

2010

CORPORATE RESPONSIBILITY & SUSTAINABLE DEVELOPMENT REPORT



HALCOR
METAL WORKS S.A.

2010

CORPORATE RESPONSIBILITY &
SUSTAINABLE DEVELOPMENT REPORT

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About the Report

The 2010 Corporate Responsibility and Sustainable Development Report is the third report published by HALCOR and is a continuation of the previous report published in 2009. This report refers to the period 1/1/2010 – 31/12/2010. Corporate Responsibility reporting has been set by the Company to an annual basis.

Scope and Boundary

The goal of this Report is to describe the impact of HALCOR's business activities on the Economy, the Environment, employees' Health and Safety and Society in order to inform institutional investors, employees, other stakeholders, any other party interested in the Company, as well as those who are interested in Corporate Responsibility and Sustainable Development issues.

This Report contains HALCOR's activities in relation to its production facilities in Greece. However, it does not include information on its subsidiaries, joint ventures, suppliers or any other third party related to the Company. Nevertheless, at certain points, specific data is presented which entail information at Group level. In addition, there are no significant changes in terms of the company's size, structure or ownership that could affect the contents of this Report. Where such changes have occurred, they are reported in the relevant sections of this Report. Expectations of stakeholders, as well as the importance of specific Company issues, were taken into consideration, in order to determine which issues should be included in the Report.

This Report presents the complete range of Economic, Environmental and Social issues that stem from the Company's activity, without limiting the scope and boundary of the Report. Since there is no information included in the Report concerning HALCOR's subsidiaries, acquisitions, divestitures, joint ventures and other activities, it is possible to compare data over the years.

This Report contains no significant changes in scope, boundary, calculation or estimation methods that are used. Any data revision has been noted, while the reasons for such a revision are clarified in the respective sections.

Methodology

HALCOR's Corporate Responsibility and Sustainable Development Report for 2010, was prepared in accordance to the latest guidelines for CSR / Sustainability Reports by the international Organization, Global Reporting Initiative (GRI – G3 edition).

The specialized Corporate Responsibility Team which is formed by managers from all Company's departments worked together in order to meet reporting requirements. The CR team's task was to collect all required data regarding various fields of HALCOR's Corporate Responsibility. Data and information presented in this Report were collected on the basis of

existing Company monitoring procedures, as well as information database of various systems. In some areas, unedited non-primary data is presented. Moreover, information on the calculation/estimation method is included, and all relevant GRI guidelines are also presented.

The Corporate Responsibility and Sustainable Development Report 2010 was implemented with the specialized guidance (data collection, data assessment, drafting and editing of the report) of the "Sustainable Development Ltd" Consulting Company.



External Verification

HALCOR aims at increasing its commitment to its stakeholders. For this reason, the Company assigned to a third party the verification of the GRI level of this Report, according to the standards and guidelines of GRI. Both statements for GRI level as well as for external verification by the independent Verification Body are presented on pages 116 and 117 respectively.

Contact

HALCOR looks forward to receiving any questions, enquiries, clarifications or improvement proposals, since the opinion of its stakeholders is of great significance to us.

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Message from the Chairman of Board of Directors

Corporate Responsibility is an integral part of HALCOR's philosophy and entrepreneurial culture because we believe that it is the only way on the course to achieving Sustainable Development.

Despite the difficulties of the previous year, significant advancement in most of HALCOR's Corporate Responsibility key areas was noted:


- Economy
- Market
- Human Resources
- Occupational Health and Safety
- Environment
- Society.

During 2010, within a particularly demanding business environment, the Company managed not only to significantly increase its total sales volume, but also to expand its market share, by improving simultaneously its key financial figures. Furthermore, initiatives regarding cost reduction as well as production improvements programs through the optimization and reorganization of the production processes continued.

Committed to develop innovative products with high added value for our customers, in 2010 the subsidiary company HALCOR Research and Development S.A was established. The first benefits from its operation were reflected in the new, pioneering product TALOS DUAL®. Furthermore, our actions for a responsible presence in the Market resulted in a significant reduction of 40% in complaints, and our customers' satisfaction was increased at the same time.

In the Occupational Health and Safety sector we implemented an investment program oriented towards the protection of our people.. In November 2010 we organized, for the first time, the "Health and Safety and Environment Month" which was particularly successful and will be organized annually from now on. During this month an extensive training program took place, aiming to further sensitize and inform our employees on Occupational Health and Safety issues, as well as on environmental protection.

In the environmental protection sector, despite the unfavorable economic conditions, we invested 1.23 million euro, in line with our our commitment to decrease our environmental footprint. Furthermore, we focused on the efficient use of raw materials, with the preservation of natural resources as our ultimate goal by combining systematic environmental management with economic efficiency. Proof of this is the fact that HALCOR is the largest recycler of copper, zinc and their alloys in Greece.



In the individual chapters of this Report there is an analytical presentation of our work in every relevant sector during 2010, as well as the strategic priorities we have set. The progress we have achieved until now is an encouraging factor to continue our efforts aimed at the Sustainable Development of our Company.

In 2011 we aim to continue investing in developing pioneering products, implementing anti-pollutant techniques and systems, enhancing our Occupational Health and Safety infrastructure and at the same time, we will continue to support local communities, responding to the needs and expectations of all Company stakeholders.

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

1. Company Profile



United Kingdom

France

Spain

USA

1.1 HALCOR Group profile

HALCOR Group is a large and modern company with more than seventy years of experience in metal processing. Its manufacturing plants have pioneering technology and the group has a significant presence both in the European and the international market.

HALCOR Group's main activity focuses on the production, processing and marketing of copper, copper alloys and zinc products and cables. HALCOR Group is comprised of 19 companies and has the following:

- Nine production facilities in Greece, Bulgaria and Romania
- Strong export activity on the European, Asian, American and African markets
- Dynamic commercial network in Greece and abroad, through its subsidiaries in Bulgaria, Romania, Cyprus, the United Kingdom, France, Germany, Italy and Serbia.



○ Russia

○ Germany

■ Romania

■ Bulgaria

○ Italy

■ Greece

○ Turkey

○ Cyprus

○ China

■ Industrial facilities

○ Sales Network



HALCOR's Participation in Major Industrial and Commercial Companies

Company	% Participation	Country	Main Activity
HALCOR S.A.	Parent Company	GREECE	Copper and copper alloys processing
HELLENIC CABLES S.A.	78.71%	GREECE	Production of aerial pipes, aerial and underground energy cables, winding wires and compounds
DIAPEM EMPORIKI S.A.	33.33%	GREECE	Liquid gas trading
STEELMET S.A.	52.83%	GREECE	Metals Sales
ELKEME S.A.	30.90%	GREECE	Research on metals
AKRO A.E.B.E.	95.74%	GREECE	Press fittings industry
FITCO S.A	100%	GREECE	Metal processing
METAL AGENCIES LTD	92.98%	UNITED KINGDOM	Imports and marketing of metal products
BELANTEL HOLDINGS LTD	100%	CYPRUS	Trading of metals
SOFIA MED S.A.	100%	BULGARIA	Processing of Copper, Copper alloys and zinc alloys
S.C. STEELMET ROMANIA S.A.	40.00%	ROMANIA	Trade and distribution
METAL GLOBE D.O.O.	53.61%	SERBIA	Imports and trading of metal products
ENERGY SOLUTIONS S.A.	38.60%	BULGARIA	Production of photovoltaic panels
VIEXAL S.A.	26.67%	GREECE	Trading, transportation and agencies
COPPERPROM S.A	71.49%	GREECE	Market research, advertising, event organizing, training
TEPRO METAL AG	36.99%	GERMANY	Trading metal middle products, thin metal films, metallic plates, cables and other products
HAMBAKIS S.A	100%	GREECE	Trading of metals
HALCOR R&D S.A	70%	GREECE	Research and development on new copper and copper alloy products
TECHOR S.A	68.97%	GREECE	Production and trading

Significant Changes in 2010

In June 2010, the secession of the Brass Bars and Tubes sector was completed and a 100% subsidiary under the name FITCO S.A. was created.

1.1.1 HALCOR S.A.

The Company "HALCOR S.A. METAL PROCESSING COMPANY" with the distinctive title HALCOR S.A. has its headquarters at 2-4, Mesogion Avenue, 115 27, Athens, Tower B Building, and was founded in 1976. The Company has been listed on the Athens Stock Exchange since 1996.

HALCOR exports its products to more than 50 countries around the world. Its sales cover a large part of the global demand with consistency, and a constant and continuous customer service, even after sales. The Company uses metals as raw materials and especially copper, and always had people and their needs at the centre of its industrial activity.

In order to ensure continuous improvements and keep the high quality of its products, HALCOR implements a Quality Management System, which is certified according to the international standard ISO 9001:2008. Furthermore, with respect to the environment and the principles of sustainable development, HALCOR implements an Environmental Management System, certified in accordance with the international standard ISO 14001:2004 in its production process.

As a result of its strategic investments on research and development over the past years, HALCOR is now regarded as one of the industry’s leading companies at an international level setting higher new standards in copper processing.

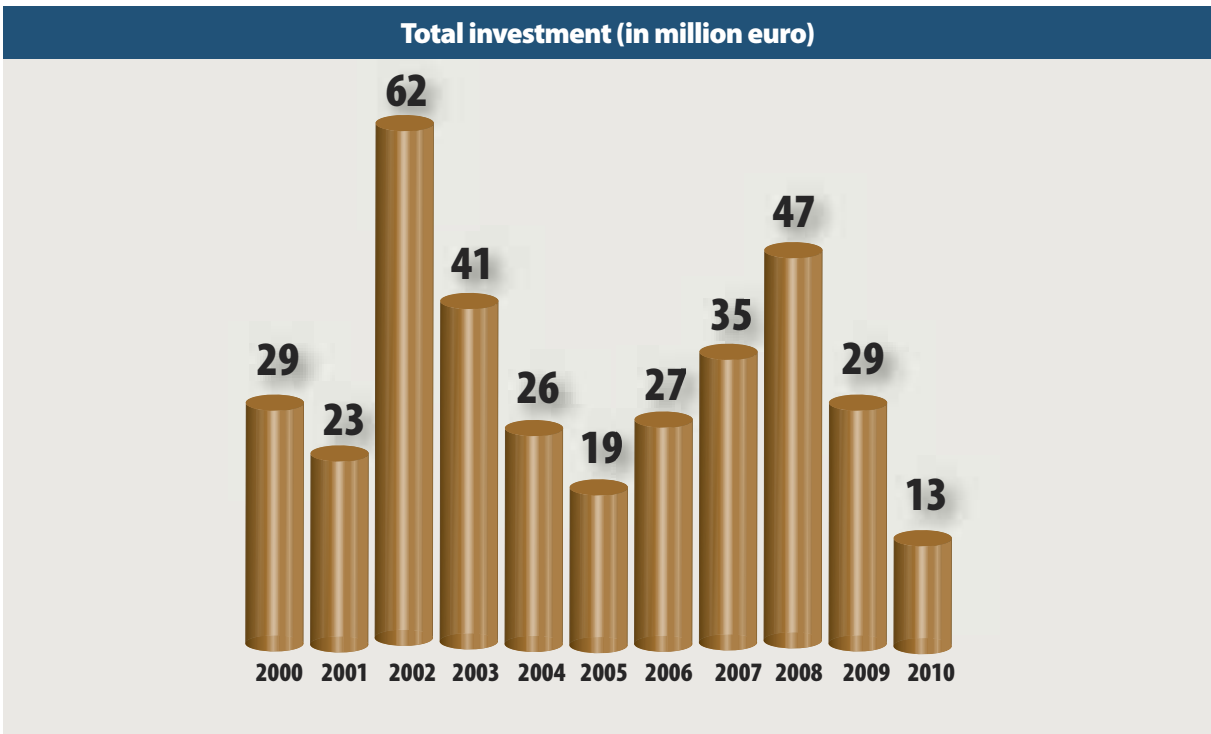
1.2 Production and Commercial Activity

Today, HALCOR Group maintains 9 production facilities in Greece, Romania and Bulgaria, manufacturing a wide range of products.

The production facilities of the HALCOR Group

Plant	Company	Area	Total Area (in m ²)	Buildings (in m ²)	Annual Production Capacity (in tn)
Melting – Recycling plant	HALCOR	Oinofyta	51,213	11,638	235,000
Copper Tubes Plant	HALCOR	Oinofyta	198,061	67,414	75,000
Extrusion Plant Brass Bars and Tubes	FITCO	Oinofyta	57,980	23,120	40,000
Titanium zinc Rolling Plant	HALCOR	Athens	60,048	37,427	20,000
Copper Processing Plant	SOFIA MED	Bulgaria	250,000	120,000	105,000
Power and Fiber-Optic Cables Plant	HELLENIC CABLES	Thiva	175,000	36,957	55,000
Copper and Winding Wires Plant	HELLENIC CABLES	Livadia	121,818	13,890	14,000
Plastic and Elastomeric Compounds Plant*	HELLENIC CABLES	Oinofyta	22,032	6,636	24,000
Cables Plant	ICME ECAB	Romania	268,000	70,000	45,000

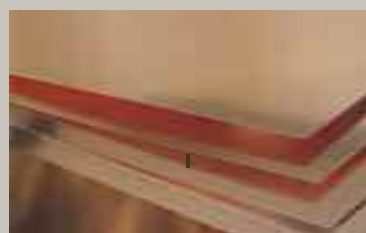
**HALCOR S.A. uses a production line of its subsidiary company's HELLENIC CABLES plant at Oinofyta, to produce compounds used for the coating of copper tubes.*



The HALCOR Group is characterized by high exporting activity, servicing not only the European, but also the international markets, and therefore contributing to the Greek trade balance significantly. The total exports of the HALCOR Group during 2010 were 528 million euro, which approximately equaled 3.63% of the total Greek exports for that year.

The HALCOR Group is characterized by high exporting activity, servicing not only the European, but also the international markets, and therefore contributing to the Greek trade balance significantly. The total exports of the HALCOR Group during 2010 were 528 million euro, which approximately equaled 3.63% of the total Greek exports for that year.

In 2010, total investments of a value of 13 million euro were realized, and were mainly oriented towards R&D, the creation of a broader range of products, the development of added value products and the upgrade of existing production equipment.



1.3 HALCOR Group products

The products manufactured and traded by the HALCOR group are presented in the following table:

HALCOR Group products

Company	
HALCOR S.A.	Produces <ul style="list-style-type: none">• Copper Tubes (TALOS & CUSMART),• 8mm Copper Wire Rod Trades <ul style="list-style-type: none">• Copper and Titanium-Zinc gutters (DOMA)
SOFIA MED S.A.	Produces <ul style="list-style-type: none">• Copper products: sheets and strips (DOMA), discs and rods• Brass Products: sheets and strips (DOMA), discs• Titanium-Zinc products: sheets and strips• Special alloy products: cups, coins Trades <ul style="list-style-type: none">• Copper Tubes (TALOS & CUSMART)
HELLENIC CABLES S.A. - CABLEL	Produces <ul style="list-style-type: none">• Power and Telecommunication Cables• Winding wires• Plastic & Elastic Compounds• Copper & Aluminum Conductors
FITCO A.E.	Produces <ul style="list-style-type: none">• Brass Products: Pipes, bars and rods Trades <ul style="list-style-type: none">• Copper products: sheets and strips (DOMA), discs and bars• Brass Products: sheets and strips (DOMA), discs• Titanium-Zinc products: sheets and strips



1.4 Milestones in the history of HALCOR

VIOHALCO S.A. was founded in 1937 in Piraeus Street, Tavros. In 1976 HALCOR S.A. was founded, continuing the copper processing activity of VIOHALCO S.A. The milestones of HALCOR's history are:

1977:	VECTOR S.A. was founded, maintaining a limited profile in terms of lines of business and business volume, until 1989. After 1990 its business activity grew, as it acquired the rolling mills of former HALCOR.
1992:	The pipe mill of former HALCOR was EN 29002- and ISO 9002-certified for its Quality Assurance System.
1994:	VECTOR S.A. was also ISO 9002-certified for its Quality Assurance System in rolling products.
1995:	The HALCOR S.A. foundry was also ISO 9002 certified.
1996:	VECTOR S.A. was listed on the Athens Stock Exchange. The Hellenic Copper Development Institute (HCDI) was established. HALCOR was a founding member.
1997:	VECTOR acquired HALCOR and the new company was named HALCOR S.A.
1998:	The Company pipe mill was ISO 9001 certified.
1999:	The Company further increased its share in HELLENIC CABLES S.A. to 47.5%.
2000:	Through its subsidiary SOFIA MED AD (Sofia, Bulgaria), the Company acquired the fixed assets of KOCM and the plant began its operations in October.
2001:	The SAP business data processing system was put into operation, allowing HALCOR to utilize the internationally acclaimed ERP business tools.
2002:	An investment project worth approximately euro 13.5 million was completed in the pipe mill, its salient feature being the purchase and installation of a new 4,000 TN extrusion press. Euro 20 million were invested in the Sofia Med plant.
2004:	SOFIA MED commenced production of new products as a result of the previous year's investment.
2005:	A new product, titanium zinc, is launched and its production started.
2008:	First "Corporate Responsibility and Sustainable Development Report" publication, according to Global Reporting Initiative guidelines, G3 edition.
2009:	HALCOR was presented awards as EXPORT LEADER in the "Exporting Turnover" subcategory by HELEXPO and STATBANK, in September 2009.
2010:	A new product, TALOS DUAL, is launched. HALCOR was awarded an honorary distinction for the 2009 Corporate Responsibility and Sustainable Development Report by the University of the Aegean.

1.5 Participation in Organizations

HALCOR participates not only in several Unions and Bodies of sectoral interest, but also in other organizations, aiming at promoting the concept of Corporate Responsibility both in Greece and Europe, and also internationally.



Hellenic Network for Corporate Social Responsibility (CSR HELLAS)

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

During 2010, HALCOR supported the activities of the Hellenic Network for Corporate Social Responsibility as in the previous year. In the context of its 10th year anniversary, one of the most important events by the Network that took place in 2010 was a conference entitled "Doing Business Socially 2010 – "The Role of the Small/Medium-Sized Enterprises". This conference took place on October 13th, 2010, at the Macedonian Museum of Contemporary Art, under the auspices of the Thessaloniki Chamber of Commerce and Industry and the Federation of Industries of Northern Greece (FING).



Hellenic Federation of Enterprises (SEV)

The Hellenic Federation of Enterprises mission is to contribute towards the modernization and development of Greek enterprises, creating a competitive national asset within the European and global economic competition. SEV is a member of the Union of Industrial and Employers Associations of Europe (Business Europe), the leading independent organization representing European Businesses. HALCOR has been a member since 1983.



Federation of Sterea Ellada Industries (SBSE)

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

HALCOR, via the Federation of Sterea Ellada Industries participated in financing a research for the cleaning of the Asopos River. It is worth noting that according to a decision by the Ministry of the Environment, Energy and Climate Change, the first phase of Asopos River cleaning will commence in 2011.



Hellenic Copper Development Institute (HCDI)

HCDI was founded in 1996 and is a non-profit organization that aims to promote the responsible application and offer updates on the uses of copper and its alloys, to specialized users and the general public.

HALCOR is a founding member of the Hellenic Copper Development Institute. Together, they participate in the programs of the European Copper Institute (ECI), which is a non-profit organization and belongs to the International Copper Association (ICA). As a result, HCDI belongs to a global network of 27 copper centers, funded and supported by the global non-profit organization ICA.

Research on Copper and Human Health

HALCOR, through the Hellenic Copper Development Institute, which is a constituent member of the European Copper Institute (ECI), has participated actively over the last decade in significant research programs on the effect of copper on human health and the environment. The results of these years of research show the definite benefits of copper usage as well as its neutral and positive effects on humans and the environment.



International Wrought Copper Council (IWCC)

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

The annual Technical Conference of IWCC (International Wrought Copper Council) was held in Athens during 7-11/3/2010, with HALCOR's support and cooperation. 75 people from around the world participated in the conference which was held at the ATHENS HILTON hotel; its subject was the technological developments in specific applications in the copper and copper alloy processing sector.



During the Conference, several metal processing companies presented their production installations. HALCOR Group presented the SOFIA MED (Sofia, Bulgaria) production plant which produces a broad range of copper products, as well as HALCOR's plants in Oinofyta, Viotia (Recycling – melting plant, Copper Tubes plant, Brass Bars and Tubes plant).



SEVIAN Federation of Hellenic Recycling and Energy Recovery Industries

SEVIAN's establishment began at the end of 2009 and was completed at the beginning of 2010. The companies that participated in SEVIAN's formation operate in Greece and exercise industrial operations in the recycling and utilization of waste, by-products and secondary raw materials sector. SEVIAN's mission is to enforce Sustainable Development through actions that are related to recycling and energy recovery. HALCOR is SEVIAN's founding member.



European Committee for Standardization (CEN)

The CEN is a non-profit organization which was founded in 1961. The main objective of CEN is to create a single standardization system that meets the current needs of all EU member countries. CEN aims at drafting the European Standards (EN), which will advance the competitiveness of the European industry in global markets, as well as help shape the internal European market. HALCOR participates as a member of the committee, which formulates the CEN specifications.

1.6 Distinctions - Awards

During 2010, HALCOR received important awards and distinctions. The following are presented indicatively:

«Strongest Companies in Greece 2010»

HALCOR was evaluated by ICAP Group with a range between AA and BB and joined the “Strongest Companies in Greece” community which includes companies with high Credit Ratings. ICAP Group has been recognized by the Central Bank of Greece as an External Credit Assessment Institution (ECAI) and by the European Central Bank as an Accepted Rating Tool Source.

"STRONGEST COMPANIES IN GREECE" is a community of Greek companies with high credit worthiness based on ICAP's Rating Score evaluation.

The vision of ICAP Group is to provide tools that will help companies with high ICAP Rating Score in all their transactions and collaborations. The ultimate goal is to create a Business Community that operates within the basic conditions of a developed and prosperous economy.



High Performance Praise for the Corporate Responsibility Report

In a special ceremony during the CSR Reporting forum in November 2010, HALCOR's Corporate Responsibility and Sustainable Development Report was awarded a High Performance Praise by the University of the Aegean.

This high performance praise for the Corporate Responsibility Report 2009 regarding the successful application of the international reporting CSR standard GRI-G3 Global Reporting Initiative (GRI), is very important for HALCOR as a recognition of its efforts for the continuous improvement of its CSR reporting, and its commitment to acting as a sound and responsible partner that invests in modern entrepreneurial practices, aiming at Sustainable Development.



1.7 HALCOR Corporate Responsibility

HALCOR has integrated the principles of Corporate Responsibility in its entrepreneurial philosophy, aiming to operate in an ethical context, in partnership with the community within which it operates.

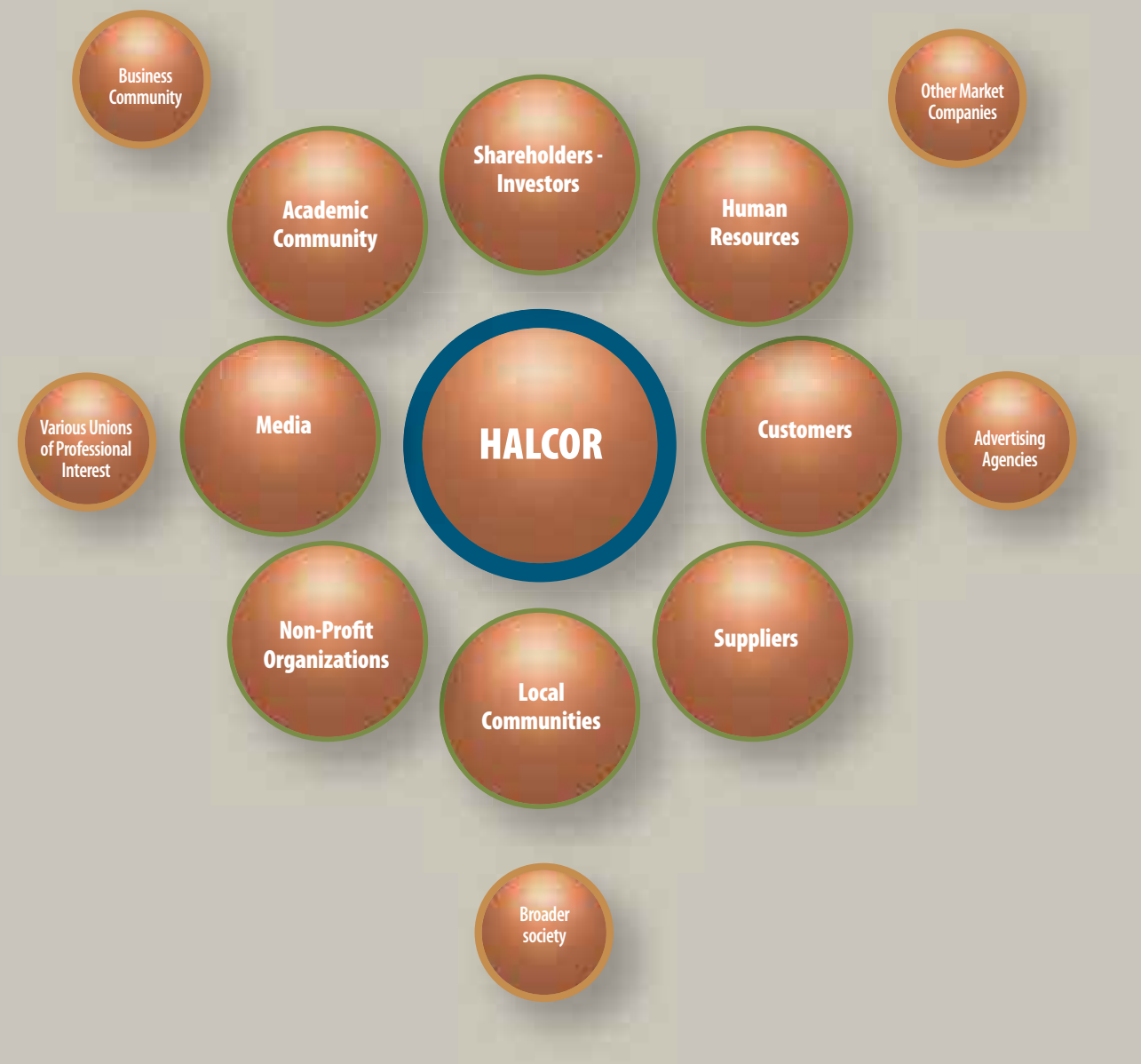
At HALCOR, responsible operation is expressed in many ways and can be traced to various fields including the economy, the protection of the environment and consideration for its employees.

HALCOR is committed to a development course in accordance to the following:

- a responsible operation, in accordance with all the relevant rules across all the Company's activities
- an obligation to provide a healthy and safe working environment for its employees
- a correct and prudent use of natural resources in an effort to minimize the environmental impact of its operations.



Stakeholders' prioritization Diagram



1.7.1 Code of Conduct for Sustainable Development

HALCOR S.A. adopts the Code of Conduct of the SEV Council for Sustainable Development and in doing so:

1. Respects the principles of Sustainable Development and incorporates them in its decision making processes.
2. Promotes the adoption of environmentally friendly and scientifically established methods of designing its activities
3. Focuses on manufacturing products and rendering services with positive environmental impact.
4. Promotes production methods that emphasize recycling, conservation of natural resources and proper management of waste products
5. Trains and orientates suitably its workforce and invests in natural, technological and financial resources aimed at sustainable development
6. Engages in continuous improvement of its performance in the fields of health, safety and environmental protection
7. Provides accurate information to Authorities and Society about its activities and aims at a sincere dialogue with all involved stakeholders
8. Contributes to the social, cultural and overall economic development of the communities in which it is active
9. Adopts modern practices of corporate governance
10. Meets its institutional obligations in a spirit of transparency and business ethics

1.7.2 Communication with the Stakeholders

Communication and cooperation with HALCOR's stakeholders is an integral part of the Company's Corporate Responsibility strategy and a constant goal. As a result, HALCOR maintains a series of different communication channels, through which it confers, communicates and cooperates with all selected stakeholders groups.

HALCOR, using a relevant procedure that is carried out by the Company's Corporate Responsibility Team, has recognized the interested parties or stakeholders that are influenced by its operations and has classified them into two main groups:

- Main stakeholders that are of utmost importance for the Company
- Secondary stakeholders that are affected by the Company's decisions and operations.

The main stakeholders' groups include shareholders and investors, employees, customers, suppliers, local communities, Non-Profit / Non-Governmental Organizations and the Academic Community.

The Company's secondary stakeholders include various professional unions, other sector companies, the public at large, the entrepreneurial community and advertizing companies.



Stakeholder Groups and the relationship – the interaction framework



Shareholders – Investors

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



Human Resources

- They offer their work and knowledge
- They receive salaries, additional benefit and opportunities for professional and personal development



Customers

- They select HALCOR for its products and services
- They satisfy their demand for high level of quality and customer service



Suppliers

- They provide services / products to HALCOR and receive payment
- Meritocratic / Objective evaluation and selection of suppliers
- The Company supports local suppliers



Local Communities

- HALCOR supports the local community by selecting local human resources and suppliers
- The Company participates in a local Association
- The Company participates in activities and events organized by the local authorities



Non-Profit Organizations (NGOs)

- They represent the citizens' society
- They strongly participate in the formation of public opinion
- They participate in the formation of State policy
- They constitute a link between society, the state and the companies
- HALCOR cooperates with NGOs to raise awareness and realize actions



Media

- They provide information regarding the Company to the public



Academic Community








- Cooperation on research issues



HALCOR has developed two-way communication channels with each group of its stakeholders. It aims at regular communication with all its stakeholder groups, in order to take note of the main issues related to each group and to cooperate with them for achieving goals with mutual benefits. This Corporate Responsibility and Sustainable Development Report is a consolidated approach not only of all issues relating to HALCOR's various stakeholder groups, but also to the Company's actions regarding these issues.

The issues recorded per stakeholder group are presented in the table below.

Cooperation with the stakeholders

	Relationship – Interaction Framework	Communication - Participation	Main Issues / Expectations Stakeholders
 Investors, Shareholders, Capital providers	<ul style="list-style-type: none"> • They invest capital at HALCOR • They receive dividends from the profits • They participate in the decision making process 	<ul style="list-style-type: none"> • Annual Shareholders' General Meeting • Investor Relations' Division • The Board informs shareholders about any changes in HALCOR • Regular press releases, announcements and repost are issued, providing information about new investments in the Group • Presentation of the financial results to the BoD on a quarterly basis • Constant communication of analysts and investors with the Company's executives • Investor Relations' Officer • Presentation in the Union of Institutional Investors • Publication of an Annual Financial Report • Publication of an annual Corporate Responsibility and Sustainable Development Report 	<ul style="list-style-type: none"> • Enhancing the competitiveness of the Company • Ensuring transparency in dealing with stakeholders • Sound Corporate Governance • Profitability
 Customers	<ul style="list-style-type: none"> • They select HALCOR for its products and services 	<ul style="list-style-type: none"> • Customer Satisfaction Survey • Regular physical and telephone communication • Company website 	<ul style="list-style-type: none"> • Provision of services / products of high quality • After sales support • Customer updates on market and product developments
 Employees	<ul style="list-style-type: none"> • They offer their work and knowledge • They receive salaries, additional benefit and opportunities for professional and personal development 	<ul style="list-style-type: none"> • Ongoing communication between Management and Employees. The Company seeks and implements an "Open Door Policy" • Communication and updating through the Company's intranet (internal network) • Information via e-mail and informative leaflets on notice boards • Information through the Company's website 	<ul style="list-style-type: none"> • Employment and insurance issues • Personnel evaluation issues • Advancement and development of human resources • Details of Company's objectives and means of achieving them
 Suppliers	<ul style="list-style-type: none"> • Suppliers provide services / products to HALCOR and receive payment • Meritocratic / Objective evaluation and selection of suppliers • The Company supports local suppliers 	<ul style="list-style-type: none"> • Participation in supplier events and exhibitions • The company updates its' suppliers on market developments • Constant contact with suppliers through the Company's Purchasing Department 	<ul style="list-style-type: none"> • Objective and meritocratic evaluation • Support of local suppliers • Supplier update on market developments • Enhancement of communications and updates
 Local Communities	<ul style="list-style-type: none"> • HALCOR supports the local community by selecting local human resources and suppliers • The Company participates in the local Viotia Industries Association • The Company participates in activities and events organized by local community associations 	<ul style="list-style-type: none"> • Constant communication with Local Authorities and Associations • Participation in activities and events organized by local authorities and associations 	<ul style="list-style-type: none"> • Response to local community issues and needs • Supports the local community by employing locals • Enhancement of local entrepreneurship
 Non-Profit / Non-Governmental Organizations	<ul style="list-style-type: none"> • They represent the citizens' society • They participate intensely in the formation of public opinion • They participate in the formation of State policy • They constitute a liaison between society, the state and the companies • HALCOR cooperates with NGOs to raise awareness and take actions 	<ul style="list-style-type: none"> • Exchange of views on common interest issues (e.g. quality of life improvement, environmental protection) • HALCOR participates in the Hellenic Network for Corporate Social Responsibility (CSR Hellas) as a main member 	<ul style="list-style-type: none"> • Support of NGO initiatives and actions
 Academic Community	<ul style="list-style-type: none"> • HALCOR supports research in Universities • HALCOR participates in research projects 	<ul style="list-style-type: none"> • Exchange of views on common interest issues • HALCOR is a founding member of the Hellenic Copper Development Institute • In 2010 HALCOR created HALCOR R&D for research and development on new copper and copper alloy products 	<ul style="list-style-type: none"> • Copper applications • Effects of copper and metals on human health and the environment

HALCOR records, monitors and manages all important issues stemming from its cooperation with the various stakeholder groups. The information it receives is utilized in order for the Company to improve its performance in the various sectors. The way the Company has responded to the various issues is presented in the individual chapters of the present Corporate Responsibility and Sustainable Development Report.



1.7.3 Corporate Responsibility and Sustainable Development Targets

HALCOR, responding to its stakeholders' demands, has set targets for the further development of its corporate responsibility. Below are presented the consolidated results, while the relevant chapter and section presenting the analytical performance per target for 2010, are also referred to.

TARGETS 2010 PER SOCIAL RESPONSIBILITY AXIS

	LEVEL OF IMPLEMENTATION	REFERENCE TO CHAPTER / SECTION
CORPORATE GOVERNANCE		
Communication to senior management on current issues of transparency and corruption.	😊	HUMAN RESOURCES, section 4.5 Training and Development.
Establishment of the Company's Corporate Responsibility Team.	😊	CORPORATE GOVERNANCE, section 2.3.4 Corporate Responsibility Management
MARKET		
Integration of Corporate Responsibility issues in the annual customer satisfaction survey.	😊	MARKET, section 3.4.1. Customer satisfaction.
Increase the percentage of scrap in purchased metals in 2010 to 40%.	😊	MARKET, section 3.5.2 Purchasing Recyclables (scrap).
Integrate Corporate Responsibility criteria in the evaluation procedure of its suppliers.	😊	MARKET, section 3.5.1 Suppliers' Evaluation and Selection.
Constant effort for customer satisfaction improvement in all areas (by improving service, trust towards the Company, product satisfaction, etc.).	😊	MARKET, Section 3.4.1, Customer Satisfaction.
Support more local suppliers, by selecting and integrating them into the supply chain of HALCOR.	😊	MARKET, section 3.5.1 Suppliers' Evaluation and Selection.
HUMAN RESOURCES		
Redesign the Company's Intranet system to strengthen internal communication and include all human resources-related issues.	😊	HUMAN RESOURCES, Section 4.6, Internal Communication.
Increase internal training on Health and Safety as well as on other issues regarding the Company's operation for all employees.	😊	UMAN RESOURCES, Section 4.5, Training and Development.
HEALTH AND SAFETY		
Continue the 5S program implementation, to continue improving the working environment and prevention of accidents/incidents.	😊	OCCUPATIONAL HEALTH AND SAFETY, Section 5.2.3 5S System: Constant improvement program.
Organize and implement "Health and Safety Month", in which relevant training will be carried out, to improve awareness and knowledge on health and safety issues. During this month there will be a campaign aimed at informing employees about correct implementation of safety measures to reduce risk and accidents.	😊	OCCUPATIONAL HEALTH AND SAFETY, Section 5.4 Health and Safety Training.
Continuous reduction of occupational incidents/accidents, aiming at their elimination.	😊	OCCUPATIONAL HEALTH AND SAFETY, Section 5.3 Health and Safety Performance
ENVIRONMENT		
Certification according to ISO 14001 - Environmental Management for all plants.	😊	ENVIRONMENT, Section 6.3 Environmental Management System.
Zero discharge of processed wastewater and recycling of the water used for cooling, through the installation of Zero Liquid Discharge system by 2011.	😊	ENVIRONMENT, Section 6.4.5, Water Use.
Increase environmental issue training for all employees in 2010.	😊	ENVIRONMENT, Section 6.3 Environmental Management System.
Continue tree planting at facilities in 2010.	😊	ENVIRONMENT, Section 6.4.8 Nature conservation and Biodiversity (section tree-planting).
SOCIETY		
Increase communication and contact with local authorities, to be updated on the important issues and needs of the local community.	😊	SOCIETY, Section 7.3.3 Social Activities.
Strengthen the local economy by selecting local employees and suppliers.	😊	SOCIETY, Section 7.3, supporting the local communities.

2. Economic Development and Corporate Governance

HALCOR fully adopts all the principles of Corporate Governance and has adopted them as a whole in its daily operation and practice. In this context, all Company developmental efforts aimed at materializing mid-term and long-term targets, are made in a spirit of transparency and effectiveness.

2.1 Contribution to the Economy

HALCOR's operation creates important direct and indirect benefits for society as a whole through:

- its significant contribution to the economy
- the support of local communities and their economies
- increased employment opportunities
- the enhancement of technical and other knowledge of its workforce
- the creation of value for shareholders and investors
- the rewarding representation of the Greek Industry sector on the international markets.

The Company's offer in total towards the society is also called "Social Product". More specifically, within the framework of developing its business activities, HALCOR makes significant investments and therefore contributing to the Country's financial improvement, via the inflow of capital, the creation of jobs, the upgrading of its human resources, the financing of insurance bodies' deficits and the general increase of State income.

These significant investments, apart from widening the production base, create secondary and tertiary income results that contribute to the increase of national resources. The social product produced in 2010 in total, amounted to 73 million euro and was distributed as follows:

Annual Contribution to Social Development – Social Product

(in thousand euro)	2008	2009	2010
Payments to suppliers (excl. materials and other transactions)	41,650	45,248	46,931
Employee expenses	33,756	28,186	26,556
Taxes	6,635	-	-
TOTAL	82,041	73,434	73,487

Although prevailing financial conditions, both domestically and internationally in 2010, constituted a challenge, HALCOR achieved a reduction of operation and administrative costs.

More specifically, during 2010, HALCOR continued the investments it had initiated in 2000, which focused on product differentiation by producing high added value products, while at the same time reducing its expenditure.

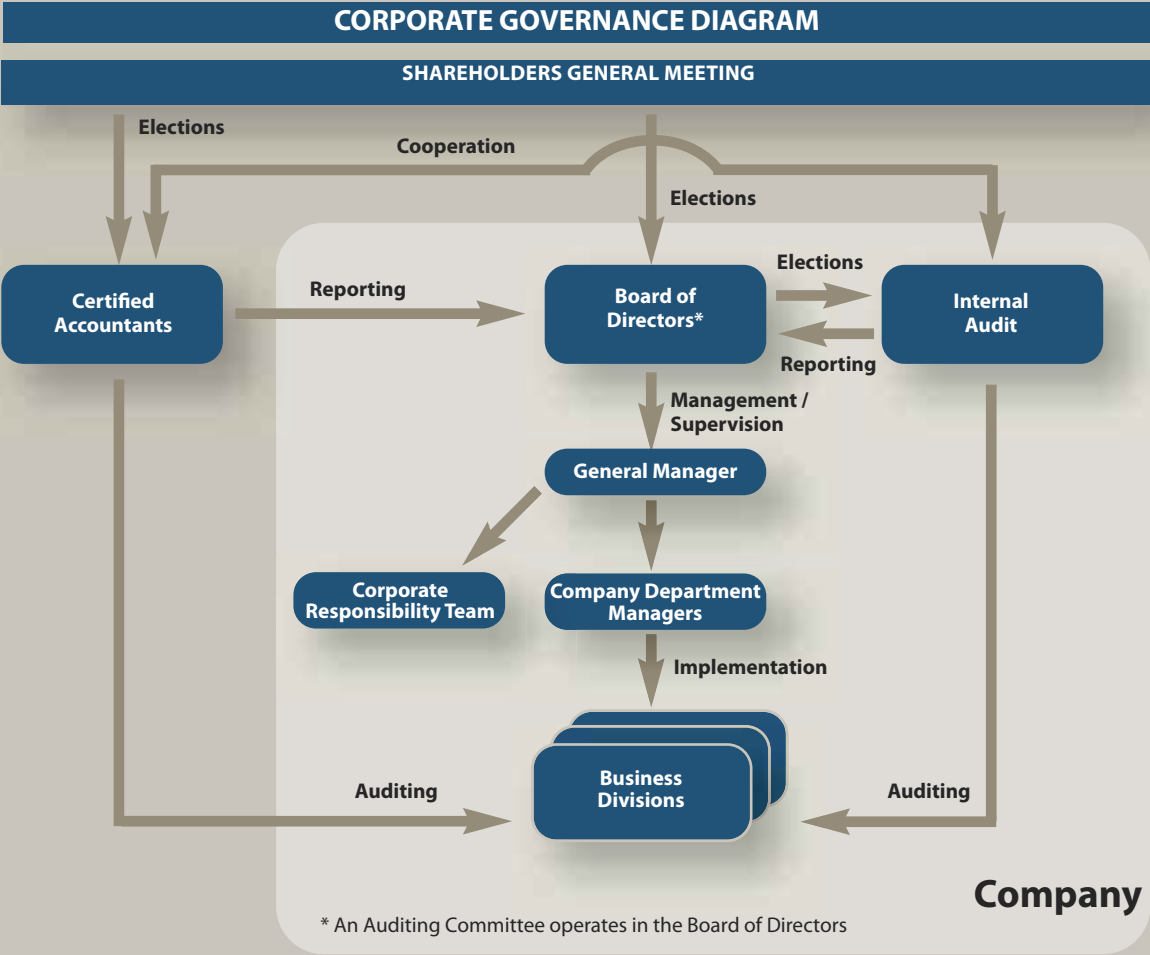
Despite 2010 being a very challenging year, the Company succeeded in increasing its sales compared to the sales of 2009, exceeding 517.6 million euro of which 393 million euro came from overseas sales. The Company's Key Financial Figures are presented in the following table.

Key Financial Figures

	2008	2009	2010
Net Sales (in thousand euro)	635,252	343,547	517,613
Other Revenues (in thousand euro)	6,692	5,112	5,267
Revenues from financial investments (in thousand euro)	4,824	1,185	713
Total Revenues (in thousand euro)	646,768	349,844	523,593
Operating Costs (in thousand euro)	(619,760)	(327,930)	(552,151)
Employee salaries and benefits (in thousand euro)	(33,756)	(28,186)	(26,556)
Payments to capital providers (in thousand euro)	(16,625)	(6,979)	(9,691)
Net losses before tax (in thousand euro)	(23,373)	(13,251)	(11,694)
Net losses after tax (in thousand euro)	(15,184)	(11,188)	(7,771)
Net earnings per share (in euro)	(0.1499)	(0.1105)	(0.0767)
Payments to governmental bodies – taxes paid (in thousand euro)	(539)	-	-
Investments (in thousand euro)	19,767	10,003	2,551
Total Capitalization (in thousand euro)	75,960	137,740	70,895
Equity (in thousand euro)	179,582	162,527	143,605
Total Liabilities (in thousand euro)	309,542	256,434	306,373
Total Assets (in thousand euro)	489,124	418,961	449,979

Note: In the table above numbers in the parenthesis have a negative sign

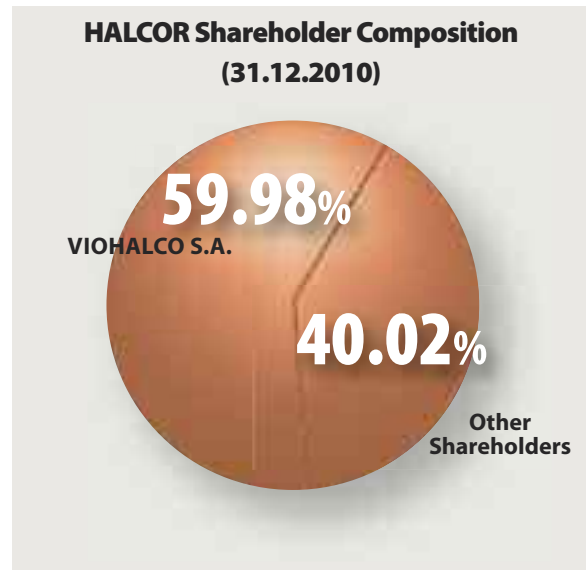
More information on HALCOR's financial figures is available in the Financial Report, in the 2010 Annual Report and on the Company's website www.halcor.gr (section Investor Relations / The Share).



2.2 Shareholder Structure

HALCOR S.A. shares are traded on the Athens Stock Exchange. The Company's share capital, on 31/12/2010, stood at euro 38,486,258 divided into 101,279,627 common unregistered shares, with a nominal value of euro 0.38 each.

HALCOR is included in the following stock market indices: GD, FTSEA, FTSES, Large-Cap (31/12/2010) in the "Raw Materials - Nonferrous metals" category.



Additional information for Halcor's stock is available in the annual report 2010 as well as the website of the company at www.halcor.gr (in Investor's Relations/ The share).

2.3 Corporate Governance

HALCOR's corporate governance system, presented in detail on page 32, is not only essential for ensuring transparency within an organization but also for reinforcing effective management, to maximize the economic value of an organization, and to protect the interests of its shareholders and creditors. The Company follows the SEV Code of Conduct for Sustainable Development.

For HALCOR, appropriate corporate governance equals a culture with respect towards its shareholders. HALCOR has established a comprehensive and modern corporate governance model in accordance with international codes of conduct, which includes:

- protection of all its shareholders' rights
- clarity in defining executive management roles and responsibilities as well as their selection procedures based, amongst others, on skills and experience in corporate governance
- transparency, integrity and responsibility in decision making
- a strong interest in social responsibility issues.

HALCOR’s main purpose for operating this corporate governance system is to establish a series of principles and operating practices which contribute towards:

- Transparency
- Consistency
- Responsibility.

In order to further enforce HALCOR’s corporate transparency and control mechanisms, an Internal Operational Regulation has been established and implemented. Its implementation is mandatory for every employee and throughout the Company’s operations.

HALCOR’s Internal Operational Regulation, which governs the Company’s main, has been approved by the Company’s Board of Directors and surpasses all legal requirements regarding listed company obligations.

2.3.1 HALCOR’s Management Bodies

The main governing bodies of HALCOR are:

- annual Shareholders’ General Meeting
- the Company’s Board of Directors (BOD).

The HALCOR General Assembly elects the Board of Directors which consists of executive and non-executive members. Among the non-executive members are at least two independent members, whom, if necessary, can submit separate reports to the Annual Meeting or extraordinary General Meeting of the Shareholders, individually or together.

HALCOR’s Board of Directors

Position	Name	Relationship
Chairman of the BoD	Theodosios Papageorgopoulos	Executive Member
Vice Chairman of the BoD	Nikolaos Koudounis	Executive Member
Member	Periklis Sapountzis	Executive Member
Member	Eftychios Kotsambasakis	Executive Member
Member	Anastasios Kasapoglou	Executive Member
Member	Georgios Passas	Non-Executive Member
Member	Konstantinos Bakouris	Non-Executive Member
Member	Christos - Alexios Komninos	Non-Executive Member
Member	Andreas Katsanos	Non-Executive Member
Member	Andreas Kyriazis	Independent Non-Executive Member
Member	Nikolaos Galetas	Independent Non-Executive Member

The Board convenes frequently and is accountable for the decision making regarding all the company's activities. It receives feedback and information through consolidated quarterly reports, which include detailed Corporate Social Governance issues such as Health and Safety and Environmental key performance indicators. The Company's department managers participate in Board meetings, in order to inform the members and present relevant issues.

In addition, the Company has adopted a procedure according to which the respective Managers can inform the Board of Directors directly on issues relating to:

- Quality
- The Environment
- Employee's Health and Safety.

The Company's Shareholders' General Assembly also serves as an immediate communication channel between shareholders and Management, since during the Assembly, all shareholders – even those who possess small percentages of the capital share – have the opportunity to participate, express their opinions and communicate directly with the members of the BoD.

2.3.2 Selection and Evaluation of the BoD Members

HALCOR's Board of Directors is evaluated by the company's shareholders, on an annual basis, during the Shareholders' general assembly. The evaluation criteria concern the activity displayed over the past year based on information submitted to the General Assembly in the relevant management report.

The remuneration of the members of the Board of Directors is linked with the Company's overall performance, including issues of responsible operation; however, until today, there is no separate procedure for monitoring the Board's performance in corporate responsibility and sustainability issues.

Furthermore, the members of the Board of Directors are monitored on issues of honesty, objectiveness, diligence and efficiency in carrying out their duties. Members of the Board of Directors are elected on the basis of certain criteria which, among others, include:

- experience
- specialization
- university degrees
- receipt of job-related awards/distinctions
- administrative skills
- creative ability, composition and analysis skills, social recognition
- fairness.

2.3.3 Management Structure

The production, financial and administrative operations of HALCOR report to General Management. The organizational structure of HALCOR is presented in the following organizational chart.

Company's Organization Chart 31.12.2010



** Strategic Planning is responsible for coordinating HALCOR's Corporate Responsibility Team.*

2.3.4 Corporate Responsibility Management

Since the embodiment of the Corporate Responsibility principles constitutes an operational method and a commitment for HALCOR, the Company created the Corporate Responsibility Team in 2009, in an attempt to achieve the optimum and integrated management of Corporate Social Responsibility Issues. The Corporate Responsibility

Team consists of representatives from various Company Departments and is coordinated by the Strategic Planning Director who reports to the General Manager.



Corporate Responsibility at HALCOR is not limited to specific operational sectors; instead, it covers the entire range of the Company's activities.

HALCOR’s Corporate Responsibility Team (Departments Involved)



HALCOR implements a consolidated Management System, through which it is possible to achieve the integrated management of issues regarding responsible operations and decision making towards Sustainable Development. The Company applies and implements an integrated Management System, which includes the following three systems:

- Quality Management System, which is under the Quality Assurance and Environmental Department
- Environmental Management System, which is under the Quality Assurance and Environmental Department
- Health and Safety Management System, which is under the Health and Safety Department.

Thanks to this structure, the Company's Administration ensures its best possible information, the monitoring and responsible management of all issues related to the financial, environmental and social dimension of its operations.

2.3.5 Audit Committee

The Audit Committee consists of at least two non-executive members and one independent member of the Company's Board of Directors, who have sufficient knowledge of financial and auditing issues. The Audit Committee monitors, informs and supports the Company's Board of Directors and is responsible to ensure the implementation of:

- the Principles on Financial Reports
- the Principles of Corporate Governance, Internal Auditing
- the maintenance, on an ongoing basis, of the effectiveness, independence and objectivity of the Company's external auditors as well as its subsidiaries and its related companies.

2.3.6 Avoiding conflicts of interest

In order to avoid any conflict of interest, HALCOR implements a series of procedures which ensure the prevention of conflicts between the interests of Board members, executives as well as other employees and the Company. Furthermore, HALCOR, aiming at ensuring transparency, has incorporated in the Company's Articles of Association and Internal Operation Regulation, conditions and commitments which are followed and implemented by all members of the Board of Directors or the Directors involved in the management of the Company, in order to avoid conflicts of interest.

2.4 Main Impact, Risks and Opportunities

HALCOR's operation has significant impacts and benefits on society, the economy and local communities. HALCOR aims to cooperate with every stakeholder group that influences or is influenced by the Company's operation. At the same time, like with every entrepreneurial operation, there are specific risks and opportunities. HALCOR has established methods and practices to prevent risks associated with its operations, and to exploit opportunities, ensuring an environmentally friendly industrial activity, where applicable.



2.4.1 Risk Management

HALCOR's Management aims to prevent and effectively manage all potential risks related to its business operation and implements specific procedures and mechanisms. More specifically, risks and opportunities can arise from fluctuations of metal prices on the London Metal Exchange (LME) and fluctuations in foreign currency, as well as from the impact of its business operation on the Environment and Society.

The Company operates mechanisms to monitor, assess and manage risks, based on fundamental information regarding business and the current economic environment. The major categories of risk associated with the operation of HALCOR are:

Industrial Risks

Operating in the metallurgical industrial sector equal several risks connected not only to the production activity but also to the consequences on local communities and the natural environment. HALCOR is aware of its responsibility for prompt prevention and appropriate risk management.

In order to fully accomplish the aims set in the field of industrial risks, the Company implements very strict operational and Safety criteria, in full compliance with Greek legislation and the European SEVESO II Directive. Furthermore, the Company has created an analytic emergency response plan, covering all possible situations, and is in close cooperation with the Fire Department for the immediate and effective response in the event of any potential incident.

HALCOR's risk management policies are implemented in order to recognize and analyze all possible risk that the Company faces, as well as to set the limits for risk taking and its effective control. Risk management policies and the relevant systems are periodically monitored, in order to take into account all changes observed in market conditions and the Company's operations.

Environmental / Occupational Risk

HALCOR, taking into account the potential impact of its operations, implements policies and systems and continuously invests in technology, research and development, and know-how, to achieve its goal towards Sustainable Business Development.

In addressing its potential environmental impact and occupational health and safety issues, HALCOR has completed all the risk assessment studies required by law and has taken preventive measures and initiatives, monitoring the relevant performance indicators. These indicators are monitored regularly and are communicated to all Company levels.

Financial Risks

The main categories of financial risks related to HALCOR's operation are:

- Market risk
- Liquidity risk
- Exchange rate risk



- Interest rate risk
- Fluctuation risk of metal prices (copper, zinc, other materials).

HALCOR's Board of Directors monitors and controls all issues relating to the Company's Sustainable Development, as well as the hedging process.

More information about Corporate Governance, Risk Management and detailed financial data is available in HALCOR's 2010 Annual Financial Report and on the company's website www.halcor.gr (Investor Relations / Financial Results - Financial Reports section).

2.4.2 Impact Management and Issue and Action Scaling

HALCOR bases its operation on the implementation of systematic risk management in order to take into consideration the most significant impact that its operation has onto

its stakeholders; as a result, it implements all the necessary measures to cope with this impact. The key identified groups are Company employees, shareholders, customers and suppliers, which are the stakeholder groups mostly affected by HALCOR's activities. In this context, HALCOR seeks further engagement with these stakeholders which can assist in establishing the right priorities for continuous improvement.

Aiming at the constant improvement in all the range of impacts occurring from its operation, HALCOR completes actions relating to the following points of its corporate strategy:

- Constant reduction of the Company's environmental footprint through the implementation of its Environmental Management System.
- Further improvement of the Occupational Health and Safety Management System.
- Further product development in order to meet the needs of its customers and the market in which it operates.
- Cooperation and harmonic symbiosis with the local community.
- Economic development and production of value for the Company's shareholders and the public at large.

Targets

The targets set for 2010 were met to a satisfactory level. In the context of continuous effort for improvement, the course of targets set is presented, while new ones for the year 2011 are also presented.

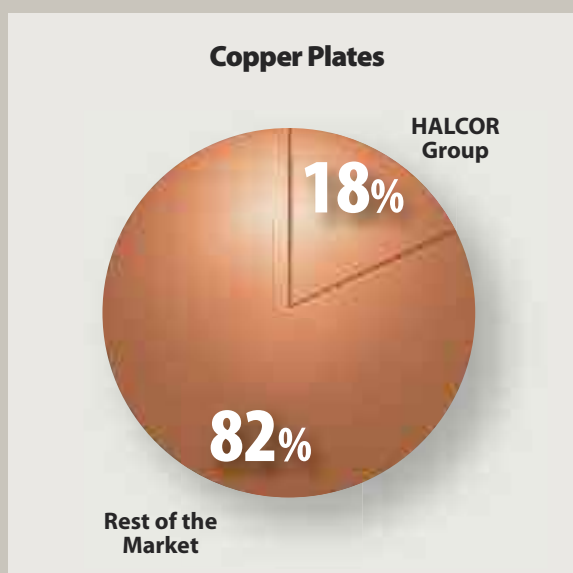
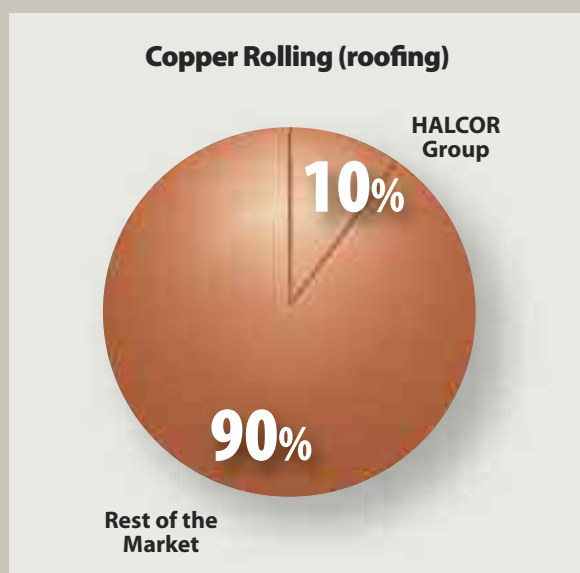
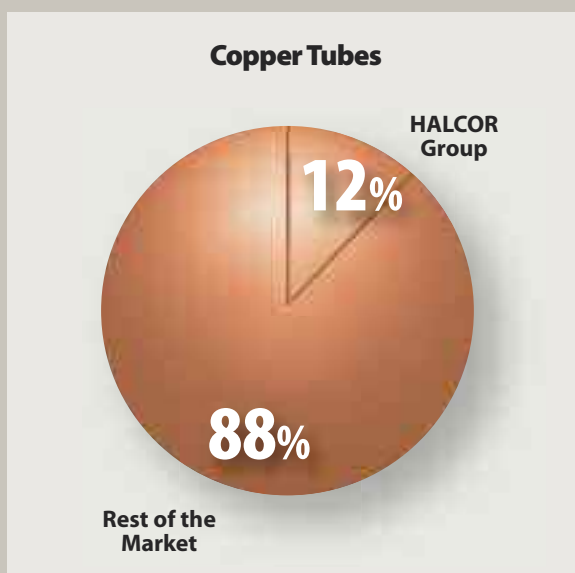
Targets 2010	Performance 2010
Establishment of the Corporate Responsibility Team.	In 2010, the Corporate Responsibility Team was re-structured and trained on issues of Corporate Social responsibility.
Communication to senior management on current issues of transparency and corruption.	25 executives received specialized training on issues of transparency and corruption.

Targets 2011
Systemisation of Corporate Responsibility issues that will be forwarded to the Company's Board of Directors.
Accession to the FTSE4GOOD index.

3. Marketplace

HALCOR, with over seventy years of experience, is one of the world's leading companies in the copper and copper alloy processing sector and the largest copper producing company in Southeast Europe. More specifically, HALCOR dominates the Greek market and covers 80% of its needs. With 88% of its sales realized overseas, HALCOR has gained an intensive exporting character and plays a significant role in Greece's balance of trade.

European Market Shares of HALCOR Group products (2010)



Copper is a metal with many beneficial properties for the economy, the environment and health:

- it is 100% recyclable
- it has a long life expectancy
- it has high endurance (resistance towards high pressure, high temperatures, fire)
- it is 100% waterproof
- it has very important anti-bacterial properties (water hygiene)
- it contributes to the aesthetic appearance and economy of spaces.

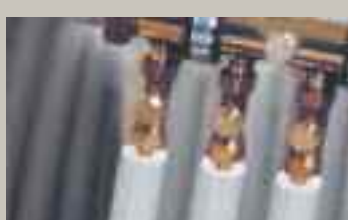


New trademark for antimicrobial copper

On March 14th 2010, at the conference held by the American Healthcare Association in California USA, the trademark "Antimicrobial Copper" was publically launched.

This new trademark was created to assist the creation of a new market and to support a demand for higher quality products. The name "Antimicrobial Copper" and its sing "Cu+" together formulate the logo of a global trademark, available for use by the copper industry and by the suppliers of the final products. The aim of this new trademark is to determine the identity of antimicrobial copper alloys and their products.

More information on Terms and Conditions regarding the use of this trademark, are available from the Hellenic Copper Development Institute and on the following website: www.antimicrobialcopper.com



3.1 Products and Services

HALCOR's wide range of products is focused mainly on copper, brass and zinc as well as a variety of related alloys. The Company's ongoing strategy to provide reliable products and top-quality services has distinguished HALCOR as one of the most important copper companies in the demanding international market with a significant commercial success.

The products manufactured and traded by HALCOR Group are presented on page 15.



3.1.1 Copper Products

During the past years, HALCOR has developed copper products that offer reliable solutions for various applications such as all pipe installation, external or in-floor heating, natural gas, air conditioning. Furthermore, it offers specialized solutions for industrial, architectural, electrical, mechanical and decorative applications.

Copper tubes are one of the Company's main product categories. HALCOR has developed and promoted a series of products-copper tubes under the name TALOS that meet several different needs with a wide range of applications. TALOS series of products includes,

among others, products with special characteristics that are environmentally friendlier. These products are:

Copper Tubes Talos Ecutherm



TALOS ECUTHERM copper tubes are products of advanced manufacturing technology that excel when compared to traditional means of insulation.

The combination of copper properties and high performance industrial insulation, offer 20% energy savings, since the reduction of losses in pipe networks exceeds 50% in comparison to other equivalent, non-insulated networks.

Based on these properties, TALOS ECUTHERM copper tubes are regarded as an exceptionally environmentally friendly product that can contribute significantly to applications aimed at preventing climate change.



Copper Bimetallic Tubes

HALCOR innovates and widens its product range for air-conditioning and cooling applications, by introducing a new product of pioneering technology, the bimetallic copper tube TALOS DUAL. This innovation utilizes all the advantages of copper, achieving at the same time optimum technical solutions at competitive prices. TALOS DUAL tube is made of a copper tube with an external seamless aluminium layer that acts as a homogeneous tube with unique properties. The metallurgic bonding of the two materials combines the strength and reliability of copper with the low weight and flexibility of aluminium.



Copper Tubes Cusmart

HALCOR, investing in research and development, has also created another innovative product, by utilizing copper and keeping consumers' needs in mind. This product called CUSMART is a copper tube with a special coating, which combines flexibility, endurance and hygiene properties.

The on-line production method used ensures a unique homogeneity, balance and superior technical characteristics. CUSMART copper tubes are tailored for every use and combined with a full range of mechanical components, constitute an integrated plumbing system of advanced technology.

CUSMART copper tubes are produced in three different types and can be used for any application such as water supply, heating and in-floor heating – cooling. Especially for heating, using CUSMART tubes with their effective exterior industrial insulation, achieves significant energy savings.



3.1.2 Copper Alloy products

Brass is a material with a significant number of applications due to its properties. Brass applications can be found in the arts, technology and industry. Compact and hollow brass bars have numerous industrial uses (hydraulic-electrical and mechanical components, decoration, etc.).

Copper and zinc alloys are used for the manufacture of cartridge cups and discs, whereas copper-nickel (CuNi), copper-nickel-silicon (CuNiSi) and copper-aluminium-nickel (CuNiAl) alloys are used in coin production.

3.1.3 Zinc Alloy Products

Titanium zinc products (ZnTiCu), are primarily sheets and strips, which are suitable for building roofs, external building cladding or interior applications. Furthermore, these sheets and strips are used as intermediary materials in the manufacturing industry, while other zinc alloys are suitable for construction and decorative applications. Titanium zinc is a 100% recyclable material and has very good mechanical properties, demonstrating very low maintenance requirements (resulting in low expenditure).

More analytical data and technical specifications regarding every product category, can be found on the Company's website www.halcor.gr, section Products.



3.2 Research and Development of New Technologies

HALCOR continuously invests in the research and development of new technologies in the copper sector, in order to improve its products and meet current requirements. In this context, the ELKEME S.A. Hellenic Research Center for Metals was founded, and HALCOR participates in it by 30.9%. ELKEME S.A. supports the Greek metals industry, by contributing to its technological advancement and to improvements to quality and competitiveness. The objective of ELKEME is to conduct research on the development of materials, of production processes and on the improvement of the properties of the final products.

ELKEME's positive contribution to the research and development of new technologies and products is achieved through:

- solving problems that may arise before as well as during the production of copper, zinc and their alloys, at HALCOR's manufacturing sites
- developing new pioneering and environmentally friendly products.

Indicative examples of products for the creation of which ELKEME's role was decisive, are:

- ecutherm, special copper tubes which offer considerable energy savings
- CUSMART flexible copper tubes, which are easier to use in a wide range of applications
- contribution to the corrosion studies and other related studies regarding the development of the new innovative product TALOS DUAL.

At the end of 2010, HALCOR R&D was founded, aiming to carry out research and development for new copper and copper alloy products. HALCOR R&D had the leading role in the development of the new product TALOS DUAL.

3.3 Quality Management

The Company implements a Quality Management System according to the requirements of the ISO 9001 standard, which is certified by an independent approved auditor. High quality products is an ongoing strategy for HALCOR; therefore, it implements a strict quality control system for the manufacture of all its products, across the entire production process. As a result of these processes and the high quality products provided, HALCOR is able to cover its products with long-term guarantees. Within this framework, the Company has developed internal processes and procedures that ensure the following:

- monitoring and control of raw materials and products
- product safety.

The quality control systems and procedures applied, are monitored and verified through frequent audits by clients and by Greek and international Certification Auditors.

Monitoring and control of products

HALCOR carries out continuous checks that aim to ensure compliance with any order's specifications and the customers' demands.

In parallel, all incoming materials are checked for quantity and quality, with reference to contractual agreements.

The various checks during production and the product acceptance criteria are based on specific procedures with detailed working instructions and specifications. Additional control points and checks are implemented as required, to ensure compliance to the client's specifications. All related checks are recorded in appropriate files which are then kept as records in order to provide reference to the quality/reliability checks of products even after a long period has elapsed.

Product Safety during Application

HALCOR issues a relevant Material Safety Data Sheet that informs the recipients of its products that contact with these products is safe. In addition, information leaflets are also issued; they include all necessary information on the optimal operational conditions of its products. With reference to water and natural gas pipes for the Greek market, special manuals are distributed, which include an operational guarantee provided by HALCOR.

Furthermore, HALCOR regularly checks the interaction of its products with the Health and Safety of the users, since in many occasions the Company's products are used in critical applications such as water pipes. In any case, copper's natural properties contribute to the health protection of end users, since copper possesses significant anti-bacterial properties.

3.3.1 Product Certification

HALCOR's product eligibility regarding their applications and the markets they serve is certified by the relevant approved Certification Bodies.

The following table presents the product labels used by HALCOR alongside the countries they are used in.

Product Quality Certification Labels

NAME	COUNTRY	LABEL
AENOR	Spain	
CSTB	France	
AFNOR	France	
DVGW	Germany	
GL	Germany	
SITAC	Sweden	
BSI	U.K.	
CE	European Union	
VTT	Finland	
CU	Germany	
ZIK	Croatia	
TUV CERT	Germany	
AR	Romania	
NSF	USA - Canada	
NSAI	Ireland	

Responsible Communication

HALCOR ensures that all its promotional actions and commercials regarding its products are in full compliance with national legislation. Furthermore, the Company does not distribute products that are the subject of public consultation or debate.

HALCOR adopts the Hellenic Code of Advertising and Communication that has been prepared by the Hellenic Association of Advertising and Communication Agencies as well as all radio and TV stations. The Code governs all advertisement for every product or service type, as well as all types of commercial and social communication. Furthermore, the Code of Advertising and Communication formulates the guidelines of professional ethics and moral behavior that must be observed towards the citizen – customer, by every party involved in the advertising sector, i.e. the the advertisers, the advertising agencies the advertising media, as well as the assignors and assignees of all the above mentioned forms of communication.

3.4 Customer Relations

Effective management of customer relations, a continuous dialogue and meeting customer requirements are cornerstones of HALCOR's business success. This explains why the company regularly monitors with personal contacts/ and customer questionnaires, the level of satisfaction of its customers. Furthermore, it records its customers’ views, evaluates data from questionnaires and implements possible corrective actions as needed, with the goal of continuously improving customer service and customer satisfaction.

Customer Distribution 2010

	Number of Customers	Percentage
Domestic Customers	1,265	83%
International Customers	266	17%
Total	1,531	100%





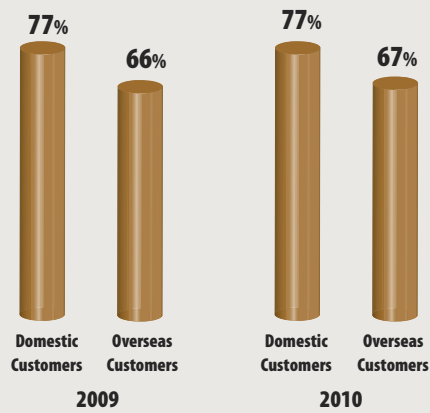
3.4.1 Customer Satisfaction

Customer satisfaction and the provision of high quality products and services represent a strategic target for HALCOR. Within this framework, the Company commenced sending customer questionnaires in 2008, evaluate them every year and then take all the necessary corrective actions, aiming to further improve its customers’ service and satisfaction. For 2011, the Company has set the target of including questions relevant to Corporate Responsibility in its annual customer satisfaction survey.

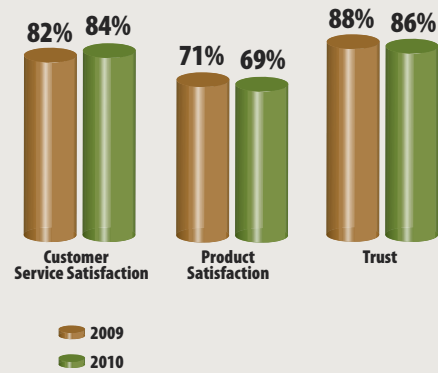
Through the Quality Management System that HALCOR implements a specific procedure in which the complaints of customers are recorded and analyzed/evaluated is used.

	2009		2010	
	Domestic Customers	International Customers	Domestic Customers	International Customers
Overall Customer Satisfaction	77%	66%	77%	67%
Customer Service Satisfaction	82%	67%	84%	69%
Product Satisfaction	71%	64%	69%	65%
Trust	88%	68%	86%	67%

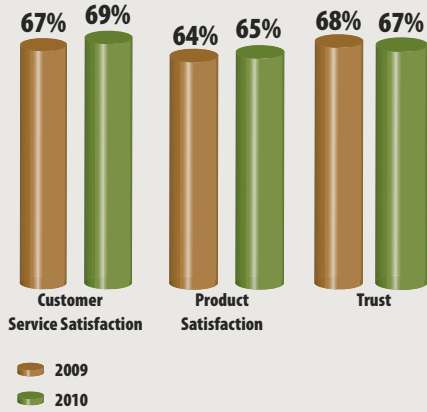
Total HALCOR Customer Satisfaction



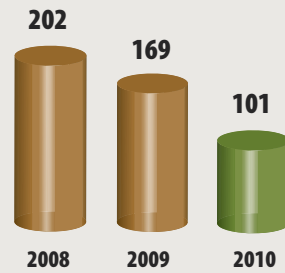
Domestic Customer Satisfaction Degree (2010)



International Customers' Satisfaction Degree (2010)



Customers Complaints



In addition, as communications with customers is of paramount importance for HALCOR and as its production is focused on the needs and specifications of every customer order, it has regular audits by existing and/or potential customers carried out in its premises in order to ensure the best possible customer service.

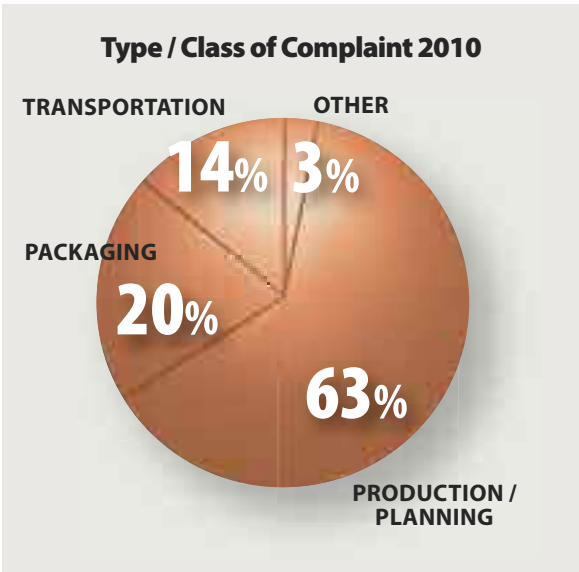
3.4.2 Complaint Management

HALCOR considers complaints as an opportunity for improvement. The Quality Assurance Department of the Company record all customer complaints at all times.

Year	2008	2009	2010
Total Number of Complaints	202	169	101

During 2010, the continuous effort of HALCOR to improve quality and customer service has resulted to a substantial decrease by 40% in complaints.

It is also worth noting that during 2010, despite the 50% increase in sales, the cost of complains settled with customers decreased by 80%.



3.5 Responsible Purchasing

For HALCOR, its suppliers constitute a basic stakeholder group with which it cooperates, communicates and trades. Due to the nature of its business activity, supplies play an important role in HALCOR’s final products and this is why HALCOR regards its suppliers as partners. The principles set as a basis for the Company’s relationship with its suppliers are:

- Equality
- Integrity
- Respect
- Objective Evaluation
- Honesty
- Absolute transparency
- Sincerity

Wherever possible, HALCOR tries to cooperate with suppliers and contractors from the local community. This way it contributes to the development of the local communities’

economy and to the return of capital to the areas within which it operates. It is characteristic that the raw materials (metals) that constitute the main volume of supplies are mainly available for purchase outside Greece. Despite that, HALCOR has managed to acquire 6.53% of total purchases from local suppliers.

The Company cooperates in total with over 1.700 suppliers and contractors, of which the most important total 500. The main materials purchased by HALCOR during 2010 were:

Purchased materials		Quantity	
Raw material	Metals	Kg	85,175,241.50
	Metals	pieces	178,045.00
	Plastic	Kg	1,050,725.10
Production related materials	Consumables	kg	1,153,031.44
	Consumables	Litres	118,403.70
	Consumables	m ³	4,942,501.20
	Consumables	pieces	1,735.00
	Fuels	Litres	260,204.00
	Fuels	NM ³	7,031,422.00
	Fuels	Kg	105,555.00
Supporting materials and spare parts	Spare parts	Kg	139,620.61
	Spare parts	meters	10,063.54
	Spare parts	m ²	193.40
	Spare parts	set	232.00
	Spare parts	carton boxes	10.00
	Spare parts	pieces	93,827.00
Packaging materials	Metal	pieces	15,900.00
	Metal	Kg	26,943.49
	Wood	pieces	68,804.00
	Wood	m ³	1,525.28
	Paper	Kg	15,951.00
	Paper	pieces	1,210,917.00
	Belts	pieces	262,317.00
	Plastic	Kg	193,782.15
	Plastic	meters	737,100.00
	Plastic	m ²	103,348.00
	Plastic plugs	pieces	6,749,524.00

3.5.1 Supplier Evaluation and Selection

Purchasing for HALCOR is of the utmost importance as it directly influences the quality of its final products:

- raw materials
- equipment, production and quality control tools
- packaging materials and consumables

- service provision
- employee clothing, protective clothing and equipment and meals.

HALCOR follows a specific process for purchasing, aiming at ensuring compliance to all related specifications and the required quality standards of the supplies and of the final products. Within 2011, HALCOR will incorporate criteria related to Corporate Responsibility in the suppliers evaluation process.

The purchasing of raw materials is carried out by pre-approved suppliers / subcontractors wherever possible or following an evaluation of potential suppliers / subcontractors.

Supplier Distribution

Supplier Category	Number of suppliers	
	2009	2010
Local suppliers	78	161
National suppliers	773	1,116
Overseas suppliers	249	404
Affiliated companies	8	34
Total	1,108	1,715

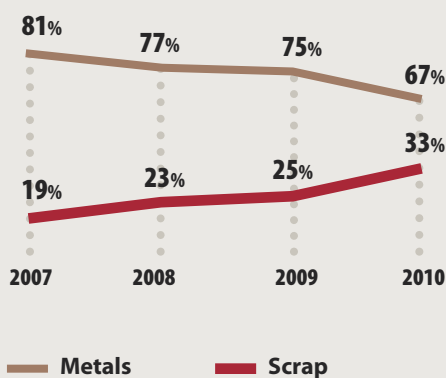
Selection criteria include, amongst others, the geographical source (local suppliers preferred), existing managerial and handling systems as well as environmental criteria.

Aiming at ensuring Occupational Health and Safety, HALCOR acknowledges the potential risks to health and safety by the goods, equipment and services purchased and/or used and communicates its requirements and relevant applied procedures to its suppliers and partners.





**Scrap proportion
to total metals purchase**



3.5.2 Purchasing Recyclables (scrap)

HALCOR uses various scrap metals as raw materials and therefore combining economic efficiency with environmental protection (reduction of inert waste) and natural resources protection (reduction of raw material consumption). HALCOR is the largest recycler of copper, zinc and their alloys in Greece.

The term scrap is used for describing recyclable materials, which are left over from all kinds of production processes and product consumption, such as vehicle components, building equipment as well as other materials. Although scrap is frequently mistaken as a type of waste, in reality it is a very useful secondary raw material with significant

monetary value. Globally, the scrap industry processes over 145,000,000 tons of recyclable materials annually, used in the production of feed materials for further industrial use.

HALCOR recycles approximately 80,000 tons of scrap annually.



Targets

For HALCOR, Corporate responsibility is synonymous of constant improvement. As a result, specific targets are set annually and monitored constantly while new ones are continuously being set.

Targets 2010	Performance 2010
Integrate Corporate Responsibility issues in the annual customer satisfaction survey.	Not accomplished.
Increase the percentage of scrap in purchased metals in 2010 to 40%.	The percentage of scrap in purchased metals in 2010 amounted to 33%.
Integrate Corporate Responsibility criteria in the evaluation procedure of its suppliers.	During 2010 the suppliers' evaluation procedure was amended.
Improve customer satisfaction in all areas (by improving service, products, etc.).	See Section 3.4.1. Customer Satisfaction .
Support more local suppliers, by selecting and integrating them into the HALCOR supply chain.	In 2010 the Company's local suppliers numbered 161, doubling the respective number for 2009 (78 local suppliers).
Targets 2011	
Integrate Corporate Responsibility issues in the annual customer satisfaction survey.	
Increase the percentage of scrap in purchased metals in 2011 to 40%	
Integrate Corporate Responsibility criteria in the evaluation procedure of its suppliers.	
Further improvement of customer satisfaction in all areas by 5%.	
New copper and copper alloys products.	

4. Human Resources



HALCOR's business success is dependent on the commitment, knowledge and capabilities of its human resources. Its human capital is one of the most important elements of its assets and forms one of the most important stakeholder groups. This is why the Company cultivates an equal opportunity and meritocratic working environment that enhances the capabilities and rewards the efforts of its employees.

4.1 HALCOR's Human Resources Policy

The Company's policy is to attract highly qualified personnel for the optimal and timely fulfillment of its needs, to establish objective evaluation and selection criteria and to ensure meritocracy and fairness in recruitment, always operating with sound and transparent procedures.

4.1.1 Employee Code of Values and Conduct

HALCOR, aiming to ensure a healthy work environment and a unified culture of responsible behavior, has established a code of values and conduct for its employees. This Code describes the basic principles and the rules governing HALCOR's employee behavior. Its implementation is mandatory for every employee throughout the range of the Company's activities.

The general principles of the Code of Employee Values and Conduct are the following:

- Quality of staff: Team spirit, respect towards colleagues
- Supporting the local community
- Protection of the environment and the cultural heritage of the local community
- Respect the environment
- Responsibility, honesty and respect towards the customer
- Protecting human rights
- Respect for human values: no form of discrimination
- Confidentiality of personal data
- Appropriate behavior with customers
- Protection of the company's interests, reputation and property.

4.2 Human Resources Data

On 31/12/2010 HALCOR's total employee number was 493. A great percentage of this reduction, compared to 2009, is attributed to the secession of the Brass Rods and Tubes department, and the creation of the FITCO S.A. subsidiary, owned 100% by HALCOR on June 30th, 2010.

HALCOR's Human Resources Data

Human Resources Data (31/12)	2008	2009	2010*
Men	683	615	456
Women	59	53	37
Total Employees	742	668	493
Employee departures (e.g. retirement, contract termination)	164	88	122
Recruitments	138	14	14
Third Party Employees	64	48	56

* The 2010 data does not include 66 employees transferred from HALCOR to FITCO S.A. in view of its secession on 30/06/2010.

HALCOR pursues cooperation the local communities and considers their expectations in order to deal with all issues of common interest. Within this context, HALCOR ensures that a significant part of its human resources needs is covered by employees from the broader local geographical area in which it operates. Apart from the obvious economic and social benefits for the local communities which stem from the employment of locals, there are also environmental benefits; namely the reduction of the environmental impact due to the reduction of transportation requirements and consequently the reduction of polluting air emissions.

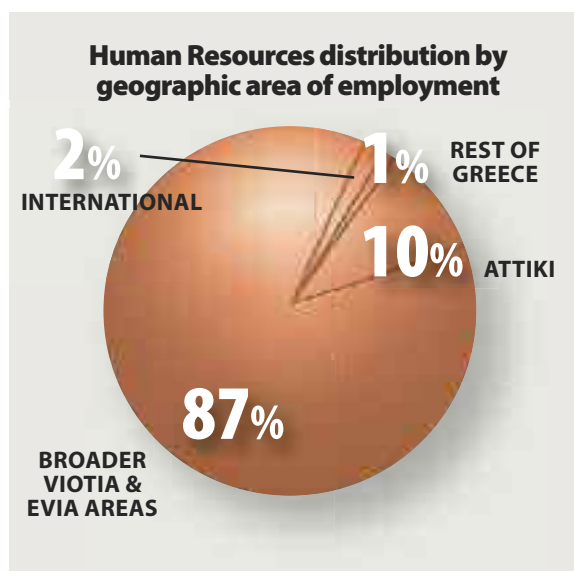
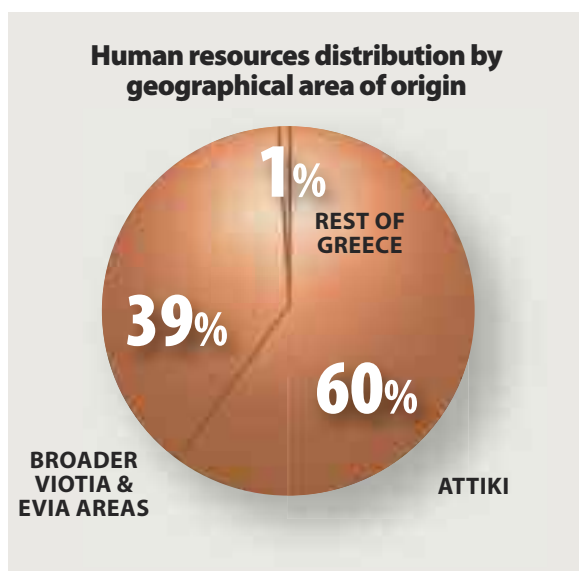
Employee Distribution by Geographic area of Origin.

Geographic Region	2008	2009	2010
Attiki	482	429	297
Broader Viotia and Evia areas	246	227	190
Rest of Greece	14	12	6
Total	742	668	493

Employee Distribution by Geographic area of Employment

Geographic Region	2008	2009	2010
Broader Viotia and Evia areas	633	574	429
Rest of Greece	102	87	56
Other (relocation abroad)	7	7	8
Total	742	668	493

Below is presented data relating to recruitment and departures from the Company by age group, gender and geographic region. It is noted that in 2010, 4 of the 14 new employees came from the broader Viotia area.



In the following tables the total number of new recruitments is presented, both by age and geographic region.

Age Breakdown of HALCOR's Recruitment (2010)

	18-25	25-40	40-50	50+
Men	4	5	1	1
Women	1	1	1	-
Total	5	6	2	1

Total Recruitment by Age and Geographic Region (2010)

	18-25	25-40	40-50	50+
Viotia	3	1	-	-
Rest of Greece	2	5	2	1
Total	5	6	2	1

In the following tables, the total number of departures for 2010 is presented both by gender and geographic region.

Total departures by Gender and Age (2010)

	18-25	25-40	40-50	50+
Men	6	50	24	30
Women	2	4	4	2
Total	8	54	28	32

Total Departures by Age and Geographic Region (2010)

	18-25	25-40	40-50	50+
Broader Viotia and Evia areas	5	18	6	4
Attiki	3	34	20	26
Rest of Greece	-	2	2	2
Abroad	-	-	-	-
Total	8	54	28	32

In the following table the total number of departures during 2010 is presented, due to discharge, contract termination, resignation and retirement.

Departure Analysis	2009	2010
Discharges	52	98
Contract termination	4	3
Resignations	14	9
Retirements	18	12
Total	88	122

It should be noted that HALCOR has never employed personnel under 18 years of age. In 2010, as in previous years, there were no incidents of child or compulsory labor, nor is there the possibility of such incidents to occur. The Company is against child and compulsory labor and is in full compliance with existing national and European legislation on the protection of human rights.

4.3. Human Resources Management

Human resources are regarded as HALCOR’s most valuable asset. For this reason, the Company takes all necessary measures to ensure the best possible working conditions. Equal opportunities and the avoidance of any kind of discrimination, internal communication between employees and the Management, as well as additional financial or social benefits, are basic parameters towards this direction and constitute HALCOR’s socially responsible profile.

4.3.1 Equal Opportunities

For HALCOR, promoting equal opportunities and avoiding any kind of discrimination are nonnegotiable principles. The Company ensures that no type of discrimination on the basis of gender, nationality, physical ability, age, sexual orientation, religion or any other criterion is acceptable and that all procedures, actions and policies affecting employees are based on the principles of equal opportunities.

HALCOR encourages the participation of women in its workforce. However, the participation of women as a percentage of the total workforce is reduced, due to the nature of its operations as an industry. An additional deterrent for women is the long distance between the Company's production facilities from major urban centres.

Hierarchical Level of Human Resources by Gender

Ranks	2009		2010	
	Men	Women	Men	Women
Managers	11	0	11	0
Directors	21	0	14	0
Supervisors	57	4	40	2
Office Staff	101	42	80	31
Warehouse keepers and workers	436	7	322	4

In 2010, as in the past, there were no complaints or recorded incidents of discrimination. In addition, there are no wage discriminations between same level male and female employees, since the sole criterion for hiring and evaluating employees are their skills and capabilities.

4.3.2 Additional Benefits

Having provided all statutory benefits according to national legislation, HALCOR offers additional benefits aiming at increasing the sense of reward to its employees, to retain capable employees and to attract new employees. There follows an indicative list of additional benefits:

- private insurance coverage for life and health risks for all employees
- meals for all employees
- emergency financial assistance in case of serious health problems
- transportation of employees working outside urban centers to and from their place of residence with Company buses
- Christmas gift (voucher) for employee's children (up to 12 years old)
- free accommodation at a summer camp, for all employee's children (up to 14 years old), for a period of three weeks during the summer months
- loans, financial benefits, in accordance with corporate policy
- company car and mobile phone, in accordance with Company policy
- housing in accordance with company policy. In 2010, HALCOR continued to offer free housing to some of its employees at a housing facility owned by the Company, in Oinofyta.

In addition, HALCOR contributes to the relief of health issues by implementing projects aimed at supporting staff and their families. Such programs include group insurance (health care and compensation), financial assistance in cases of urgent need, blood bank and precautionary medical checks.

Assistance programs for serious illnesses

Program Beneficiaries	Education / Training		Counseling		Prevention / Risk Control		Blood Bank	
	Yes	No	Yes	No	Yes	No	Yes	No
Employees	√		√		√		√	
Employee Families		√		√		√	√	

4.3.3 Collective bargaining agreements

All HALCOR employees (100%) are covered by collective bargaining agreements and the majority are covered by collective open-end employment agreements. The following table shows the Company's human resources by category of employment and agreement.

Employment type	2008	2009	2010
Collective bargaining agreement	100%	100%	100%
No collective bargaining agreement	0	0	0
Open-end employment agreement	739	667	490
Fixed-term employment agreement	3	1	3
Part-time employment	8	1	3
Full-time employment	100%	100%	100%
Seasonal employees	0	0	0
Total number of employees	742	668	493

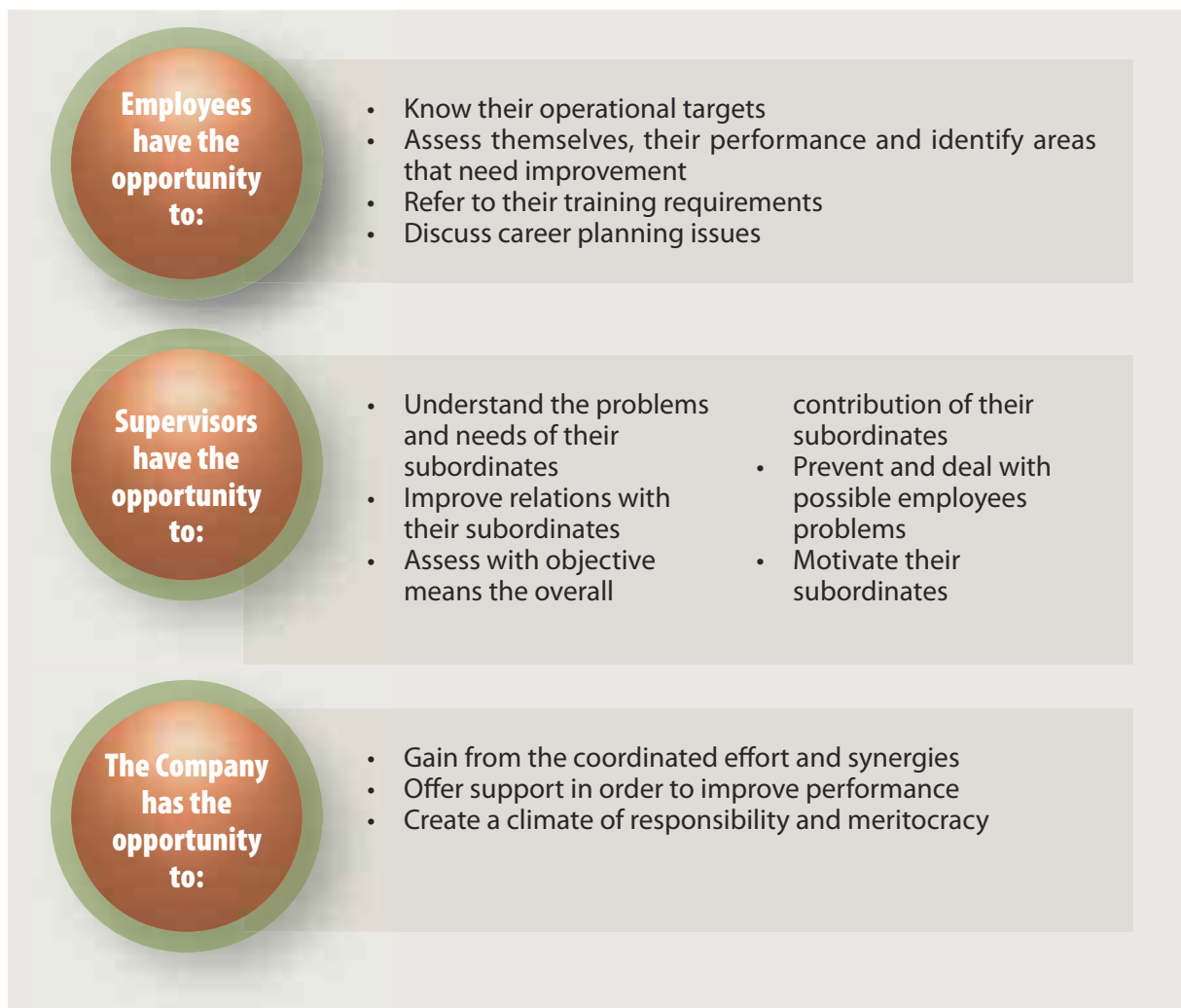
4.4 Employee Assessment

Aiming at the continuous improvement of its workforce, the provision of equal opportunities and the detection of possible training needs, HALCOR implements an evaluation system of its employees' professional performance. One of the main criteria is the actual performance against the relevant job description and its responsibilities as well as the levels of cooperation and participation an employee demonstrates HALCOR's evaluation system aims at:

- rewarding good performance
- encouraging performance improvement through training and development
- harnessing employee's skills and abilities by connecting individual and business goals

- developing its staff via career planning and promoting competition within the organization
- improving communication and cooperation between the evaluated employee and his/her assessor.

In addition, this assessment system has the following advantages:



The main target of employee assessment is the employee's professional performance improvement. For this reason, every employee has access to their personal assessment results.

In 2011, HALCOR is planning to implement the new pilot evaluation system for its executives

entitled “Evaluation 360°”. According to this system, every executive under evaluation, will receive feedback on all sectors (Main principles, Leadership, Behavior, Communication, Efficiency – Innovation), from the entire range of relationships he/she has developed within the Company, i.e. supervisors, subordinates and colleagues.

This new system aims to further develop the evaluation process into a more dynamic and reciprocal process. The executives who will participate and be evaluated will gain a wider understanding of the way their working environment comprehends the result of their work. Furthermore, it will work as a basis for the further development of their capabilities.

4.5 Training and Development

HALCOR offers its employees opportunities for training, further education and lifelong learning, aiming at performance improvement, specialization of knowledge and the provision of development opportunities. Several seminars and training programs are organized and implemented on an annual basis, while training needs are identified and defined in accordance with:

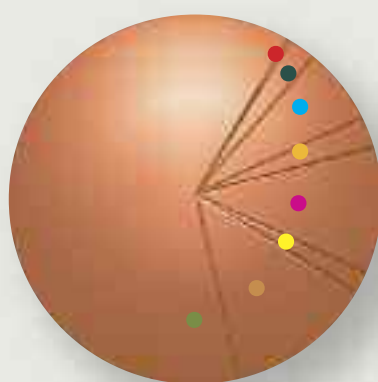
- the employee assessment, where specific gaps in know-how are identified and improvement plans are set
- departmental targets as a result of corporate objectives that promote the attainment of new skills and capabilities.

Training indicators

Indicator	2008	2009	2010
Courses held	127	80	448
In-house training participation (number of employees)	65	17	1187
Participation in external seminars, conferences (number of employees)	62	63	60
Training work-hours (participation in hours)	5,657	3,088	5,653
Amount spent on education (in euro)	121,386	82,346	60,980

The following table presents the 2010 trainings per work position / hierarchical degree.

Personnel Training	Number of Employees	Total Hours	Annual Training average per position / level (2010) of training
Board of Directors	11	-	-
Managers	14	365	26.1
High-End Executives	42	362	8.6
Employees	111	1,414	12.7
Superintendents and workers	326	3,512	10.8
Total	493	5,653	11

Man-hour training distribution (2010) per subject

14	HUMAN RESOURCES
145	INFORMATION
387	POST GRADUATE STUDIES
159	FOREIGN LANGUAGES
631	ECONOMICS
100	SUPPLIES / PURCHASES
719	SALES
3,498	TECHNICAL ISSUES

Finally, it is worth noting that there have been no corruption incidents within the Company so far. However, as a precautionary measure, in 2010 the Company conducted a specialized training seminar on corruption, attended by 25 of the Company's executives from all Departments.

Postgraduate study programs

Year	Employees
2007	7
2008	19
2009	7
2010	6

Postgraduate study programs completed in 2010, focused on the following subjects: F9 Financial Management, Management and Business Administration (MBA), executive MBA, professional MBA, postgraduate accounting and finance.

Student Internships

The Company encourages student internships or summer jobs at its facilities. For this reason, HALCOR collaborates with the Department of Mining and Metallurgical Engineering of the National Technical University of Athens and provides an internship every year. In addition, in 2010, HALCOR offered 8 internships with remuneration (more information is available in Chapter "Society").

4.6 Internal Communication

Constant, meaningful and reciprocal communication is of utmost importance for HALCOR, since it further strengthens the trust between the workers and the Management. In this context, the Company implements a series of practices, aimed at enhancing internal communication while, at the same time, pursuing the enhancement of the reciprocal communication between Management and workers. The main internal communication methods at HALCOR are the following:

- i-hal internal network (intranet)
- Company website (www.halcor.gr)
- electronic (via e-mail) information to the personnel regarding any new development
- immediate information to all employees on every issue concerning the Company, via newsletters on notice boards.
- frequent meetings between the General Management and the heads of the Departments, and between the heads of the Departments and the personnel, in order to exchange information on the course of the Company.
- quarterly newsletters from the General Manager to all personnel.

HALCOR applies an 'open door policy', whereby Management is always willing to accept and discuss staff-related issues.

Internal Network (Intranet)

The i-hal internal network (intranet), constitutes an internal process by which employees are informed directly on latest developments. Through this internal website, employees have access to the latest, most accurate, comprehensive and interactive pieces of information on various subjects related to HALCOR's activities.

HALCOR's internal website is functional and user-friendly and includes useful information on a wide variety of topics regarding its operation, such as:

- current news
- useful documents
- human resources
- warehouse deliveries
- mandatory operational systems.

Company Website (www.halcor.gr)

In 2010, HALCOR upgraded its website. A special section relating to Corporate Responsibility was created within this context. This section includes all information relating to HALCOR's corporate social responsibility actions. Furthermore, the Company's website includes the Corporate Responsibility and Sustainability Report Feedback Form that all stakeholders are asked to fill in and return to the Company.



Targets

The targets set for 2010 were met to a satisfactory level. In the context of continuous effort for improvement, the course of targets set is presented, while new ones for the year 2011 are also placed.

Targets 2010	Performance 2010
Redesign the Company's Intranet to strengthen internal communication and include all human resources related issues.	Completed (see section 4.6 Internal Communication).
Increase internal training for all employees.	5.653 training hours were completed in 2010, compared to 3.088 in 2009 (see Section 4.5, Training and Development) .

Targets 2011
Completion and operation of HALCOR's new corporate website.
Pilot implementation of the "Evaluation 360o" Personnel Evaluation System.

5. Occupational Health and Safety



For HALCOR, the provision of a healthy and safe work environment for its employees is a continuous objective.. The Company demonstrates its interest on the issue by investing annually on infrastructures and other means related to Occupational Health and Safety, while it has created all the necessary administrative and organizational structures in order to monitor its performance in this sector.

HALCOR has instituted and implements Occupational Health and Safety principles that are binding for all employees across the range of the Company's activities.

HALCOR's Health and Safety Principles

- All accidents and occupational diseases can be avoided by the use of proper preventive means
- The Company's supervisors are responsible for the prevention of accidents.
- Working safely is a prerequisite for employment and cooperation with the company.
- Training of employees and subcontractors in safety issues is essential and necessary
- Supervisors' main duty is to monitor compliance with the rules of occupational safety with on-site audits
- All accidents and near-miss accidents should be investigated immediately and in depth
- The prevention of accidents is beneficial for the Company and its employees
- All employees and subcontractors should be involved in the effort to improve safety.

HALCOR's Quality, Environmental and Occupational Health and Safety Policy

HALCOR's senior Management bearing in mind product quality, the protection of the Environment and Occupational Health and Safety has integrated the Management of the parameters affecting the above concepts and operations in a Unified System and is committed to its implementation.

The Unified System is in accordance to the Organizational and Administrative requirements described in the international standards EN ISO 9001:2008, EN ISO 14001:2004 και OHSAS 18001:2007. It covers the entire range of operations regarding the design, production, marketing and formation of copper and copper alloys products, for coated and non-coated copper and copper alloy tubes, rolled products with or without surface treatment in the form of sheets and strips, and copper wires for electrical pipes. The principles governing the implementation of the **Unified Management System** are specified in the present **Quality, Environmental and Occupational Health and Safety Policy**.

HALCOR S.A. is committed to provide all the means for full compliance with the legal and other requirements governing its operation. It is committed to continuously work towards the prevention of all occupational accidents and diseases, as well as minimizing the risks that could potentially occur from its operation.

Ensuring Occupational Health and Safety is a primary goal and commitment for the Company's Management, a Health and Safety Policy has been implemented, based on the above mentioned principles that HALCOR adheres to. On the basis of its Health and Safety Policy, HALCOR:

- Has as a priority and continuous target to achieve the highest possible standards of health and safety for its employees, subcontractors and visitors.
- Provides all necessary resources (financial, human, organizational, etc), in order to achieve such standards.
- Recognizes that promoting health and safety at work is a best business practice and is committed to continuous improvement
- Commits to comply with relevant legislation and to implement the highest standards of health and safety.
- Recognizes health and safety as a key criterion for any business assessment and decision.
- Assigns absolute priority to accident prevention and controlling hazardous situations prior to their occurrence
- Recognizes the key role of human behavior in health and safety and ensures the constant update and training of its employees in this area.
- Supports the active participation of its entire workforce, regardless of hierarchy, in improving health and safety



- Aims at promoting a culture of safety throughout its activities, including other companies, contractors, suppliers, etc.
- HALCOR's strategic target is the constant reduction of accidents.

CONTINUOUS IMPROVEMENT  **ZERO ACCIDENTS**

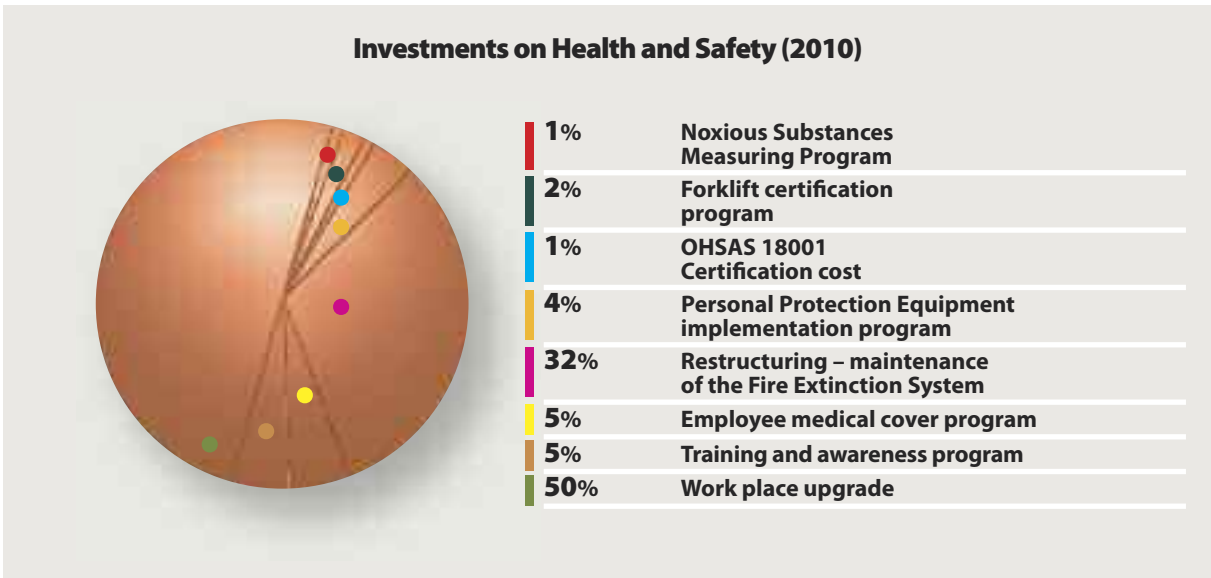
5.1. Investment and Operational Spending on Health and Safety

HALCOR's Management recognizes the importance of Occupational Health and Safety and with total respect for the human factor is realizing a series of investments, aimed at the constant upgrading of its infrastructure in this sector. In parallel, the totality of the investments realized at the Company's facilities, have as their prerequisite the improvement of the Health and Safety conditions of its personnel.

	2008	2009	2010
Spending on Health and Safety (in euro)	350,000	520,000	332,000

During 2010, 332,000 euro were spent on Health and Safety issues such as:

- Personal Protection equipment implementation program
- Restructuring – maintenance of the Fire Extinguishing System
- Employee medical cover program
- Training and awareness program
- Workplace upgrades
- Noxious substances Measuring Program
- Forklift certification program
- OHSAS 18001 Certification cost.



5.2. Occupational Health and Safety Management System

HALCOR, aiming at the integrated management of Occupational Health and Safety issues, implements a certified Health and Safety Management System. The System covers the following HALCOR production installations: Copper Tubes Plant, Recycling and Melting Plant and Brass Bars and Tubes Plant.

Certification of the Occupational Health and Safety Management System according to OHSAS 18001:2007

In April 2010, having completed an important set of improvements, and having achieved a series of goals in Occupational Health and Safety, HALCOR successfully certified its Occupational Health and Safety Management System according to OHSAS 18001:2007.

This certification is confirmation for HALCOR, proving its commitment for the continuous improvement of its performance in the area of Health and Safety.



In order to manage, monitor and improve all related issues, the Health and Safety Manager has regular meetings with the plant Managers of HALCOR the Safety Technicians and the Departments' supervisors on a monthly basis. In parallel, the supervisors conduct regular inspections of their Departments on a monthly basis. In this context, employees are encouraged to exchange views and submit proposals in order to improve Health and Safety issues. The Company's Health and Safety Team ensures employee Health, the safe conduct of operations and their continuous improvement, aiming at the elimination of accidents.

In the context of the certified Occupational Health and Safety Management System, HALCOR implements a series of programs and actions.

5.2.1 Occupational Health

HALCOR, aiming to secure its employees' Health, carries out a number of actions such as:

- Installation, maintenance and regular cleaning of the required amenities and equipment on the shop floor (changing rooms, toilets, personal lockers).
- Implementation of personal hygiene rules (washing and/or showering after work).
- Operation of a well-equipped infirmary in each plant and scheduled visits by the Occupational Doctor.
- Medical records for all employees.
- Installation of first-aid kits per Department and medicine replenishment is the responsibility of departmental managers.
- Employee medical examination by the Occupational Doctor after any reported accident.
- Medical checkups for all employees to ensure their good health.
- First aid seminars with the cooperation of the Hellenic Red Cross
- Implementation of a voluntary blood donation program over the last decade, maintaining a Blood Bank for employees and their families. In 2010, in cooperation with the "Laiko" General Hospital of Athens, a blood donation event took place in the company's infirmary and a total of 38 units of blood were collected.
- Conducting appropriate measurements in the workplace to validate that working conditions meet all required criteria.



5.2.2 Occupational safety

With reference to Occupational safety HALCOR has carried out the following actions for its employees:

- A Specialist Management team assigned to monitor the continuous compliance with Safety standards and, using their specialized knowledge on Health & Safety, advise all employees accordingly.
- Scheduled Health and Safety inspections with the participation of senior management and employees to identify hazards and take all corrective and preventive actions, in order to prevent accidents from occurring.
- Analysis of accidents and incidents to conclude on root causes and take appropriate actions to prevent recurrence.
- Published and distributed to employees a Health and Safety Manual containing the Company's Health and Safety Principles and relevant rules aiming to help change behavior towards safer practice.
- Published and distributed the 5S Manual
- Training program implementation, also involving external specialists to continuously train and update employees on Safety
- Recalculates, at regular intervals, the risk associated with various tasks with employee involvement in such assessments with the objective of taking corrective actions that reduce/minimize risk
- Identification of required improvements and budgeting for their implementation
- Market Research, purchase and use of the latest and most advanced Personal Protective Equipment (PPEs)
- Emergency drills to ensure equipment integrity and employee readiness
- Certifies lifting machinery (cranes, forklifts) and reservoirs.

5.2.3 5S System: Continuous improvement program

HALCOR, aiming to constantly improve Occupational Health and Safety issues and to manage resources and equipment effectively, applies the 5S system and its philosophy (Short, Straighten, Sanitize, Standardize, Sustain). This System came from Japan and is widely recognized around the world. It has been proven internationally that 5S System is an effective methodology for the continuous improvement of the working environment.

The targets of the 5S System implementation improve the working environment and are the following:

- Improvements in Occupational Health and Safety
- Reduction of number of accidents/incidents
- Improvement of working conditions and ergonomics
- Improvement of shop floor employees morale
- A clean and tidy workplace at all times
- Improved productivity
- Recycling, respect towards the environment
- Energy consumption reduction
- Participation of all staff, gradual culture change.

5.3. Health and Safety Performance

HALCOR’s performance in \Health and Safety is presented in the table below:

Health and Safety Index

Indicators	2008	2009	2010*
Total employees	742	668	568
Annual Working hours	1,905,664	1,520,632	1,530,714
Annual total number of incidents that resulted in absence from work	19	11	14
Percentage of accidents/incidents for all employees (%)	2.6	1.6	2.5
Absences / lost days due to occupational accidents or incidents	567	397	572
Absences / lost working hours due to occupational injuries or accidents	4,536	3,176	4,576
Percentage of total days lost due to injury or occupational accident per total working days (lost working hours / total working days %)	0.2	0.2	0.3
Occupational disease incidents	0	0	0
Total fatal accidents	0	0	0
Frequency Index (*1)	10	7	9
Severity Index (*2)	300	260	370
*Data include FITCO employees which seceded on 30/6/10.			

During 2011, HALCOR will intensify employee training on Health and Safety issues in order to reduce occupational accidents.

No occupational diseases have ever occurred in the Company.

(*1) Frequency Index =
$$\frac{\text{incidents (LTI)} \times 10^6}{\text{number of manhours worked}}$$

(*2) Severity Index =
$$\frac{\text{absence days due to incidents} \times 10^6}{\text{number of manhours worked}}$$

5.4. Health and Safety Training

In 2010 HALCOR continued its training and audit programs on Health and Safety. The Company has as a primary target the elimination of all injuries as well as incidents that relate to employee safety and in this context implements the following actions:

- continuous staff training on Health and Safety issues through in-house training seminars including:
 - Occupational Health and Safety
 - Electrical Audits and Safety for electrical engineers
 - 5S Methodology
- training focused on special, high-risk technical issues (e.g. chemical substances)
- monthly audits in all factory departments by a team of engineers (assigned as per responsibility sector), to ensure all safety rules are complied with and PPEs are used appropriately by all
- monthly audits by the Health and Safety and Environmental Supervisors, with the participation of the engineers and supervisors from all departments. Audits are conducted based on the 5S methodology and the action plan for continuous improvements is updated.
- risk Analysis and assessment, using established tools and techniques to calculate risk with the active participation of employees.

Furthermore, during 2010, the Company offered its employees a series of half-hour training programs, on various subjects such as:

- hazard spotting
- fire prevention
- fire fighting
- burns and first aid
- chemical substance leak management
- safe management of forklifts
- safe management of cranes
- equipment securing and marking
- falls and avoidance
- occupational orderliness
- hazardous noises
- welding.

Training indices on Health and Safety Issues

Year	Training Hours	Employee Participation	Training Hours / employee
2008	863	560	1.5
2009	432	470	0.9
2010*	786	470	1.7

* data include FITCO employee participation, which seceded on 30/6/2010.

Health and Safety and Environmental Month

During 2010, the Company organized for the first time the "Health and Safety and Environmental Month" in which relevant training was carried out to further improve awareness and knowledge on Occupational Health and Safety issues as well as environmental protection. Furthermore, during this month an extensive training program regarding the proper implementation of safety measures as well as the implementation of measures preventing occupational accidents and the prevention and handling of environmental impacts, took place.

Regarding Occupational Health and Safety in particular, during the Health and Safety and Environmental Month, the following seminars were organized:

- "Safe use of cranes". 57 employees attended this seminar and the topics covered were: unsafe handling, correct lifting of loads, crane types, basic Safety regulations, raising equipment.
- "Safe use of forklifts". 19 employees attended this seminar and the topics covered were: movements of pedestrians and vehicles in the work place, correct load storage, loading and unloading maneuvers, relative legislation, dangerous situations, use of forklifts, maintenance.
- "Correct use of Personal Protection Equipment". 17 employees attended this seminar and the topics covered the use of PPE for eye, breathing and body protection.

During the seminars, employee observations were recorded and evaluated and all necessary corrective actions were taken.





Targets

The targets set for 2010 were met to a satisfactory level. In the context of continuous effort for improvement, the course of targets set is presented, while new ones for the year 2011 are also placed.

Targets 2010	Performance 2010
Increase of the internal training hours for the entire workforce.	In 2010, 786 hours of training on Health and Safety Issues took place, compared to 432 in 2009.
Continuous implementation of the 5S program, aiming at the continuous improvement of the working environment and the prevention of accidents.	5S Program was successfully implemented.
Design and organization of the “Month of Health, Safety and Environment”.	The “Month of Health, Safety and Environment” was very successful and will be organized on an annual basis.
Constant decrease of occupational incidents / accidents with a target of zero occupational accidents.	In 2010 a slight increase of occupational incidents / accidents was observed.
Targets 2011	
Minimum of 1 hour of training per employee.	
Medical check for 60% of workers (blood test and x-rays)	
25% participation of the workforce in Emergency Drills.	
10 annual Health and Safety inspections per plant.	

6. Environment



The Company acknowledges its responsibility towards protecting the environment; as a result, it takes all necessary measures to prevent and avoid any form of environmental impact occurring from its operation. At the same time, it aims at decreasing its environmental footprint. For HALCOR, responsible development through the implementation of sound management practices and the integrated management of environmental issues is a one-way street towards Sustainable Development and one of the Company's strategic objectives.

The protection of the natural environment is realized through significant investments in integrated pollution prevention measures as well as in the improvement of production processes, through the application of the Best Available Techniques as set by the European Union. In the context of the adoption of the Best Available Techniques, the production processes are assessed and improved based on their total environmental footprint, including consumption of natural resources, electric energy, water, etc.

HALCOR is committed to utilize the following:

- Human resources with a high level of training and sound organizational skills.
- Modern technology equipment and state-of-the-art production equipment to monitor all parameters that affect targets.
- Modern methods for product development and production, as well as for monitoring the parameters affecting Health and Safety and the Environment.
- Methodology for the systematic recognition of hazards and risk assessment.
- Dialogue with its stakeholders on environmental issues.

6.1 Environmental Protection at HALCOR

HALCOR's pursuit for the continuous reduction of its environmental impact is a goal for a comprehensive approach and the result of such commitment by the Company's Management. For this reason, the implemented Environmental Policy is based on environmental principles adhered to by all hierarchy levels. In parallel, HALCOR has formed a specific managerial structure relating to the management of the environmental issues related to its operation. In this context, it observes and implements a Environmental Management System, which with related actions confirms the company's commitment to the responsible and integrated management of its environmental impact. Since the continuous improvement of environmental protection is a continuous goal for HALCOR, it implements every year an investment program for the protection of the environment.

HALCOR's Environmental Policy is based on the following environmental principles:

1. Compliance with existing national and European environmental legislation and regulations. Its manufacturing sites always operate within the emission limits of their environmental licenses.
2. Responsible operation with full knowledge of existing and potential environmental consequences and taking appropriate measures to reduce these.
3. Cooperation with licensed waste management companies (for the collection, transportation, further use, and disposal of waste), that follow practices in full compliance with relevant legislation.
4. Continuous improvement on environment related issues and minimization of the environmental impacts of its operations
5. Transparency and open communication with all stakeholders on environmental issues.
6. Continuous Training, updating and awareness of employees on environmental issues so that they actively participate in matters of environmental concern
7. Implementation of an Environmental Management System to ensure continuous improvement and compliance with the law and regulations.

HALCOR's Environmental Policy

As an environmentally responsible Company, HALCOR will not damage the development and quality of life of future generations. It is also committed to continuous improvement, pollution prevention and compliance with environmental standards above the relevant legal requirements, through the provision of all necessary resources.



This commitment is proved by the Company's transparent operation, its full compliance with environmental regulations and legislation as well as its commitment to invest in technologies and equipment that minimize environmental impact. Additionally, this commitment is evident by its relevant policy, systems and development of knowledge for sustainability.

6.2 Environmental Protection Investments and Expenditure

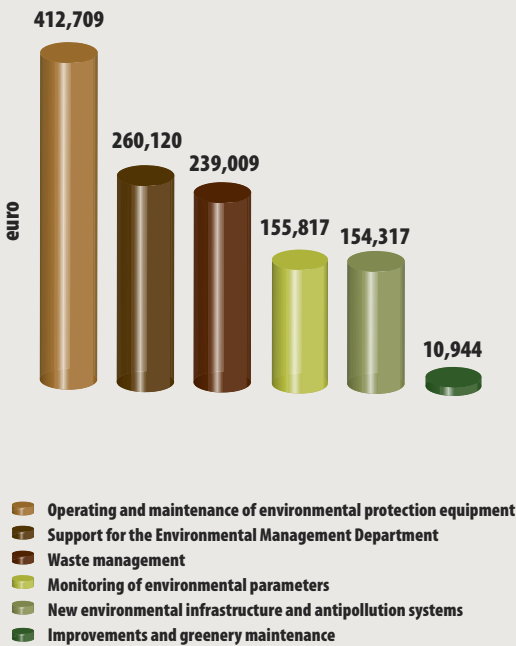
Committed for continuous improvement, HALCOR aims to upgrade its operations for the protection of environment, as well as to create new ones. For this reason, a specific budget for significant investments is allocated for the achievement of this goal every year for the past few years.

Specifically for 2010, despite the global economic recession, the Company's environmental investments and expenditure reached euro 1.23 million.

The environmental expenditure and investments for 2010 included the following:

- Operating and maintenance cost for environmental protection equipment reached euro 412,709.
- Various expenditures such as the Environmental Management Department, external subcontractors and REACH regulation compliance costs and voluntary environmental sponsorships, reached euro 260,120.
- Waste management costs, by licensed companies, reached euro 239,009.

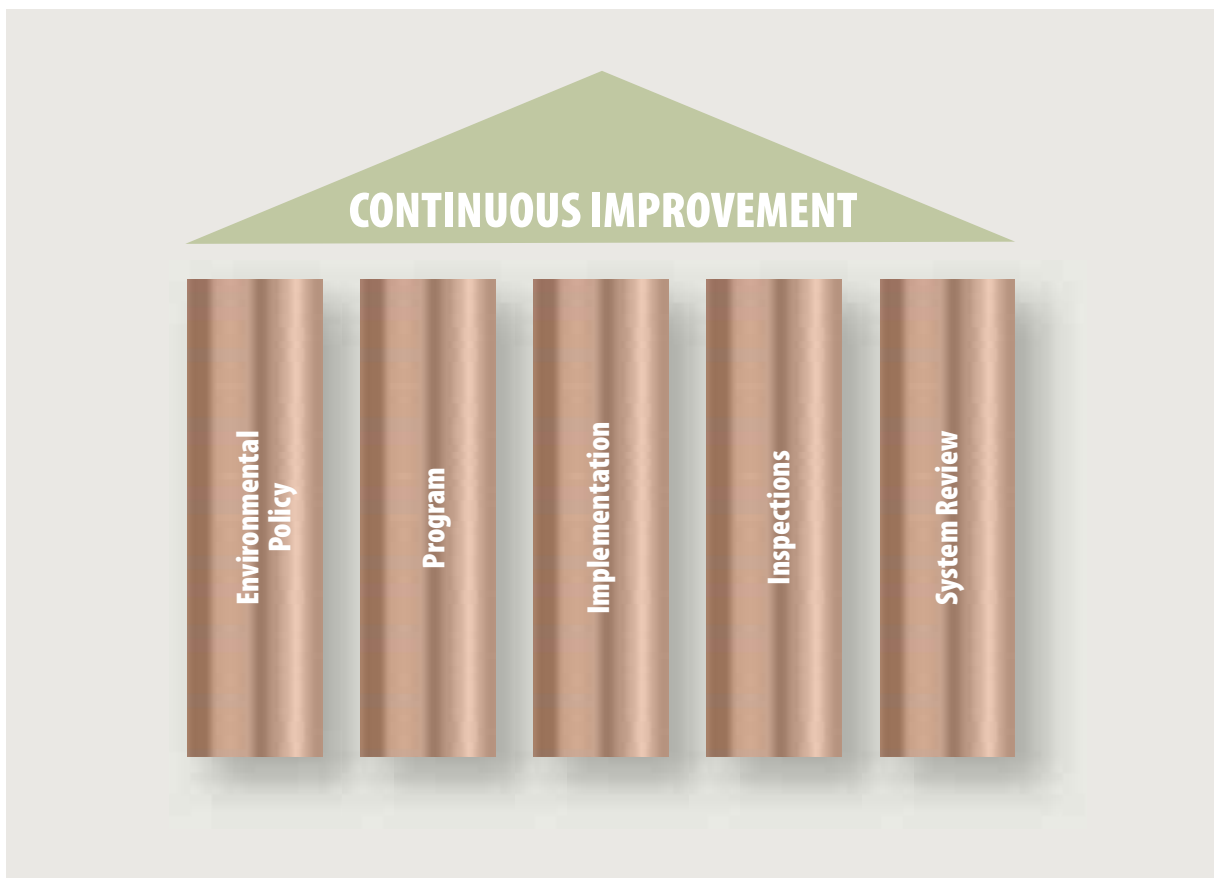
Environmental Expenditure (2010)



- Monitoring environmental parameters costs (water chemical analysis, air pollutants, etc.), reached euro 155,817
- Investments in new environmental infrastructure and antipollution systems reached euro 154,317; these included primarily antipollution measures at the recycling and melting plants as well as natural resources preservation projects at the copper tubes plant.
- Planting trees at company premises and general environmental cleanup costs, reached euro 10,944.

6.3 Environmental Management System

HALCOR's commitment to a substantial and comprehensive environmental management is achieved through the implementation of an Environmental Management System, which aims at continuously improving the Company's environmental performance.



HALCOR implements an Environmental Management System certified according to the ISO 14001:2004 standard, at four of its five manufacturing facilities. Furthermore, according to the timetable, by the end of 2011 all the Environmental Management Systems implemented at HALCOR's manufacturing facilities will be certified.

HALCOR's ISO 14001 Certification

A/A	Plant	2009	2010	2011
1	Copper Bars	√	√	√
2	Brass Bars and Tubes (*)	-	√	√
3	Recycling and Melting	√	√	√
4	Rolled Titan zinc Products (**)	√	√	√
5	Compounds (***)	-	-	√

- (*) *Seccession of Brass Bars and Tubes sector from HALCOR S.A. on 30.06.2010.*
- (**) *The plant's production has been temporarily suspended since 01.01.2011; as a result, the plant's registration to the EMAS register has not been renewed. The plant in Pireos Street is located in a sensitive residential/ urban area that is gradually moving towards de-industrialization. Furthermore, the production process has been streamlined, and the production line of titanium zinc products has been relocated to the corresponding rolling lines of the SOFIA MED plant in Bulgaria.*
- (***) *HALCOR has a production line at the plastic and elastic compound plant of its subsidiary company HELLENIC CABLES S.A. located at Oinofyta, which produces PVC compounds exclusively for copper tube sheathing. For this reason, its environmental impact is also monitored.*





Governance structure and environmental training

HALCOR aims at an effective and comprehensive management of environmental issues. As this can only be achieved through the active involvement and support of all employees, the Company has adopted a specific environmental management organization model with relative environmental responsibilities across the entire management hierarchy.

In addition, HALCOR aspires to the provision of continuous updating, training and awareness on environmental issues for its employees; as a result, HALCOR has implemented an annual training program, planned at the beginning of each year. More specifically, during 2010, 67 hours of training took place and 120 employees participated. The main training subjects were:

- environmental Management System implementation
- environmental legislation implementation
- waste management
- emergency situations.

6.4 HALCOR's Environmental Issues

With, effective management and planning, monitoring and the prevention of environmental impacts as main targets, HALCOR has traced, listed and evaluated all the environmental parameters that relate to its operation. The most important are:

- use of natural resources (water, fuels, energy, raw materials etc.)
- use of chemical substances
- solid waste, liquid waste, wastewater and air emission management
- preparation for and response to emergency situations.

A recording system based on standard and internationally acceptable methods monitors the quantitative data of the Company's various environmental parameters. The system is subject to constant internal and external audits by the relevant services and authorities during the inspections of the Company's Environmental Management System. In 2010, 49 internal inspections were conducted by the responsible Company executives and 11 external by external bodies (environmental and country planning Directorate of the Sterea Ellada region, Development Division of S.E. Viotia, Development Division of Athens Prefecture, TUV Austria Hellas and external Consultant) at the various installations, aiming at the constant improvement of the Company's environmental performance.

6.4.1 Raw materials

The raw materials HALCOR uses for the production of its products constitute a very important environmental parameter. The main raw material the Company uses is copper, the use of which equal a high financial cost. HALCOR, combining environmental management with financial efficiency and the preservation of natural resources is focused on the efficient use of raw materials. HALCOR is the largest recycler of copper, zinc and their alloys in Greece.

Copper recycling benefits

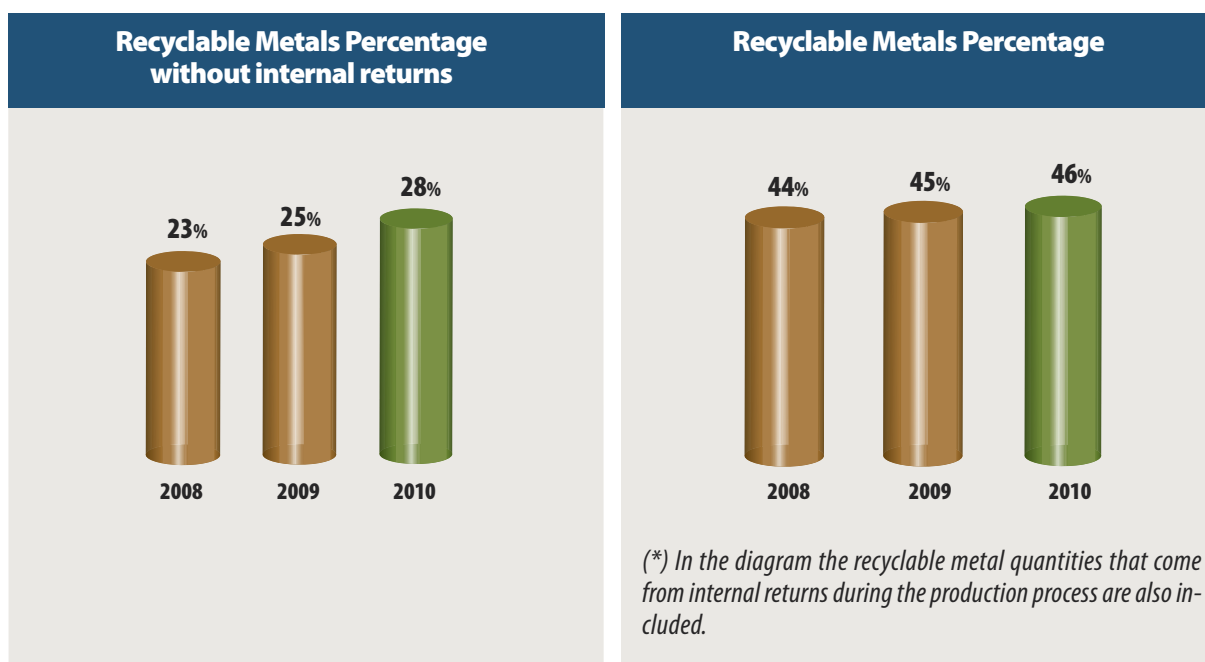
Copper can be recycled continuously without losing any of its properties. Compared to the production of primary copper from minerals, copper recycling has the following advantages:

- it averts harmful gas emissions such as Sulfur dioxide, particles, etc.
- saves almost 85% of the required energy (3 times less electric energy and 2.5 times less thermal energy is required) and reduces almost 75% of CO₂ emissions, contributing to the global reduction of greenhouse gases.

The only Company production facility that can use recycled materials is the recycling-melting plant. During 2010, recycled materials (copper scrap, zinc and related alloys) constituted 28% of the total feed of materials used, increased from 25% in 2009.

Furthermore, recycled materials used, including returns from the production process, showed a small improvement since it increased from 45% in 2009 to 46% 2010.

HALCOR combines its size, strength and infrastructure with its vision and utilizes metals in



accordance to people and their needs. HALCOR is the largest recycler of scrap copper and its alloys in Greece, recycling approximately 80,000 tons of scrap annually, including the internal returns of its plants.

More information on the supply, recycling and use of old metals is provided in the “Marketplace” chapter, “Responsible Purchasing” section.

As a large metals processing company HALCOR, like all other companies in the metals industry, uses significant amounts of chemicals in its production processes, as necessary. However, the company pursues the reduction of the use of these substances to the absolute minimum while at the same time the use of Best Available Techniques aims at reducing the environmental impacts of their use. Raw material management is always conducted according to the specifications of the Safety Data Sheets (MSDS) such as:

- storage in dry, guarded areas
- operator’s training on avoiding spills
- conducting response drills in case of emergency.

In addition, HALCOR has placed special collection units at all points where an oil or dissolver spill may occur.

HALCOR complies fully with legislation covering chemical substances and preparations, according to REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) and CLP (Classification, Labeling and Packaging) European Regulations.

6.4.2 Energy Use

HALCOR consumes thermal and electric energy for the operation of its production facilities.

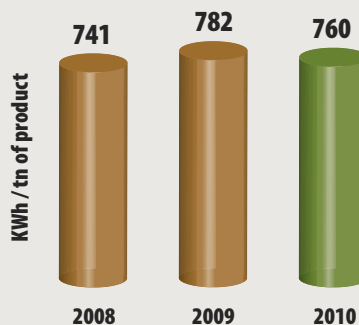
Thermal Energy

During 2010, thermal energy consumption increased by 21.2%, amounting to 86,724 MWh. Specific thermal energy consumption (consumption by product quantity) for 2010, amounted to 760KWh per product ton, demonstrating a decrease of 2.8%.

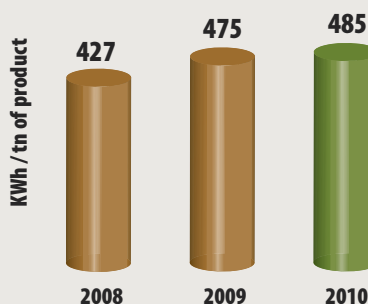
This decrease stems mainly from the consumption of more efficient natural gas: this was achieved through:

- improved control of the temperature of the annealing furnace following the installation of electronic equipment of the most modern technology.
- improved product production scheduling/ programming resulting in thermal energy savings during the process of billets' pre-heating.

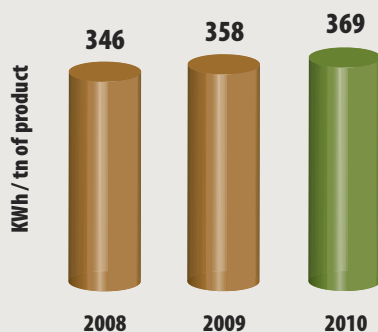
Specific Thermal Energy Consumption



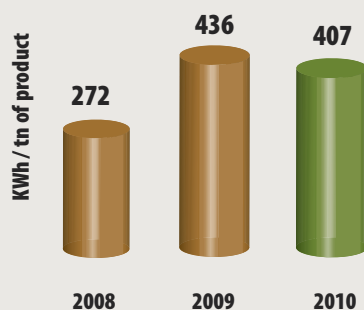
Specific Thermal Energy Consumption Recycling and Melting Plant



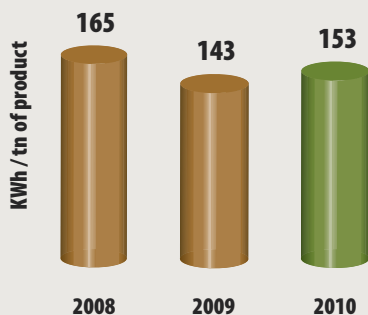
Specific Thermal Energy Consumption Copper tubes plant



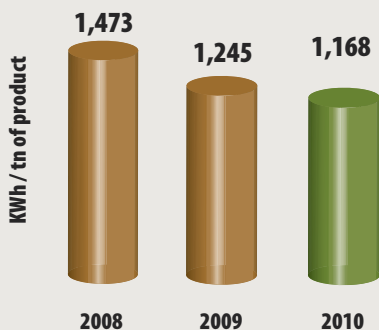
Specific Thermal Energy Consumption Brass Bars and Tubes Extrusion Plant



Specific Thermal Energy Consumption Titanium – Zinc Rolling Plant



Specific Thermal Energy Consumption Plastic and Rubber Compound Plant



Electric energy

The specific energy consumption in the production operations during 2010 was 387 KWh/ton of product, displaying a 19.9% decrease compared to 2009. This result was achieved through the production reduction in the inductive ovens, as well as with the energy reduction program at the Copper Tubes plant.

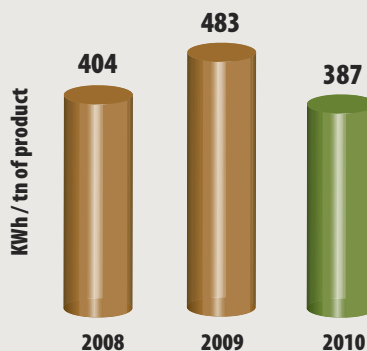
6.4.3 Climate change

Although HALCOR is excluded from the European System of Emissions Trading, it implements a series of measures to reduce pollutants that contribute to climate change, since it recognizes its significant contribution to the prevention of climate change. For this reason the Company:

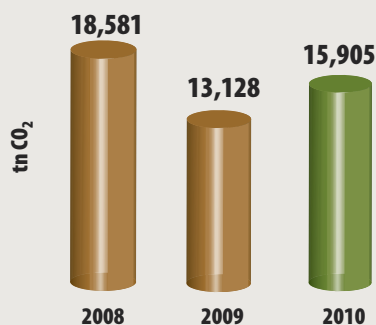
- uses environmentally-friendly fuels, such as natural gas, which produce fewer air polluting emissions per energy unit consumed
- has introduced regular maintenance and fine tuning of relevant equipment, in order to maximize efficiency and therefore reduce air polluting emissions.

In the diagrams on the right are presented the total and specific direct CO₂ emissions deriving from fossil fuel combustion as well as from the use of heating oil and the fuel used for forklifts. The increase of the total direct emissions is attributed to the production increase, while the decrease of the specific indirect emissions is attributed to the more efficient scheduling of the production process in relation to the pre-heating of billets.

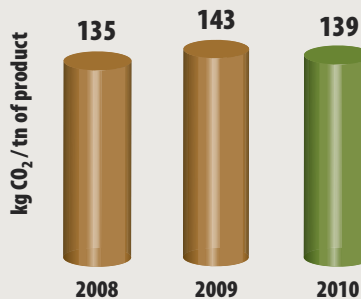
Specific Electric Energy Consumption



Total Direct CO₂ emissions



Specific Direct CO₂ emissions



Emissions CO₂ (kg/ tn of product) 2010

A/A	Plant	Direct	Indirect
1	Copper Tubes	67.7	217.6
2	Brass Bars and Tubes	74.2	290
3	Recycling and Melting	88.6	160.6
4	Titanium zinc Rolling Plant	32.6	618
5	Plastic and Elastomeric Compounds Plant	211.1	550.4

Photovoltaic panels

HALCOR, through its subsidiary Energy Solutions S.A., entered the European photovoltaic panel market. Energy Solutions is the first company that produced crystalline silicon photovoltaic panels in the Balkans region.

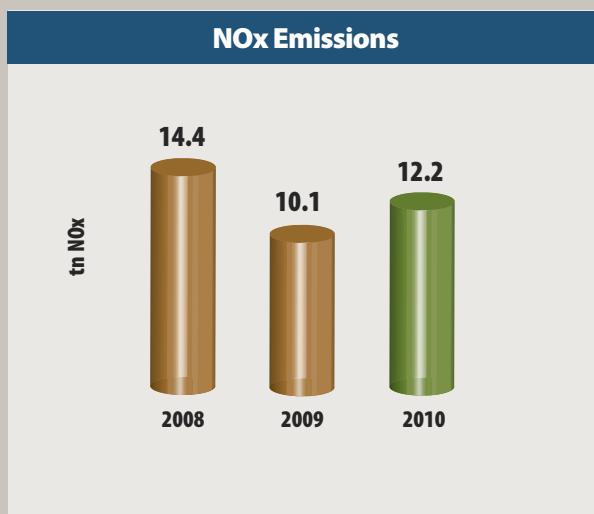


6.4.4 Atmosphere

HALCOR, within the context of environmental parameters, continuously monitors its air emissions. This is implemented both through the operation of instruments for continuous monitoring and recording of solid particles at the Recycling – Melting plant, as well as through the frequent measurements of various environmental parameters at air emission points at all plants.

NOx Emissions

NOx emissions are mainly the result of fossil fuel combustion processes, including natural gas which is the main type of fuel used for the Company's thermal energy requirements.



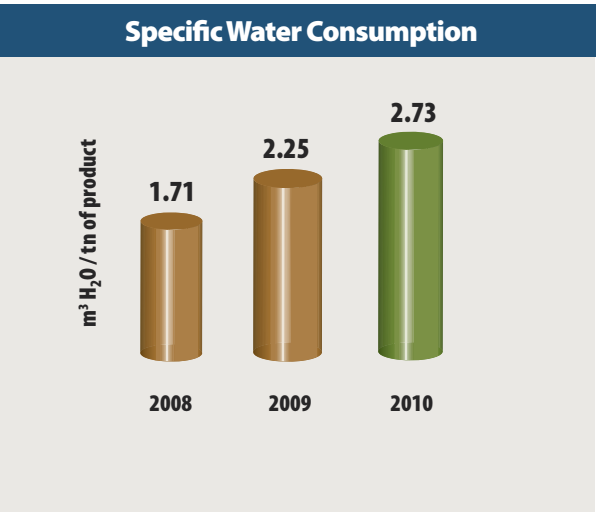
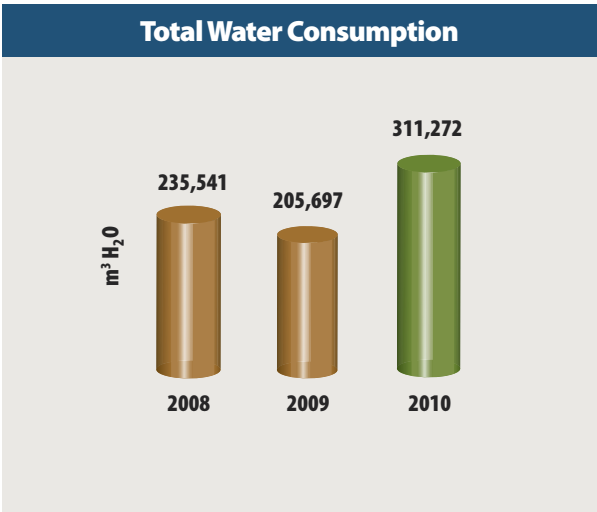
The NOx emissions increase is a result of the natural gas consumption increase during 2010.

Airborne particles

Airborne particles emitted into the atmosphere are monitored via a system of constant measuring of the furnaces' waste air at the Recycling and Melting Factory. More specifically, HALCOR has 3 permanent recording machines, which are used to record continuous measurements of airborne particles. The Company meets all the legal requirements regarding air emission limits. Until today, according to the measurements conducted, there have been no excesses of the limits set by Greek environmental legislation.



6.4.5 Water Use
Amont HALCOR’s environmental goals is to constantly reduce the use of water for its operational needs to the possible minimum, while at the same time to try and minimize its waste water.



Water Consumption by source (in m ³)	2010
EYDAP Water Supply Network	154,238
Water Drilling (Titanium Zinc rolling Plant)	147,480*
Oinofyta Water Network	9,476
Tankers	78

** Data is from the plants' meter due to the delayed issuance of the bill by EYDAP (Greek Water Company).*

The increase of total water consumption is attributed to the relevant production increase. Furthermore, the specific water consumption is attributed to the upgrading of the product quality and the wide range of products at the Titanium Zinc rolling plant that required larger quantities of water for the process (surface treatment) per ton of product.

Wastewater Processing Systems

HALCOR possesses suitable infrastructure for wastewater processing and is in full compliance with the current limits of wastewater disposal into aquatic bodies. During 2010 there was no excess of the duly constituted limits of wastewater disposal into aquatic recipients. Following approval from the authorities, the Company will conduct all necessary works in order to fully comply with the new disposal limits for 2012.

6.4.6 Waste

A result of the production processes is waste which is generated in liquid or solid form. HALCOR is making every possible effort to produce an absolute minimum of waste, its proper processing and legitimate final disposal. For this reason, waste from the production process is separated at source, then collected by licensed companies and transferred towards further processing such as recycling and energy recovery.

Waste	Management Method	Quantity (kg)		
		2008	2009	2010
Mixed Recyclables (scrap metals, metal packaging, paper, wood, plastic)	Recycling	29,266,337	19,184,504	26,995,228
Sewage sludge	Recycling	72,850	73,590	81,830
Metals	Recycling	1,270,460	1,557,727	1,505,261
Mixed materials	Recovery *	-	-	164,410
Waste	Landfill disposal	814,930	1,039,205	313,881
Used oils	Recycling	472,040	370,644	358,179
Batteries	Recycling	533	1,180	2,486
Filter dust	Recycling	258,124	190,228	154,970
Emulsions	Recovery *	909,270	1,019,950	872,430
Polluted absorbing materials	Recovery*	1,550	17,520	36,480
Fluorescent lamps	Recycling	-	80	20
Total Waste		33,066,094	23,454,628	30,485,175

** Recovery (energy or other form of recovery) recovery*



It should be noted that in accordance with Law 2939/2001, HALCOR is contracted with all Alternative Waste Management Systems.

6.4.7 Noise

The operation of the production plants of HALCOR results in the creation of noise. For its monitoring, HALCOR conducts measurements along the perimeter of the plant with its own measuring instruments, twice a year. All measurement results recorded until today are within the relevant legal limits.

6.4.8 Nature conservation and Biodiversity

HALCOR ensures that all necessary measures are taken in order to minimize as much as possible the impact on the natural environment surrounding the areas of its operations. All of HALCOR's operations are located outside protected areas or areas of high biodiversity value, and none of its facilities is adjacent to protected areas. Therefore, there is no direct impact from its operations to protected areas' biodiversity or other areas of high biodiversity value.

Tree Planting

HALCOR aims at environmental improvement, as well as at the aesthetical upgrade of its installations and the participation of its employees in environmental awareness activities. For this reason it organizes tree-planting and green areas' improvement. In 2010, the study for tree-planting at the Copper Tubes factory was completed, and several improvements to and maintenance of the 2009 tree-planting were conducted. In 2011, the company aims to expand the tree-planting program to the Copper Tubes factory. It is noted that through tree-planting the visual disturbance from the Company's factories is reduced.



Targets

At HALCOR environmental targets are set on an annual basis. The targets set for 2010 were met to a satisfactory level. In the context of continuous effort for improvement, the course of targets set is presented, while new ones for the year 2011 are also placed.

Targets 2010	Performance 2010
Certification according to ISO 14001 - Environmental Management for all plants by 2011.	The following plants were certified again: <ul style="list-style-type: none"> • Brass Bars and Tubes • Recycling – Melting • Titanium Zinc Rolling.
Zero discharge of processed wastewater and recycling of the water used for cooling, through installation of Zero Liquid Discharge system at ELVAL by 2011	The improvement of the wastewater processing unit at the Copper Tubes plant has commenced in order to connect with the Zero Liquid Discharge unit at ELVAL.
Increase environmental issues training for all employees in 2010.	In 2010 almost 20% of HALCOR employees received training on issues of environmental management.
Improvement of the Company's surroundings with the expansion of the green areas and tree-planting in 2010.	Within 2010 the Company further improved the surroundings via a small tree-planting activity in a part of the Recycling – Melting plant.

Targets 2011
Certification of the Environmental Management System at the Plastic and Elastic Compound plant in accordance to ISO 14001.
Expand training to all personnel, upgrading of the training material on environmental compliance, awareness and recycling issues.
In 2011, HALCOR aims to expand the tree-planting program at the Copper Tubes plant.

7. Society



HALCOR pursues reciprocal communication with all important stakeholder groups, including local communities. In particular, a responsible approach and contribution to the local communities has been recognized as one of the important aspects of HALCOR's Corporate Responsibility and Sustainable Development. In this context, the Company supports programs and actions aimed at society, the environment, groups with special and/or extra needs, culture, health, education and research.

7.1 The benefits of using copper

The benefits of using copper are multiple for today's society. A very important issue is the re-use and recycling of copper and other metals, not only at financial level but also at environmental and social level.

Copper is one of the most important metals, characterized by specific properties with very positive impacts on Health, while at the same time it can assist in the protection of the environment.

7.1.1 The antibacterial properties of copper

Copper use is extremely beneficial for the Health sector. Detailed research has confirmed the antibacterial properties of copper, constituting copper and copper alloy products the most suitable for use in the fields of heating, water management, ventilation and air

conditioning. Furthermore, the antibacterial properties of copper are confirmed by the replacement of other materials used on surfaces that people come in frequent contact with (e.g. door handles, handrails etc), with copper or specific copper alloys, resulting in the reduction of their bacterial load. As natural antibacterial materials, copper and copper alloy products can help against infections and contribute further to the reduction of the bacterial load of such surfaces, always in combination with modern methods of sterilization.

Copper can act against:

- Gastric infections, since its use in water pipes minimizes the risk of water contamination from a variety of bacteria (E.Coli, Listeria)
- "Legionnaire" disease, since its use in air conditioning pipes, reduces the growth of the Legionella microbe
- The salmonella bacteria, since the surface of copper hinders its growth in food
- Viral infections, such as H1N1, the common flu virus as well as the H5N1 avian influenza, which becomes rapidly inactive upon contact with copper
- Skin conditions caused by fungus or staphylococcus, since the simple contact of these microbes with a copper surface is enough to eliminate them within two hours.

Germes and the high percentage of failures to fight them with the last generation antibiotics, demonstrate the need to develop other methods to deal with the microbial flora. The antimicrobial property of copper and specific copper alloys result in the replacement of other materials used on surfaces that people come in frequent contact with. Characteristic examples are:

- Kindergarten Mejiro in the Hachioji district, Tokyo, Japan responded to parents' request for a safer environment for their children, by using copper alloys with inherent antimicrobial properties on tactile surfaces. These surfaces exterminate bacteria and viruses such as Influenza A, E. Coli and MRSA between regular cleaning, contributing to a more hygienic environment 24 hours a day, 7 days a week.



- In other similar applications in hospitals (e.g. Selly Oak Hospital, Birmingham, UK), tactile surfaces (door handles, handrails, switches, taps) were replaced by antimicrobial copper; as a result, these surfaces demonstrated an infection percentage reduced by 90% - 100% compared to the usual surfaces that did not contain copper.

Recent studies have proved that the development of copper plated intensive care units, as well as other hospital units, combined with the use of antimicrobial copper in everyday life, fights off stems of germs responsible for the spreading of infections, resulting in minimizing the use of antibiotics and reducing the days and cost of patients' medical treatments.

At the beginning of 2010, a special Scientific Conference organized by the Hellenic Copper Development Institute (HCDI), presented the antimicrobial actions of copper and its resulting contribution to the fighting off of the microbial flora in hospitals. The main conclusion of the conference was that the use of antimicrobial copper in the Health sector and in society as a whole, constitutes an important step towards the confinement of microbial flora, with beneficial consequences for public Health and the reduction of Health expenditure.

Copper air ducts

The first installation of copper air ducts in Greece was made in a Company's office building in Marousi, Attiki.

Copper air ducts are made of copper sheeting and are used in central air-conditioning and ventilation systems, either in new installations or in expansions or renovations.



They can be easily formed to the desired dimensions and in various geometrical shapes, the same way that air ducts from other materials can be formed; furthermore, their installation is equally simple.

At the same time, copper air ducts are one of the main elements of ecological building since copper is 100% recyclable at the end of its useful life. Copper air ducts not only ensure a healthy interior environment, but are also the most suitable material for ecological building.

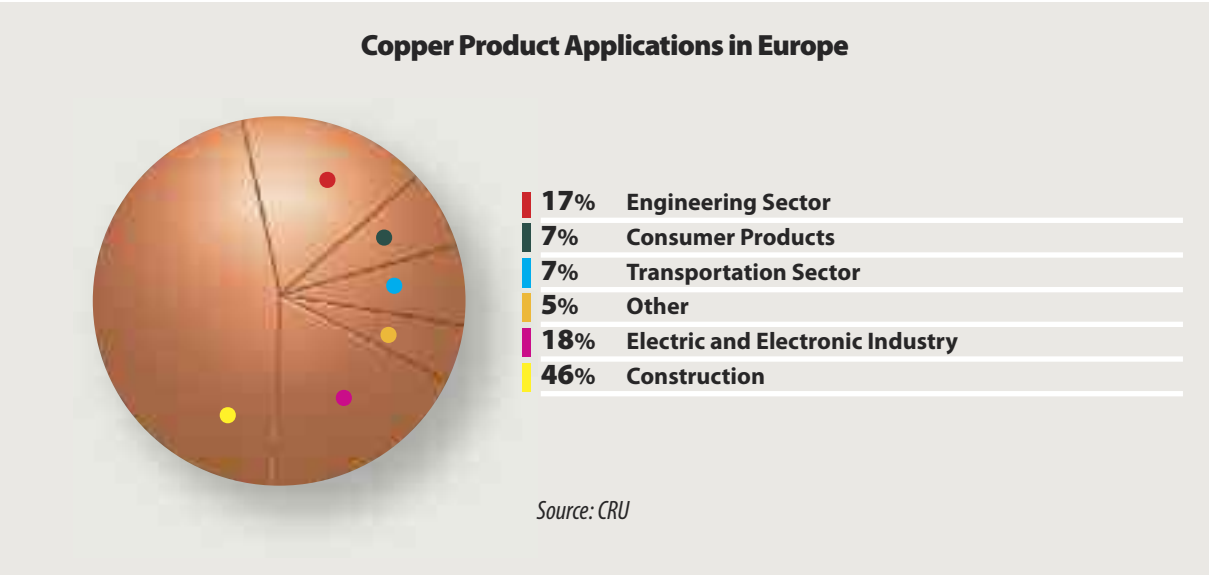
7.1.2 Copper and the Environment

Regarding copper's contribution to the protection of the environment, its natural properties and characteristics constitute the profile of a metal whose use of not only does not have an environmental impact, but can also significantly contribute to its protection since it is:

- 100% recyclable and can be recycled many times over without losing any of its properties
- has resistant and long-lasting properties
- a good conductor for electricity increasing the efficiency of electrical applications.

According to a study by the Motor Challenge Program, the use of copper in the manufacture of high performance motors, could lead to annual savings of 200 billion kW/h as well as reducing CO₂ emissions by 100 million tons, which is equivalent to 25% of the E.U. commitment under the Kyoto treaty.

In addition, according to published research, the energy saved through the use of copper electrical applications (transformers, motors, etc) could reach up to 70% of the energy consumed.



The construction sector accounts for 40% of energy consumption in Europe. For this reason the most significant applications of copper are today found in the construction industry and particularly in buildings. Its natural properties such as anti-corrosion, plasticity as well as its distinctive color, constitute copper an ideal material to use in construction and various other architectural applications.

7.2 Enhancing Research and Training

HALCOR is constantly looking for new methods of metal processing and for new applications; as a result, it invests in research and development. In this context it promotes the use of metals and constantly supports the activities of the Hellenic Copper Development Institute (HCDI) and the ELKEME S.A.Hellenic Research Centre for Metals.

7.2.1 Hellenic Copper Development Institute (H.C.D.I.)

HALCOR supports the activities of the HCDI in educational matters and the promotion of using copper in sensitive areas, such as Health and the Environment. More specifically and in relation to education and training, HALCOR participated in organizing programs for the HCDI, by providing related materials and facilities for courses, or through funding the implementation of specific programs throughout Greece. HALCOR sponsored the plumbers' competition that took place in Thessaloniki in 2010.

In addition, through the Hellenic Copper Development Institute, which is a constituent member of the European Copper Institute (ECI), HALCOR has participated actively over the last decade in significant research on the effect of copper on human health and the environment.



The results of many years of research show the definite benefits of copper usage as well as its neutral and positive effects on human health and the environment.

7.2.2 ELKEME S.A.Hellenic Research Centre for Metals

HALCOR supports the activities of the ELKEME, which are aimed at developing new technologies for the production and use of steel, aluminium, copper and zinc products.

Having developed partnerships with most universities and other education institutes in Greece and abroad which conduct research on metals and materials, ELKEME contributes to student training, providing materials, equipment and training staff to carry out training and experiments. In addition, ELKEME coordinates the promotion of students to the industrial

sector, so they can conduct research for their thesis or work as interns.

7.2.3 Supporting Educational Institutions

In 2010, HALCOR sponsored the following educational institutes, offering materials (metals, copper tubes, etc.):

- the Thermo-hydraulic Laboratory and the Laboratory of “Aerial Gas Technicians” of the 1st Laboratory Centre of Western Attica.
- the Technical Vocational Educational Schools at Inoi, Schimatari.

In addition, it offered free zinc sheets to support the dissertation and the completion of the studies of a final year student at the School of Fine Arts in Athens.

Furthermore, the Company sponsored the Oinofyta High School by covering the school’s educational needs.

HALCOR sponsored the Environmental Department of the University of the Aegean and provided relevant scholarship for students during the 2009 – 2010 academic year.

Student Internships

The Company encourages student internships at its facilities. This policy aims at supporting young people to gain work experience in their educational field and consequently should they desire, work in the the equivalent profession and be therefore capable of adapting easier to such working environment.

For this reason, HALCOR offers young people (final year students at Universities and Technological Educational Institutes), on an annual basis, the ability to conduct their practical training at the Company. In 2010, HALCOR offered 8 internships with remuneration; these students were employed in the electrical and engineering maintenance department, in the quality control department and in the Company’s accounting department.

7.3 Supporting local communities

For HALCOR, cooperation with local communities is very important because it can create substantial mutual benefits. For this reason, it has developed a systematic communication in order to record, evaluate and respond to the important issues concerning the local communities affected by its operation. The issues set by the local communities during 2010 belonged to the following three basic categories:

- employment
- purchasing
- support of local authorities and associations.

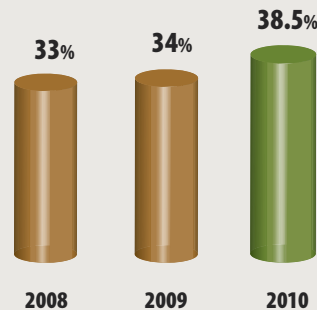
The Company, despite the current challenging economic conditions responded to such issues and aims to enhance its actions even more during 2011.

7.3.1 Human Resources and Local Community

HALCOR has a long tradition in supporting the local community as one of its goals has always been to employ people from the local communities near its facilities.

During 2010, 190 of the 493 of the Company's employees came from the local community, i.e. 38.5% of HALCOR's total workforce. This number increased by 4.5% compared to the year 2009.

Human Resources from the Local Community



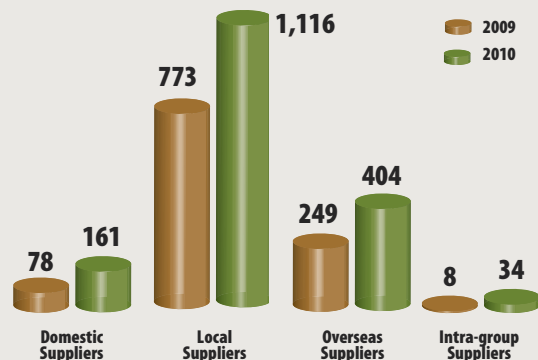
Geographic Region of Residence	2008	2009	2010
Broader Viotia and Evia areas	246	227	190
Percentage of the total human resources	33%	34%	38,5%

7.3.2 Purchasing and the Local Community

HALCOR, in the context of supporting the local community whenever possible, pursues cooperation with local suppliers and contractors, aiming at contributing financially to the local community. During 2010, 6.53% of purchasing was realized from local suppliers.

In 2010 HALCOR, in support of local development, included 161 local suppliers in its supply chain, doubling the number compared to the previous year.

Supplier Distribution



Supplier Category	Number and percentage of Suppliers	
	2009	2010
Local Suppliers	78	161
Total Number of Suppliers	1,108	1,715
Local suppliers as a percentage of the total number of suppliers (%)	7%	9.4%

7.3.3 Social Activities

During 2010 HALCOR sponsored and supported various social activities, the most important of which were:

Support for the “Transparency International Greece” NGO

In the context of supporting events that provide information and raise awareness for society and the entrepreneurial community, HALCOR sponsored the Conference organized by “Transparency International Greece”, held in Athens in the Hotel Grande Bretagne, on the 19th of April 2010, entitled “State and Corruption”. “Transparency International Greece” is a Non-Governmental Organization that has been active since 1997. Its sole aim is the fighting against corruption. The conference was very successful with over 400 participants from the political, social, entrepreneurial, academic and media sectors.



Support for the “PNOI” (“BREATH) - Friends of Intensive Child Care” NGO

For another year, instead of sending out corporate Christmas gifts, HALCOR chose to allocate a sum for the needs of the “PNOI” (BREATH) – Friends of Intensive Child Care” NGO, in order to support its actions. BREATH is a non-profit organization, created to support the intensive care of children and infants (ICU).



Support of the Opening Ceremony at the church of “Agios Georgios” (Saint George) at Loukisia, Viotia

In June 2010, the Opening Ceremony of the reconstructed Byzantine church of “Agios Georgios” (Saint George) at Loukisia took place in the presence of the Archbishop of Athens and Whole Greece Ieronimos II' and many citizens. HALCOR supported the event as a sponsor.



44th Panhellenic Exhibition in Lamia

HALCOR sponsored the 44th Panhellenic Exhibition in Lamia (May 8-16), aiming at promoting the entrepreneurial development of the broader region.

The Panhellenic Exhibition in Lamia operates as a lever for development both for the production process, as well as for the promotion of products. All exhibits form a wide range of products from agricultural- industrial- handicraft products and machinery, to traditional products, furniture, cooling and heating systems, mobile phone systems and electronic and telecommunication equipment.





Supporting local Associations and Authorities

The Company supported the local Parents' Association of Children with Disabilities, named "Agioli Anargiroi" by covering the fees for the participation of its employees in a local event.

The Company supported the local Parents' Association of Children with Disabilities, named "Agioli Anargiroi" by covering the fees for the participation of its employees in a local event.

- the Livadia Police Directorate in order to purchase equipment for the DIAS team in Livadia.
- the upgrading of the building installations of the Oinofyta Fire Department.

7.3.4 Employee Voluntary Contribution

HALCOR recognizes that employee' voluntary actions can contribute significantly to cover the basic needs both of the local and the wider community. For this reason, it supports and pursues to develop such actions further.



In particular, in 2010, the company organized an internal program of employee voluntary offer, aiming at contributing to the support of poor families. The program was particularly successful due to the large participation of employees that led to the collection of significant quantities of:

- food
- clothing and footwear
- toys
- books.

These items were collected at HALCOR's premises and were transported by a Company vehicle to the storage room at the Holy Diocese of Thiva and Livadia, in order to be distributed to the families in need.

Targets

The targets set for 2010 were met to a satisfactory level. In the context of continuous effort for improvement, the course of targets set is presented, while new ones for the year 2011 are also placed.

Targets 2010	Performance 2010
Increase communication and contact with local authorities, in order to be updated on the important issues and needs of the local community.	Like every year, in 2010 HALCOR responded to the needs of the local community.
Strengthen the local economy by selecting local employees and suppliers.	In 2010, although it was a difficult year for the economy, HALCOR hired 4 people from the local community. The local suppliers doubled as a number in 2010, compared to 2009.

Targets 2011
Planning and executing employee voluntary actions.
Priority to hiring from the local community, where possible, and continuation of the internship program.

8 . Key CSR Performance Indicators

Below are presented key financial, environmental and social performance data for HALCOR in 2010:

Economy	2008	2009	2010
Net Sales (in thousand euro)	635,252	343,547	517,613
Total Revenue (in thousand euro)	646,768	349,844	523,593
Operating Profits (in thousand euro)	(619,760)	(327,930)	(552,151)
Payments to capital providers (in thousand euro)	(16,625)	(6,979)	(9,691)
Total Investments	19,767	10,003	2,551
Net profit / (loss) (in thousand euro)– after taxes	(15,184)	(11,188)	(7,771)
Payments to government bodies - taxes paid (in million euro)	(539)	-	-
Net profit / (loss) per share (in euro)	(0,1499)	(0,1105)	(0,0767)
Total capitalization (in thousand euro)	75,960	137,740	70,895
Marketplace	2008	2009	2010
Payments to suppliers (excl. materials and inter-company transactions) (in thousand euro)	41,650	45,248	46,931
Suppliers from the local community	6,2%	7%	9,4%
Customer complaints (number)	202	169	101
Employees	2008	2009	2010
Total employees	742	668	493
Women / total employees (%)	8,0%	7,9%	7,5%
Training man-hours (training X hours)	5,657	3,088	5,653
Employee salaries and benefits (in thousand euro)	(33,756)	(28,186)	(26,556)
Annual total number of incidents that resulted in absence from work	19	11	14
Number of fatal accidents	0	0	0
Injuries / accidents percentage	2.6	1.5	2.5
Investment & Operational Expenditures on Health and Safety	350,000	520,000	332,000
Environment	2008	2009	2010
Total water consumption (m ³)	235,541	205,697*	311,272
Specific water consumption (m ³ /tn product)	1.71	2.25*	2.73
Specific thermal energy consumption (KWh/tn product)	741	782	760
Specific electric energy consumption (KWh/tn product)	404*	483*	387
Total direct CO ₂ emissions (tn)	18,581	13,128	15,905
NOx emissions (tn)	14.4	10.1	12.2
Total waste products (kg)	33,066,094	23,454,628	30,485,175
Environmental investments (in euro)	1,759,419	1,748,182	1,232,916
Society	2008	2009	2010
Total value of social product	82,041	73,434	73,487
Occupation of employees from the local community (%)	33.2%	34%	38.5%
Employee blood donations - number of bottles gathered	46	67	38
<i>Note: Data included in the table above, in brackets, have a negative sign.</i>			

* The data have been reviewed due to misprint.

9. Glossary

GRI

The international organization Global Reporting Initiative (GRI) has developed a framework of sustainability indicators in order to standardize sustainability reports that organizations publish. The GRI Organisation's aim is that the sustainability reports will become a useful tool and a standardized procedure, as is the case of financial reports. The GRI framework includes company economic, environmental and social performance indicators (www.globalreporting.org).

SAP

Central management system software.

Sustainability

Sustainability or Sustainable Development is defined as the manner in which an Organization operates, to the extent that it meets the needs of the present, without compromising the ability of future generations to meet their own needs (the Rio Declaration on Environment and Development, United Nations Organization, 1992).

Corporate Responsibility

Corporate Responsibility is a concept whereby companies integrate voluntary social and environmental concerns into their business operations and relationships with stakeholders, and understand that responsible behavior leads to sustainable business success (Green Paper on Corporate Social Responsibility, European Commission, 2001).

Scrap

As scrap are described the recyclable copper and zinc materials and their alloys with commercial value, which can be used as a feed material in production processes and derive from the:

- a) copper and zinc products processing and their alloys
- b) used copper, zinc and their alloys products, after their life-cycle end.

Abbreviations

CPL	Classification/Labeling / Packaging	TUV	Technischer Überwachungsverein
CO ₂	Carbon Dioxide	BoD	Board of Directors
EMAS	Eco Management Audit Scheme	DEPA	Public Gas Company
FTSE4GOOD	Financial Times Stock Exchange for Good Index	EIAX	Hellenic Copper Institute
GRI-G3	Global Reporting Initiative version G3	E.U.	European Union
ISO	International Organization for Standardization	CSR	Corporate Social Responsibility
Kg	Kilogram	ELKEME	ELKEME Hellenic Research Center for Metals
KWh	Kilo Watt per hour	Sq.m. (m ²)	Square Meters
m ³	Cubic Meters	OHS	Occupational Health and Safety
MSDS	Material Safety Data Sheet	YPEKA	Ministry of Environment, Energy and Climate Change
MWh	Mega Watt per Hour	EIDAP	Athens Water Supply & Drainage Co.
NOx	Nitrogen Oxide	KEPEK	Centre for the Prevention of Professional Risk
OHSAS	Occupational Health and Safety Assessment Series	PPE	Personal Protection Equipment
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals	NGO	Non Governmental Organization
Tn	Tons	SEV	Hellenic Federation of Enterprises
		SBSE	Federation of Sterea Ellada Industries

10. GRI Indicators Table

GRI Code	Description	Section – Notes
PROFILE		
STRATEGY AND ANALYSIS		
1.1	Chairman's statement	Page 6-7
1.2	Description of key impacts, risks and opportunities	Page 6-7 / 2.4 / 2.4.1 / 2.4.2
ORGANIZATIONAL PROFILE		
2.1	Name of the Company	2.2
2.2	Primary brands, products, and/or services	3.1 / 3.1.1 / 3.1.2 / 3.1.3
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	1.1 / 1.1.1 / 1.2 / 1.3
2.4	Location of organization's headquarters.	1.1.1
2.5	Countries where HALCOR operates	1.1 / 1.2 / 3
2.6	Nature of ownership and legal form	2.2
2.7	Markets served	1.1 / 1.2 / 3
2.8	Scale of HALCOR	2.1 / 8
2.9	Significant changes during the reporting period	1.1
2.10	Awards received in the reporting period	1.6
REPORT PARAMETERS		
REPORT PROFILE		
3.1	Reporting period	Page 4
3.2	Date of most recent previous report	Page 4
3.3	Reporting cycle	Page 4
3.4	Contact point	Page 5
REPORT SCOPE AND BOUNDARY		
3.5	Process for defining report content	Page 4
3.6	Boundary of the report	Page 4
3.7	Specific limitations on the scope or boundary of the report	Page 4
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities	Page 4
3.9	Data measurement techniques and the bases of calculations	Page 4
3.10	Explanation of the effect of any re-statements of information provided in earlier reports	Page 4
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report	Page 4
GRI CONTENT INDEX		
3.12	Table identifying the location of the Standard Disclosures in the report	10
ASSURANCE		
3.13	Policy and current practice with regard to seeking external assurance for the report	Page 5
GOVERNANCE, COMMITMENTS, AND ENGAGEMENT		
GOVERNANCE		
4.1	Governance structure of the organization	2.3 / 2.3.1 / 2.3.2 / 2.3.3 / 2.3.4 / 2.3.5
4.2	Indicate whether the Chair of the highest governance body is also an executive officer	2.3.1
4.3	Number of members of the highest governance body that are independent and/or non-executive members	2.3.1
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	2.3.1 / 4.6
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives	2.3.2

GRI Code	Description	Section – Notes
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	2.3.6
4.7	Process for determining the qualifications and expertise of the members of the highest governance body	2.3.2
4.8	Internally developed statements of mission or values, codes of conduct, and values relevant to economic, environmental, and social performance	1.7 / 1.7.1 / 3.3 / 4.1 / 4.1.1 / 4.3.1 / 5 / 5.2 / 6 / 6.1
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	2.3 / 2.3.1 / 2.3.3 / 2.3.4
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance	2.3.2
COMMITMENTS TO EXTERNAL INITIATIVES		
4.11	Explanation of whether and how the precautionary approach or value is addressed by the organization	2.4.1 / 4.3.2 / 5 / 5.2.2 / 6 / 6.1 / 6.4
4.12	Externally developed economic, environmental, and social charters, values, or other initiatives to which the organization subscribes or endorses	1.7.1 / 10
4.13	Memberships in associations and/or national/international advocacy organizations	1.5
STAKEHOLDER ENGAGEMENT		
4.14	List of stakeholder groups engaged by the HALCOR	1.7.2
4.15	Basis for identification and selection of stakeholders with whom to engage	1.7.2
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	1.7.2
4.17	Key topics and concerns that have been raised through stakeholder engagement	1.7.2
ECONOMIC PERFORMANCE INDICATORS		
ECONOMIC PERFORMANCE		
EC1	Direct economic value generated and distributed	2.1 / 8
EC3	Coverage of the organization's defined benefit plan obligations	4.3.2
EC4	Significant financial assistance received from government	The Company did not receive any financial support from the government
MARKET PRESENCE		
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation	3.5.1 / 7.3.2
EC7	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation	4.2 / 7.3 / 7.3.1
INDIRECT ECONOMIC IMPACTS		
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement	7.2 / 7.2.1 / 7.2.2 / 7.2.3 / 7.3 / 7.3.3 / 7.3.4
EC9	Significant indirect economic impacts	2.1 / 7.2 / 7.2.1 / 7.2.2 / 7.2.3 / 7.3 / 7.3.1 / 7.3.2
ENVIRONMENTAL PERFORMANCE INDICATORS		
MATERIALS		
EN1	Materials used by weight or volume	3.5 / 3.5.2 / 6.4.1
EN2	Percentage of materials used that are recycled input materials	3.5.2 / 6.4.1
ENERGY		
EN3	Direct energy consumption by primary energy source	6.4.2
EN4	Indirect energy consumption by primary source	6.4.2
EN5	Energy saved due to conservation and efficiency improvements	6.4.2
EN6	Initiatives to provide energy-efficient products and services	3.1.1 / 6.3.4
EN7	Initiatives to reduce indirect energy consumptions and reductions achieved	6.4.2
WATER		
EN8	Total water withdrawal by source	6.4.5
EN9	Water sources affected by withdrawal of water	6.4.5

GRI Code	Description	Section – Notes
BIODIVERSITY		
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.4.8
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	6.4.8
EN13	Habitats protected or restored	6.4.8
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity	There is no negative impact on biodiversity, since the Company does not operate in protected areas
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	There is no negative impact on IUCN Red List species and national conservation list species, since the Company does not operate in such areas
EMMISSIONS EFFLUENTS AND WASTE		
EN16	Total direct and indirect greenhouse gas emissions by weight	6.4.3
EN18	Initiatives to reduce greenhouse gas emissions by weight	6.4.3
EN20	NOx, SOx, and other significant air emissions by type and weight	6.4.4
EN22	Total weight of waste by type and disposal method	6.4.6
EN23	Total number and volume of significant spills	There were no significant spills
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	There are no water discharges in protected areas
PRODUCTS AND SERVICES		
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	6.1 / 6.3 / 6.4.2 / 6.4.3
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	3.5.2 / 6.4.1
COMPLIANCE		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with environmental laws and regulations	There were no fines or non monetary sanctions
OVERALL		
EN30	Total environmental protection expenditures and investments by type	6.2
LABOR PRACTICES AND SESCENT WORK PERFORMANCE INDICATORS		
EMPLOYMENT		
LA1	Total workforce by employment type, employment contract, and region	4.2 / 4.3.1 / 4.3.3
LA2	Total number and rate of employee turnover by age group, gender, and region	4.2
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.3.2
LABOR/MANAGEMENT RELATIONS		
LA4	Percentage of employees covered by collective bargaining agreements	4.3.3
OCCUPATIONAL HEALTH AND SAFETY		
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region	5.3
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases	4.3.2
TRAINING AND EDUCATION		
LA10	Average hours of training per year per employee by employee category	4.5
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	4.5
LA12	Percentage of employees receiving regular performance and career development reviews	4.4
DIVERSITY AND EQUAL OPPORTUNITY		
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity	4.3.1
LA14	Ratio of basic salary of men to women by employee category	4.3.1

GRI Code	Description	Section – Notes
HUMAN RIGHTS PERFORMANCE INDICATORS		
NON-DISCRIMINATION		
HR4	Total number of incidents of discrimination and actions taken	4.3.1
CHILD LABOR		
HR6	Child labor	4.2
FORCED AND COMPULSORY LABOR		
HR7	Forced and compulsory labor	4.2
INDIGENOUS RIGHTS		
HR9	Total number of incidents of violations involving rights of indigenous people	No incidents
SOCIETY PERFORMANCE INDICATORS		
CORRUPTION		
S02	Percentage and total number of business units analyzed for risks related to corruption	All business units are being systematically audited. There were no incidents of corruption
S03	Percentage of employees that are trained in policies and procedures that the organisation takes against corruption	25 company employees (5.1%) were trained during 2010
S04	Actions taken in response to incidents of corruption	There were no incidents of corruption
PUBLIC POLICY		
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country	The Company does not contribute in-kind or financially to politicians and/or political parties
ANTI-COMPETITIVE BEHAVIOUR		
S07	Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes	There were no legal actions
COMPLIANCE		
S08	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with laws and regulations	There were no incidents of non compliance
PRODUCT RESPONSIBILITY PERFORMANCE INDICATORS		
CUSTOMER HEALTH AND SAFETY		
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	There were no incidents of non compliance
PRODUCT AND SERVICE LABELING		
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	3.3.1
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	The were no incidents of non compliance
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	3.4 / 3.4.1 / 3.4.2
MARKETING COMMUNICATIONS		
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship	3.3.1
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	There were no incidents of non compliance
CUSTOMER PRIVACY		
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	There were no complaints
COMPLIANCE		
PR9	Monetary value of significant fines for non compliance with laws and regulations concerning the provision and use of products and services	There were no fines

Application Level

In this Report HALCOR has covered all necessary disclosures required for level B of GRI-G3 Guidelines. The relevant statement by the Independent Assurance Provider is at page 117.

Report Application Level	C	C+	B	B+	A	A+
Standard Disclosures						
GRI Profile (Disclosure)	Report on: 1.1 2.1 - 3.1b 3.1 - 3.3, 3.10 - 3.13 4.1 - 4.4, 4.12 - 4.15		Report on all criteria listed in level C plus: 1.2 3.9, 3.11 3.5 - 3.13, 4.10 - 4.12		Same as requirement for level A	
GRI Management Approach (Disclosure)	Not required		Requirement Approach Disclosure for each Indicator Category	Report Externally Assured	Management Approach Disclosure for each Indicator Category	Report Externally Assured
GRI Performance Indicators (Disclosure)	Report on a minimum of 10 Performance Indicators, including at least four from each of Economic, Social and Environmental.		Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility.	Report Externally Assured	Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility.	Report Externally Assured

Global Compact Principles – GRI Indicators Cross Reference Table

HALCOR supports United Nations Global Compact. The following table shows which GRI G3 performance indicators relate to each of the ten Global Compact principles.

Issue Areas	Global Compact Principles	Relevant GRI Indicators
Human rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights	EC5, LA4, LA6-9, LA13, LA14, HR1-9, S05, PR1, PR2, PR8
	Principle 2: Businesses should make sure that they are not complicit in human rights abuses	HR1-9, S05
Labor	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	LA4, LA5, HR1-3, HR5, S05
	Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor	HR1-3, HR7, S05
	Principle 5: Businesses should uphold the effective abolition of child labor	HR1-3, HR6, S05
	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation	EC7, LA2, LA13, LA14, HR1-4, S05
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges	EC2, EN18, EN26, EN30, S05
	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility	EN1-30, S05, PR3, PR4
	Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies	EN2, EN5-7, EN10, EN18, EN26, EN27, EN30, S05
Anti-Corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	S02-6

The photographs used for this Report are from shots taken by the photographer Spyros Charaktinos, as well as by Ioannis Kollios, George Mavraganis and Erietta Papadogianni.

The paper used for this Report has been produced from FSC sustainable management forests and plantations and contains 60% pulp from recycled paper.

11. Statement on the Level Check

The certification body TUV HELLAS, has been assigned by the Board of Directors of HALCOR S.A, to conduct the Level Check, according to the GRI G3 Guidelines Sustainability Reporting, referring to the Corporate Responsibility and Sustainability Report of HALCOR S.A, for 2010.

The Level Check was conducted based on the corresponding correlation table of GRI Indicators, stated by HALCOR S.A, in order to confirm the company's compliance to the requirements of the GRI's G3 for B Level.

TUV HELLAS has not conducted an inspection and evaluation of the contents of the Corporate Responsibility and Sustainability Report.

TUV HELLAS has not conducted an inspection and evaluation of the contents of the Corporate Responsibility and Sustainability Report.

For TUV HELLAS

G.J. Kechribaris
Managing Director

S.Peltekis
General Manager

Athens, 09/06/2011



12. Corporate Responsibility and Sustainable Development Report 2010 Feedback Form

Your opinion helps us improve

We invite you to provide your opinion in order to help HALCOR's Corporate Responsibility and Sustainable Development Report be improved by filling the following questionnaire:

Which stakeholder group do you belong to?

- ☐ Employee
- ☐ Shareholder/investor
- ☐ Customer
- ☐ Supplier
- ☐ Local Community
- ☐ NGO
- ☐ Media
- ☐ Other:

What is your overall impression of the Report?

	VERY GOOD	GOOD	AVERAGE	BAD
Coverage of basic subjects regarding the Company's operations				
Completeness of quantity data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Text completeness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Graphics and illustration completeness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Balance between sections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

What is your opinion regarding the following sections of the Report?

	VERY GOOD	GOOD	AVERAGE	BAD
Company profile	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corporate Governance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marketplace	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Human Capital	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health & Safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Society	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are there any sections that need to be extended?

Do you have any comments or suggestions that you would like to state?

Personal Details (Optional)

Name/Last name:

Company/organization:

Address:

Tel./Fax:

E-mail address:

Please return this form by post to:

HALCOR, attention to Mr George Mavraganis
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fax to 0030 22620 48910

All data for the report evaluation and statistical purposes will be statistically processed only to improve the Report. All personal data will be protected as defined by law.