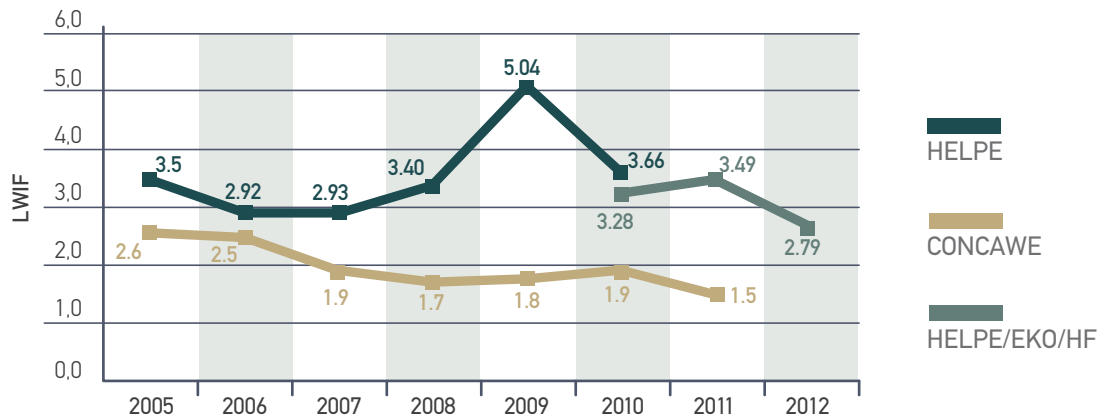
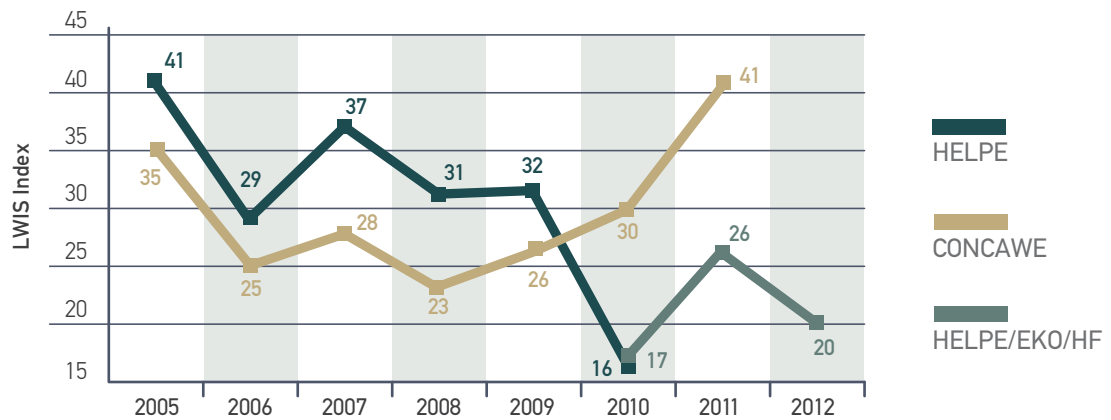


Chart 5.3.3c: LWS Index



There was no recorded case of any occupational illness in the Group's industrial facilities.

Generally there are no employees who are at high risk of occupational illness and where there are significant risks (e.g. poor hearing due to noise at airports), appropriate measures are taken to prevent them.

Under the joint efforts of European refineries to establish specific indicators concerning the safety performance of processes, HELLENIC PETROLEUM was one of the first companies globally, that have adopted them and monitors the new process safety performance indicator according to the instructions of CONCAWE and in line with the new API RP 754, 2010 (Recommended Practice 754 "Process Safety Performance Indicators for the Refining and Petrochemical Industries").

Chart 5.3.3d: Process Safety incident Frequency, PSIF

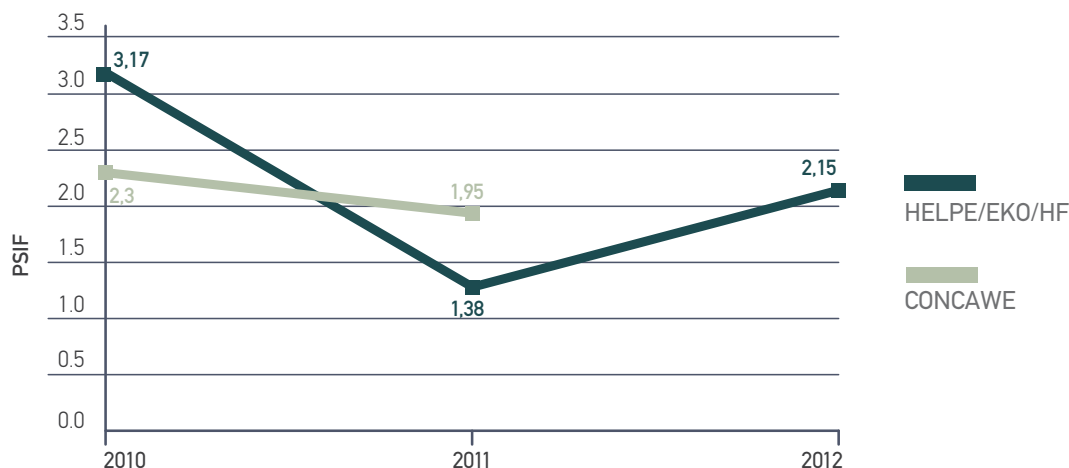


Chart 5.3.3 d presents the total process safety index PSIF (Process Safety Incident Frequency) trend which corresponds to all process safety incidents of categories 1 and 2 per one million man-hours, compared with the CONCAWE's corresponding index where it is evident that the Group's index is close to the European average.

In order to reduce these indicators, all facilities are striving to reach an annual target to minimize leakages with the ultimate goal of nullifying them (zero PSIF).

Table 5.3.4: Process safety incidents based on CONCAWE's definitions

FACILITY	HELPE (BEA, BEE, BEΘ)	EKO & HF	OKTA
Process safety accidents class 1 (PSI-1)	7	0	0
Process safety accidents class 2 (PSI-2)	9	1	1
PSIF-1 Indicator	1.3	0	0
PSIF-2 Indicator	1.7	0.5	0.8

Note: The incidents Class 1 have a relatively greater impact than those in Class 2.

5.3.6 | Safety Culture Improvement for Zero Accidents

To further raise employees' awareness in accident prevention and operate the facilities in a safe manner, we continued the implementation of the Rewarding Safety Performance Policy for groups of employees who achieve objectives, based on work hours without lost workday injuries.

In 2012, the achieved objectives included:

- 1,000,000 hours with no lost workday injuries at BEΘ, and
- 200,000 hours at DIAXON.

In an individual level, from 2012 and on, all employees that intervened and prevented either accidents or corrected false behaviors, were awarded by the Group.

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

For all the above mentioned actions and for some specific internal seminars, to improve safety behavior implemented over the last three years, the company was commended on both a Greek and European level in the context of the European Agency for Health and Safety's 2012-2013 campaign (EU campaign "Working together for risk prevention").

5.4 | Materiality assessment

The materiality assessment process in accordance with the GRI standard, helps us identify the main and "essential" (material) issues that the Group faces.

Our first materiality assessment (employee opinion survey) took place in 2011-2012 and the next one is scheduled in 2013-2014, (see also Introduction section, "Materiality and Stakeholders").

During the opinion survey (focus group) concerning our stakeholders - "employees" - questionnaires and interviews were used as research tools in order to log the views of employees, from different departments and hierarchical levels, on sustainable development. The issues raised for discussion with employees are: the concept of CSR, company and employees relations, health and safety, environment, social contribution and the Group's CSR programs.

In response to the above, indicative actions, planned and implemented, include:

- Expanding our communicative actions for the Group's CSR. In addition to this annual sustainability report, releasing, a concise and less technical booklet presenting the Group's social presence in 2013
- Planning and implementing an awareness / training program, for all employees in the Group, covering sustainable development issues such as social reporting, code of ethics, human rights and the environment.

06

OUR STAKEHOLDERS



Program Providing Primary Health Services with the Cooperation of Mediciens Du Monde

6 | Our Stakeholders

Our communication and collaboration with our stakeholders is multidimensional, from the determination of our strategy and policies to our understanding of their needs and expectations and the relevant adjustment of the Group's actions & programs. Typical examples are the scheduled surveys assessing materiality, customer satisfaction surveys, public opinion surveys as well as public debates and the many other forms of regular communication.

The results of these actions are evaluated to reflect and meet the stakeholders' requirements where possible. Furthermore, appropriate actions and programs are designed in line with our stakeholders' expectations and needs, as reflected in these surveys/studies.

6.1 | Respect for Human Rights and Labour Relations

The Group monitors and adopts the relevant labor legislation (national, EU, ILO), including the prohibition of child labor, 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 eight employee unions (in Greece) with a 94-100% participation rate (the LA4 index, Table 7.3.2, analytically presents the unions that exist in the Group's companies

as well as employee participation).

HELLENIC PETROLEUM's representative union signs a one or two year collective bargaining agreement which defines the terms for employees' (with permanent contracts) remuneration. A corresponding agreement exist for EKO's & DIAXON's employees.

The percentage of workers (inside and outside Greece) employed on fixed term contracts is less than 8% of the Group's manpower. Overall, 93% of employees are covered by an operational collective labor agreement.

6.2 | Ethical Management

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

Ethics are not only the core of the Group's sustainable development and competitiveness but a reference point for employees' social and financial activities. The Group's Code of Conduct was completed, approved and published in 2011. An awareness program, planned in 2012 and implemented in 2013, will disseminate the code at all levels of the Group. This will further assure the trust of our stakeholders through transparency in all actions.

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

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

6.3 | Customers & Quality Management

Our aim is to optimize customer satisfaction through placing 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, while ensuring for competitive advantage.

In order to keep customers (fuel stations, drivers etc) fully informed and satisfied, a variety of activities are being designed and implemented, differentiated on a case by case basis. Moreover further initiatives take place such as regular meetings are organized, the provision of consulting services and scheduled training. In order to improve efficiency, COMO service stations are being rationalized and targets have been set to improve performance.

With product quality and customer satisfaction being the main objective, the Group's marketing companies:

- In cooperation with the NTUA's Fuels and Lubricants Laboratory, have established a Fuels Quality Control Program and Measuring Equipment Calibration Service at their fuel stations.
- Use vehicles specially equipped with fuel analyzers manned by staff from the NTUA's Fuels and Lubricants Laboratory to perform on-site fuels quality control and verify the calibration of measuring equipment to ensure for the quality and quantity of the fuel that the customer purchases.

6.3.1 | Industrial complexes, storage facilities and service stations' certifications

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

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

In implementing its policy for the environment, over the past few years, HELLENIC PETROLEUM has set specific targets and strategies to achieve these objectives and has developed action plans for keeping safety and environmental standards high throughout its facilities.

The action plans include a continuous improvement process in terms of environmentally managing the industrial facilities, whether this concerns the incorporation of best practices at an international level or the actual implementation and certification of environmental management systems.

Table 6.3.1: Certification of Group's industrial facilities, storage facilities and service stations, in accordance with internationally recognized standards

Facility	ISO 9001	ISO 14001	OHSAS 18001	ISO 17025**	EAOT 1429
Aspropyrgos (BEA)		√	√	√	
Elefsina (BEE)		√	√	√	
Thessaloniki (BEΘ)	√	√*	√	√	
DIAXON	√		√		
HF liquid fuel storage facilities at Aspropyrgos, Thessaloniki, Corfu and Herakleion		√			
EKO Lubricants Factory	√	√	√		
EKO liquid fuels and chemicals storage facility at Scaramanga and liquid fuels storage facility at Elefsina & Aspropyrgos		√	√		
EKO aviation fuel filling stations at 18 airports	√	√	√		
Service Stations (EKO CALYPSO, Automobile Service Station Aspropyrgos)	√				
ASPROFOS	√	√	√		√
HP Cyprus	√	√	√		
OKTA		√*		√	

Notes: * In the certification process

** Concerns refineries' laboratories

In addition, DIAXON applies the BRC/IoP Global Standard System for Packaging and Packaging Materials Issue 4 (Category 1).

The Group's facilities in Cyprus go through an Environmental Risk Assessment (every 5 years for service stations) as well as a Fire & Explosion Risk Assessment (at fuel storage facilities).

The implementation of a Safety Management System in the Transportation of Hazardous Substances in accordance with international standards, international agreements (ADR, RID) and Greek Law, confirms the care that the Group takes throughout the production cycle (from design and production to storage and transportation).

6.3.2 | Customer Service

Regular inspections are carried out at the Group's service stations to measure the effective implementation of safety, operation and service. At the same time, mechanisms have been established whereby customers can communicate their views ensuring for proper feedback.

This approach consists of the following course of actions which are implemented four times a year through secret visits to the service stations:

- ❑ Mystery visitors are selected (mystery motorist).
- ❑ 30 elements are evaluated divided into 6 sections (forecourt and equipment, service, safety, shop, uniforms, WCs).
- ❑ Monitoring of results, per inspector, per service station.
- ❑ Briefing service station managers and taking corrective actions.
- ❑ Rewards/incentives are given for the best managers and their staff.

Customer surveys evaluate the degree of customer satisfaction, customer loyalty, service station commitment, brand health and employee satisfaction. Where appropriate, specific surveys are made through the use of a questionnaire which is customized to record specialized issues such as the success of a promotional program or the degree of customer preference for/acceptance of a scheme etc. Also, focus groups are established and detailed qualitative research is conducted before the introduction of important customer programs or market offers.

Care for Customer's Satisfaction

Examples of actions in order to assure customer satisfaction are:

- All employees at **HELLENIC PETROLEUM Cyprus**' service stations attended the "Service Etiquette" training. The training's objective was to show the participants how to best serve the customer once he/she visits the fuel station in terms of politeness, selling other products, cleanliness, attitude, service - until the customer departs.
- Ongoing approaches (such as training, competitive pricing and promotional activities) at **EKO Bulgaria** to ensure that our partners comply with corporate policy and regulations, confirm the loyalty of our customers and improve sales methods. Regular testing of fuels samples are conducted in independent laboratories to confirm the quality of the products.
- In order to improve customer satisfaction, **EKO Serbia** is organizing monthly 'mystery motorist' checks with very strict standards for customer service, politeness and appearance. Customers can voice their complaints via phone or e-mail and the company replies swiftly either verbally or in writing. Customer satisfaction is the main part of the regular training organized every day at different service stations, by 3 area trainers and 3 area managers.

Rewarding the service station performance

The "Retail Championship 2012" took place once again (third time). The program aims to evaluate the performance of EKO service stations and the corresponding sales staff in Greece, Cyprus, Montenegro, Bulgaria and Serbia.

The participants (managers, station owners, sales staff) are assessed and awarded, based on specific, quantifiable criteria to ensure that the service stations operate safely, that effective customer services are in place and that annual operational objectives are achieved.

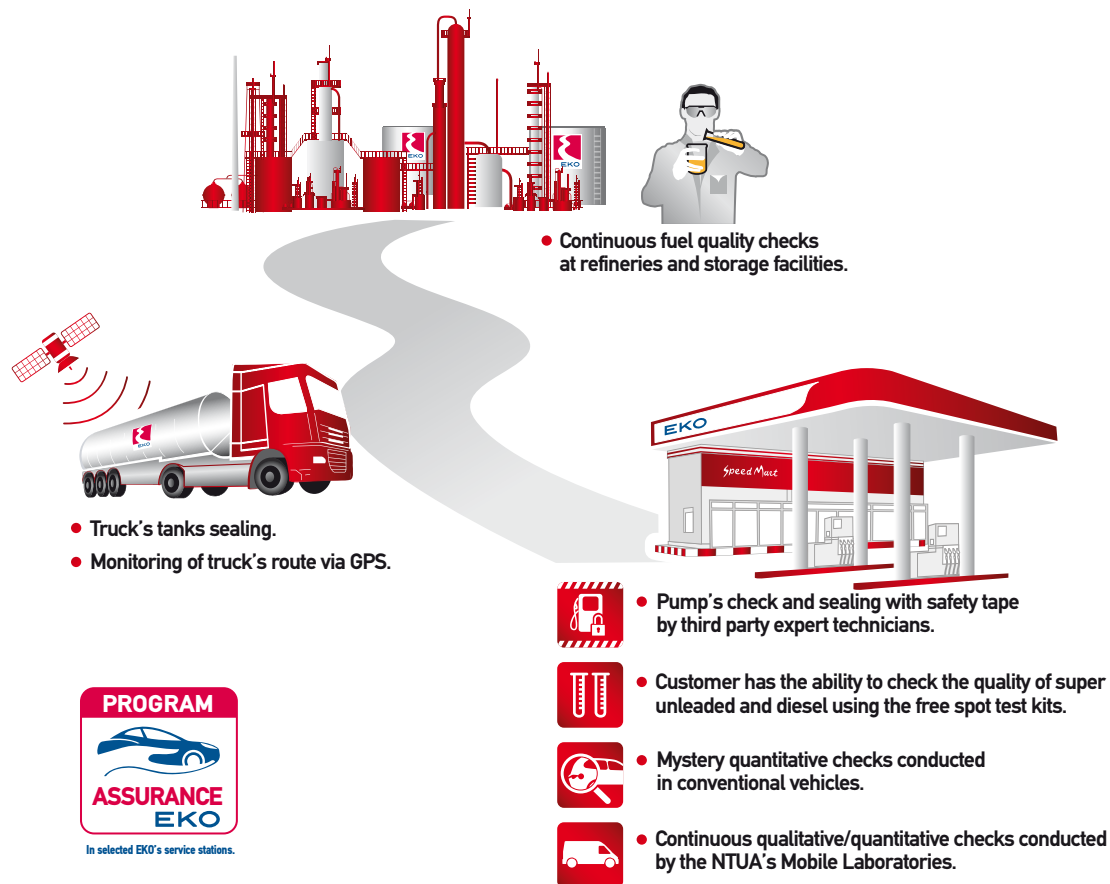
6.3.3 | The Quality of our Products

To ensure that our products reach the final consumer without any form of alteration/adulteration, annual scheduled inspections take place throughout the service stations where product samples are collected. This process covers all service stations. A particular emphasis is placed on large urban centers and geographical sites where the probability of fuel adulteration is in fact more probable. The samples are then delivered to an independent laboratory for chemical analysis. If specific tests show contamination, further sampling is then scheduled.

The Group provides high quality products to all of its customers not only aiming for customer satisfaction but also

guaranteed engine performance and a cleaner environment. Ongoing approaches (such as training, mystery shopping, 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, as reflected in surveys that are periodically undertaken.

EKO, in December 2012, aimed at meeting customer satisfaction, created the first integrated program to check the quality and quantity of fuel through ongoing audits, from the refinery to the tank of the customer. The implementation of the program **"Assurance EKO"** reassures customers for the quality and quantity of received fuels.



Similar surveys are also conducted abroad in order to gain a clearer picture of the corporate image on quality, services and prices. In addition, information is gathered on the level of customer service provided by the service stations in addition to their providing petroleum products.

In this context, in June 2012, the NTUA and EKO mobile laboratory for quality and quantity checks at petrol stations visited Cyprus. HPC's service stations were tested to verify that the fuels sold were meeting the product quality specifications and that the dispensing pumps were delivering the correct quantity. All of HPC's service stations fully met both the fuel quality and the quantity standards respectively.

Besides the above mentioned tests, all of HPC's service stations are visited four times a year, unexpectedly, by the com-

pany's retail territory managers who carry out additional fuel quality tests.

Particular emphasis is given to the provision of reliable information about the products and services in relation to health and safety. These include specific safety signs at service stations (smoking, use of a mobile, engine turned off), a detailed description of the properties of products (MSDS - material Data Safety Sheets), the continuous training of station managers and their staff as well as continuous informative literature, with specialized guides such as "Safely operating a Service Station" as well as "Emergencies and how to deal with them" through informational leaflets, promotional programs, e.g. posting the "The Golden Rules of Safety" on the company's website, etc.

Customer Protection

Customer concerns or complaints go through to the Customer Services Department. Those that are not directly answered through oral communication are recorded in a database and the process begins in resolving them. If the complaint is resolved at the Customer Services or Sales Department level, then the process - which involves oral or written communication with the customer - comes to a close. If the complaint or comment requires more specialized treatment, they are forwarded to the Sales and Marketing Services (Marketing Division) for their prompt resolution either through written or oral communication.

6.3.4 | Customer Information

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

Labels and Material Data Sheets (MDS) substantiate the safety of the product, provide information on how to use it, its specifications and how to dispose of it.

Each product is labeled in accordance with the relevant European legislation where the packaging contains the required information (the product's shelf life is not mandatory).

Indicatively, in Cyprus, MDS for fuels are available at all service stations in hard copy form informing customers of the products' specifications, how to safely use them and how to dispose of them. All of HPC's marketing communication is performed through an external Communications / Advertising Office. The Communications/Advertising companies are monitored by the "Advertising Body" and the "Cyprus Authority of Television and Radio". Communications/Advertising Companies must comply with the codes of practice of the aforementioned bodies.

In 2012, no reported incidents of non-compliance with regulations and voluntary codes concerning the labeling of products occurred.

All activities related to advertising and promoting products fully comply with the Hellenic Association of Advertisement Agencies and the Hellenic Advertisers Association's Code of Ethics. The Group's marketing executives also participate in educational programs and seminars to keep abreast of best practices and new regulations.

An indicative action related to customer information was organized by HPC in June. A Press Conference was held in Nicosia to inform consumers about the corporate actions (in cooperation with NTUA) which were being implemented for the control and quality of fuels being sold at the Group's service stations. How to detect adulterated fuel was demonstrated and the fact that no problems were detected in terms of fuel quality or quantity was announced.

6.3.5 | Transportation of Fuels

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.

The vessels - especially designed for the Greek seas - are certified by the French Bureau Veritas to travel even under extreme weather conditions, ensuring for the continuous and uninterrupted supply of fuel to the Greek islands. They are equipped with systems that follow the strictest standards for environmental protection and safety. The loading of vehicles onto the secure closed garages on the vessels contributes both to port safety and to minimizing disturbance during the time that they are moored in ports.

6.4 | Social Contribution

As a Group, we believe that the communities where our facilities are located should enjoy added value through the creation of new jobs, business opportunities, buying products and services, taxes, levies, actions to improve the quality of life or programs to protect the environment.

That is why our cooperation with stakeholders is multidimensional; from determining what our strategies and policies should be to our understanding of the needs and expectations and the relevant adjustment of the Group's services initiatives and benefits.

We employ over 411 permanent employees, who live in the Thriassion region's neighboring municipalities and 146 people who come from the Western Thessaloniki region.

We spend € 3 mil. annually on municipal duties and support the local economy through buying goods and services from the various businesses in the neighboring areas where we operate, (Table 6.4.1).

Purchases from local suppliers account for more than 10% of the total Group's procurement (not taking oil and chemicals procurement into account).

Table 6.4.1: Expenses on purchases made from local businesses

Group's Suppliers	Value of Invoices €	Number of Suppliers
Suppliers of Group facilities (South)	25,522,016 (6.8%)	193 (6.3%)
Suppliers of Group facilities (North)	15,076,810 (3.9%)	230 (7.5%)
Total from local market	41,598,826 (10.7%)	423 (13.8%)
Other markets	346,171,537 (89.3%)	2,653 (86.2%)

Public Opinion Surveys

Through the use of regular public opinion surveys, the Group records both the needs and expectations of the local communities. It also explores the effects of the implemented CSR programs in order to address its actions towards the areas that surround it, where society and its people's needs are considered as urgent.

These surveys, which are repeated every two years, investigate public opinion in the local communities adjacent to our industrial facilities. At the end of 2011, quantitative research through telephone interviews with 200 residents and qualitative research through personal interviews with 11 persons from the local government and cultural and sporting organizations took place (stakeholders' engagement survey).

The results of the surveys confirm the belief that supporting the communities where we live creates conditions for open communication along with operational action (social license to operate, SLO). The company's involvement plays an important role in securing and maintaining that "SLO", improves relationships, reducing risk, contributing to employee recruitment and retention and creating synergies with the state, local agencies as well as NGOs.

groups and sector association committees as well as national & international organizations, actively promote public dialogue on sustainable development. They are also actively involved in initiatives inducing dialogue and communication with local communities.

The Group and its staff, with their participation in working

This kind of policy is targeted, because it is based on the business strategy, values & principles and commitments undertaken within and outside the Group as well as international initiatives and standards.

In 2012, we designed and implemented a broad CSR program with the following set of objectives:

- ✓ Identifying actions and initiatives prioritizing local communities.
- ✓ Preparing and implementing a long-term CSR program.
- ✓ Encouraging and developing human resources and improving the working environment.
- ✓ Engaging in initiatives, best practices, principles and codes on a voluntary basis that support the link between strategy and sustainable development - designed after investigating stakeholders' concerns and our communication with them.
- ✓ Employees' voluntary involvement in CSR actions.

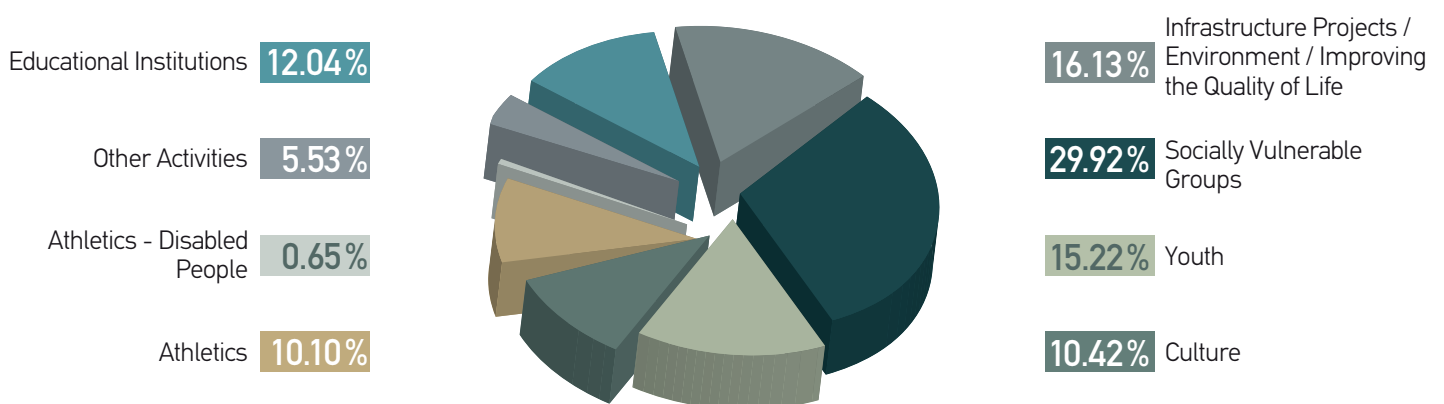
In 2012, the Group's investments in CSR initiatives within Greece and abroad, amounted to over € 3 mil.

For the immediate future, we aim to focus our attention on areas where there is greater social demand and improving our performance and our contribution to CSR issues. This will in turn contribute to sustainable development, improve relationships with human resources, strengthen social solidarity and ensure for relationships built on trust with the local community and society at large.

6.4.1 | The Group's Social Contribution in Greece

The act of giving and a responsible attitude towards society is an integral part of the Group's culture and strategy. Through concrete actions, emphasis was placed on social solidarity, socially vulnerable groups, youth, education, health, the environment, culture and sport.

Chart 6.4.2: Breakdown of CSR program in Greece



These actions (amounting to € 2.56 mil.) are addressed mainly to the local communities where the Group's business takes place. Some of these actions are presented in more detail below:

Social Vulnerable Groups

- Program providing primary health services, with the cooperation of Medicins Du Monde, to 1,016 people in the regions of Western Thessaloniki (Kordelio-Evosmos and Delta municipalities) and Thriassion (Aspropyrgos municipality). The Medicins Du Monde mobile team provided general services for detection, diagnosis and counseling, as well as more specialized pediatric and gynecological exams. The program will continue in 2013 covering over 1,000 residents from the Thriassion region (Municipalities of Aspropyrgos, Elefsina, Mandras - Edilias and Megaron).



- Donating heating oil (EKO prepaid cards, worth 500 €), to 380 unemployed residents living in the neighbouring municipalities.



- The "Let's go Camping" program for 280 children from financially vulnerable families from neighbouring municipalities.
- Supporting the "Social Groceries" program (in the municipalities of Aspropyrgos, Delta, Elefsina and Kordelio - Evosmos) via the donation of vouchers to purchase food.



- Donation of free food vouchers to more than 300 families with financial difficulties during the Easter and Christmas periods.

- The following NGOs were also given support: The Hellenic Society for Disabled Children, Foundation for Protection and Rehabilitation of Children "Theotokos", Greek Rescue Team, the "Margarita" vocational training center for people with intellectual disabilities, the Philanthropic Association "SAINT ALEXIOS", the Metropolis of Nikaia, the Rehabilitation Centre for Disabled Children of Attica, UNICEF, the Sikiarideio Foundation, the "Pediatric Trauma" Association, the Pan-Hellenic Society of Blind People, MDA Hellas, PISTI, the Hatzipaterion Social Work Foundation, Pyrounakeio Foundation in Elefsina, Church meals for vulnerable groups (St. George in Elefsina).



Youth

- 327 students residing in neighboring municipalities were awarded for gaining admission into universities and technical colleges (2011-2012 academic year). Over the last three years, the program has awarded approximately 1,300 students.



Educational Institutions

- Donation of heating oil (170,000 litres) to schools in the neighbouring municipalities. Approximately 700,000 litres have been donated over the last five years, for the same reason.

- Supporting school events.

- Financial support of LSE, European University Institute and National University of Athens programs



Infrastructure - Environment - Improving the Quality of Life

- Donation of fuel for fire protection in the Mandra - Edyllia municipality.

- Donation of specialized vehicles (aerial/crane) in the Mandra - Edyllia municipality.



- Installation of photovoltaic systems in two schools in Western Thessaloniki.

- Covering expenses for the local bus service in N. Peramos (Megara).

- Covering maintenance expenses for the station measuring atmospheric pollution in the Aspropyrgos municipality.

- Contribution to cleaning services in Aspropyrgos and Elefsina on World Environment Day World Water Monitoring Day.

- Supporting the Public Library in the Kordelio - Evosmos municipality.

- Sponsorship of program for environmental protection in the Ambelokipoi - Menemenis municipality.

- Organisation of event on environmental issues in the Municipality of Aspropyrgos: workshops for kids, theatre, musical performances.



- Fuel donation to fire protection volunteer groups (voluntary group "Kouros" from the Megara and Thriassion Association of volunteers).

Athletics - Culture

- Annual financial support given to local clubs and athletic clubs for people with special needs.



- Covering purchasing expenses of sporting equipment for social and athletic associations.
- Covering of expenses in the framework of athletic events.
- Providing financial support to athletes.
- Sponsoring/financial support of annual cultural events in neighbouring municipalities.
- Financial support/donations given to museums, cultural institutions, NGO, publishing organizations, etc.

Volunteering - Social Solidarity

- Blood Donation Programs coordinated by the employees' representatives. Supporting the blood banks of the hospitals with 500 bottles of blood a year.



- Participation in the "Tree" of MDM with milk collected by employees. The "Tree", made from milk packs, was set up in the center of Athens as an act of love on Christmas Day.



- Concentration of drugs to support the action of MDM in Thriassion & Western Thessaloniki.

- Books, games and puzzles offering on the event for the World Environment Day held in the Municipality of Aspropyrgos.
- Preparation and making of food and sweets, by employees, for the children of the Special Primary School of Elefsina in the framework of a school celebration.

The Group also supported, in various ways, institutions (such as the Foundation for Global Compact, ELIAMEP, Transparency International Greece, the Hellenic Federation of Enterprises, Citizens' Movement for an Open Society) and the implementation of conferences in thematic areas of energy, environment, CSR, RES, health & safety, entrepreneurship and economy.

CSR Leaflets

An interesting overview of the relationship between the Group and its local communities in the last five years, is available through various CSR printed documents such as "We live here together", for Thriassion and Western Thessaloniki, where we describe our actions and overall contribution to our local communities.

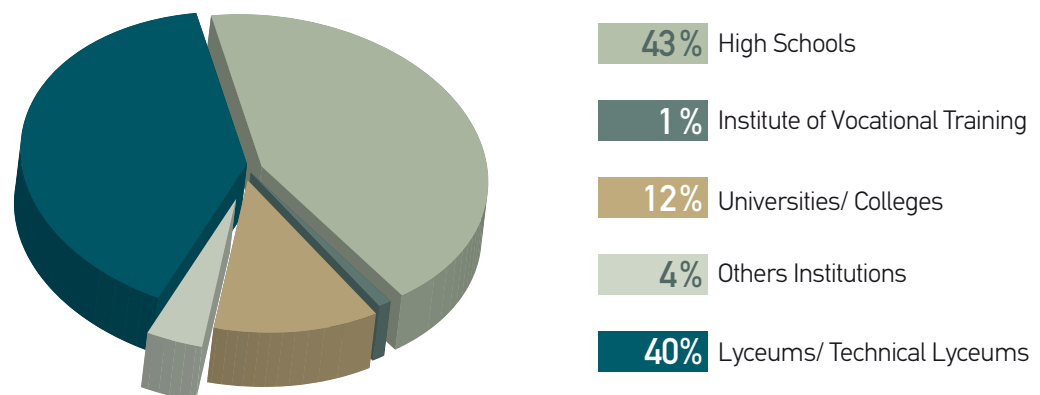


Educational Visits to Group Facilities

In 2012, a significant number of pupils, students and teachers (2365 visitors, 1,460 to BEA and 905 to BEΘ) from educational institutions from all levels of education were welcomed, advised and guided around the Group's facilities.



Chart 6.4.3: Educational visits breakdown by educational level



6.4.2 | The Group's Social Contribution - Abroad

In the countries in which HELLENIC PETROLEUM is active, it attempts to meet the needs that arise out of its multidimensional role as a social, cultural and business partner. In addition to the grants and donations that support infrastructure projects in local communities which aid in improving the overall quality of life, these actions contribute to the consolidation of friendly relations between neighboring countries.

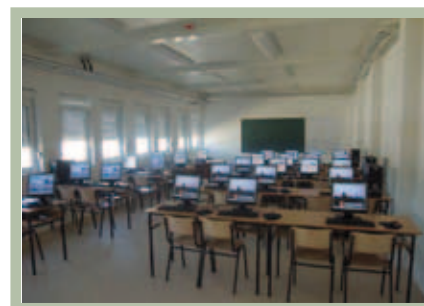
This commitment is mainly focused on supporting sports and cultural events, environmental protection and providing general assistance to those in need.

The total cost of the Group's social responsibility activities, outside of Greece in 2012, exceeded the amount of € 500,000.

Indicative examples from corporate social responsibility initiatives in each country are presented here below. These reflect the breadth of our commitment to society in general.

In FYROM

- Sponsorships to support cultural events (such as the Ohrid Summer Fest music festival 2012, the 42nd Zlatno Slavejce child song festival 2012, the Gala Ballet Concert).
- Sponsorships supporting sporting events (such as the Moto Club ALEKSANDAR, part of Biking 2012, the 8th International Children's Karate Tournament MAVASHI OPEN 2012) and international conferences (such as the International Symposium Energetic 2012, the Congress of Chemical and Technology and the 17th annual assembly of ACI-Association of financial markets).
- Employees volunteering through food vouchers on the "day against hunger" to support socially vulnerable groups (Skopje Red Cross).
- Donations in kind to organizations such as the Children's Village SOS (equipping homes), the Skopje Fire Service (fire fighting foam), the Zlatan Sremec & Idnina schools for children with special needs (clothing), the Miladinovci primary school in the Municipality of Ilinden (fully equipping school for 420 students), the training center for people with reduced vision (computer equipment).
- Continued support for surface drainage and groundwater monitoring projects in the Bujkovci and Miladinovci regions in the Municipality of Ilinden.
- Donation of IT equipment to the NGO "New Beginnings Children's Centre", a foundation for children with impaired vision.



In Serbia

- Fuel donation to support the work of charitable and humanitarian organizations (such as the HRH Crown Princess Katherine Foundation, the maliVeliki ljudi Organisation).
- Donation made to the Deki Foundation to support patients.
- Financial support given to the "Home for mentally handicapped children and young people" in Sremcica.
- Grants to support sports organizations and events (like car races, national football team, Radnicki youth basketball team).
- Donation of fuel to the Kaludjerica Monastery.



In Cyprus

- Main sponsor, for the fourth consecutive year, of the 500km "Cycling for Kids" initiative, a percentage of the funds raised was donated to the Pancyprian Organisation for Children with Cancer and the 'One Dream one Wish' organisation.
- Sponsoring the "Racing with the Sun" rally. Participating vehicles only used batteries connected to solar panels.
- Donations and grants to various social organizations and vulnerable groups (such as the Cyprus Paraplegic Organization, the Maronite Archbishop of Cyprus, the Cancer Association, The Neapolis Literature & Art Center, the Antileukemic Association). Also, contributions were made to feeding the poor, providing food to needy elementary school & high school pupils and looking after cancer patients.
- Sponsoring information and training events (such as the 14th International Road Safety Conference, the Pancyprian Federation of Labor (PEO) Conference, the Seminar on Energy Management) and donation of medical equipment (such as a the defibrillator to the Paralimni municipality).
- Scholarships given to two elementary school teachers to attend training seminar on road safety in England (organized by The Royal Society for the Prevention of Accidents).
- Sponsoring sports clubs (such as the Children's Football Association, golf tournaments, the Geroskypou tennis club, the Engomis' basketball team) and cultural events (such as the historical car rally, the Heritage Association of Nicosia, the Paphos municipality cultural event).



In Montenegro

- Donation of heating oil to the "Mladost Orphanage" in Bijela.
- Financial support given to cultural and sports organizations to organize events (such as the sporting event in Zabljak, Gradska Muzika Kotor and JEDINSTVO Kotor's tours).
- Donation to the Secretariat for Social Welfare of Podgorica to supply 2500 daily food rations to the destitute.
- Supporting the Basketball Federation of Montenegro.
- Donation of diesel fuel to municipalities affected by heavy snowfall.



In Bulgaria

- The sponsorship of the program "Call When You Get There" (initially organized in 2006) continued. The program aims to encourage drivers to be safe and responsible on the road (more information can be found at: <http://www.eko.bg/Text.aspx?menuitemid=110&lan=1>). The program covers a wide range of road safety issues such as lighting pedestrian crossings, Best Idea for road safety contest and training events on road safety in kindergartens.
- Financial support for cultural and sporting events (such as the Bulgarian Motor-cycling Federation, the Brimabuild Racing Team, the Olympia football club).
- Supporting the National team in the Homeless World Cup in order to enable the homeless to change their way of life.



07

APPENDICES



7.1 | Awards

During 2012, the Group was distinguished for its performance in sustainable development. The awards and prizes in the table below signify the recognition of the policy and strategy that are followed built on the three axes of sustainable development – financial performance - environmental management - respect towards society.

Table 7.1.: Awards & Praises in 2012

HELLENIC PETROLEUM Group	1st Process Award	From the Greek Businesses Association for Environmental Protection (PASEPPE) under the auspices of the Ministry for the Environment (P.E.K.A.), in the context of the Greek Business Awards for the Environment.
	Prize (Gold) in CR Index for Performance based on CSR Issues	INSTITUTE OF CORPORATE RESPONSIBILITY in Cooperation with the Organisation Business in the Community (BITC).
	Best Progress GOLD award	For significant progress it has shown in relation to the last (previous year) evaluation.
	Distinction for Perception Index in categories: Governance, Society, Environment, Labour, stakeholders approach	BRAVO awards, in the context of the evaluation of Sustainability Reports.
	5th among energy companies in "Refining and Marketing of Oil & Gas (Europe, Middle East, Africa)" and 59th in overall performance in the region (EMEA), for the year 2012	International Organization Platts
	Distinction for the Sustainability Index in the category of best sustainability report	BRAVO awards, in the context of the evaluation of Sustainability Reports.
	1st Award for the most popular Company in CSR	In the frame of the CEO & CSR Money Conference 2012 - HAPPINESS: "A new index to measure the success of states and enterprises" Conference, the THALES - CEO & CSR 2012 prizes were awarded.
	1st Prize for the best Listed Company in CSR	In the frame of the CEO & CSR Money Conference 2012 - HAPPINESS: "A new index to measure the success of states and enterprises" Conference, the THALES - CEO & CSR 2012 prizes were awarded.
	3rd Prize for Best CSR Team	In the frame of the CEO & CSR Money Conference 2012 - HAPPINESS: "A new index to measure the success of states and enterprises" Conference, the THALES - CEO & CSR 2012 prizes were awarded.
OKTA AD SKOPJE	Gratitude Award	Municipality of Ilinden.
	Honor Award	OKTA received an honor award from FYROM's Energy Association for its continuous support and help over the last few years.
	1st class Certificate	1st place in "Largest companies in FYROM" from the Euro Business Centre.
	Honored Distinction	Red Cross: Skopje & Municipality of Gazi Baba (FYROM).
	Honored Distinction	From the "Special Elementary School Idnina" and "Zlatan Sremac", for children with special needs.
	Honored Distinction	SOS Children's Village FYROM.
EKO SERBIA AD	Certificate of Excellence	The Institute for Interlaboratory Studies in the Netherlands awarded the OKTA laboratory for its participation in an inter-laboratory proficiency testing scheme for fuels.
	CSR Praise	Children's Foundation Kolevka Subotica & Sremcica Beograd.

7.2 | Memberships - Joint Actions

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

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

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

Panhellenic Exporters Association (PEA)	KODAP (Cyprus strategic stocks)
Association of SAs and LTDs	CYMEPA (Cyprus Marine Environment Protection Association)
Athens Chamber of Commerce and Industry (ACCI)	The Bulgarian Fuels and LPG Association
Hellenic Federation of Enterprises (SEV)	The Hellenic Business Council
Hellenic Petroleum Marketing Companies Association (SEEPE)	The Bulgarian Business Leaders Forum
Federation of Industries of Northern Greece	American Chamber of Commerce
Hellenic Management Association	
EUROCHLOR	
FRI (Fractionation Research Institute)	
MTI (Material Technology Institute)	
IVEPE	
Thessaloniki Chamber of Commerce and Industry	
EUROPA	
CONCAWE	
Cyprus Chamber of Commerce and Industry (CCCI)	
Cyprus Employers & Industrialists Federation (OEB)	

EKO is a member of the Executive Board of the MNE Economy chamber and the American Chamber & Institute of Standardization of Montenegro.

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

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

Participation in joint activities with similar companies and other bodies

In 2011, HELLENIC PETROLEUM was awarded at European level for the voluntary organization that took place together with the companies TITAN and HALYVOURGIKI for safety training seminars for privately owned contracting companies based in the Thriassio area, in Attica.

Furthermore, the Group:

- Promoted changes pertaining to directives or new guide-lines concerning the environment, health and safety through the permanent Greek delegation at the European Commission, the Oil Companies' European Organisation for the Environment, Health and Safety (CONCAWE) and the European Petroleum Industry Association (EUROPIA), of which HELLENIC PETROLEUM is a member.
- Actively participated, with a (presentation) poster on «The effect of extrusion reprocessing on structure and properties of isotactic polypropylene», at the "11th European Symposium on Polymer Blends" (Spain, 25-28/03/2012) under the research collaboration with TETEP (Department of Laboratory and Plastics' Technical Applications of BEΘ) with the NTUA's Lab for Polymer Technology.
- Presented the paper "Effect of extrusion reprocessing on the thermal stability and transitions of polyolefin systems", at the "5th National Conference of Thermal Analysis and Calorimetry (THERMA 2012)", Thessaloniki, 25-27/05/2012, as part of its TETEP (Department of Laboratory and Plastics' Technical Applications of BEΘ) research collaboration with NTUA's Lab of Polymer Technology Laboratory.
- Presented, at the International Conference on Biofuels for Sustainable Development of Southern Europe (Bio4SuD), held in Thessaloniki, 19-20 November 2012, its work on the "Effectiveness of CoMo and NiMo Catalyst on Co-hydroprocessing of Heavy Atmospheric Gas Oil -Waste Cooking Oil".
- Participated at the Conference Corporate Waste and Recycling with the presentations "Sustainable development for HELPE: Elefsina Refinery Modernization Project" and "Managing oil-refinery sludges".
- Has been nominated for the awards of "best safety practices" of the European Agency for Safety and Health at Work, on 3/9/2012, in the context of the European campaign "Working together for risk prevention".
- Made presentations at a workshop on "Health and Safety: Challenges - Continuous Improvement", organized for contractors by TITAN, at Thessaloniki, on 10-11/12/12.
- Participated, with presentation, at a HSE conference on "Promoting staff's administrative capacity to improve safety", on 21.11.12.
- Participated in the program "Responsible Care for Chemicals", organized by the HACI (Hellenic Association of Chemical Industries) and held at BEΘ, in August 2012.
- Participated, and held the presidency, of the SMG of CONCAWE (annual safety statistics, operator shelters, H2S detectors, retail safety, learning from incidents etc.), at Brussels from 1.1.2011 to date.

In addition to the above, HELLENIC PETROLEUM:

- Promotes both the corporate and the Greek state's positions on important issues such as the European REACH regulation and carbon dioxide trade through participating in the EU and EUROPIA's working groups. Note that HELLENIC PETROLEUM is a member of the BoD of EUROPIA.
- Participates in the UN's committee for climate change, in the relevant working groups for Best Available Techniques (BATs), the review of the relevant reference documents (BREFs - Refinery and Large Combustion Plants), the Inter-ministerial committee for carbon dioxide and the relevant European directive.

In the formulation of its environmental policy and strategy, each project proposal is evaluated in advance to ensure for the timely address of any adverse environmental impacts. In this context, the Group bases its operations and investments on the principle of sustainable development for the benefit of society and the environment.

Employees from the Department of Laboratories and Technical Plastic Applications (BEΘ), have been participating in the Leonardo da Vinci CHEMLAB II program, lasting 24 months. Participation in the program took place in the context of the continuing education program. It is a European cooperative program for lifelong education for young workers (DUAL-VET system which provides technical and specialized knowledge) without higher education in modern technologies, designed in order to improve their skills.

The collaboration involves 12 partners from universities, organizations and private enterprises.

One of its objectives, is apprentices and trainees' approach from different countries and nationalities, the promotion of the European idea, the improvement of mobility between Member - States and partner countries, and the cultivation of "pan-European Quality criteria in Analytical Chemical Vocational Education" for young apprentices who do not have university education.

Within the above framework, an innovative educational project is being developed, based on a combined approach of theoretical and practical training in analytical methods and strategies, in current analytical methods and techniques, as well as industrial and technological challenges, with a particular emphasis on mass spectrometry. The knowledge will be certified by providing a commonly acceptable training certificate, which ensures the quality and completeness of the trainee's knowledge.



7.3 | Extent of GRI & UNGC Reporting

Initially, the first reference to the GRI indicators was made in the preparation of the HELLENIC PETROLEUM Group's 2007 CSR Report. Since then, the Group has voluntarily used these indicators to capture its economic, social and environmental performance.

In 2008, the Group formally committed to integrate the 10 principles of the UN Global Compact (UNGC) into its corporate strategy and culture, and to promote them within the sphere of its influence. This public commitment communicates the desire of the management, employees and the entire Group in the pursuit of sustainable development.

The pursuit of sustainable development is determined by the Group's business values and principles and is visible in its policies and culture. Through these principles, the Group and its employees commit to the continuous care of the environment, the creation of a safe workplace and implementing socially responsible behavior.

In the above context, this report also covers the requirements of the "Communication on Progress" (advanced level) report, presenting the integration of the principles of the UNGC in the strategy, activities and programs that the Group supports and participates in. Table 7.3.1 shows the respective UNGC principles & GRI indicators with corresponding references to relevant sections of the Report.

Similarly, in Table 7.3.2 GRI indicators are associated with the relevant references in the Report. Where it is deemed as necessary, additional comments are provided as a supplement to the indicators.



This is our Communication on Progress in implementing the principles of the United Nations Global Compact. We welcome feedback on its contents.

Table 7.3.1: GC Advanced COP Self-Assessment in accordance with the 21 criteria, (Updated on 1 March 2013) and reference to GRI indices of Table 7.3.2 and relevant pages of this Report

	Criteria Summary	Best Practices	Self-Assessment	GRI Indices, Table 7.3.2 and / or report's sections
	Strategies & Operations			
1	The COP describes mainstreaming into corporate functions and business units	<ul style="list-style-type: none"> 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. Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy. Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts. 	<ul style="list-style-type: none"> ✓ ✓ ✓ 	<p>1.1, 4.1, 4.6 Moreover, sustainability responsibilities are assigned to Directorates of Procurement, HR, Environment, H & S.</p> <p>4.1, 4.5, 4.8, DMAs</p> <p>4.1-4.7, 4.9, 4.10</p>
2	The COP describes value chain implementation	<ul style="list-style-type: none"> Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts. Communicate policies and expectations to suppliers and other relevant business partners. Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence. Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ 	<p>1.2, 4.13-4.16</p> <p>4.16, SO5, (sections 6.3, 6.4)</p> <p>4.8, 4.9, 4.12 (section 2)</p> <p>Sections 4.10, 5.3.3</p>
	Robust Human Rights Management Policies & Procedures	<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. We aim to be the preferred employer with a respectful corporate culture and support for our employees' well-being. 	<p>Systems</p> <ul style="list-style-type: none"> Code of Conduct Corporate S & H Policy Internal Labour Regulation Procurements' Regulation <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 <i>commitments, strategies or policies</i> 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>✓</p> <p>✓</p> <p>✓</p>	<p>HR DMA, Sections 6.1-6.2</p> <p>4.8-4.9, 4.11-4.13, HR DMA</p> <p>4.8-4.9, 4.11-4.13, HR DMA</p> <p>The annual edition of this Sustainability Report</p>
4	The COP describes effective <i>management systems</i> 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>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>4.8, 4.12 (sections 6.1, 6.2)</p> <p>HR DMA, HR1-2, HR4-7, HR9, S01</p> <p>HR3, HR8, HR DMA</p> <p>HR9, S01</p> <p>HR DMA, HR1-HR11, S01, S09, S010</p>
5	The COP describes effective <i>monitoring and evaluation mechanisms</i> of human rights integration	<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. <p>• Outcomes of integration of the human rights principles.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>HR DMA, 4.4, HR1-9</p> <p>4.17</p> <p>4.1, 4.4, 4.9</p> <p>HR9-11, S01 (section 4.9, crisis manual)</p> <p>HR2, HR10-11</p>

	<i>Robust Labour Management Policies & Procedures</i>	<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	The COP describes robust <i>commitments, strategies or policies</i> in the area of labour	<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. 	<ul style="list-style-type: none"> ✓ 1.1, 1.2, 4.8, 4.12-13, 4.17, LA DMA 4.17 ✓ LA DMA, 4.17 ✓ 4.8, 4.12-13, see also Group's Internal Labor Code, http://www.helpe.gr/Uploads/resource/Πολιτική%20ΥΑΠ%20-NEA-2008.pdf ✓ LA DMA, LA1 - 15
7	The COP describes effective <i>management systems</i> to integrate the labour principles	<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. 	<ul style="list-style-type: none"> ✓ 1.2, 4.17, 4.18, LA DMA ✓ LA4, see section 6.1 ✓ 4.1, 4.6, 4.8, 4.9 ✓ LA10 - 13 ✓ 4.4

8	The COP describes effective monitoring and evaluation mechanisms of labour principles integration	<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. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ 	<p>4.1, 4.9, LA DMA, LA3-8, LA11-12, LA14</p> <p>HR1-2 (section 2)</p> <p>4.1, 4.9, LA DMA, LA4, HR4-7</p>
	<i>Robust Environmental Management Policies & Procedures</i>	<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: 0,186 (GRI EN16) ■ Percentage of ISO 14001 coverage increased to 91% (previous year: 88%) ■ Relevant GRI environmental indicators 	
9	The COP describes robust <i>commitments, strategies or policies</i> 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. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ 	<p>4.8, 4.12-13 (section 3.2)</p> <p>1.1, 1.2, 4.17, EN DMA</p> <p>4.8, EN DMA http://www.helpe.gr/Uploads/resource/Πολιτική%20ΥΑΠ%20-NEA-2008.pdf</p> <p>EN DMA, EN1-30</p>

10	The COP describes effective <i>management systems</i> 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. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ ✓ 	<p>4.11, PR1, EN DMA</p> <p>PR1</p> <p>EN DMA, 4.1, 4.6, 4.8, 4.9</p> <p>LA10</p> <p>4.4, S01</p>
11	The COP describes effective <i>monitoring and evaluation mechanisms</i> 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. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ 	<p>4.1, 4.9, EN1-3, EN5-6,</p> <p>EN8, EN10, EN12-14</p> <p>EN16,</p> <p>EN18-20, EN25-27, EN DMA</p>
<i>Robust Anti-Corruption Management Policies & Procedures</i>		<p>Our Commitment</p> <p>We do not tolerate corruption and are committed to compliance with international antibribery standards, as stated in the Global Compact and regional anti-corruption and bribery legislation.</p> <p>Systems</p> <ul style="list-style-type: none"> ■ Code of Conduct ■ Corporate Governance Code ■ Internal Labour Regulation ■ Procurements' Regulation ■ Third-party compliance standards 	<p>Actions</p> <p>Follow-up activities to intensify Anti-Corruption and anti-bribery policies.</p> <p>Performance</p> <ul style="list-style-type: none"> ■ Internal Auditing investigates concerns and concludes them ■ Relevant GRI indicators ■ Third-party audits review ■ Review of the existing compliance processes as part of the risk management project 	
12	The COP describes robust <i>commitments, strategies or policies</i> 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. 	<ul style="list-style-type: none"> ✓ ✓ ✓ 	<p>Code of Ethics</p> <p>4.8, 4.12, SO DMA, S05, code of ethics</p> <p>Corporate Governance, Code of Ethics</p>

13	The COP describes effective <i>management systems</i> 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>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>S0 DMA, Code of Ethics, S02-4</p> <p>Corporate Governance, S02, S04</p> <p>4.1, 4.6, 4.8, 4.11, S0 DMA, code of ethics</p> <p>S04, Corporate Governance</p>
14	The COP describes effective <i>monitoring and evaluation mechanisms</i> 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>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>4.1, 4.8, S02, S04</p> <p>S02-4</p> <p>S07-8</p> <p>S02</p> <p>S02-4</p>
<i>Taking Action in Support of Broader UN Goals and Issues</i>				
15	The COP describes core business contributions to <i>UN goals and issues</i>	<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>✓</p>	<p><i>The following initiatives are embedded in the Group's business strategy & implemented in daily operations:</i></p> <ul style="list-style-type: none"> • <i>Human Rights</i> • <i>Children's Rights</i> • <i>Gender Equality</i> • <i>Health</i> • <i>Education</i> • <i>Humanitarian Assistance</i> • <i>Employment & Decent Working Conditions</i> • <i>Anti-Corruption</i> • <i>Biodiversity</i>

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>✓</p> <p>✓</p> <p>✓</p>	<p>S01, Sections 3.4 & 6.4</p> <p>Section 7.2</p> <p>Deemed immaterial, taking into account the locations of the Group's facilities</p> <p>Sections 6.4.1, 6.4.2</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>✓</p>	<p>CEO's message at page 8</p> <p>S05, see also section 7.2</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 and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain. 	<p>✓</p> <p>✓</p>	<p>S01</p> <p>4.13, see also section 7.2</p>
<i>Corporate Sustainability Governance and Leadership</i>				
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. 	<p>✓</p> <p>✓</p> <p>✓</p>	<p>CEO's message to stakeholders, page 8</p> <p>S05</p> <p>4.5</p>
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). 	<p>✓</p> <p>✓</p>	<p>4.9</p> <p>This report is approved and signed by the CEO</p>

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". 	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>1.2, see also Materiality & Stakeholders Inclusiveness at p. 4</p> <p>4.16, 4.17</p> <p>4.4, 4.16</p> <p>4.4, 4.14, 4.15</p>
<i>ANNEX: Business & Peace</i>				
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.		
The COP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas				
The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas				

Table's 7.3.2 Reference Symbols

 the Annual Report 2012, at: http://www.elpe.gr/Uploads/ANNUAL%20REPORT%202012_EN_new.pdf

 the Annual Financial Report for fiscal year 2012, at: http://admin.elpe.gr/Uploads/pdf/Annual%20Report%20of%20Board%20of%20Directors%20and%20Financial%20Statements_2012.pdf

 this Corporate Responsibility Report 2012

 the Group's Code of Ethics, at: <http://www.elpe.gr/uploads/coc/index.html>




































 the Group's Internal Labor Regulations (available only at intranet)








Table 7.3.2: GRI Indicators Content Index, with additional references

GRI	Brief description	Reference at / Additional comments
1	Strategy	
1.1	Statement from the most senior decision maker of the organization (e.g., CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy	<p> p. 5-7</p> <p> p. 149-150 (E')</p> <p> p. 6-7</p>
1.2	Description of key impacts, risks, and opportunities	<p> p. 6-7, 10-11, 18-21, 27-30, 63 (table 6.3.1)</p> <p> p. 94-97, 143-145, 151-153</p> <p> p. 21-25, 53-57, 63-64</p> <p>The Group meets the expectations and rights of workers by offering wages and benefits significantly higher than that of the market, focusing on continuous improvement of workers' skills through training and development programs, providing opportunities for promotion by primarily introducing and maintaining policies and human resource processes that promote meritocracy, transparency, productivity, competitiveness, openness, recognition and rewarding.</p> <p>Challenges facing the Group are: maintain labor peace, safe operation of facilities, the occupational safety and health of employees. Also, changes in the working environment due to changes in labor and social security law (contractual issues, working conditions, remuneration).</p> <p>A revised draft of Internal Labour Regulation for EKO's staff was prepared in 2012, to ensure smooth working relations.</p> <p>Also a revised remuneration system & benefits scheme for EKO's employees was developed in harmonization with modern practices and domestic market. These have as a key objective the rationalization of costs and the improvement of competitiveness.</p> <p>In the context of taking initiatives and designing actions to improve the competitiveness of the Group's trading companies, the Human Resources Dept participates in a restructuring program called "EDGE".</p> <p>Issues arising in 2012:</p> <p>In seeking harmonization with international laws and the sustainable development, the Procurement Dept has recently included a relevant questionnaire in all tender documents sent to potential suppliers. Given the current economic crisis to reduce the "risk of cooperation failure", with at least the major suppliers (eg catalysts), Procurement Dept has classified the suppliers and monitors their financial data before and during the execution of supply requests.</p> <p>Marketing: Completion of the integration of the organisational structures of the two commercial companies (EKO & HF), through the redesigning of the management scheme and the development of common functions in the context of achieving further financial and operational synergies.</p> <p>Refineries (southern): In view of the completion of the Elefsina refinery Upgrade Project, it has been required to adjust the two refineries to the new operational requirements in order to improve their competitiveness, to ensure safe operation of the plant and achieve the strategic objectives of the Group in the refining sector in general. Specifically, the Group implements procedures and safety practices, consistent with international standards in the areas of design, operation, facilities maintenance and emergency management. The Group continually invests in safety equipment and maintenance and all refineries operate with the most modern systems of automatic control.</p> <p>DIAXON manages all aspects of labor relations in accordance with the Internal Labour Regulation while the existing collective agreements are fully applied. Furthermore, all obligations deriving from relevant laws and overseeing bodies (Operating License for Plant, Environmental Terms, Labour Inspectorate, etc). Employees (through their union) negotiated with the company and agreed (on a periodic basis with a specific duration), the current collective agreement.</p> <p>The same time, the Company monitors international developments in its business sector (through benchmarking with peers, the latest was in November 2011), evaluates and selectively adopts practices mainly in technology. At the same time, the Company is exploring and responding in changes concerning relevant legislation. Thus, the Company meets the expectations of employees. During 2012 there was a change of category concerning social security of production workers under the amended legislation. Also on April 30, 2012 a new collective agreement signed, without changes in pay and benefits. Despite the difficult economic environment.</p>


GRI	Brief description	Reference at / Additional comments
2	Organizational Profile	
2.1	Name of the Organization	HELLENIC PETROLEUM Group
2.2	Primary brands, products, and/or services	 p. 22-24  p. 33-49  p. 129-132
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	 p. 11, 18-19  p. 13-14  p. 128-129
2.4	Location of organization's headquarters	8A Chimarras str., 151 25 Maroussi, Greece
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report	 p. 3 (REPORTING BOUNDARIES), 14, 22-24, 46  p. 18, 78-80
2.6	Nature of ownership and legal form	HELLENIC PETROLEUM Group, HELLENIC PETROLEUM SA  p. 23
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)	 p. 42-44  p. 22-24, 25  p. 129-132, 136-140
2.8	Scale of the reporting organization, including: <ul style="list-style-type: none"> • Number of employees; • Number of operations; • Net sales (for private sector organizations); • Total capitalization broken down in terms of debt and equity; and • Quantity of products or services provided 	 p. 129-132, 134-140  p. 30-51, 72, 73-78  p. 15, 25, 46
2.9	Significant changes during the reporting period regarding size, structure, or ownership	 p. 2-3 (REPORT'S CONTENT, REPORTING BOUNDARIES) In November 2012 the Group withdrew from the Albanian market.
2.10	Awards received in the reporting period	 p. 77
3	Report Parameters	
3.1	Reporting period (e.g., fiscal / calendar year) for information provided	Calendar year January - December.  p. 2
3.2	Date of most recent previous report (if any)	July 2012 (responding period: January - December 2011).  p. 2
3.3	Reporting cycle (annual, biennial, etc.)	Annual (01.01 - 31.12)  p. 2
3.4	Contact point for questions regarding the report or its contents	Mrs Rania Soulaki, Group CSR Director Mail: rsoulaki@helpe.gr Tel: +30 210 6302894, Fax: +30 210 6302573


GRI	Brief description	Reference at / Additional comments																								
3.5	Process for defining report content	 p. 2-4 (REPORTING GUIDELINES, REPORT'S CONTENT, REPORTING BOUNDARIES, MATERIALITY) & p. 59																								
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)	 p. 3 (REPORTING BOUNDARIES)																								
3.7	State any specific limitations on the scope or boundary of the report	 p. 3 (REPORTING BOUNDARIES)																								
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations	 p. 2-3 (REPORT'S CONTENT, REPORTING BOUNDARIES)																								
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report	 p. 2 (REPORT'S CONTENT) Data presented in this report are either measured (by means of continuous or sampling monitoring) or estimated using globally accepted estimation methodology. As far as measurements are concerned, international standards (ISO, ASTM) are followed whereas, in the case of estimations, methodologies developed in cooperation with international organisations (eg CONCAWE) are used.																								
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods)	 p. 2-3 (no restatements)																								
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods	 p. 3 (REPORTING BOUNDARIES) (no significant change)																								
3.12	Table identifying the location of the Standard Disclosures in the report	 p. 98, (table 7.3.2)																								
3.13	Policy and current practice with regard to seeking external assurance for the report	 p. 3 (ASSURANCE) & p. 123-127																								
4	Governance, Commitments & Engagement																									
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight	 p. 59-69  p. 140-143, 146-149 The Executive Committee assigned responsibilities of the Board for issues concerning sustainable development. The breakdown of the BoD members -of the Group's companies included in this report- is as follows: <table border="1" data-bbox="699 1628 1430 1884"> <thead> <tr> <th colspan="3">67 BOD members in 1 companies</th> </tr> <tr> <th>Age Group</th> <th>No. of persons</th> <th>%</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>0</td> <td></td> </tr> <tr> <td>30-50</td> <td>26</td> <td>39%</td> </tr> <tr> <td>>50</td> <td>41</td> <td>61%</td> </tr> <tr> <th>Gender</th> <th>No. of persons</th> <th>%</th> </tr> <tr> <td>Female</td> <td>4</td> <td>6%</td> </tr> <tr> <td>Male</td> <td>63</td> <td>94%</td> </tr> </tbody> </table> Percentage of women in senior management: 10% approx.	67 BOD members in 1 companies			Age Group	No. of persons	%	<30	0		30-50	26	39%	>50	41	61%	Gender	No. of persons	%	Female	4	6%	Male	63	94%
67 BOD members in 1 companies																										
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Gender	No. of persons	%																								
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Male	63	94%																								

4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement)	<p>The Chairman of the Board is an executive member.</p> <p> p. 141, 146-147. Also the role, functions and related responsibilities of the President of the Board are outlined in the Bylaws of the Company, which are approved by the Board, within the frame and in full coherency with the applicable provisions of company law 2190/1920, as amended, apply today.</p>
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members	<p> for definitions see p. 128-129</p> <p> p. 146-147</p> <p>The BoD members are 13. The relationship between executive and non executive board members is 3:10.</p> <p>According to Article 2 of N.3016/2002 for corporate governance, the existence of independent members is not mandatory when representatives of minority shareholders are designated board members.</p>
4.4	Mechanisms for shareholders and employees to provide	<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.</p> <p>Moreover, because of the Group's activity and the shareholding structure, HELLENIC PETROLEUM provided to the Ministries of Finance and Environment-Energy-Development data to answer about 40 questions from MPs, all sides, on oil policy, environmental and labor relations.</p> <p>In chapter K' of the Internal Labor Code, the Committees on Personnel Issues (Hiring Committee, Loans Committee, Personnel Committee, Health & Safety and Industrial Affairs Committee) are defined.</p> <p>At each facility Committees for Occupational Health and Safety (E.Y.A.E.) are established.</p> <p>In chapter IB' of the Internal Labor Code (participatory processes, Articles 45 and 46) the Council of Employees Representatives and the Labour Affairs Committee are defined.</p> <p>Health & Safety Committees have been operating at all Group's facilities.</p> <p>Employee Suggestion Program is a particularly useful tool for the Group through which information, experiences and ideas can be shared and heard. The main objective of the Program is to inform management on issues / concerns of employees.</p> <p>During 2012, a significant number of proposals were received concerning a variety of topics including: new business, savings, human resources, CSR, informatics, intranet, etc. All proposals, depending on the goal - simple, direct implementation or not - and in conjunction with the approved budget, the goals and strategy were thoroughly examined and 39% of them were implemented while a further 11% is in the process of implementation.</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 (every 3 months), annual analyst day, annual day of institutional investors, meetings with financial analysts (every 3 months), ensure communication with the investment community. • Information meetings - discussions with the engineers of industrial plants. • Regular meetings with the elected union representatives.
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance)	<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><i>For senior and top management, the evaluation is made annually based on KPIs, while the performance of the Company is associated with the objectives of the staff on issues such as sustainable development (safety, environment, etc.) with a weighting factor of 20%.</i></p>

		<p>Furthermore, a percentage of the employees' goals concern health, safety and environmental issues. This weighting factor depends on company / department.</p> <p>In DIAXON, for Director's remuneration, KPIs related to, inter alia, energy consumption and safety of employees are taken into account.</p> <p>In Cyprus, the individual goals of executives have a certain percentage related to health, safety and environmental issues. This percentage varies depending on the Department.</p>
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	<p> p. 17</p> <p> p. 142-143</p> <p> p. 59, 60-62</p> <p>The current ratio 3 executive and 10 non-executive board members assures avoidance of "conflicting interests".</p>
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity	<p> p. 61-69</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 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 GA audits and approves the BoD's performance.</p>
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their	<p> p. 6, 11, 12-17 (Code of Business Conduct)</p> <p> p. 16-17</p> <p> Internal Labour Regulation</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>The Code of Conduct was approved and notified in 2011 (in Greek and English) with full implementation throughout the Group. A special awareness program is implemented (2012-2013) for all employees in Greece and abroad.</p> <p>Group's values address all the Group's subsidiaries in Greece and abroad.</p> <p>The statements, codes or policies concerning procurement activities fall under the existing Purchasing Regulations, common to Hellenic Petroleum and EKO. With the acquisition of HELLENIC FUELS, this Regulation is revised with effect on the entire Group, paying special attention to cooperation with suppliers.</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> <ol style="list-style-type: none"> 1. Policy for box for suggestions / comments / complaints 2. Policy for clean workspace (offices only) 3. Policy for non intrusive work environment (offices only) 4. Policy for Casual Friday (offices only) <p>At EKO Serbia:</p> <p>The company has developed a 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 leading all the projects of the company for innovations implementation, network operations, environment friendly projects and CSR activities.</p>

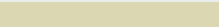
		<p>At EKO Bulgaria:</p> <ul style="list-style-type: none"> • Communication Procedure • Authorities manual • DIMA Investment Divestment Procedure • Internal Labor and Ethics code • Procurement manual • Public and Media Relations • Risk Assessment Procedure
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles	<p> p. 3 (ASSURANCE) & p. 18-21</p> <p> p. 53-57, 63-64</p> <p> p. 140-149</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, <i>"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"</i>. <p>In 2012, the Crisis Management Manual had been developed and is expected to be approved by the Board in 2013.</p>
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance	<p> p. 162-166</p> <p> see also indicators 4.5 & 4.7</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. 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 Association of Business and Industry (at: http://www.sev.org.gr/Uploads/pdf/KED_SEV_InternetVersion_updatednew2132011.pdf)</p>
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization	<p> p. 18-21</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 (section 6.4), the employees' - partners' - customers' satisfaction surveys (sections 5 & 6.3), the risk assessment (section 3.2) and the quality, environmental, health and safety policies (section 6.3) confirm a proactive approach.</p> <p>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 arising from non systematic or non thorough evaluation of parameters affecting its areas of operation. Moreover, monitors: the market trends on remuneration & benefits issues (through surveys issued by specialized consulting firms), the changes in labor and insurance issues (through the newsletters of Labor Legislation), whereas is kept updated as a member of the HFE & HMA. Furthermore, the Group participates in the relevant study of SOLOMON in order to know its position in relation to its competitors and is working with Shell Global Solutions for refinery optimization issues.</p> <p>In the area of procurement, "the precautionary principle" is one of the basic principles of operation and included in the formulation of specific procurement strategy, giving particular consideration to the smooth and endless supply under the best techno-economical conditions (eg, restriction of monopolies supply).</p>

		<p>By recording the targeted number of near misses and taking preventive measures, DIAXON, avoids potential accidents.</p> <p>At HP Cyprus: There are risk assessment sheets for the various tasks performed either by employees or associates who work on site and also in the area of product delivery. Based on these considerations, all precautionary measures to avoid accidents are implemented. The Company, during the evaluation process of contractors who shall work in the area of the petrol stations, takes into account as a prerequisite for inclusion of the contractor in the list of "Approved Contractors" that the potential partner is certified in accordance with OHSAS 18001. Also, near misses and accidents are recorded and, based on these records, corrective measures are taken and preventive measures are designed in order to avoid accidents.</p>
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses	<p> p. 20 (corporate regulations & stds), p. 63 (table 6.3.1), p. 41</p> <p> p. 59 (Corporate Governance Code of HFE) at: http://www.sev.org.gr/Uploads/pdf/KED_SEV_InternetVersion_updatednew2132011.pdf</p> <p>Furthermore, the subsidiaries follow national or local standards and initiatives; eg EKO Serbia follows the "State Rules Book" about technical and other requests for liquid fuels 64/2011 (31.08.2011) and standards as SRPS EN 228, SRPS EN 589 & SRPS B.H2.134.</p>
4.13	Memberships in associations (such as industry associations) and / or national /international advocacy organizations	<p> p. 27, 41, 78-80</p>
4.14	List of stakeholder groups engaged by the organization	<p> p. 3-4 (section MATERIALITY & STAKEHOLDERS INCLUSIVENESS) & p. 59</p>
4.15	Basis for identification and selection of stakeholders with whom to engage	<p> p. 3-4 (MATERIALITY & STAKEHOLDERS INCLUSIVENESS) & p. 59</p>
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	<p> p. 3-4 (section MATERIALITY & STAKEHOLDERS INCLUSIVENESS) & p. 59</p> <p>Moreover, the scheduled annual public opinion surveys (section 6.4), the regular employees' - partners' - customers' satisfaction surveys (sections 5, 5.4, 6.3 and indicator 4.4), the regular communication with customers, partners & employees (their representatives are members of the BoD) confirm the engagement of the interested parties.</p> <p>Specifically:</p> <p>For investors: Apart from regular interaction mentioned above, feedback is sought wherever possible, either formally (eg through the broker who organizes a roadshow and then comes in contact with the investor), or informally by direct contact with participating analysts. There is no institutionalized communication channel, but an open line of communication of the stakeholders with the IR Department, through which they contact the company and get answers to their questions. The roadshows (3-5 times per year), the day for financial analysts (once a year), the days of Greek institutional investors (annually), the teleconferencing with financial analysts (4 times per year) take place at a frequency sufficient to ensure continuous communication with the investment community. Whenever further data is required regarding the operation of the company, it is provided whenever possible.</p> <p>With suppliers: Regular communication through personal contacts and discussions are part of the Procurement Department's operation aiming to enhance cooperation through a constructive dialogue and exchange of information and experience from the existing cooperation. Clearly there is evaluation of the suppliers and specifically the contractors, after completion of a project, in issues concerning safety, performance, compliance with contractual obligations, etc. For these reasons evaluation sheets are properly filled in.</p> <p>For customers: 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. We develop a mystery-shopper program, per month at the Group owned petrol stations and per three months to the rest. On an annual basis and after evaluation, especially in areas concerning image, safety, products promotion etc., station owners are rewarded. The Group companies, locally, conduct market research and customer satisfaction surveys.</p>



		<p>For employees: Through the internal network (intranet) the employees are daily updated with business news related to the activities of the Group, (information, announcements, articles, calls concerning the Group in general and / or its subsidiaries). Also, employees are informed about the promotional activities of the commercial companies of the Group. Along with the internal network, the most important news & announcements are posted on bulletin boards on specific landmarks in all buildings of the Group. The employees' approach is mainly through electronic invitations; individual or group invitation depending on the audience and the type of event. The contact frequency is regular (from daily to annual) again depending on the type of event. The content of the home page of the intranet is daily checked / reviewed and the main topics are refreshed every 2 to 3 days. More than 80% of employees, in Greece, have access to a computer. All employees are informed by postings on bulletin boards, e-mails concerning notices and management decisions, or printed material received from specific distribution outlets (eg, entry - exit point of workplaces). Finally, there are electronic information boards in plain view on the premises of industrial plants.</p> <p>Moreover, quarterly briefing on financial results to the senior and middle management, via emailed invitation.</p>
4.17	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	<p> p. 4, 10-11, 64-66, 67-75</p> <p>Indicative list of significant issues (>30%) that emerged from surveys on local communities:</p> <ul style="list-style-type: none"> • Support for unemployed • Provision of health services • Support of elderly • Support for vulnerable social groups • Support young people and strengthen education • Provision of relief items to vulnerable social groups • Employment for local communities • Further steps to reduce pollution <p>It was also recorded that:</p> <ol style="list-style-type: none"> 1. The completion of the project at Elefsina's refinery and the smooth operation is the main point of interest of the investing community. 2. The Corporate Responsibility Report provides a framework for a structured approach, with detailed recording, of all issues that have arisen and the actions planned to better address them. 3. The potential breach of contractual obligations by a supplier (probably as a result of the bad economic situation) has as a result the redefinition of needs, re-evaluation of the reliability of suppliers, cost renegotiation, search of new partners, tender reopening. As long as the technical offer of a potential supplier is rejected, the sealed financial bid is returned in accordance with the current regulation of procurement. 4. Marketing, in the context of continuous training of the petrol stations personnel, develops training material focusing on the following topics of interest: behavior to consumers - safety at petrol stations - sales regulations - consumers' management complaints - personnel appearance - health and safety. 5. Scheduled training of employees in topics such as customers' complaints, health and safety. <p>EKO Serbia, through communication with stakeholders identified the following concerns:</p> <ul style="list-style-type: none"> - Contribution to safety and safe drive - Fuels quality, innovation in applications - Environment friendly suggestions and engagement - Customers' satisfaction improvement - Increase of customers who are loyal to the company - Management of complaints





Management Approach Disclosures		
EC	Economic Performance	The Group's strategy has been formulated with the objective of sustainable development and the principles of safe operation of plants and facilities. We focus on environmentally responsible operation of the units and - environmentally friendly - product specifications, corporate social responsibility, good cooperation with local communities to protect the employees' health and adding value for our shareholders.
EN	Environmental Performance	We have adopted and implemented, environmentally friendly management policies - beyond those required by legislation - in order to contribute to the strategic objective of the Group for sustainable development. For the operation of the facilities we employ methods, techniques and know-how to avoid and prevent potential environmental impact and to handle the waste with the application of BATs.
SO	Society	The Group, as a responsible corporate citizen, designs and implements, in a systematic way, a multifaceted social program to provide substantial support to the residents of neighboring municipalities who need it, confirming its socially responsible behavior. Our believe, to support local communities that are close to our industrial facilities, is implemented by continuously strengthening of actions, planning and implementation of welfare programs to support vulnerable groups and the implementation of infrastructure projects. Moreover, our subsidiaries abroad participate in social contributions as cultural and social partners (citizens) of the local communities.
HR	Human Rights	We defend human rights within the sphere of influence and operation of the Group. Respect to employment, employment with dignity, meritocracy and equal opportunities for professional development and progress, are among our basic principles. In this context any kind of discrimination, employment of minors and all forms of forced labor are prohibited. Furthermore, we support the balance between social and professional life, equal remuneration for equal work, regardless of gender, ethnicity or religion.
LA	<i>Training and Education</i>	The right to education and development is an established company policy. This includes life-long learning programs, aiming at continuous improvement of skills and knowledge of the Group's human resources. People's development, lifelong training and retraining are among our main objectives and key competitive advantages. Our employees are a key pillar of the Group's corporate strategy; their capabilities and effectiveness contribute to the fulfillment of our objectives and the management of economic, social and environmental challenges.
	<i>Occupational Health and Safety</i>	Continuous care for the health and safety of employees, their families and the citizens of the neighboring communities, is a primary concern for the Group and hence policies, actions and programs that contribute towards this direction have been adopted.
	<i>Labor Practices and Decent Work</i>	We design and implement strategies and adopt modern policies, through which the Group's vision as an "employer of choice" and "our people are our most competitive advantage" is implemented, our business objectives are achieved, our values and principles are applied. The Group places particular importance in shaping a dynamic policy framework for managing human resources in order to achieve optimal operational objectives while meeting the goals and expectations of employees.
	<i>Diversity and Equal Opportunity</i>	Remuneration is only determined by individual performance, experience, etc, and within the context of the collective labor agreements, without any gender, age or other discrimination. The right to education and development is an established company policy.
PR	Product Responsibility	In the context of the quality policy and care for customers, the Group is committed to supplying products and services that fully comply and / or are better than the agreed specifications, to provide full technical data on the quality of products / services to all concerned and to provide customers, partners and executives the opportunity to evaluate and contribute in further improving the quality of products and services.



PERFORMANCE INDICATORS G 3.1																										
EC	Economic Performance Indicators																									
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments	<p> p. 25</p> <table> <tr> <td>Group's payroll:</td> <td>185,026,982 €</td> </tr> <tr> <td>Insurance contributions:</td> <td>40,668,827 €</td> </tr> <tr> <td>Insurance program:</td> <td>5,510,807 €</td> </tr> <tr> <td>Pension plan:</td> <td>7,425,170 €</td> </tr> <tr> <td>Food allowance:</td> <td>4,465,628 €</td> </tr> <tr> <td>Staff transportation:</td> <td>3,552,077 €</td> </tr> <tr> <td>Extra financial support:</td> <td>107,977 €</td> </tr> <tr> <td>Support to employees' family members with special needs:</td> <td>93,687 €</td> </tr> <tr> <td>Long-service allowance:</td> <td>165,487 €</td> </tr> <tr> <td>Financial aid for serious health cases:</td> <td>25,500 €</td> </tr> <tr> <td>School aid:</td> <td>402,106 €</td> </tr> <tr> <td>Other benefits:</td> <td>4,522,817 €</td> </tr> </table> <p>(health care programs, preventive exam, vouchers Easter-Christmas, crèches, awards for employees' children, student aid, camps)</p>	Group's payroll:	185,026,982 €	Insurance contributions:	40,668,827 €	Insurance program:	5,510,807 €	Pension plan:	7,425,170 €	Food allowance:	4,465,628 €	Staff transportation:	3,552,077 €	Extra financial support:	107,977 €	Support to employees' family members with special needs:	93,687 €	Long-service allowance:	165,487 €	Financial aid for serious health cases:	25,500 €	School aid:	402,106 €	Other benefits:	4,522,817 €
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EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	<p> p. 30-31, 33, 41-43</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 7.2) facilitates the monitoring of the forthcoming regulatory changes. The Group's commitment to sustainability issues is confirmed by the participation to the Board Council for Sustainable Development, the commitment to the UNGC and the cooperation with the Network for Corporate Social Responsibility.</p> <p>Financial implications and other risks and potential opportunities for operational activities due to climate change are within the scope of any feasibility study concerning investment operations of the Group. The company's strategic choice for tackling climate change is the energy saving, both in production activity and administrative functions. 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 European Emissions GHG Trading Scheme. The developments concerning the relevant Directive 2003/87/EC are monitored, at European level for the sector (participation in a EUROPIA group) and the impacts are evaluated at country and company level.</p> <p>Για τις δύο πρώτες φάσεις εμπορίας δικαιωμάτων (2005-2007 και 2008-2012) σχεδόν όλα τα δικαιώματα καταμελήθηκαν. 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.</p> <p>For the period 2013-2020 (third trading phase), which changes the rules of allocation and only 50% of total allowances will be distributed free while the remaining 50% will be auctioned - because of the exposure of the refining industry at a significant risk of «brain carbon» (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 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.</p> <p>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. 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.</p> <p>It is also noted that because power generation activities are not allocated free allowances (since 2013), refineries are expected to incur additional increased cost concerning electricity purchases; as the cost of buying allowances for electricity is expected to be passed on to consumers.</p> <p>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 market penetration is continuous. Moreover, investments are implemented for the improvement of the energy efficiency and in the field of RES.</p>																								

EC3	Coverage of the organization's defined benefit plan obligations	<p> p. 45, 48</p> <p>The Group does not use defined benefit plan, but defined contribution plan. This program covers: HELLENIC PETROLEUM 97.69% of employees, ASPROFOS 65.41%, DIAXON 95%, HP Cyprus, JPK & EKO Bulgaria 100% of permanent staff.</p> <p>The employees participate in meeting the cost, and more specifically the health and pension plan. Indicative examples at DIAXON & HELPE are: "Newly insured employee": 2.5% employer contribution and 0.5% to 5% employee contribution. "Already insured employee": 6.5% employer contribution and 1.5% to 5% employee contribution.</p> <p>At ASPROFOS: the employee participation is 2-4% and the company participation is 3%. At HP Cyprus: The Welfare Fund is of Defined Contribution. The Pension Fund and its collateral fund are of Defined Benefit. At the Welfare Fund the company pays 5% and the employee 5-15% of their annual salary. For the Pension Fund the contribution comes entirely from the company. For 2012 the figure was 17.2% over the annual salary. For the collateral fund of the Welfare Fund payment comes entirely from the Company. For 2012, the rate stood at 1.9% of annual salary. With regard to the Welfare Fund, the Company is obliged to pay 5% and has no other liability for investment performance. At JPK & EKO Bulgaria: a standard, obligatory scheme, which is predefined by the national law. At EKO Serbia: All contributions for pension and health are covered by the company (22% 12.3% of gross salary).</p>
EC4	Significant financial assistance received from government	No direct financial support from the State.
EC5	Range of 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.</p> <p>No permanent employee is remunerated at the minimum / basic salary in HELPE, EKO, DIAXON, EKO Bulgaria, EKO Serbia and JPK Montenegro.</p> <p>Significant locations of HELPE's operations are the industrial sites Aspropyrgos, Elefsina & Thessaloniki. Indicative examples of salaries are: Operator earns 32% higher than the "local minimum" and Engineer earns 62% higher than the "local minimum"</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%. EKO: The minimum wage in force at local level is approximately 79% of basic salary for a typical newly recruited by the company. EKO Bulgaria: Minimum wage - EUR 135. Entry level wage EUR 450. The entry level (new hires with no experience) is higher than the local by 284% for engineers, accountants & technicians. EKO Serbia: newly recruited with no experience receive 444% (engineers), 166% (accountants), 277% (sales representatives) higher than the local minimum. JPK (Montenegro): the lower company's salary is 2.28-2.65 times higher than the local minimum. OKTA (FYROM): the lower company's salary is 2.4-3.8 times higher than the local minimum. HP Cyprus: There is a collective bargaining agreement, which regulates the wage scale in relation to the respective job. On the basis of these standards the payroll of new recruits is adjusted. The collective agreement is common to the 3 major oil companies (HELPE, BP, Exxon Mobil) operating in Cyprus. The permanent staff is paid based on levels of collective agreement. The seasonal staff is paid based on the minimum wage defined by law.</p>
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation	<p> p. 68 (table 6.4.1)</p> <p>the spending proportion on locally-based suppliers at significant locations of operation is 10% of total expenditure for supplies and is presented in Table 6.4.1</p> <p>Local supplier is the provider of materials, products, and services that are based in the same geographic market as the significant locations of the Group. Significant locations are the neighboring to the refineries municipalities at Thriassio and Thessaloniki.</p> <p>Group policy is to support the local market and local contractors, from the moment does not affect the selection criteria, such as safety, quality standards or competitiveness. In this context the Group (along with other large companies) is investing in proper training of subcontractors to ensure their ability to participate in projects of the Group.</p>

EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation	<p>In the category 'senior management' executives with rank higher than the Assistant Director are included. This proportion of executives from local communities varies from 5% to 100%.</p> <p>HELPE: in the process of recruitment there is a provision to award points to residents of neighboring, to the refineries, municipalities.</p> <p>DIAXON: The percentage of executives from the local community is 40% (2 out of 5 executives). Staff with rank higher than supervisor is considered as executive.</p> <p>EKO Bulgaria: 100% of executives from the local community.</p> <p>EKO Serbia: 33%, furthermore there is a policy to prefer executives from the local community (the executives are managers & directors).</p> <p>HELPE Cyprus: 100% of employees from the local community.</p> <p>JPK Montenegro: 67% of executives from the local community (the staff is 4% of workers).</p> <p>OKTA FYROM: 17.3% of executives are from the local community (staff is 16.5% of employees).</p>
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement	<p> p. 40, 69-75</p> <p>In the period 2011-2012 quantitative and qualitative surveys took place based on structured questionnaire and interviews took place involving individuals from local communities. Such approaches are used to determine the investment in infrastructure and other activities for the benefit of local communities. All projects are made in consultation with local communities.</p> <p>Indicatively, for 2012, are referred:</p> <p>The 49,500 € project for the drainage of surface water and groundwater level adjustment - the project continues for 3rd year - in Bujkovci-Illinden.</p> <p>The donation of all equipment and furniture for the new elementary school Miladinovci, in the Municipality of Ilinden (17.000 €), the donation of two special purpose vehicles of 150K€ to the municipality of Madras, the donation of 2 photovoltaics of 30K€ to schools in Thessaloniki, the adoption and reforestation of the damaged by fire area of "hill Gikas", the improvement of water quality of Lake Koumoundouros and monitoring, promotion and protection of biodiversity in the lake (100K€), the study of formulating and highlighting of the archaeological importance "hill Reton".</p>
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts	<p> p. 59, 68</p> <p>In the period 2011-2012 quantitative and qualitative surveys took place based on structured questionnaire and interviews took place involving individuals from local communities. The 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.</p> <p>Assessing the findings will lead in planning activities for 2013. 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> <p>Moreover, during the planning phase of new investment care is taken of the direct and indirect impacts. For example, during the implementation of the project "Modernization and Upgrading of Refinery" an increase for job positions locally was noted, as well as support of the local market (supply, jobs).</p> <p>The typical average employee's wage in the Group is 30-60% higher than the equivalent salary in Greece; respectively abroad is up to 300% higher than the corresponding national average.</p>

EN			BEA	BEE	BEØ	OKTA	SUBSIDIARIES	Units / Comments	
EN1	Materials used	Crude oil	7.036,3	1.500,9	2.634,5	263,7	n.a	ktn	
		Throughput (crude oil + other supplying streams)	8.724,8	1.959,4	3.646,3	263,7	n.a	ktn	
		Semi-finished products	106,2		315,9	436,3	0,021	ktn	
		Catalysts		3,4	151,3			tn	
		Lubricants			57,5		10,10	tn	
		Additives	541,8		2.436	1.392,5	1.338,7	tn	
		Solvents				6,7	0,4	tn	
		Packing materials					314,6		
		Used hydraulic fluids, anticorrosive agents, acids, surfactants, scale inhibitors, gelling agents, friction reducers					419,1	0,83	tn
		Other material				764,8	10.892	tn	
EN2	Recycled input materials	For the refineries Slop oil / throughput	0,11	0,00	1,10	3,68	7,29	%	
EN3	Energy	Consumption of fossil fuels	23.547,4	1.075,7	5.963,2	1.222,9	81,4	TJ	
		Electricity	Total electricity consumption	1.849,9	866,8	905,2	116,8	212,09	TJ
			Self-produced electricity	1.149,3	279,1	32,9	0	0	TJ
	Total Energy	Energy Intensity Index	2,91	0,99	1,88	5,08	n.a	GJ/tn throughput	
EN4	Indirect energy consumption	Total from PPC (grid)	700,6	587,7	872,3	116,8	212,1	TJ	
		Conventional sources	628,9	527,6	783,1	84,1	190,4	TJ	
		RES	71,7	60,1	89,2	32,7	21,7	TJ	
EN5	Saving energy		60,0	n.a. (operation started in 4 th quarter 2012)	50,3		3,8	TJ	
EN6	Initiatives to provide energy-efficient or renewable energy-based products and services, and reductions in energy requirements as a result of these initiatives		See section 4.6 (biofuels) and section 4.7 (RES)						
EN7	Initiatives to reduce indirect energy consumption and reductions achieved		In 2012 the indirect energy consumption measuring program had been further extended in order to include administration building and offices buildings at Elefsina and Thessaloniki refineries. This measuring program, started in 2010 with the HQs building at Maroussi and expanded in 2011 to include the administration building at Aspropyrgos refinery. Based on the above and as a result of initiatives to move the company's employees, a significant proportion of workers uses company's buses and public transport (31% for BEA, 39% for BEE, 51% for BEØ and 24% for Maroussi) to move to and from their workplaces.						
EN8	Total water withdrawal by source	Total	5.537.724	7.205.652	2.423.260	1.259.700	296.682	m ³	
		Drills	0	587.772	0	0	48.114	m ³	
		Sea water	960.045	3.672.000	0	0	4.365	m ³	

EN			BEA	BEE	BEΘ	OKTA	SUBSIDIARIES	Units / Comments	
EN9	Water sources significantly affected by withdrawal of water		Not such significantly affected water sources						
EN10	Percentage and total volume of water recycled and reused, based on the total water volume	Percentage	3,76	1,01	2,10	5,84	0,004	%	
		Volume	208.381	72.938	50.981	73.600	12	m ³	
EN11	Location and size of land 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 in established industrial areas.						
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas		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.						
EN13	Habitats protected or restored		Not such habitats. See also EN11 and section 4.4.						
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity		See section 4.4						
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations		0	0	0	0	0		
EN16	Total direct and indirect greenhouse gas emissions by weight	Verified CO ₂ emissions (for the 3 refineries participating in EU ETS)	1.498,9	81,9	329,7	84,0	5,1 (εκτίμηση)	kt _n CO ₂ The direct GHG emissions (CO ₂) from the three refineries in Greece - covered by the directive 2003/87/ECEK (ETS) - are calculated in accordance with the methodology of the relevant decision 2007/589/EC & the GHG emission permits issued by the Emission Trading Bureau. There are no emissions related to activities of special interest	
		Direct GHG emissions except CO ₂ (eg HCFCs, CH ₄ , N ₂ O)	8.816,9	211,8	1.152	n.a.	n.a.	tn CO ₂ eq (HCFCs emissions in accordance with PRTR reports)	
		Indirect emissions - National grid (PPC: 11.13 kg CO ₂ /kWh for 2011 and FYROM's factor: 0.797 kg CO ₂ /kWh)	219.915	184.468	273.828	25.856	n.a.	tn CO ₂	
		Indirect emissions - electricity at HQs office buildings	HQs building at Maroussi: 1,506 tn CO ₂ eq Aspropyrgos refinery, administration building: 3,242 tn CO ₂ eq Elefsina refinery, administration building: 509 tn CO ₂ eq Thessaloniki refinery, administration building: 881 tn CO ₂ eq						t CO ₂
		Total	1.727,6	266,6	604,7	109,9	n.a.	Ktn CO ₂ eq All Group's refineries are included	
		Emissions Intensity Index	0,20	0,14	0,17	0,42	n.a.	tn CO ₂ eq / throughput	

EN			BEA	BEE	BEØ	OKTA	SUBSIDIARIES	Units / Comments
EN17	Other relevant indirect greenhouse gas emissions by weight	Total amount of indirect CO ₂ emissions, from all activities (air trips, private transportation) at the administration buildings (HQs, BEA,BEE & BEØ)	2.264					t CO ₂ -eq (apart from electricity consumption which is referred at EN16)
		Estimation concerning emissions related to the use of end product (GHG protocol, Scope 3), eg transportation fuels.	34.735					kt CO ₂ -eq (emission factor from Greece National Inventory Report 2012)
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	Energy save - energy exploitation of the thermal streams & steam	191.994	0,00	11.956	0,00	n.a	tn CO ₂ -eq Section 4.2.1 - Description of the calculation method, Chart 4.4
EN19	Emissions of ozone-depleting substances by weight	HCFCs	0,0052	0,00	0,00	0,00	n.a	tnCFCEq
EN20	NO _x , SO _x , and other significant air emissions by type and weight	NO _x	3.108	66.54	449	256	2,43	tn
		NO _x Emissions Intensity Index	0,36	0,03	0,12	0,97	n.a	Kg NO _x / tn throughput
		SO ₂	3.973	130	1.503	938	0,05	tn
		SO ₂ Emissions Intensity Index	0,46	0,07	0,41	3,56	n.a	Kg SO ₂ / tn throughput
		VOCs	851	821	320	500	5.860	tn
		VOCs Emissions Intensity Index	0,10	0,42	0,09	1,9	n.a	Kg VOCs/ tn throughput
EN21	Total water discharge by quality and destination	Volume	2.083.814	3.827.766	1.616.100	1.033.000	32.823	m ³
		Destination	Saronicos gulf	Saronicos gulf	Thermaikos gulf	Skopje	n.a	
		Treatment process	The Group's facilities effluent treatment units include treatment of 1st, 2nd and, occasionally, 3rd level.					Effluent treatment unit
		H/C Index	1,51	7,30	2,19	5,13	n.a	gr HC/ tn throughput
EN22	Total weight of waste by type and disposal method	total	4.390	2189	4388	90	2.340,8	tn There is no reporting limit; all quantities are reported. Wastes are neither underground disposed nor composted nor stored
		Hazardous	2.063	1.867	51	38	1.681,1	
		Non hazardous	2.327	322	4.337	52	658,6	
		Reuse	253	0	0	0	4,04	
		Recycle	218	256	365	0	148,9	
		Incineration	262	0	646	0	0	
		recovery	3.657	1.927	0	0	2.057	
		Landfill	0	5	3377	0	130,9	


EN			BEA	BEE	BEØ	OKTA	SUBSIDIARIES	Units / Comments
EN23	Total number and volume of significant spills	>100bbbls	0	0	0	0	0	tn Furthermore, no significant leaks in storage and during transport (subcontractors). See also Section 5.3.3 for safety.
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII	(Quantity)	1,70	10,38	30,59	0	0	tn (no imports of wastes from abroad)
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff		No affected ecosystems. See also EN11, EN13 & section 4.4.					
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation		The supply of "cleaner" fuels (zero sulphur), the addition of bio-diesel to fuels and the use of cleaner self-consumption fuels contribute to the reduction of the environmental impacts from the main Group's products. More specifically, a reduction of the sulphur content, at the following fuels, has been achieved, because of significant environmental investments (actual values less < or more less << than the specs): Gasoline & diesel 0.005%w/w (2006), <0.001%w/w (2012). Air fuel 0.30%w/w (2006), <<0.30%w/w (2012) Gas oil (heating) 0.2%w/w (2006), <0.1%w/w (2012) Fuel oil (self-consumption) 2.7%w/w (2006), <1.0%w/w (2012). Moreover, the finally available fuels, from the Group's commercial companies EKO & HF, significantly contribute to the reduced emission of pollutants and the reduced fuel consumption; eg the EKO 95 Economy (up to 2% less fuel consumption) and the new BP Ultimate 95 (12 more km on average compared to conventional fuel).					
EN27	Percentage of products sold and their packaging materials that are reclaimed by category		Packaging materials are not in use since fuels are transported via pipelines, tank trucks and ships. See also section 6.3.5.					
EN28	Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with environmental laws and regulations		0	0	0	0	0	No fine or other sanction for non-compliance with environmental legislation or regulations
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce		To quantify the environmental impact caused by personnel commuting, in 2012, a study was carried out concerning personnel working at the administrations buildings (HQs, BEA, BEE & BEØ). 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 1984 tCO ₂ -eq). Moreover, the ways of raw materials and products transport were studied and it was estimated (one of the few oil companies that made such a calculation) that the transport by ship results in emission of 367 ktCO ₂ -eq (for crude deliveries, deliveries of raw materials / products, other transport and export of products).					

EN		BEA	BEE	BEØ	OKTA	SUBSIDIARIES	Units / Comments
EN30	Total	1.198.947	729.091	1.335.332	104.140	890.144	€ See also section 4.1.2
	Waste treatment and disposal	791.296	175.111	1.161.131	0	147.546	€
	Treatment of Emissions	0	19.058	0	0	0	€
	Fees for certification of environmental management system	25.000	9.000	5.000	0	8.365	€
	Equipment maintenance cost	41.061	60.538	101.715	13.140	688.233	€
	Clean up and remediation cost	341.590	465.384	67.486	91.000	46.000	€

LA Labor Practices and Decent Work Performance Indicators

LA1

Total workforce by employment type, employment contract, and region, broken down by gender

 p. 45-48

Normally there are no seasonal workers. EKO is an exception because of staff seasonal changes at the premises of airports.

HELPE

Breakdown by gender, contract and age group:

TYPE OF CONTRACT	M	F	Total
Indefinite Contract	1819	267	2086

	AGE GROUP					
	<30		30-50		>50	
	persons	%	persons	%	persons	%
M	251	12	1143	54,8	425	20.4
F	19	0,9	202	9,7	46	2.2
TOTAL	270	12,9	1345	64,5	471	22.6

APROFOS

workforce breakdown by gender & employment contract:

TYPE OF CONTRACT	M	F	Total
Indefinite Contract	106	74	180
Fixed Time	2	3	5
Supervised Workers	44	6	50
Full Timers	108	77	185

DIAXON

breakdown by gender & employment contract:

TYPE OF CONTRACT	M	F	Total
Indefinite Contract	83	15	98
Fixed Time	2	0	2
Supervised Workers	34	1	35
Student 6 months apprenticeship	1	0	1
Full Timers	118	16	134
Part Timers	0	1	1
Project Contract	2	0	2

Global Albania:

breakdown by gender & employment contract:

TYPE OF CONTRACT	M	F	Total
Indefinite Contract	4	1	5

EKO Bulgaria:

Workforce breakdown by gender & employment contract:

TYPE OF CONTRACT	A	Г
Indefinite Contract	59	1
Fixed Time	1	0

JPK Montenegro:

Breakdown of workforce by country of origin and gender:

Country	MNG	SERBIA	GRC	BOSN
M	158	4	2	1
F	68	1	0	31
TOTAL	226	5	2	32

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

TYPE OF CONTRACT	M	F
Indefinite Time	136	41
Fixed Time	29	31
TOTAL	165	72

EKO Serbia:

Breakdown of workforce by gender & type of contract:

TYPE OF CONTRACT	M	F
Indefinite Time	15	23
Fixed Time	2	6
TOTAL	17	29

HP Cyprus:

Indefinite contract and full time 40 M + 16 F

OKTA FYROM:

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

TYPE OF CONTRACT	M	F
Indefinite Time	522	111
Fixed Time	53	43
TOTAL	575	154

HF

Breakdown of workforce by gender & type of contract:


TYPE OF CONTRACT	M	F	Total
Indefinite Time	137	51	188
Fixed Time	6	0	6

EKO

Breakdown of workforce by gender & type of contract:


TYPE OF CONTRACT	M	F	Total
Indefinite Time	237	126	363
Fixed Time	10	0	10
Total	247	126	373




Total number and rate of new employee hires and employee turnover by age group, gender and region



 p. 45-48

New hires by age group and gender

		<30	30-50	>50
HELPE	M	33	17	0
	F	1	1	0
ASPROFOS	M	0	1	0
	F	3	0	0
EKO Bulgaria	M	0	1	0
	F	0	1	0
EKO Serbia	M	0	0	0
	F	0	2	0
DIAXON		0	0	0
JPK Montenegro	M	2	0	0
	F	2	0	0
OKTA FYROM	M	0	0	0
	F	1	1	0
HP Cyprus	M	0	1	0
HF	M	1	8	2
	F	3	5	0
EKO	M	0	0	0
	F	0	0	0

LA	Labor Practices and Decent Work Performance Indicators																																																																																												
	<p>New hires turnover: 0</p> <table border="1" data-bbox="569 358 1124 1004"> <thead> <tr> <th colspan="5">Employee turnover by age group & gender</th> </tr> <tr> <th></th> <th></th> <th><30</th> <th>30-50</th> <th>>50</th> </tr> </thead> <tbody> <tr> <td rowspan="2">HELPE</td> <td>M</td> <td>1</td> <td>7</td> <td>92</td> </tr> <tr> <td>F</td> <td>0</td> <td>6</td> <td>12</td> </tr> <tr> <td rowspan="2">ASPROFOS</td> <td>M</td> <td>0</td> <td>0</td> <td>18</td> </tr> <tr> <td>F</td> <td>0</td> <td>0</td> <td>18</td> </tr> <tr> <td>EKO Bulgaria</td> <td></td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td rowspan="2">EKO Serbia</td> <td>M</td> <td>0</td> <td>1</td> <td>0</td> </tr> <tr> <td>F</td> <td>1</td> <td>0</td> <td>0</td> </tr> <tr> <td>DIAXON</td> <td></td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td rowspan="2">JPK Montenegro</td> <td>M</td> <td>1</td> <td>1</td> <td>7</td> </tr> <tr> <td>F</td> <td>0</td> <td>3</td> <td>3</td> </tr> <tr> <td rowspan="2">OKTA FYROM</td> <td>M</td> <td>0</td> <td>1</td> <td>2</td> </tr> <tr> <td>F</td> <td>0</td> <td>0</td> <td>1</td> </tr> <tr> <td rowspan="2">HP Cyprus</td> <td>M</td> <td>0</td> <td>0</td> <td>1</td> </tr> <tr> <td>F</td> <td>0</td> <td>0</td> <td>1</td> </tr> <tr> <td rowspan="2">HF</td> <td>M</td> <td>0</td> <td>8</td> <td>4</td> </tr> <tr> <td>F</td> <td>0</td> <td>2</td> <td>2</td> </tr> <tr> <td rowspan="2">EKO</td> <td>M</td> <td>0</td> <td>12</td> <td>16</td> </tr> <tr> <td>F</td> <td>0</td> <td>5</td> <td>4</td> </tr> </tbody> </table> <p><i>Percentage of employees that stay in the Group (loyalty indicator, the voluntarily departures are not included)</i> HELPE 99.3% DIAXON & ASPROFOS 100% HP Cyprus 97% EKO Bulgaria 98.3% JPK Montenegro 92% OKTA FYROM: 99.9% HF: 55% has more than 10 years of service EKO: 81% has more than 10 years of service</p>	Employee turnover by age group & gender							<30	30-50	>50	HELPE	M	1	7	92	F	0	6	12	ASPROFOS	M	0	0	18	F	0	0	18	EKO Bulgaria		0	0	0	EKO Serbia	M	0	1	0	F	1	0	0	DIAXON		0	0	0	JPK Montenegro	M	1	1	7	F	0	3	3	OKTA FYROM	M	0	1	2	F	0	0	1	HP Cyprus	M	0	0	1	F	0	0	1	HF	M	0	8	4	F	0	2	2	EKO	M	0	12	16	F	0	5	4
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LA3	<p><i>Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation</i></p> <p> p. 45, 48-50</p> <p>HELPE From the list shown in section 5, the following benefits are not provided to temporary employees: loans, supplementary insurance schemes, students/pupils awards and allowances for employees' children.</p> <p>ASPROFOS Benefits to full time employees: school allowance, summer activities for children, childcare allowance, award to employees' children for excellent school performance, extra financial support to employees due to marriage or birth.</p> <p>DIAXON Benefits to indefinite contract employees: summer camps, childcare allowance, loans, school allowance, students' allowance, award to employees' children for excellent 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> <p>EKO Bulgaria Additional Health insurance, Food vouchers, Corporate Mobile phones. EKO Serbia laptop, corporate mobile, private health insurance to indefinite contract employees. HP Cyprus: pension fund, welfare fund, contribution to the national social security system (legal obligation), health fund, medical insurance, life insurance program JPK Montenegro: long service allowance, humanitarian support, scholarships, Xmas presents to employees' children. OKTA FYROM: long service allowance, financial help for children of employees who are pupils/students, financial help for employees (sickness, death, disaster), awards for children of employees with excellent performance in high school, severance pay for retirement, Xmas gifts to employees.</p>																																																																																												

LA	Labor Practices and Decent Work Performance Indicators	
		EKO & HF: Benefits to employees with fixed time contract EXPENSES FOR PREVENTIVE MEDICAL TESTS WEDDING/BIRTH ALLOWANCE SHOPPING VOUCHERS COMPANY'S PARTICIPATION IN NURSERY EXPENSES AWARDS ON ACHIEVING SAFETY GOALS SUMMER CAMPS FOR EMPLOYEES' CHILDREN
LA4	Percentage of employees covered by collective bargaining agreements	 p. 61 Number of employee unions (per company) and percentage of employees covered by collective bargaining agreements: HELPE 3 - 94% EKO 1 - 94% HF 2 - 100% ASPROFOS 1 - 95,6% DIAXON 1 - 99% JUGOPETROL 1-98% OKTA 1 - 97% HELPE CYPRUS 3 - 100%
LA5	Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements	The minimum notice period of one month applies to all major changes. In cases were changes concern large groups of employees, the notification is made by the Administration. It can be done by emails, personal appeal, personal letters, notes, notification of decisions or Administrative Service Board. Any change in conditions of individual contracts is disclosed to interested parties under the provisions of PD 156/94 within one month of the upcoming change. Depending on the local/national legislation, the minimum notice period might vary, eg in Bulgaria, Serbia, Skopje the minimum period is 30 days, in Montenegro is 5 days, in Cyprus is 2-3 months.
LA6	<i>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</i>	<i>100% of personnel</i>  p. 50-52
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender	 p. 56, (table 5.3.3) Not all facilities keep statistics concerning accidents distribution by gender. Clarifications: <ul style="list-style-type: none"> • The Injury rate (IR) indicator corresponds to the AIF indicator of table 5.3.3, except that the multiplying coefficient of 1.000.000 (in Europe) instead of 200.000 (in USA). • The ODR indicator is mentioned in table 5.3.3 (last two lines), except that the multiplying coefficient of 1.000.000 (in Europe) instead of 200.000 (in USA). • The Absentee rate (AR) is mentioned at the end of table 5.3.3, but there is not a systematic documentation at all facilities.

LA	Labor Practices and Decent Work Performance Indicators	
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases	<p>Program amounting to 10,500 € in order to support HELPE's employees to stop smoking. The program involved 21 employees.</p> <p>Educational presentation was held at ASPROFOS on "Information for breast cancer".</p> <p>In cases of serious illness or loss of a family member of the employee, the company provides support by a psychologist or social worker.</p> <p>At the facilities' infirmaries, the physicians train the shift working employees on First Aid provision, handling of respirators (recovery from major accidents), means of rescue from enclosed workplaces, etc.</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> <p>In DIAXON, for precautionary reasons, an employee changed position and working hours because of a hearing problem.</p>
LA9	<i>Health and safety topics covered in formal agreements with trade unions</i>	<p> p. 63 (table 6.3.1)</p> <p>Facilities certification in accordance with OHSAS 18001/EAOT 180, see also section 6.3.1.</p> <p>H & S issues, agreed in collective agreements with unions, refer to the Internal Labor Regulations, which is accessible on the corporate network. An agreement is signed among the Group's companies and the relevant labor unions concerning safety personnel.</p> <p>Internal Safety & Prevention Services (ESYPP) operates under PD95/1999) and aims at monitoring the occupational health and safety and implementing measures to minimize accidents.</p> <p>Occupational Health and Safety Committees (EYAE) operating at each facility, consisting of elected representatives of employees. 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. Moreover, the committees highlight H & S problems in the workplace, participate in the solution, improve H & S procedures or audit processes. See also:</p> <ul style="list-style-type: none"> • Internal Labor Regulation Article 45 • EKO By laws Article 28 • Group's Code of Conduct chapter 7.1 <p>Outsourced Safety & 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 the implementation of the relevant labor legislation and reports to the management of the facility. The H & S issues are covered 100% by local agreements.</p> <p>There are formal agreements covering issues such as:</p> <ul style="list-style-type: none"> • Distribution 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>At HELPE Cyprus two Safety Committees are operating; their composition and role is governed by relevant legislation. Elections for the committees' staff take place every three years. The members of the two safety committees (one for Nicosia and one for Larnaca) represent the employees for all health and safety issues.</p> <p>At OKTA, local agreements cover issues such as: Personal protective equipment; Participation of workers representatives in health and safety inspections, audits, and accident investigations; Training and education; Right to refuse unsafe work; Periodic inspections.</p>
LA10	Average hours of training per year per employee by gender, and by employee category	<p> p. 29 (environmental training), p. 48-50 (training programs, training investment and man-hours), p. 53 (H & S training)</p> <p>Statistical information concerning training expenses, training hours and breakdown by gender and training issue are presented in Tables 5.2.1 - 5.2.3, at page 49.</p> <p>The Group's education investment was 721,000 € and the total training hours were 121,855.</p> <p>Training hours breakdown per company is presented in Tables 5.2.1-5.2.2; whereas indicative breakdown for Bulgaria, Serbia and Cyprus is as follows:</p>


Employees' Category	Senior & Top Management		Middle Management		Other Staff	
Gender	M	F	M	F	M	F
No. of Employees by gender	1	0	6	3	23	28
Total No. of Employees	1		9		51	
No. of Training Hours by Category and Gender	4		160	53	225	211
No. of Training Hours by Category	4		213		436	
Average Training Hours by category & employee	4		20		15	

Employees' Category	Senior & Top Management		Middle Management		Other Staff	
Gender	M	F	M	F	M	F
No. of Employees by gender	3	0	5	5	9	24
Total No. of Employees	3		10		33	
No. of Training Hours by Category and Gender	0	0	70	70	126	336
No. of Training Hours by Category	0		140		462	
Average Training Hours by category & employee	0		14		14	



Employees' Category	Senior and Top Management		Middle Management		Other Staff	
Gender	M	F	M	F	M	F
No. of Employees by gender	4	0	5	1	31	15
Total No. of Employees	4		6		46	
No. of Training Hours by Category and Gender	60	0	80	23	430	207
No. of Training Hours by Category	60		103		637	
Average Training Hours by category & employee	15		17.16		13.84	

LA11

Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings

 p. 48-50

The HR Department, as part of its efforts to support lifelong learning, aims at the continuous improvement of the skills of all the employees by implementing long in-house education & training programs to ensure their "continuous employment". Indicative topics covered by these programs are: learning English, economics for non-economics managers, legal for non-legal managers, principles of management, basic management skills and techniques of effective presentations. See also section 5.2.

LA	Labor Practices and Decent Work Performance Indicators																																																				
		<p>In case of an employee resignation or retirement:</p> <ul style="list-style-type: none"> • a compensating payment is provided, taking into account the age and experience. • a supporting program helping to find another job is made available. <p>In principle, the Group resolves labor contracts when employees meet the conditions for full retirement.</p>																																																			
LA12	<p><i>Percentage of employees receiving regular performance and career development reviews, by gender</i></p>	<p>The percentage of employees</p> <table border="1" data-bbox="574 535 1451 891"> <thead> <tr> <th colspan="3">Employees % receiving regular performance and career development review per company</th> </tr> </thead> <tbody> <tr><td>HELPE</td><td></td><td>100%</td></tr> <tr><td>EKO</td><td></td><td>100%</td></tr> <tr><td>HF</td><td></td><td>100%</td></tr> <tr><td>ASPROFOS</td><td></td><td>98%</td></tr> <tr><td>DIAXON</td><td></td><td>100%</td></tr> <tr><td>EKO SERBIA</td><td></td><td>100%</td></tr> <tr><td>JUGOPETROL</td><td></td><td>93%</td></tr> <tr><td>OKTA</td><td></td><td>98%</td></tr> <tr><td>EKO BULGARIA</td><td></td><td>100%</td></tr> <tr><td>HELPE CYPRUS</td><td></td><td>41%</td></tr> </tbody> </table> <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 (security, environment, etc.) with weighting 20%.</p>	Employees % receiving regular performance and career development review per company			HELPE		100%	EKO		100%	HF		100%	ASPROFOS		98%	DIAXON		100%	EKO SERBIA		100%	JUGOPETROL		93%	OKTA		98%	EKO BULGARIA		100%	HELPE CYPRUS		41%																		
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LA13	<p>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>At the BoDs of the Group companies - included in this report - the breakdown of the 67 board members, at 11 companies, is:</p> <table border="1" data-bbox="574 1084 1303 1340"> <thead> <tr> <th colspan="3">67 board members at 11 companies</th> </tr> <tr> <th>Age group</th> <th>No. of persons</th> <th>%</th> </tr> </thead> <tbody> <tr><td><30</td><td>0</td><td></td></tr> <tr><td>30-50</td><td>26</td><td>39%</td></tr> <tr><td>>50</td><td>41</td><td>61%</td></tr> <tr> <th>Gender</th> <th>No. of persons</th> <th>%</th> </tr> <tr><td>Female</td><td>4</td><td>6%</td></tr> <tr><td>Male</td><td>63</td><td>94%</td></tr> </tbody> </table> <p>Women in senior management positions: approx 10%.  p. 146 (Executive versus non executive members of BoD: 3/10).  p. 46-47 (tables 5.1.2a & b for HELPE's employees breakdown).</p> <p>At the end of 2011, the Group employed, as permanent employees, 148 people with special needs.</p> <p>HELPE Employee breakdown by age group and by other indicators of diversity:</p> <table border="1" data-bbox="574 1617 1164 1775"> <thead> <tr> <th colspan="3">Age Group</th> <th colspan="2">Persons with Special Needs</th> </tr> <tr> <th><30</th> <th>30-50</th> <th>>50</th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td>12.94%</td> <td>64.48%</td> <td>22.58%</td> <td>3.19%</td> <td>11.24%</td> </tr> </tbody> </table> <p>ASPROFOS</p> <table border="1" data-bbox="574 1850 960 1979"> <thead> <tr> <th>Age Group</th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr><td><30</td><td>0</td><td>2</td></tr> <tr><td>30-50</td><td>46</td><td>54</td></tr> <tr><td>>50</td><td>60</td><td>18</td></tr> </tbody> </table>	67 board members at 11 companies			Age group	No. of persons	%	<30	0		30-50	26	39%	>50	41	61%	Gender	No. of persons	%	Female	4	6%	Male	63	94%	Age Group			Persons with Special Needs		<30	30-50	>50	M	F	12.94%	64.48%	22.58%	3.19%	11.24%	Age Group	M	F	<30	0	2	30-50	46	54	>50	60	18
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DIAXON

Age Group	M	F
<30	2	0
30-50	77	15
>50	4	0

Global Albania

Age Group	M	F
<30	0	0
30-50	4	1
>50	0	0

EKO Bulgaria

Age Group	M	F
<30	4	9
30-50	21	21
>50	5	1

EKO Serbia

Age Group	M	F
<30	3	7
30-50	12	20
>50	1	3

HP Cyprus

Age Group	M	F
<30	0	3
30-50	26	13
>50	14	0

JPK Montenegro (2 employees with special needs)

Employee breakdown by country of origin and gender:

	MNG	Serbia	Hellas	Bosnia
M	158	2	4	1
F	68	0	1	3

Employee breakdown by religion and gender:

	Orthd	Cathl	Muslims
M	142	16	7
F	65	7	0

Employee breakdown by age group and gender

	<30	30-50	>50
M	6	80	79
F	10	49	13

OKTA FYROM (65 employees with special needs,42 M+ 4F)

Employee breakdown by nationality gender:




	ALB	SRB	GR	BUL	MNG	TRK	CRT
M	9	32	2	5	3	3	0
F	2	5	0	0	1	0	2

Employee breakdown by age group and gender:




	<30	30-50	>50
M	41	106	428
F	15	58	81


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		<p>HF Employee breakdown by age group and gender:</p> <table border="1" data-bbox="571 426 1152 562"> <thead> <tr> <th>AGE GROUP</th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>3</td> <td>2</td> </tr> <tr> <td>30 - 50</td> <td>110</td> <td>41</td> </tr> <tr> <td>>50</td> <td>23</td> <td>7</td> </tr> </tbody> </table> <p>EKO Employee breakdown by age group and gender:</p> <table border="1" data-bbox="571 635 1182 771"> <thead> <tr> <th>AGE GROUP</th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>1</td> <td>2</td> </tr> <tr> <td>30-50</td> <td>170</td> <td>110</td> </tr> <tr> <td>>50</td> <td>67</td> <td>14</td> </tr> </tbody> </table>	AGE GROUP	M	F	<30	3	2	30 - 50	110	41	>50	23	7	AGE GROUP	M	F	<30	1	2	30-50	170	110	>50	67	14
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LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation	<p>Non-essential issue because the Group does not practise any differentiation between men and women on the wage system. The fee 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.</p> <p>For example at OKTA (FYROM) the ratios of the basic salary of men and women by category are: for senior managers: 1:1, for middle managers: 1: 1, for operators: 1: 1</p>																								
LA15	<i>Return to work and retention rates after parental leave, by gender</i>	<p>Complying with the relevant legislation all employees are entitled to maternity / paternity leave.</p> <p>HELPE: 18 (F) employees took parental leave and 8 returned. The retention rate after returning from parental leave is 100%.</p> <p>ASPROFOS, Hellenic Petroleum Cyprus: 0</p> <p>DIAXON: 1 (M) and 1 (F). The return & retention rate after parental leave is 100%.</p> <p>EKO Bulgaria: 6 (F) employees took parental leave and two returned. The retention rate after parental leave is 100%.</p> <p>EKO Serbia: 2 (F) employees took parental leave and one returned. The retention rate after returning from parental leave is 100%.</p> <p>Montenegro: 9 (F) employees took parental leave and four returned. The retention rate after returning from parental leave is 100%.</p>																								
HR	Human Rights																									
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening	<p>The Code of Ethics (sections 7.2 & 7.3) and the Internal Labor Regulations (article 2.3) provide guidance on the protection of human rights throughout the supply chain. Both documents make clear references to the respect of the human rights. Furthermore, all employees are trained, both documents are accessible by all employees in the corporate network and copies have been distributed throughout the Group.</p> <p>The Procurements Regulation (in the new revision in 2013) shall include an article related to sustainable development terms, which shall be an obligatory part of every new contract. In 2012, the screening percentage was 0.</p> <p>The Group's companies, where appropriate, use evaluation questionnaires, covering topics such as child labor, respect to HR, labor rights, equal opportunities, H & S, etc.</p>																								
HR2	Percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken	<p>Suppliers who cooperate with the Group are subject to evaluation in order to monitor their compliance with specific standards on human and labor rights.</p> <p>The Procurement Dept has developed a relevant questionnaire, which is sent to suppliers as of 2012. There was no reference on incidents and no action was taken in 2012.</p>																								








HR	Human Rights	
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	<p>100% of employees were trained on HR issues through the company's Internal Labour Regulation and the Code of Ethics, which is available at the intranet, (ILR articles 22, 23, 26, 38 & 39, CoE chapter 7).</p> <p>Moreover, in 2012-2013 a wide training program, including issues on CSR and human rights, has been developed and implemented, (in 2012, 20 employees attended one hour training on human rights).</p>
HR4	Total number of incidents of discrimination and corrective actions taken	The HR Department monitors such phenomena and acts accordingly in cooperation with the union of employees. No relevant reports in 2012.
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights	The HR & Procurement Departments (in cooperation with the union of employees) monitor such phenomena and act accordingly. No report in 2012.
HR6	Operations and significant 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 Departments (in cooperation with the union of employees, where appropriate) monitor such phenomena and act accordingly. No report in 2012.</p> <p>The recruitment policy of the Group has a lower limit for recruitment the age of 18 years.</p>
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor	The HR & Procurement Departments monitor such phenomena and act accordingly (in cooperation with the union of employees and the work councils, where appropriate). No report in 2012.
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations	<p>All Group's security personnel (60) are properly trained. The permanent personnel are trained, immediately after their recruitment, on HR through the Internal Labour Regulation and the Code of Ethics.</p> <p>The group is outsourcing security services to a third party. This party supports the principles of the Universal Declaration of Human Rights of the UN and applies those principles in management procedures and practices. Furthermore, measures are taken to ensure that the work of employees complies with internationally accepted human rights treaties. During basic training the guards refer to the Code of Ethics of the partner company which contains elements of corruption and human rights. After completing basic training, a copy of the Code of Conduct is given to each member of the security personnel. There are no armed guards at the premises of the Group.</p>
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	No such incident
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments	There were no reviews or assessments because it have not either arisen or reported related problems.



HR	Human Rights	
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms	<p>The HR Department monitors phenomena of human rights violation and acts accordingly, in cooperation with the union of employees and the work councils.</p> <p>No report in 2012.</p>
S0	Society Performance Indicators	
S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs	<p> p. 68. In 2011-2012 quantitative and qualitative surveys took place based on a structured questionnaire interviews involving selected individuals from local communities. Such stakeholders engagement surveys are repeated every two years.</p> <p>The 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. It was recorded that local communities anticipate actions with a focus on supporting the unemployed, health services, support of elderly and vulnerable groups in general.</p> <p> p. 69-75. Analytical presentation, by country (100% operations), actions taken in the framework of surveys, consultation and communication with local communities.</p> <p>Furthermore, during the design phase of a new investment, provision is made for direct and indirect impacts. An example is the project "Upgrading and Modernization of Refinery" which provides for an increase of jobs locally and support of the local market. Moreover, the operational planning of any investment (such as upgrading the Elefsina refinery) includes for the study of direct and indirect impacts on the local community..</p>
S02	Percentage and total number of business units analyzed for risks related to corruption	<p>All business units are controlled for risks associated with corruption; following standard internal auditing procedure. The procedure is consistent with the Group's Code of Conduct.</p> <p>No relevant report or complaint in 2012.</p> <p>In 2012, the Departments of Internal Auditing was audited by a third party.</p>
S03	Percentage of employees trained in organization's anti-corruption policies and procedures	<p>100% of the employees (5% management employees, with minor differentiation per company) are trained on anti-corruption policies and procedures through the Internal Labour Regulation and the Code of Ethics (copies of the documents are distributed to all employees).</p> <p>For 2012-2013 a training program has been designed and is implemented with special attention to corporate social responsibility, including the issues of corruption and protection of human rights.</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).</p> <p>Procurement personnel attend relevant seminars and are the guardians of the Code of Procurement.</p>
S04	Actions taken in response to incidents of corruption	<p>No actions planned in 2012 (apart from relevant training) to address incidents of corruption and no reported incidents to the administration board, the BoD or the union representatives.</p> <p>However, there is provision for administrative and legal measures in accordance with the Internal Labour Regulations. Moreover, regular audits are planned by the relevant auditing departments.</p> <p>HELPE & EKO participated in a survey evaluating the implementation of policies combating corruption, organized by Transparency International - Greece.</p> <p>During 2012 the Competition Commission investigated on complaints of shipping companies for prices of fuel oil and complaint of trailers' shipowners for towage operations specifications at BEΘ's port facilities. The company was asked to provide information to the Competition Commission in both cases on answering relevant questionnaires. In the second case, the CC has stated in writing that he is unauthorized, while in the former there is so far nothing new on that.</p>
S05	Public policy positions and participation in public policy development and lobbying	<p> p. 27, 78-80</p> <p>The Group participates in professional and business associations. The Managing Director is member of the BoD of the Hellenic Federation of Enterprises (HFE) and vice president of the Sustainability Council of the HFE (established in 2008 to promote sustainable development in the Greek business reality and create a framework for dialogue between business, state and society).</p>

S0	Society Performance Indicators	
S06	<i>Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country</i>	Zero contribution, (such contribution is prohibited by the Code of Ethics).
S07	<i>Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes</i>	<p>There is a procedure pending before the Supreme Administrative Court (Conseil d'état) for the annulment of a fine (circa 5 million Euros) imposed by the Greek Competition Commission. The hearing took place in 22.06.2011 and the decision is still pending. A potential rejection of HEP's appeal will not have a negative impact to the company, since the relevant fine (€5.8 million) has already been paid since 2008.</p> <p>There was one legal action in 2011 regarding dominant position of JPK in market of providing fuel storage services on geographical area of Bar.</p> <p>There was no fine imposed in that case, but just an order to implement clear and transparent commercial conditions for potential users of the fuel storing service.</p> <p>Cyprus</p> <p>(a) The Commission for the Protection of Competition has decided to re-open its investigation against the Petroleum companies in Cyprus (wholesale). In its previous Decision dated 24.5.2009, a fine of €14,269,000,00 was imposed against the company. This decision was subsequently annulled by the Supreme Court of Cyprus on 25.5.2011. The re-examination of the case will be conducted by the newly constituted Commission on the basis of the documents collected in the context of the previous investigation of the previous Commission.</p> <p>(b) Ghinis Petrol Station Ltd have also filed a complaint with the Commission for the Protection of Competition against the Company alleging abuse of dominant position related to refusal to supply. The Company has prepared and filed replies to questionnaires sent by the Commission. The investigation is still pending before the Commission.</p> <p>Montenegro</p> <p>In October 2012, the Competition Authority initiated procedure against JPK based upon a complaint filed by the Union of Free Trade Unions of Montenegro with respect to the COMO system applied in its retail network.</p> <p>On January 28th 2013, JPK received Conclusion of the Competition Authority terminating the procedure that was initiated upon the above Request. This Conclusion remains subject to appeal.</p>
S08	Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations	<p>There were no fines from the Labour Inspectorate, on labor disputes, concerning the Group's human resources departments.</p> <p>There were no environmental fines.</p> <p>Total number of non monetary sanctions: 9 revoked licenses for shorten customs procedure.</p> <p>Montenegro: Monetary value of important fines 54.161 eur (out of which 48.916 eur for labour cases from previous years) 5 decisions for non-compliance with legislation (out of which 2 labor cases from previous years). 2 court decisions from labor court cases, in total value of 48.916 eur.</p> <p>Petrol stations were fined €248,000 for fraud and €40,000 problem at pumps; all fines were appealed in 2012</p>
S09	Operations with significant potential or actual negative impacts on 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) and health and safety of employees and local communities (which are discussed at section 5.3: security operation, inspection, contingency plans, training, behavior improvement, investment, indicators and targets).
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities	<p>Significant impacts may occur in the stages of: entry of a new activity, running or exit from it.</p> <p>The operation of the facilities may have environmental impacts (analytically presented at Section 4: emissions, climate change, pollutants, education, investments, protection of biodiversity) and health and safety of employees and local communities (which are discussed at section 5.3: security operation, inspection, contingency plans, training, behavior improvement, investment, indicators and targets).</p>

PR	Product Responsibility	
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures	<p> p. 66</p> <p>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 phases (production, storage, transport, distribution, uses).</p> <p>Scope is the evaluation of the permissible level of dose/concentration to which humans and environment may be exposed in order to conclude the proper Risk Management Measures (RMMs).</p> <p>The assessment has been conducted for the whole life cycle of each substance and includes the exposure scenarios for every use. For this purpose, communication up and down the supply chain is continuous, as REACH Regulation requires.</p> <p>Products are properly labeled for hazards and users are provided with the guidance on safe use through the extended Safety Data Sheets (e-SDSs).</p>
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	No incidents of non-compliance.
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to	<p> p. 66-67</p> <p>Copies of the Material Safety Data Sheets (MSDS) are provided with packaged products such as lubricants.</p> <p>The products breakdown is presented in Table 3.2 of the report.</p> <p>For the non-packaged products there is no such requirement.</p> <p>The safety sheets for lubricants and fuels are available to the public through the website of the Group.</p>
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>Sections 6.3.2, 6.3.3 and 6.3.4 analytically present the auditing and inspection processes during the products sale.</p>
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	<p> p. 64-76</p>

PR	Product Responsibility	
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship	<p> p. 66-67</p> <p>Group monitors developments in legislation, international standards and voluntary codes of conduct to continuously adapt its practices and ensure compliance with best available practices.</p> <p>All activities, such as advertising and product marketing, agree fully with the Code of Ethics of the Hellenic Association of Advertisement Agencies and the Hellenic Advertisers Association. The marketing staff participates in educational programs and seminars to keep abreast of best practices and new regulations.</p> <p>Group's subsidiaries abroad follow similar approach. For example in Bulgaria, Serbia and Cyprus the Group's Code of Conduct and the codes of national / local agencies (such as the Advertising Body, the Cyprus Authority of Television and Radio, the Bulgarian advertising agencies association) are fully implemented</p>
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	No incidents of non compliance. Full compliance with relevant regulations/codes (eg unfair competition and consumer protection).
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	No complaints. Records of personal customer data fully comply with relevant legislation and are fully harmonized with EU law.
PR9	Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services	<i>No such fines</i>

OG	Oil & Gas Sector Supplement Specific Indices	
OG1	Volume and type of estimated proved reserves and production	<p> p. 3 (REPORTING BOUNDARIES)</p> <p>Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.</p>
OG2	Total amount invested in renewable energy	<p> p. 43</p> <p>The operation of 4 solar farms with a total power of 1,400kW started in 2012, in HELPE's property.</p> <p>The investment in 2012 was € 2.850.000.</p> <p>See also Government Press, 2nd edition, serial number 2432, 02.11.11, tables 1-5</p>
OG3	Total amount of renewable energy generated by source	<p> p. 43</p> <p>The electricity produced by photovoltaic in 2012 was 888 MWh.</p>
OG4	Number and percentage of significant operating sites in which biodiversity risk has been assessed and monitored	<p> p. 40</p> <p>There are no such areas near the 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.</p>
OG5	Volume of formation or produced water	<p> p. 3 (REPORTING BOUNDARIES)</p> <p>Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.</p>
OG6	Volume of flared and vented hydrocarbon	<p>Air fuel (hydrocarbons) flared at the refineries, based to the verified ETS reports:</p> <p>Aspropyrgos refinery (BEA): 1,716,344 Nm³</p> <p>Elefsina refinery (BEE): 42,042,461 Nm³</p> <p>Thessaloniki refinery (BEΘ): 1,938 tn</p> <p>OKTA refinery: 274,737 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 2012.</p>
OG7	Amount of drilling waste (drill mud and cuttings) and strategies for treatment and disposal	<p> p. 3 (REPORTING BOUNDARIES)</p> <p>Not applicable because the hydrocarbons exploration and production activity is out of the scope of this report.</p>
OG8	Benzene, lead and sulfur content in fuels	<p> EN26, table 7.3.2 of the report.</p> <p>See also section 4.3.3 "less than the legislative imposed lead and sulfur content".</p>
OG9	Operations where indigenous communities are present or affected by activities and where specific engagement strategies are in place	<p>No Group's operations in/adjacent to indigenous peoples' communities.</p>
OG10	Number and description of significant disputes with local communities and indigenous peoples	<p>None.</p>
OG11	Number of sites that have been decommissioned and sites that are in the process of being	<p>There were and are not going to be sites decommissioned.</p>

OG	Oil & Gas Sector Supplement Specific Indices	
OG12	Operations where involuntary resettlement took place, the number of households resettled in each and how their livelihoods were affected in the process	None.
OG13	Number of process safety events, by business activity.	No such incident.  p. 58 (Table 5.3.4 in section 5.3.4)
OG14	Volume of biofuels produced and purchased meeting sustainability criteria.	 p. 42 See also Government Press, 2nd edition, serial number 2432, 02.11.11, tables 1-5.

7.4 | Verification Statement

Since 2008 we invite a globally recognized independent body to verify and validate the Group's Corporate Responsibility Report.

This year the TUV AUSTRIA HELLAS carried out this assessment in accordance with the:

- GRI Guidelines G3.1 and the Oil & Gas Sector Supplement
- the UNGC 24 criteria, CoP advanced level

Our goal is to further extend the assurance of the integrity and objectivity of the provided information.

The GRI report application level matrix and the relevant statement of assurance are following:

REPORT APPLICATION LEVEL		C	C+	B	B+	A	A+
Standard Disclosures	G3 Profile Disclosures OUTPUT	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
	G3 Management Approach Disclosures OUTPUT	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach Disclosures for each Indicator Category	✓
	G3 Performance Indicators & Sector Supplement Performance Indicators OUTPUT	Report on a minimum of 20 Performance Indicators, including at least one from each of: Economic, Social and Environmental.		Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility		Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	

*Sector supplement in final version

TÜV AUSTRIA Hellas

Assurance Statement

for Hellenic Petroleum's Corporate Responsibility Report 2012

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 2012 ('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, apart from the inspection of Management Systems.

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2012 annual report and financial statement which have been audited by other third parties.

Scope of Assurance

The Provider undertook the following tasks during June 2013:

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, 1st of July 2013

Sifakis Nikolaos

Lead Auditor



Kallias Yiannis

General Manager

TÜV AUSTRIA Hellas

ATHENS: 429, Mesogeion Ave., Agia Paraskevi

Branch Offices in Greece: THESSALONIKI-CRETE

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

TÜV AUSTRIA Hellas

Assurance Statement

for Hellenic Petroleum's Corporate Responsibility Report 2012

Information on the Assurance Statement

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The Provider has not offered any consulting services to the Company, apart from the inspection of Management Systems.

Economic and financial data were not audited. Instead, they were assessed with respect to the information contained in the 2012 annual report and financial statement which have been audited by other third parties.

Scope of Assurance

The Provider undertook the following tasks during June 2013:

1. Reviewed the Report against the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines G3.1 and confirmation of the application level (GRI Application Level Check).
2. Visited the Company's Head Offices in Athens and its refineries located in Aspropyrgos, Eleusina and Thessaloniki in order to evaluate the systems for generating, gathering and managing information included in the Report.
3. Performed checks of the reliability and accuracy of performance information disclosed in the entire Report and the processes for capturing and reporting such data.

Conclusions

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



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

The Provider concurs that the criteria for GRI-G3.1 Application Level “A” 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:

- ☞ Adaption to the GRI-G4 Sustainability Reporting Framework
- ☞ 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.

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7.5 | Abbreviations - Glossary

This list of abbreviations and terms is related to this report and aims to facilitate, the unfamiliar with such terminology, reader.

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.
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	the Centre for Chemical Process Safety.
COMO	Company owned & company managed petrol stations.
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/CommunicatingProgress/ .
CSR	Corporate Social Responsibility.
EKO	Stands for the Group's subsidiary EKO ABEE.
EK	Stands for the Group's subsidiary HELLENIC FUEL (ex BP).
ΕΛΠΕ	Stands for HELLENIC PETROLEUM.
ELOT	The Greek Standardization Organization.
ESYPP	Stands for Internal Safety & Prevention Services, an operational unit, within an organisation, operating under PD95/1999, and aiming at monitoring the occupational health and safety and implementing measures to minimize accidents.
EMAS	The EU Eco-Management and Audit Scheme (EMAS) is a management tool for companies and other organisations to evaluate, report and improve their environmental performance.
EUROPIA	The European Petroleum Industry Association.
EU - ETS	European Union GHG Emission Trading Scheme.
Executive/non-executive Board Member	The BoD defines as executive members the members which are responsible with everyday business management; whereas non-executive are the members which are responsible for the promotion of corporate issues. The number of non-executive BoD members should be, at least, one third of the total number of BoD members.
EXYPP	stands for Outsourced occupational health and safety & Prevention Services. Where appropriate an organisation instead of having ESYPP may outsource the monitoring of the occupational H & S activities to a properly qualified external partner (EXYPP). This partner (EXYPP) is responsible for the implementation of the relevant labor legislation and reports to the management of the facility.
EYAE	Stands for employee committee for occupational health & safety.

GHG	Green House Gases.
GRI	Global Reporting Initiative, Sustainability Reporting Guidelines. While this Report endeavours to address many of the GRI's key performance indicators, it is a summary of progress against priorities we ourselves set.
GROUP	Stands for the HELLENIC PETROLEUM Group, unless it is otherwise stated.
HELLENIC PETROLEUM	Refers to the HELLENIC PETROLEUM Group, unless it is otherwise stated.
HELPE stands	For HELLENIC PETROLEUM.
HF	Stands for the Group's subsidiary HELLENIC FUEL (ex BP).
HFE	Stands for the Hellenic Federation of Enterprises.
HMA	Hellenic Management Association.
HR	Stands for either for human rights or human resources.
HSE	Health - Safety - Environment.
LDAR	Leak Detection and Repair system.
LWIF	Lost Workday Injury Frequency, is calculated from the number of Lost Workdays Injuries (LWI) divided by the number of hour worked expressed in millions.
LWIS	Lost Workday Injury Severity.
MTC	Medical Treatment Cases.
OHSAS	Occupational Health and Safety Accreditation System.
PRTR	Pollutant Release and Transfer Register, http://prtr.ec.europa.eu/ .
PSIF	Process Safety Incident Frequency.
REACH	The European regulation for "Registration, Evaluation and Authorization of Chemicals" (1907/2006).
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
Triple Bottom Line	Report not only on financial performance but, also, on the environmental and social performance of a company.
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.
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.
VOC	Volatile Organic Compounds.



8 | CORPORATE RESPONSIBILITY REPORT FEEDBACK (Questionnaire Improvement)

HELLENIC PETROLEUM Group's Corporate Affairs Division / CSR Department coordinated and was responsible for the preparation of this annual "2011 Sustainable Development Report".

However, other departments within the Group also contributed to its preparation such as the Human Resources, Environment and Health & Safety, Internal Audit, Finance, Marketing, Purchasing and Legal Departments. The Group's subsidiaries also contributed data which is included in the Report.

The report is addressed to all of our stakeholders who wish to keep track of all of HELLENIC PETROLEUM's advancements in all areas of Sustainable Development.

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

Group contact details and headquarters:

Group Corporate Affairs Division
Group CSR Department
8A Chimarras St., Maroussi 151 25
Tel.: +30 210 630 2241, +30 210 630 2894,
Fax: +30 210 630 2573
e-mail: info@helpe.gr

Readers of this report who would like more information or clarification may contact the Group's CSR Department at the above address or visit the Group's website:

www.hellenic-petroleum.gr or www.helpe.gr



Report's Improvement Questionnaire

Please, take a few minutes to fill out the questionnaire as we are asking for your opinion on the 2012 HELLENIC PETROLEUM's Corporate Responsibility Report. We value your opinion as it helps us to improve.

1. Which of the following interest you the most?

(please mark with an X)

- Corporate Governance & Transparency
- Social Responsibility & CSR Actions
- The Environment
- Health & Safety
- Our People
- Stakeholders' information (shareholders, employees, neighbouring municipalities, customers, suppliers, NGOs etc)

2. Mark the statements (with an X) as to how much you agree with the following statements.

(1) Completely disagree (2) Disagree (3) Neither agree/neither disagree (4) Agree (5) Completely agree

	(1)	(2)	(3)	(4)	(5)
The principles and issues are sufficiently covered in accordance with the company's sustainable development strategy.					
The content is complete and clear.					
The Report's structure is functional and sufficient.					
The presented information is reliable and accurate.					
The tables and charts are easily understood and depicted in a satisfactory manner.					
The photographs and images positively enhance the Report making it easier to read and more attractive.					
I will recommend the report to other readers.					



3. Assess in the order of priority from 1 to 5 the following areas which the company has developed significant initiatives and activities in, in your opinion.

- Safety
- Working environment
- Protecting the environment
- Caring for society and the environment
- Programs supporting local communities
- Transparency
- Human Rights

4. Please specify any issues which haven't been included in the 2012 Corporate Responsibility Report which you would like to see featured in the next issue or areas that need improving

.....

.....

.....

5. After reading the 2012 Corporate Responsibility Report, has your opinion of HELLENIC PETROLEUM been influenced at all?
(mark only one of the below with an X)

- Positively influenced Has not been influenced Negatively influenced

6. Which of the following groups of stakeholders do you belong to?

- | | | |
|--|--|--------------------------------------|
| <input type="checkbox"/> Employee organization | <input type="checkbox"/> Local community | <input type="checkbox"/> NGO |
| <input type="checkbox"/> Media | <input type="checkbox"/> Supplier | <input type="checkbox"/> Customer |
| <input type="checkbox"/> Citizen | <input type="checkbox"/> Authorities | <input type="checkbox"/> Other |

Thank you for your cooperation.

The above data will be collected and used so that we can improve our Corporate Responsibility Report as well as actions and initiatives in regard to the HELLENIC PETROLEUM Group's Corporate Responsibility.

Send to:

Address: HELLENIC PETROLEUM, Group CSR Dpt., 8A Chimarras St., Maroussi 151 25

Email: rsoulaki@helpe.gr

Fax: +30 210 63 02 573



HELLENIC
PETROLEUM