

09

**CORPORATE RESPONSIBILITY &
SUSTAINABLE DEVELOPMENT REPORT**

HALCOR

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ABOUT THE REPORT

The 2009 Corporate Responsibility and Sustainable Development Report is the second report published by HALCOR and is a continuation of the previous report published in 2008. This report refers to the period between 1/1/2009 and 31/12/2009. Corporate Responsibility reporting has been set by the company to an annual basis.

Scope and Boundary

The goal of this Report is to depict impacts of business activities of HALCOR on the Economy, Environment 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 are presented which entail information at a Group level. In addition, there are no significant changes in terms of the company's size, structure or ownership that would affect the contents of this report. Where such changes occurred are reported in the relevant sections of this report. Expectations of stakeholders, as well as importance of specific issues of the Company, were taken into consideration, in order to determine which issues should be included in the Report.

This Report deals with 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 through the different years.

This Report contains no revision of data presented in the previous Report, while at the same time there were no significant changes in scope, boundary, calculation or estimation methods that are used.

Methodology

HALCOR's Corporate Social Responsibility and Sustainable Development Report for 2009, was prepared in accordance to the latest guidelines for CSR / Sustainability Reports of the international Organization, Global Reporting Initiative (GRI – G3 edition).

A specialized CSR Team was formed by managers from all departments, in order to meet reporting requirements. The CSR team's task is to collect all required data regarding various fields of HALCOR's Corporate Responsibility. Data and information presented in this Report are collected on the basis of existing monitoring procedures of the Company, as well as information databases of various systems. In some areas, unedited non-primary data are presented. Moreover, information on the calculation / estimation method is included, while at the same time, all relevant GRI guidelines are followed.

The Corporate Social Responsibility and Sustainable Development Report 2009 was implemented with the specialized guidance (data collection, data assessment, drafting and editing of the report) of the Consulting Company "Sustainable Development Ltd".

External Verification

HALCOR has the goal of increasing its commitment to its stakeholders. For this reason, the Company assigned to a third party verification of the GRI level of this Report, according to standards and guidelines of GRI. Both statements for GRI level as well as for external verification by the independent Verification Body are presented in page 66.

Contact:

HALCOR looks forward to any question, enquiry, clarification or improvement proposal, since the opinion of its stakeholders bears great significance to the Company.

HALCOR S.A.

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LETTER FROM THE CHAIRMAN OF THE BoD





Letter from the Chairman of the Board of Directors

With this Corporate Responsibility and Sustainable Development Report, our Company is presenting, its commitment towards a responsible operation in all the areas related to our business activities. For HALCOR, Corporate Responsibility is an integral part of its business culture and it is considered a means for achieving sustainable development and operational success.

In 2009, the global economic crisis, impacted on HALCOR as well . Despite this crisis, by implementing various operational improvements, such as strict control of operating and administrative costs and investment slow-down, the Company managed to respond effectively to these new economic conditions. In HALCOR, we strive to see beyond the risks and challenges presented to us by a global economic crisis, identifying the significant opportunities that may arise and that can advance our business activities , leading to sustainable development which is one of our continuous goals

Despite the adverse economic conditions in Greece and in the countries we are active in; our Company continued the development of its Corporate Responsibility. Focusing on critical areas of operations, we responded to significant challenges by intensifying our efforts with particular actions, covering all areas of our Corporate Responsibility:

- safeguard the Health and Safety of our employees
- reduce our environmental footprint
- consistently produce high quality products
- support the local communities in which we operate, operating always with transparency, reliability and ethos.

The Company placed particular emphasis in its Human Resources. It should be noted that , once again in 2009 , further improvements in all the employee Health and safety performance indicators were achieved.

We are committed to continue investing in modern business practices, setting Sustainable Development as our ultimate goal. For HALCOR, Corporate Responsibility equals continuous improvement. Our successful performance against our sustainable development objectives creates a foundation upon which we aim to intensify our efforts.

In 2010 and for the next 3-5 years, HALCOR is facing the challenges that are a result of this international and national economic downturn, in order to achieve the expectations of its shareholders, employees, customers, suppliers as well as its other stakeholders. Always committed to achieve our sustainable strategic goals, our objectives for 2010 include further improvements on the results of our activities within the economic, social and environmental domains. For example we aim to further reduce our environmental footprint through the implementation of the waste water management system "Zero Liquid Discharge Project". In addition, to improve further on Health and Safety issues, we aim to reduce further the risks that could lead to accidents. Also, we shall continue to manufacture products of high quality meeting all the needs of our international market

In 2009, HALCOR, committed towards its sustainable goals created a Corporate Responsibility Team. This new team is now responsible for activities within areas such as environmental protection, occupational health and safety, product quality and related social initiatives.

Sustainable development is a path we are on, setting continually goals , actions and synergies that can help us in meeting the challenges of any modern business, responsibly.

Theodosios Papageorgopoulos,
Chairman of the Board of Directors

1. COMPANY PROFILE

1. Company Profile

HALCOR is a modern metals processing company which, operates mainly in Europe as well as in the rest of the world.

Halcor operates with an adaptive model, which has at its core the fundamentals of sustainable development, social responsibility and competitiveness.

The HALCOR group operates in the production and marketing of copper, copper alloys and zinc products. It is an international Group of 18 companies, which is comprised of the following:

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

Group regional structure

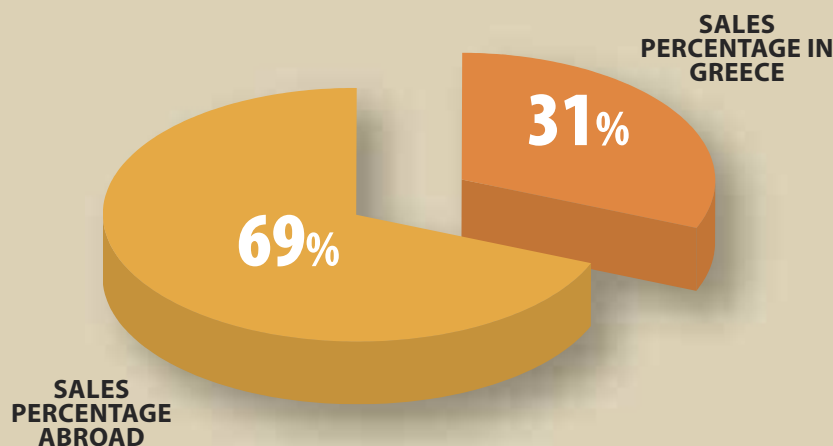


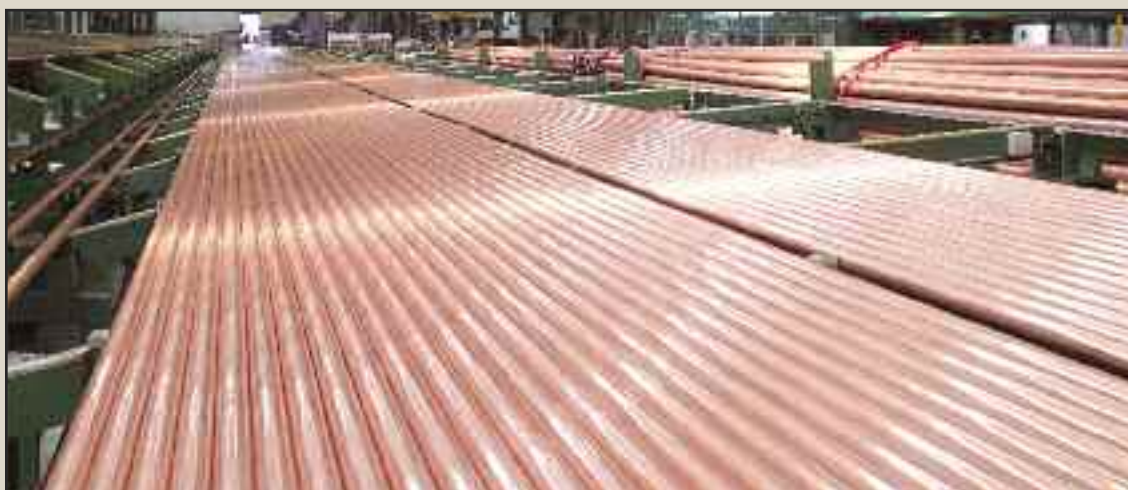
HALCOR's participation in major industrial and commercial companies		
Company	% of participation	Country
HALCOR S.A.	Parent	GREECE
HELLENIC CABLES S.A.	78.71%	GREECE
DIAPEM EMPORIKI S.A.	33.33%	GREECE
STEELMET S.A.	52.83%	GREECE
ELKEME S.A.	30.90%	GREECE
AKRO S.A.	95.74%	GREECE
SYLL.AN. S.A.	100.00%	GREECE
METAL AGENCIES Ltd.	92.98%	UNITED KINGDOM
BELANTEL HOLDINGS Ltd.	100.00%	CYPRUS
SOFIA MED AD	100.00%	BULGARIA
S.C. STEELMET ROMANIA S.A.	40.00%	ROMANIA
METAL GLOBE D.O.O.	53.61%	SERBIA
ENERGY SOLUTIONS S.A.	38.60%	BULGARIA
OGWELL LIMITED	100.00%	CYPRUS
VIEXAL S.A.	26.67%	GREECE
COPPERPROM S.A.	71.49%	GREECE
TEPRO METALL A.G.	43.53%	GERMANY
HAMBAKIS S.A.	100.00%	GREECE

The HALCOR group has over 70 years experience in the manufacture and sale of its products and has a strong commercial position in the European and other international markets. The total exports of the HALCOR Group, in 2009, were Euro 312 million, which approximately equaled 2.2% of total Greek export activity for that year.

In 2009, 69% of the Group's products were exported to numerous countries, with the remaining 31% sold to the Greek market.

HALCOR Group Sales distribution





The production facilities of the HALCOR Group

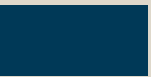
Facility / plant	Region (m ²)	Total area	Built-up area (m ²)	Annual Production Capacity (tons)
HALCOR Cast house	Inofita	51,213	11,639	235,000
HALCOR Copper Tubes Plant	Inofita	198,061	67,414	75,000
HALCOR Extrusion Plant for Brass Bars and Tubes	Inofita	57,980	23,120	40,000
HALCOR Titanium Zinc Rolling Plant	Athens	60,048	37,427	20,000
SOFIA MED Copper Processing Plant	Bulgaria	250,000	120,000	105,000
HELLENIC CABLES Power and Fiber-Optic Cables Plant	Thiva	175,000	36,957	55,000
HELLENIC CABLES Copper and enamelled wires plant	Livadia	121,818	13,890	14,000
HELLENIC CABLES Plastic and Elastomeric Compounds Plant*	Inofita	22,032	6,636	24,000
ICME ECAB Cable Plant	Romania	268,000	70,000	45,000

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

The table below presents the main products of each of the group's manufacturing companies

Products of the HALCOR Group

Company	Products
HALCOR S.A.	<ul style="list-style-type: none"> • Copper Products: Copper Tubes (TALOS & CUSMART), circles, rods, wire Ø8mm, water supply tubes (DOMA) • Brass Products: tubes, circles, rods • Zinc Products: sheets & strips, water supply tubes (DOMAZINC)
SOFIA MED S.A.	<ul style="list-style-type: none"> • Copper Products: sheets & strips (DOMA), circles & rods • Brass Products: sheets & strips (DOMA), circles & bars • Special Alloy Products: slabs, strips, cartridge cups, blanks
HELLENIC CABLES S.A. – CABLEL	<ul style="list-style-type: none"> • Power & Telecommunication cables • Enamelled wires • Plastic & Elastic compounds • Copper & Aluminium conductors





1.1 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 sector of VIOHALCO S.A. The milestones of HALCOR's history are:

1977:	VECTOR S.A. was founded, keeping 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:	The Hellenic Copper Development Institute (ELKEME) was established. HALCOR was a founding member.
1998:	The Company pipe mill was ISO 9001 certified.
1999:	The Company increased further 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 best acclaimed business tools of SAP A.G..
2002:	An investment project of €13.5 million approximately was completed in the pipe mill, its salient feature being the purchase and installation of a new extrusion press of 4,000 TN. 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 investments
2005:	A new product titanium zinc is launched and its production started.
2006:	FITCO taken over by HALCOR
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 subcategory "Exporting Turnover" from HELEXPO and STATBANK, in September 2009

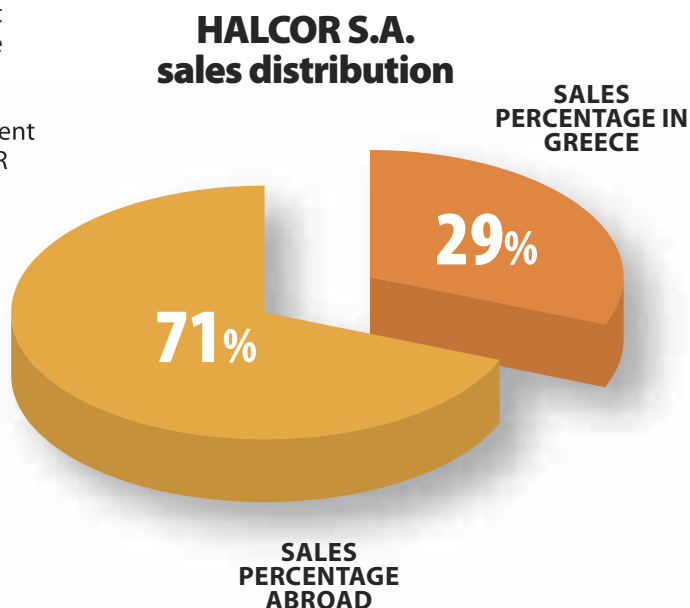
1.2 Company Information

The Company with the name "HALCOR S.A. METAL PROCESSING COMPANY" and the distinctive title "HALCOR S.A." has its headquarters at 2-4, Mesogion Street, 11527, Athens, Tower B Building and was founded in 1976. The Company is listed on the Athens Stock Exchange since 1996.

HALCOR S.A. is one of the largest Greek exporting companies, selling 71% of its products in over 50 foreign countries.

The Company, in order to ensure the high quality of its products, implements a Quality Management System, which is certified according to the international standard ISO 9001:2008.

Through the implementation of large investment projects in research and development, HALCOR constantly creates new standards in copper processing, placing itself amongst the leading companies of its industrial sector, worldwide. 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.



1.3 Participation in Organizations



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 the country, as well as to develop communication, synergy and co-ordination mechanisms amongst the corporations which are members of the network, for the common implementation of programs and the exchange of good practices.



Hellenic Federation of Enterprises (SEV)

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



Viotia Industries Association (SBB)

SBB Viotia Industries Association was founded in 1982 and its primary objective is to promote the needs of the Viotia - based industries and to ensure the creation of the appropriate means to achieve sustainable development responsibly, within a competitive business environment. SBB, aims at supporting its members by promoting entrepreneurship, competitiveness, sustainable development and environmental protection of Viotia. HALCOR is a founding member of SBB and members from the Board of Directors of the Company participate in the BoD of VIA as well.



Hellenic Copper Development Institute (ELKEME)

ELKEME was founded in 1996 and is a nonprofit organization that aims to promote responsibly applications, updates on the uses of copper, and its alloys, to specialized users and the general public. HALCOR and the Greek Hellenic Copper Development Institute (ELKEME) are both members and 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, ELKEME belongs in a global network of 27 copper centers, funded and supported by the global nonprofit organization ICA. HALCOR is a founding member of the Hellenic Copper Development Institute.



International Wrought Copper Council (IWCC)

The IWCC, which was founded in 1953, is an industrial communication organization 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



European Committee for Standardization (CEN)

The CEN is a non-profit organization and was founded in 1961. The main objective of CEN is to create a single standardization system that meets the current needs of all the 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 forms the specifications of CEN.



1.4 Awards – Certifications

HALCOR, aiming to improve its customer service, continues a successful course within its sector. A proof of this success are the awards it has received over the years. In addition HALCOR participates in assessments by independent bodies, as it is one of the largest companies in Greece.

Accountability Rating Greece

Corporate Accountability Rating (Accountability Rating TM) operates in Greece since 2007 and is part of an international initiative that quantitatively monitors the way in which large corporations worldwide develop and “communicate” responsibility practices within the framework of the business activity.

In Greece, this assessment was applied in 2009 to all major corporations (based on sales, ICAP top100), on a very broad range of criteria, while the information needed was disclosed by the companies themselves (through annual reports, corporate websites, announcements etc).

HALCOR’s assessment was published in December 2009, regarding its operation for 2008 and was ranked 22nd, an improvement on its previous year’s rank of 29th.

EXPORT LEADER Award

HALCOR was honoured as an EXPORT LEADER in the subcategory “Exporting Turnover” from HELEXPO and STATBANK, in September 2009, during the 5th Business Forum of the 74th Thessaloniki International Fair, which was organized and was dedicated to utilizing investments as means to combat the international economic crisis.

With this award, HALCOR was recognized as one of the most dynamic investment – export companies operating in Greece.

This award for HALCOR represents an honorary recognition of the successful exporting activity of the Company and provides moral incentives for further investment and export achievements.

1.5 Corporate Responsibility in HALCOR

The Company has all the principles of Corporate Social Responsibility integrated in its operations, as CSR has always been part of its philosophy. HALCOR is committed towards a development course according 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 proper and prudent use of natural resources in an effort to minimize the environmental impact of its operations.



HALCOR S.A. Corporate Responsibility Team

Corporate responsibility for HALCOR is a result of a consistent approach to plan and implement actions, that aim to create value to all stakeholders affected by its operations. HALCOR is committed to continuously invest in modern business practices for sustainable development and to constantly impact positively on all those affected directly or indirectly by its activities.

1.5.1 Code of principles for Sustainable Development

HALCOR S.A. adopts the Code of Principles for Sustainable Development as constituted by the Hellenic Federation of Enterprises:

1. Respects the principles of Sustainable Development and incorporates them in its decision making process.
2. Promotes the adoption of environmentally sound and scientifically proven methods of designing its operations.
3. Focuses on the production of goods and services with a positive environmental impact.
4. Promotes the implementation of production processes which focus on recycling, natural resources conservation as well as sound management of the produced waste.
5. Educates and trains its human resources while investing in physical, technological and financial resources, constantly aiming at sustainable development.
6. Seeks to constantly improve its performance in the areas of health and safety as well as in environmental protection.
7. Provides accurate information to authorities and society about its operations, while seeking a sincere dialogue with those affected by it.
8. Contributes to the social, cultural and economic development of the communities in which it operates.
9. Endorses the implementation of modern systems of corporate governance.
10. Consistently complies with its statutory obligations in a spirit of transparency and business morality.

1.6 Communication with the Stakeholders

HALCOR has recognized as stakeholders, all persons and legal entities directly or indirectly affected by its operation. The Company acknowledges as key stakeholder groups the following: shareholders, employees, customers, suppliers, local communities, non-profit non-governmental organizations (NGOs) and the academic community.

HALCOR promotes dialogue with its key stakeholders, aiming at a mutually beneficial bilateral communication process. To achieve this goal it has set the foundations for implementing a series of methods and practices through which it communicates, receives and records systematically the issues and expectations of the stakeholder groups, seeking to respond appropriately to their needs and requests.



HALCOR's Stakeholders		
Stakeholder group	Means of Communication	Expectations / Main issues
Shareholders - Investors	<ul style="list-style-type: none"> The Board informs shareholders about any changes in HALCOR Regular press releases, announcements and repost are issued, providing information about new investments Constant communication of analysts (quarterly teleconference) and investors with the Company's executives Appointment of a specific officer responsible for investor relations and updates Annual presentation in the Union of Institutional Investors Publication of an Annual Financial Report Publication of a 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
Human Resources	<ul style="list-style-type: none"> Ongoing communication between Management and Employees. The Company seeks and implements an "Open Door Policy" Monthly meetings with Management Communication and updating through the Company's intranet (internal network) 	<ul style="list-style-type: none"> Employment and insurance issues Personal Evaluation issues Advancement and development of human resources Details of Company's objectives and means of achieving them
Customers	<ul style="list-style-type: none"> Meetings, phone and electronic communication Operation of a Customer Service Department Implementation of a customer satisfaction survey on a regular basis (sending questionnaires to all company's customers) 	<ul style="list-style-type: none"> Provision of services / products of high quality After sales support Customer updates on market and product developments
Suppliers	<ul style="list-style-type: none"> Selection of suppliers based on objective and meritocratic criteria Participation in supplier events and exhibitions Constant contact with suppliers through the Purchasing Department of the Company 	<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"> Consistent and continuous communication with local community authorities and organizations Local Union participation Participation in activities and events organized by local authorities 	<ul style="list-style-type: none"> Response to local community issues and needs. Supports the local community by employing locals Promotes local development
Non-Profit / Non-Governmental Organizations	<ul style="list-style-type: none"> Cooperating with NGO's to raise awareness and take action Exchange of opinions on issues of mutual interest (e.g. copper and health, environmental protection) Participation of HALCOR in NGO events 	<ul style="list-style-type: none"> Support of NGO initiatives and actions
Academic Community	<ul style="list-style-type: none"> Support of research in Universities Participation in research projects 	<ul style="list-style-type: none"> Copper applications Effects of copper and metals on human health and the environment

2. ECONOMIC DEVELOPMENT AND CORPORATE GOVERNANCE

The annual Corporate Responsibility and Sustainable Development Report of HALCOR is a testament of its objective to improve communication and commitment towards its stakeholders. The Company regularly records the issues and concerns of each stakeholder group to be able to take them into consideration when related decisions and actions take place.

The primary goal of HALCOR is to create value for its shareholders as well as for the society in general. One of the key challenges faced in 2009 was to serve this goal with less available funding. In response to the significant domestic economic downturn HALCOR achieved lower investment costs, operational costs, reduced inventories of raw materials and finished products as well as administrative costs.

The deteriorating economic conditions of 2009 internationally and domestically, had a significant impact on HALCOR's financial results. However, when shaping its long term strategy, HALCOR continues to take into account, both the expectations of its shareholders as well as any potential improvements, within the context of sustainable development.

Despite the negative impact on sales and metal prices, HALCOR contributed through its reported actions towards domestic sustainable development, a proof of its sustainable growth commitment towards employees, suppliers and other stakeholders.

HALCOR S.A.

Annual Contribution to Social Development (In thousand euros)	2007	2008	2009
Payments to suppliers (Apart from materials and other transactions)	47.350	41.650	45.248
Employees expenses	32.077	33.756	28.186
Dividends and taxes	15.74	56.635	-
TOTAL	95.172	82.041	73.434

2.1 Key Financial Figures of HALCOR

The company's financial data for the last three years is presented below:

Financial figures	2007	2008	2009
Net Sales (in thousand euros)	755,974	635,252	343,547
Other revenues (in thousand euros)	6,793	6,692	5,112
Revenues from financial investments (in thousand euros)	4,216	4,824	1,185
Total revenue (in thousand euros)	766,983	646,768	349,844
Operating Costs (in thousand euros)	(708,057)	(619,760)	(327,930)
Employee salaries and benefits (in thousand euros) (32,077)	(33,756)	(28,186)	
Payments to capital providers (in thousand euros) (13,752)	(16,625)	(6,979)	
Net profit before tax (in thousand euros)	13,097	(23,373)	(13,251)
Net profit after tax (in thousand euros)	9,786	(15,184)	(11,188)
Net earnings per share (in euro)	0.1977	(0.1499)	(0.1105)
Payments to governmental bodies - taxes paid (in thousand euros) (7,141)	(539)		
Investments (in thousand euros)	12,046	19,767	10,003
Dividend per share (in euro)	0.065	-	-
Total capitalization (in thousand euros)	326,120	75,960	137,740
Equity (in thousand euros)	193,747	179,582	162,527
Total liabilities (in thousand euros)	311,280	309,542	256,434
Total assets (in thousand euros)	505,027	489,124	418,961

2.2 Shareholder structure

HALCOR S.A. shares are traded in the Athens Stock Exchange in the Large-Cap category. The shareholder structure of the Company, as of 31/12/2009, was as follows:

- VIOHALCO S.A.: 59.43 %
- Other shareholders: 40.57%

The Company's share capital, on that date, 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, Large-Cap in the category "Nonferrous metals".

Further information on HALCOR's shares is included in the Financial Report of the Annual Report 2009 as well as at the corporate website www.halcor.gr (Investor Relations / the Share).

2.2.1 Significant Changes

During 2009, the merger through absorption of "THISVI ELECTRIC GENERATION S.A." by "ENERGY THESSALONIKI S.A.", which was renamed "ELPEDISON ENERGY S.A." was completed and therefore HALCOR increased its holding in this company from 0.55% to 2.5% through the purchase of shares from ELPEDISON B.V., with a total value of Euro 2,5 million. As of 2005, ELPEDISON ENERGY S.A. has been the first substantial independent power generator in Greece with 395 MW total installed power, using natural gas combined-cycle technology.

2.3 Corporate Governance

A corporate governance system is not only essential to ensure transparency within an organisation but also to reinforce effective management, to maximise the economic value of an organisation, and to protect at the same time the interests of its shareholders and creditors.

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

- Protection of all its shareholders' rights.
- Clarity in defining executive management's roles and responsibilities as well as their selection procedures based amongst other on skills and experience in corporate governance
- Transparency, integrity and responsibility in decision making
- A strong interest in social responsibility issues.

HALCOR Corporate Governance Principles

HALCOR's principles of corporate governance, equal a number of obligations, including the following:

- The prompt publication of every piece of information or fact that is linked to Halcor's activities and has the potential to affect its share price
- Maintain the internal organizational structures and mechanisms, which safeguard the company's interests
- The Internal Audit Department, which is responsible for monitoring HALCOR's operations and reports directly to the members of the Board of Directors.

The main purpose of operating this corporate governance system is to establish, a series of operating principles and practices which contribute in:

- Transparency
- Consistency
- Responsibility

HALCOR's corporate transparency and control mechanisms are established in the Company's Internal Operational Regulations and implemented by the Internal Audit Department. The Internal Audit Department is responsible for:

- drawing up a timetable for carrying out transactions
- Implementation of controls
- assessing the adequacy of control systems
- assessing the effectiveness of existing processes
- the implementation and adherence to the Company's Internal Operation Regulation and Memorandum of Association.
- supervising conformity with legislation related to the Athens Stock Exchange as well as to incorporated companies.

2.3.1 Management Bodies

The main governing bodies of HALCOR are:

- Annual Shareholders' General Meeting
- The Company's Board of Directors (BOD).

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

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

Moreover, the Company has adopted a procedure, according to which Quality, Environment and Health and Safety Managers can inform directly the Board of Directors concerning issues relevant to:

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

During the Shareholders' general assembly, minority Shareholders can participate, express their opinion and communicate with the members of the Company's Board. The Company complies fully with the Law 2190/1920 regarding the mechanisms for minority Shareholders' views and involvement.

HALCOR's Board of Directors

President	T. Papageorgopoulos	Executive member
Vice President	N. Koudounis	Executive member
Member	P. Sapountzis	Executive member
Member	E. Kotsabasakis	Executive member
Member	A. Kassapoglou	Executive member
Member	G. Passas	Non-Executive member
Member	K. Bakouris	Non-Executive member
Member	C. Komninos	Non-Executive member
Member	A. Katsanos	Non-Executive member
Member	A. Kiriazis	Independent
Member	N. Galetas	Non-Executive member
		Independent
		Non-Executive member

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. It should be noted that, the remuneration of the members of the Board of Directors are linked with the Company's entire 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:

- Honesty
- Objectiveness
- Diligence
- Efficiency shown in carrying out their duties.

Members of the Board of Directors are being elected on the basis of certain criteria, among others being experience, specialization, university degrees, job related awards received, administrative ability, creative ability, composition and analysis skills, social recognition and fairness.

2.3.2 Audit Committee

All members of the Audit Committee are elected from the Shareholders’ General Assembly (in accordance with the Law 3693/2008). This committee consists of at least two non-executive members and one independent member of the Company’s Board of Directors, who has sufficient knowledge on financial and auditing issues. The Audit Committee monitors, informs and supports the Company’s Board of Directors.

The Audit Committee is responsible to ensure the implementation of:

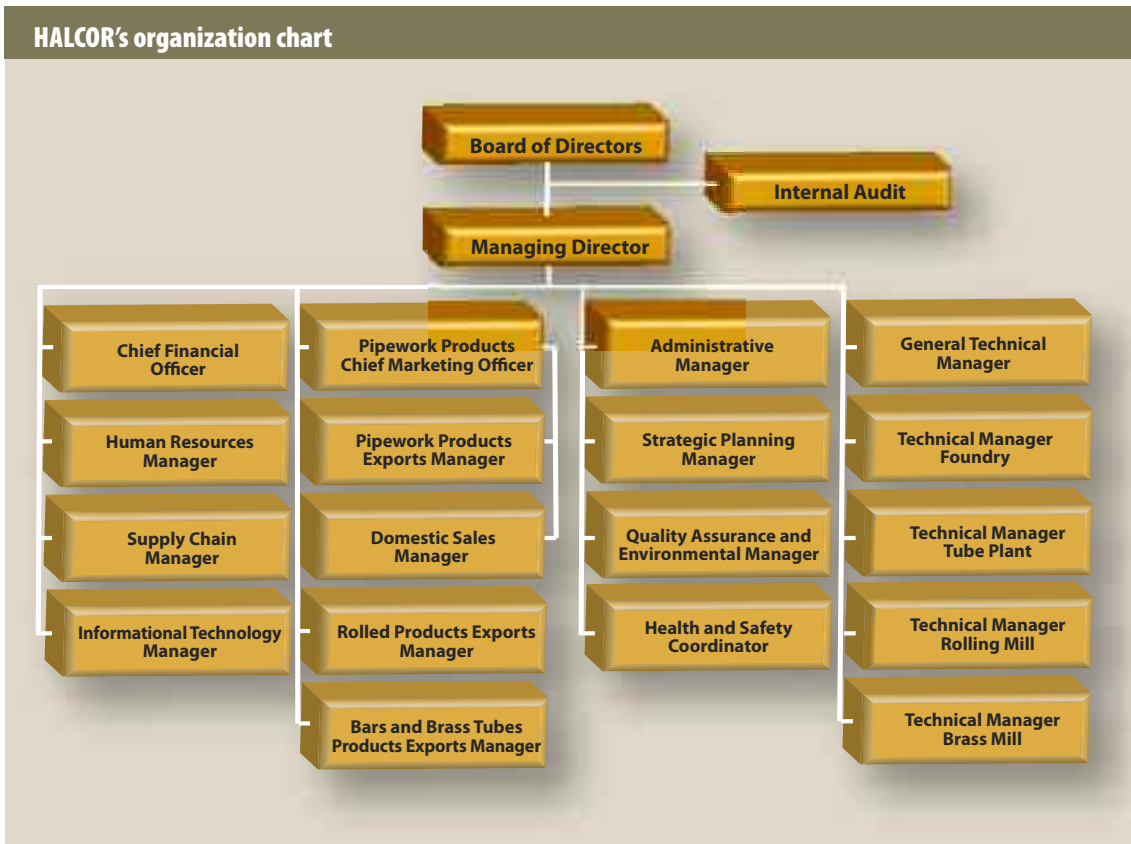
- The Principles on Financial Reports
- The Principles of corporate governance, internal audit and the maintenance, on an ongoing basis, of the effectiveness, independence and objectivity of the Company’s external auditors as well as its subsidiaries and its related companies.

Additionally, the Company engages a qualified independent audit team (Internal Audit). The auditors are appointed by the Board of Directors and their tasks are independent, non-hierarchical and are not subordinate to any other operational Unit within HALCOR.

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.

HALCOR created in 2009 a Corporate Responsibility team, which meets, at least, on a monthly basis and is responsible for managing all issues and schedules appropriate actions. The Corporate Responsibility Team consists of representatives from various Departments of the Company and is coordinated by the Strategic Planning Department which reports to the General Manager.



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
- Occupational Health and Safety Management System, which is integrated into the Quality – Environment – Occupational Health and Safety Management System.

2.3.4 Avoiding conflicts of interest

The Company wishes to avoid any conflict of interest and therefore has developed 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 must be 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 Risk Management

HALCOR, aware of its responsibility for prompt prevention as well as for proper risk management, has established methods and practices to prevent risks associated with its operations, ensuring an environmentally friendly industrial activity, where applicable.

The Board of Directors of HALCOR, monitors and reviews issues related to the sustainable development of the Company, as well as the process of risk management. For HALCOR, risks and opportunities can arise from the 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 towards Environment and Society.

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 its occupational health and safety, HALCOR has completed all the risk assessment studies required by law and has taken preventive measures and initiatives, monitoring the installed relevant performance indicators (e.g for Quality, Environment, Health and Safety). These indicators are monitored regularly and are communicated at all Company levels.

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:

- Market risk
- Liquidity risk
- Exchange rate risk
- Interest rate risk
- Fluctuation risk of metal prices (copper, zinc, other metals).

More information about Corporate Governance, Risk Management and detailed financial data is available in HALCOR's 2009 Annual Financial Report and the company's website www.halcor.gr (Investor Relations / Financial Results - Financial Reports section).

2.4.1 European Competition Committee

A survey conducted by the European Union Competition Committee concerning European producers of copper tubes, determined the violation of competition standards in copper tubes for water supply. The E.U. Commission fined seven companies, including HALCOR. The fine for Halcor is Euro 9.16 million for which the Company has issued an equal-value Letter of Guarantee. Nevertheless, as Halcor believes that the fine is unjustified, unfair and its amount excessive, it has appealed against the decision before the European Court of Justice.

2.5 Main Impact and Opportunities

The operation of HALCOR has a significant impact to its stakeholders part of which is the wider society. The key identified groups are employees, shareholders, customers and suppliers of the Company, which are the stakeholder groups mostly affected by Halcor’s activities. In this context, HALCOR seeks further engagement with these stakeholders that assists in setting the right priorities for continuous improvements.

Reducing the Company’s environmental footprint, improving accident rates, closer collaboration with local communities and increasing its positive impact on national economy and society in general, are the priorities that HALCOR is focusing upon for the near future.

Regarding the Company’s growth, the prevailing economic crisis and resulting conditions of 2009 lead to signs of deceleration, at least in some markets, where the Company operates. However, an increase in demand may be coincidental and not accompanied with a price increase, as competition is intensified over the past years. The uncertainty of metal prices and the concerns regarding the intensity, speed and demand growth in major developed economies, created a volatile environment, in which Halcor operates in 2010.

In this challenging macroeconomic environment, the Company has set as its main strategic goal, to maintain its market share in Western and South-Eastern Europe and strengthen its business by entering new markets. Actions implemented for cost reduction will continue in 2010 and production reorganisation is amongst the top priorities. In addition, the optimum management of cash-flow, the maintenance of positive cash flows and the further reduction of net debt, are the main financial priorities for the current year.

Finally, Occupational Health and Safety, a harmonious coexistence with the local community, protection of the environment and an overall sustainable development continue to be the non-negotiable goals of Halcor.

Risks and Opportunities – HALCOR’s strategic objectives	
Axis	Objectives
Economy / Corporate Governance	Further integration of Corporate Responsibility and Sustainable Development in the operation of the Company
Market	Maintaining the high quality of products and services and continue to cooperate with responsible suppliers
Employees	Continuous improvement of the working environment, with Occupational Health and Safety as a top priority
Environment	Reducing environmental footprint and protect the environment.
Society	Support local communities’ needs and contribute positively to national economic growth.

Targets 2010
With reference to corporate governance, HALCOR has set the following targets for 2010:
<ul style="list-style-type: none"> • Establishment of its Corporate Responsibility Team. • Communication to senior management on current issues of transparency and corruption

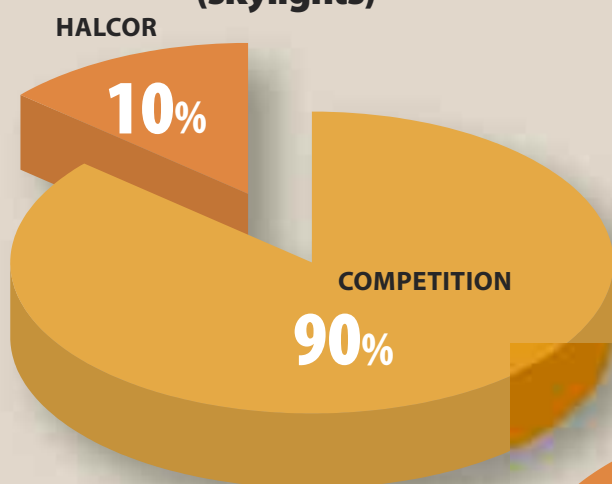
3. MARKETPLACE

HALCOR is a large modern company with over 70 years experience in processing copper and its alloys. It holds a significant position in the European as well as in the global market. Being primarily an exporting organization, HALCOR sells 71% of its products to numerous countries outside Greece.

The dynamic presence of HALCOR in the international market is underlined by the business activities it has developed in more than 50 countries in all five continents. 89% of its exports are absorbed in EU member states, 4% in other European countries, while 1% is channeled towards the US.

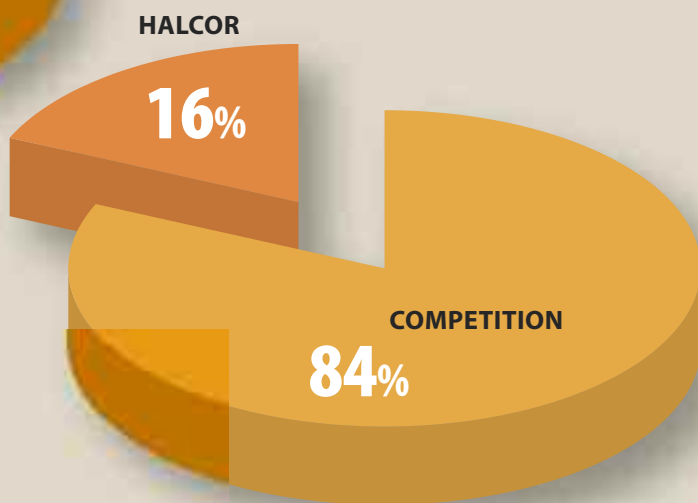
European market shares of HALCOR's products

Copper Rolling (skylights)



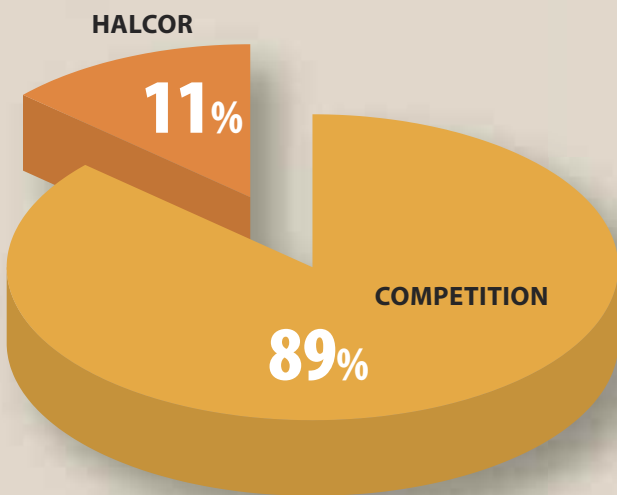
Market Size: 90,000 tones

Copper Busbars



Market Size: 70,000 tones

Copper tubes



Market Size: 380,000 tones

3.1 Products and services

HALCOR produces a diversified range of copper, brass and zinc products. Its products can be found in demanding markets, such as EU member countries, making HALCOR one of the largest exporting Greek companies.

The major benefits of copper are:

- 100% recyclability
- Long lifespan
- High endurance (resistance towards high pressure, high temperatures, fire).
- 100% waterproof
- Anti-bacterial properties (water hygiene)
- Aesthetic and economic.

The products of HALCOR are classified into four main categories:

- copper products: copper tubes (TALOS & CUSMART), sheets and strips (DOMA), circles, rods, wire Ø8mm, rain gutters (DOMA)
- brass products: tubes, sheets, strips, circles, rods
- zinc products: sheets, strips and rain gutters (DOMAZINC)
- special alloy products: cartridge cups and coin blanks.

3.1.1 Copper products

HALCOR offers an innovative series of copper tube products, that are the most reliable and effective choice for engineers as well as consumers, for every piping installation, external or in-floor heating, natural gas, air conditioning, industrial use project, etc. The copper rolled products are destined primarily for architectural, electrical, decorative and industrial uses. They are also used as intermediary materials for building facades, roofs, water pipes, etc. The copper rolled products are manufactured according to the European Standard EN 1172. The copper extrusion products are destined primarily for architectural and decoration uses as well as construction, electrical and mechanical applications (electric boards, valves, batteries, etc) and also for water piping support applications.

Copper air ducts – A Greek innovation in copper usage applications

A new market worth millions of euros has been created for the copper products manufacturing sector as a result of the pilot application in Greece of a new and innovative copper air duct, for internal use. This product is a result of the cooperation between the Hellenic Copper Institute and HALCOR.

Copper air ducts are mechanically advanced and their geometric shapes (circular, rectangular or oval), defined by their position, allow their installation in several different areas. The principles of energy efficient design, ecologic architecture as well as ecologic construction apply—nowadays there are relevant European standards that Greece has to comply with. These principles result in an immediate need for special materials used in technical installations, such as copper with its multiple uses.

3.1.2 Brass uses

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

Production of brass bars is made according to the European standards EN12164/12165/12168/12163 as well as other international standards, such as ASTM B16/B124/B249 and ISO 426.



3.1.3 Titanium Zinc Products

Titanium Zinc products (ZnTiCu) are primarily sheets and strips (DOMAZINC), which are suitable for building roofs, outer building cladding or internal applications. Furthermore, these sheets and strips are used as intermediary materials in the manufacturing industry. These products are manufactured according to the European Standard BS EN 988:1997.

Titanium zinc (which is 100% recyclable) has advantages in specific applications when compared to steel and aluminium, that require costly maintenance. It benefits from low non-uniformity and also has very good mechanical properties. HALCOR, utilizing these benefits of offers modern architecture an integrated water pipe system which is called DOMA.

3.1.4 Copper alloy products

Copper and zinc alloys are used for the manufacture of cartridge cups and circles, whereas copper-nickel, copper-nickel-zinc and copper-aluminium-nickel alloys are used for coin blanks.

	TUBES	SHEETS	STRIPS	CIRCLES	GUTTERS	OTHER
COPPER PRODUCTS	√	√	√	√	√	Rods, Wires Billets, Rods
BRASS PRODUCTS	√	√	√	√		Rods
TITAN ZINC PRODUCTS	√	√	√			
SPECIAL ALLOYS						Coins, Cartridge Cups

HALCOR manufactures products of high quality and this is achieved by the use of advanced technology and experienced personnel. A Quality Management System is applied, according to the requirements of the ISO 9001 standard, which is certified by an independent approved auditor. By continuously investing in research and development, HALCOR creates new and innovative products, in order to achieve its goal of being a key market player.



3.2 Research and Development of New Technologies

The Hellenic Metals Research Center S.A. (HMRC) was founded, in order to support the Greek metals industry, by contributing to its technological advancement and to improvements on quality and competitiveness. The objective of HMRC is to conduct research in related advanced designs and techniques, aiming at improving production processes as well as eliminating any product defects and flaws.

The positive contribution of HMRC towards the development of HALCOR's products, is justified –amongst other- by the following :

- solving problems that may arise before as well as during the production of copper, zinc and their alloys, in HALCOR's manufacturing sites.
- developing new and environmental friendly products, such as:
 - Ecutherm, special copper tubes which lead to considerable energy savings.
 - Cusmart flexible copper tubes, which are easier to use in a wider range of applications benefiting also by competitive pricing.

3.2.1 Copper tubes TALOS ECUTHERM

These industrial insulated copper tubes (TALOS ECUTHERM) are a result of using advanced manufacturing technology, while they offer high added value, when compared to traditional insulation means.

The TALOS ECUTHERM copper tubes combine the unique advantages of copper high endurance properties with industrial high efficiency insulation (Engineering Foams) offering significant energy savings.

Energy savings are a result of significant reduction in pipe network heat losses, which exceed 50%, in comparison to other equivalent non-insulated pipe networks. The final energy savings that these tubes can achieve can reach up to levels of 20%.

3.2.2 Copper tubes CUSMART

HALCOR, by investing in research and development, has created an innovative product,, by utilizing copper in mind also of the consumer's needs. This product called CUSMART is a copper tube with a special coat, which combines flexibility, endurance and hygiene properties.

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





CUSMART copper tubes can be used for water supply, heating and in-floor heating – cooling. Especially for heating, by using these tubes with their effective exterior industrial insulation, significant energy savings are achieved.

3.3 Product Quality – Certifications

HALCOR implements a strict

quality control system for the manufacture of all its products, across its entire production process. All Halcor products are covered by a 20 or 30 year documented guarantee.

One of Halcor's main goals is continuous improvement. Ensuring the quality of its products is key to achieve this; within this framework, internal processes and procedures are applied that ensure the following :

- Monitoring and control of raw materials and products
- Product safety.

Monitoring and control of products

All incoming materials are checked for quantity and quality, with reference to contractual agreements. These controls aim at ensuring that the incoming materials conform to the specifications and requirements of clients.

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 if needed, to ensure compliance to the client's specifications. All related checks are recorded in appropriate files which are then kept in record in order to have reference to the quality/reliability checks of products even after a long period has elapsed.

Product Safety

HALCOR issues a relevant Material Safety Data Sheet for its copper, brass and zinc products. The purpose of this Sheet is to inform the recipients of its products that contact with these products is safe. In addition, information leaflets are issued, which 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. In addition all products transported by HALCOR are adequately insured.

The quality control systems and procedures applied, are checked and verified through frequent audits by clients and by Greek and international Certification Auditors. In addition, by implementing special programs, employee participation in quality assurance is ensured on a daily basis.

Traceability of products per customer order

All actions regarding traceability of products are incorporated into the Ordering, Production and Quality Control Procedures.

Product Labeling

HALCOR has quality labels that refer to product usage suitability,,, as well as certificates for its raw materials sources and the suitability of packaging. In the following table product labels that HALCOR uses are presented, indicating the countries they are used in.

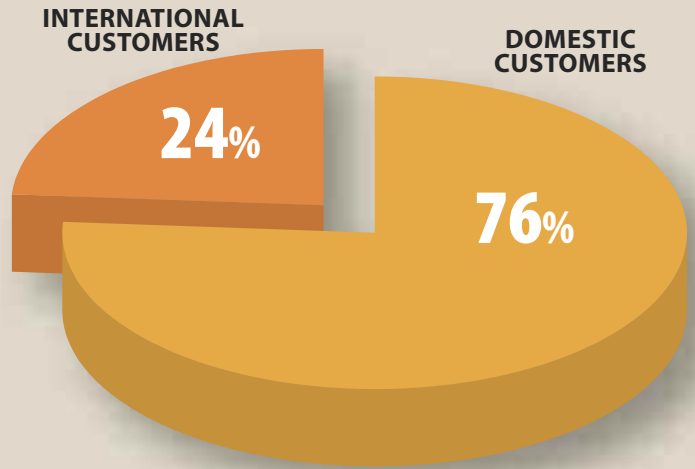


Product labels		
NAME	COUNTRY	LABEL
AENOR	Spain	
CSTB	France	
AFNOR	France	
DVGW	Germany	
GL	Germany	
RAL	Germany	
SITAC	Sweden	
BSI	U.K.	
NSAI	Ireland	
NSF	USA/Canada	
TUV CERT	Germany	
AR	Romania	
KOMO (for zinc products)	Netherlands	

3.4 Customer relations

HALCOR considers good, effective customer relations as a key factor for its business success. Therefore, customer satisfaction is in the core of its business strategy. The customers of HALCOR are large companies and organizations the majority of which are outside Greece ; therefore making effective customer relations a challenging and demanding goal. Customers distribution is presented in the adjacent graph.

HALCOR's Customers Distribution



3.4.1 Customer satisfaction

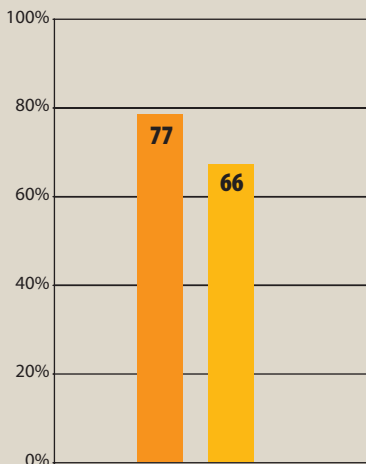
Halcor monitors and assesses continuously customer satisfaction, aiming at improving its products and services as well as meeting its quality goals. Within the framework of the applied Quality Management System, a specific procedure is used in which the views and complaints of customers are recorded and analysed/evaluated. Customer satisfaction is measured also through a relevant questionnaire that is sent to them.

In these questionnaires, that are sent twice a year to all customers, the following is included :

- questions related to the profile of the customer, its operating markets as well as its suppliers
- questions related to customer satisfaction as a result of the sales process
- product assessment
- overall customer satisfaction.

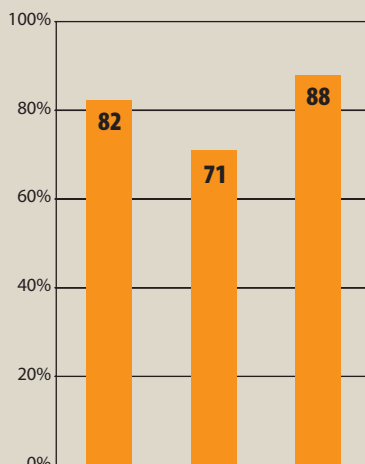
The results of these customer surveys during 2009 are presented in the following graphs.

Overall HALCOR's Customer Satisfaction

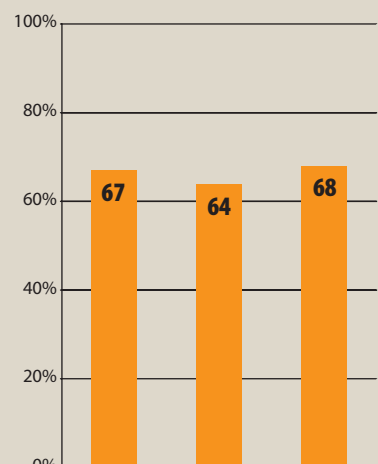


Domestic Customers
International Customers

Domestic Customer Satisfaction



International Customer Satisfaction



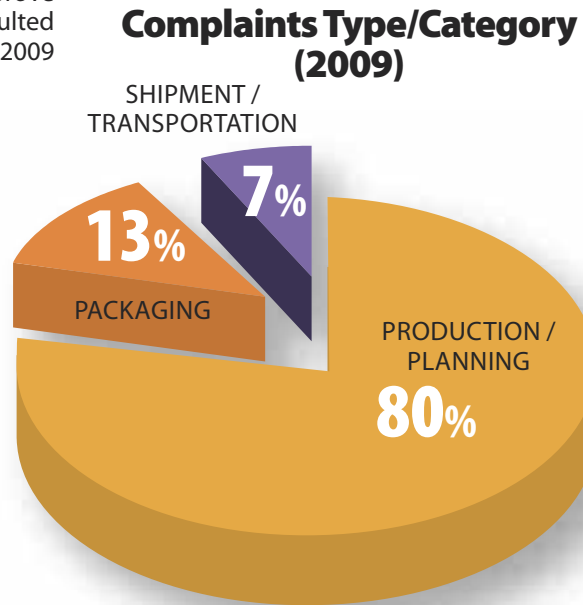
As HALCOR's production is focused on the needs and specifications of each customer order, it has regular audits from existing or potential customers. Prior to any production run, Halcor communicates with the relevant customer(s) to check and confirm all related order(s).

3.4.2 Complaint management

HALCOR is committed towards having satisfied customers. Therefore, apart from the customer satisfaction assesment, mentioned above, also a complaint management procedure is implemented. With this procedure, all relevant Quality Assurance Departments keep records of all customer complaints and the resulting key performance indicators.

Customer complaints	
Year	Number of complaints
2009	169
2008	202
2007	200

The continuous effort of HALCOR to improve product quality and customer service, has resulted in a 19% decrease of customer complaints in 2009 in comparison to 2008.



3.5 Supplier relations

HALCOR within the framework of Corporate Responsibility sees its suppliers as strategic partners. The principles, set by HALCOR, as a foundation for the contact with suppliers are:

- equality
- objective evaluation
- absolute transparency
- integrity
- honesty
- candor
- respect.

Within the framework of supporting local communities, HALCOR chooses local suppliers and subcontractors wherever possible, aiming at supporting and developing them, in order to maintain a long term cooperation serving the interests of HALCOR and of the local communities.

3.5.1 Purchasing

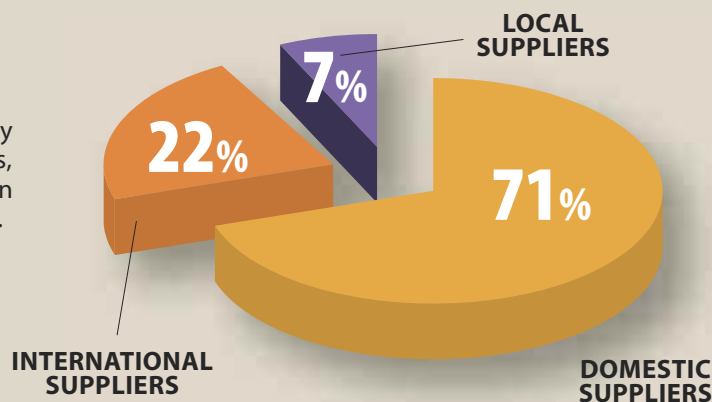
One of HALCOR's goals is to ensure that the quality of any component, material, product or service received by any supplier has the appropriate specifications and is in compliance to the relevant contractual agreements.

Purchasing refers to:

- primary - raw and secondary materials
- equipment, production tools and quality control instruments
- packaging materials and consumables
- services provision
- health, safety and sustenance of employees.

Purchasing of raw materials is made by approved suppliers / subcontractors, wherever possible or following an evaluation of potential suppliers / subcontractors. Selection criteria include amongst other, the geographical source (local suppliers preferred), existing managerial and handling systems as well as previous dealings with HALCOR. In addition, each new raw material or new supplier is evaluated and selected against specific criteria, which include amongst other environmental and qualitative criteria.

Suppliers Distribution



HALCOR, acknowledging the potential risks to health and safety by the goods, equipment and services purchased and/or used communicates its requirements and relevant applied procedures to its suppliers and partners.

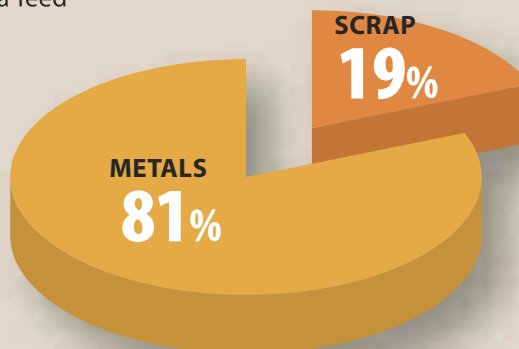
3.5.2 Purchasing Recyclables (scrap)

HALCOR is the largest recycler of scrap copper, zinc and their alloys in Greece, recycling approximately 80,000 tones of scrap annually.

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 more than 145,000,000 tons of recyclable materials annually, used in the production of feed materials for further industrial use.

HALCOR is the largest scrap buyer of copper and brass in Greece. In its recycling – melting plant, it receives, inspects and processes through sorting, the recyclable materials. From these materials, the percentage of materials that is not utilized (e.g. iron, wood, other materials) is separated and forwarded to properly licensed companies for recycling or final disposal. Although this entire procedure is a cost for the Company, strategically it promotes the integration of scrap as a feed material in its production.

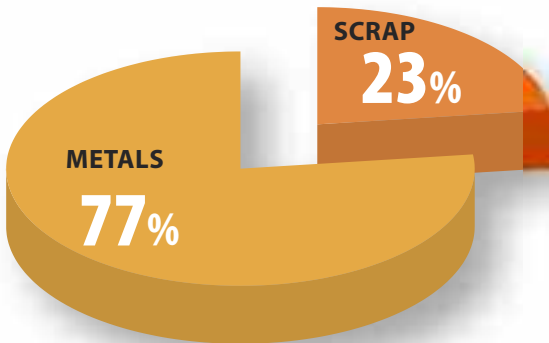
Scrap proportion to total metals purchase (2007)



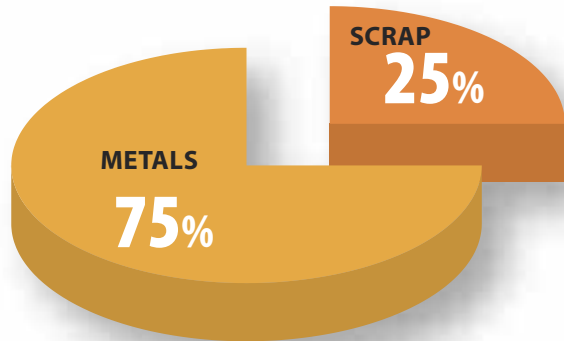
In the graphs below, metal purchasing by HALCOR is presented for the last three years, as related to scrap.

Despite the adverse conditions of the economic crisis, HALCOR tries to maintain its percentage of scrap utilization.

Scrap proportion to total metals purchase (2008)



Scrap proportion to total metals purchase (2009)



Copper recycling



During copper recycling, there is a risk that copper is contaminated with hazardous materials. An example is the risk of radioactive materials present inside copper loads that are to be recycled.

HALCOR manages all such risks and for this specific risk it has installed and operates, in the recycling –melting plant, which receives these materials, a special radiation scanner. This is used to scan all incoming vehicles that transport materials. In the rare case that a suspicious indication occurs, the respective. Government Authority-“Democritus Natural Sciences Research Center” is notified so that the radioactive materials are handled as required.



Targets 2010

HALCOR sets the following targets regarding marketplace (customers – suppliers), based on the Corporate Responsibility Strategy that it has developed:

- integrate Corporate Responsibility issues in the annual customer satisfaction survey
- increase to 40% the percentage of scrap in purchased metals in 2010
- integrate Corporate Responsibility criteria in the evaluation procedure of its suppliers
- improve customer satisfaction in all areas (by improving service, product etc)
- support more local suppliers, by selecting and integrating them into the supply chain of HALCOR.

4. HUMAN RESOURCES



One of HALCOR's main advantages is the quality of its employees who have played a key role in the successful course of the company so far. For this reason, the Company places great emphasis in the selection process, evaluation and reward of its employees.

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 Code of Employee Values and Conduct

HALCOR, in the context of its responsible operation, has established a code of values and conduct for its employees. The implementation of this code is mandatory for all the employees across all the company's activities. This Code has been incorporated in the Internal Code of Conduct of the Company and outlines the main Principles and Rules governing the internal operation and practices of the organization, taking into account the existing provisions stemming from the national and international legislative framework.

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 interest, reputation and property.

4.2 Human Resources Management

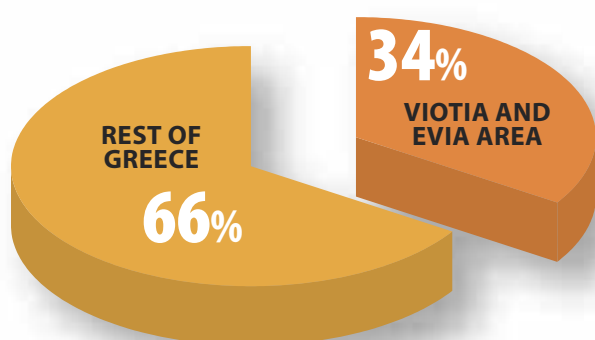
At the end of 2009, HALCOR's total employee headcount was 668, compared to 742 in 2008, a decrease of 10%. This reduction was due to voluntary departures (retirement, termination of employment and other departures). Of the 668 employed in 2009, 615 were men and 53 were women.

In the context of the existing equal opportunities policy, the Company wishes and pursues a balanced distribution amongst employed men and women. However, due to the nature of HALCOR's operation, the total participation of males equal 92% with a 8% participation of females.

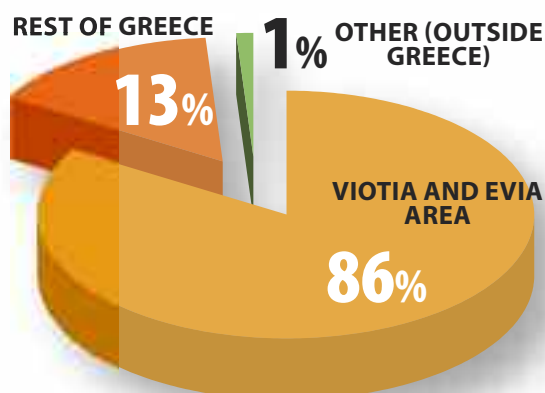
HALCOR's Human Resources Data			
Human Resources Data (31.12.2009)	2007	2008	2009
Third party employees	74	65	48
Men	703	683	615
Women	66	59	53
Employees departures (e.g. retirement, end of contract)	125	164	88
New employments / Recruitments	159	138	14
Total Employees	769	742	668

In addition, HALCOR has employees from the local communities in Viotia and Evia, supporting therefore regional employment. For 2009, the total employment from the local community was 34.2%.

Human resources distribution by geographical area of origin



Human Resources distribution by geographic area of employment



Human Resources distribution by geographic area of employment			
	2007	2008	2009
Wider area of Viotia and Evia	643	633	574
Rest of Greece	117	102	87
Other (relocation abroad)	9	7	7

HALCOR, continuously aims at improving its internal organisation and ensures that the employment of its people is governed by professionalism, a high sense of responsibility and team spirit. During 2009, the Company recruited 14 new employees of whom 13 were males and 1 was female. In addition, with local community in mind, 5 of these new employees were from the regions of Viotia and Evia.

Age breakdown of HALCOR's Recruitment in 2009

Age category	18-25	25-40	40-50	50+
Men	2	7	2	2
Women	1	0	0	0
Total	3	7	2	2

Total recruitment by age and geographic region in 2009

	18-25	25-40	40-50	50+
Viotia	2	1	0	2
Rest of Greece	1	6	2	0
Abroad	0	0	0	0
Total	3	7	2	2

In 2009 as in previous years, the voluntary departures (retirement, termination of employment, etc.) in HALCOR totaled 88 people, of which 82 were men and 6 were women. The table below shows the departures of staff by gender and age in 2009.

Total Departures by gender and age in 2009

Age category	18-25	25-40	40-50	50+
Men	9	30	17	26
Women	0	0	1	5
Total	9	30	18	31

Total Departures by age and geographic region in 2009

	18-25	25-40	40-50	50+
Viotia	8	30	14	23
Rest of Greece	1	0	4	8
Abroad	0	0	0	0
Total	9	30	18	31

It should be noted that HALCOR has never employed personnel of less than 18 years of age. In 2009, as in previous years, there has been no incident of child or compulsory labor. The Company is against child labor and is in full compliance with existing national and European relevant legislation.

HALCOR places special emphasis on the educational level and training of its human employees, which has proven to be critical for an effective quality management and the continuous improvement of its business performance. The table below shows the company's employees by hierarchical level for the year 2009.

Hierarchical Level of Human Resources	
Personnel per employment category	2009
Managers	11
Directors	21
Supervisors	61
Office staff	143
Warehousemen and workers	443

4.2.1 Collective bargaining agreements

All HALCOR employees are covered by collective bargaining agreements (CBAs). The table below shows the Company's human resources by category of employment and agreement.

Human Resources – Collective Bargaining (data of 2009)			
Employment type	2007	2008	2009
Collective bargaining agreements	100%	100%	100%
Open-end employment agreements	762	739	667
Fixed-term employment agreements	7	3	1
Full-time employment	100%	100%	100%
Part-time employment	0	0	0
Seasonal employees	5	8	3
Total number of employees	769	742	668

4.2.2 Additional Benefits

HALCOR, provides the following additional benefits to its employees, which exceed national legislation:

- private insurance coverage for life and health risks for all employees
- meals for all employees
- emergency financial assistance in case of health problems
- transportation of employees working outside urban centers to and from their place of residence
- Christmas celebration gift (voucher) for employee children (up to 12 years old)
- free accommodation in a summer camp, for all employee children (up to 14 years old), for a period of three weeks during the summer months
- loans, financial benefits and a gift for newlyweds, according to corporate policy
- company car and mobile phone, according to company policy
- housing in accordance with company policy. In 2009 HALCOR offered four apartments, with a total area of 240 m² in a housing facility, owned by the Company, in Inofita.

In addition, HALCOR implements projects aimed at supporting staff and their families. Such programs are group insurance (health care and compensation) and financial assistance in cases of urgent need.

Assistance programs for serious illnesses	Education / Training		Counseling risk control		Prevention bank		Blood	
	YES	NO	YES	NO	YES	NO	YES	NO
Program beneficiaries	√		√		√		√	
Employees		√		√		√		√
Employees' families		√		√		√		√
Community members		√		√		√		√



4.2.3 Internal Communication

HALCOR's employees are encouraged to participate actively in improving production processes as well as overall operations, by submitting their improvements proposals. "Ideas and Proposals" forms are available to all staff and for proposals that are actually implemented there is a financial reward.

Communication between senior management and the shop floor workforce is carried out by newsletters on bulletin boards that exist in all departments. With reference to communication between senior management and the rest of HALCOR's employees (executives, office staff), this is carried out through announcements on the corporate intranet. HALCOR has an 'open door policy', whereby Management is always willing to accept and discuss staff-related issues.

Internal Site (Intranet)

The internal website (intranet) constitutes an internal process by which employees are informed directly on any latest developments. Through this internal website, employees have access to the latest, accurate, comprehensive and interactive pieces of information on various subjects related to HALCOR's activities. In order to improve further on communication, HALCOR redesigned its internal website structure and content in order to be more functional and user friendly. The new Company's intranet includes useful information on a wide variety of topics, such as:

- Current news
- Useful forms
- Human resources
- Warehouse deliveries
- Mandatory operational systems.

4.2.4 Equal Opportunities

HALCOR puts great emphasis on promoting equal opportunities and avoidance of any kinds of discrimination. All procedures, actions and policies affecting employees are based on the principles of equal opportunities and any type of discrimination is not acceptable, on the basis of sex, nationality, physical ability, age, sexual orientation, religion or any other criterion.

In HALCOR, protection of diversity and equal opportunities is key to ensure a healthy, productive workplace of high quality. HALCOR's people are recruited and assessed solely on the basis of their competences and skills, without any form of discrimination. When considering gender in managerial positions, these are mostly covered by male employees, as a result of the generally high percentage of total male employees (thus, only 5% of senior managers are female employees).



It should be noted that, in 2009 as well as in the past, there were no complaints or recorded incidents of discrimination (race, colour, sex, religion, political beliefs or ethnic origin). In addition, there are no wage discriminations between male and female employees of the same level (senior managers, managers, office employees, shop floor workers).



4.3 Employees Assessment

One of Halcor’s goals is fair and objective employee performance assessment systems. One of the main employee assessment criteria is actual performance against a job’s function, its responsibilities as well as the levels of cooperation and participation an employee demonstrates. HALCOR’s evaluation system aims to:

- reward good performance
- encourage performance improvement through training and development
- harnessing employee’s skills and abilities by connecting individual and business goals
- develop Staff via career planning, promoting competition within the organization
- improve communication and cooperation between the evaluated employee and his/her assessor.

In addition, this assessment system has the following advantages:

Employees have the opportunity to:	Supervisors have the opportunity to:	The Company has the opportunity to:
<ul style="list-style-type: none"> • Know their operational targets • Assess themselves, their performance and identify areas that need improvement • Refer to their training requirements • Discuss career planning issues 	<ul style="list-style-type: none"> • Understand the problems and needs of their subordinates • Improve relations with their subordinates • Assess with objective means the overall contribution of their subordinates • Prevent and deal with with employees’ possible problems • Motivate their subordinates 	<ul style="list-style-type: none"> • Gain from the coordinated effort and synergies • Offer support to improve performance • Create a climate of responsibility and meritocracy.

According to HALCOR’s assessment system, each employee has access to its personal assessment results.

4.4 Training

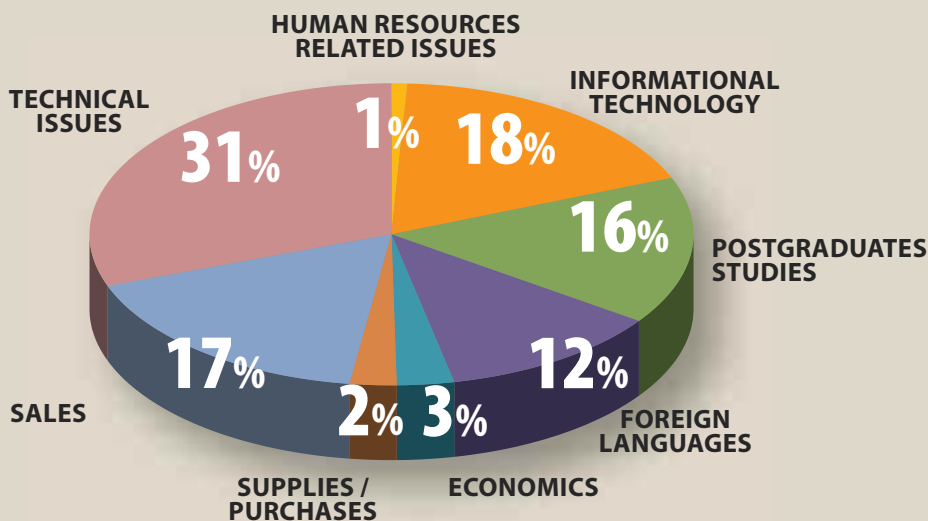
HALCOR puts great emphasis on its employee training and development, especially on new technologies and systems applied in the production process. The Company organises and implements several seminars and training programmes to train and update the skills of its employees. Training requirements are identified and defined in accordance with:

- the employees’ 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.

In 2009, a total of 80 training programmes were implemented, with 17 programs in in-house training and 63 programs in external seminars, with total training hours reaching 3,088.

Training indices			
Indicators	2007	2008	2009
Courses held	66	127	80
In-house training participation	14	65	17
Participation in external seminars, conferences	52	62	63
Training man-hours (participation x hours)	3,588	5,657	3,088
Annual average employee training hours	83	156	66
Amount spent on education (in euro)	90,551	121,386	82,346

Man-hours training distribution



There have been no corruption incidents within the Company so far and therefore until now it has been deemed unnecessary to conduct training on such issues. However, for 2010, such a relevant educational program is under review.

Postgraduate studies programs	Employees
2007	7
2008	19
2009	7

Postgraduate studies programs completed in 2009, focused on the following subjects:

- F5-F7 Financial Management
- Diploma in International Financial Reporting by ACCA (Association of Chartered Certified Accountants)
- Management Accounting & Costing (M.A.C.)
- Management and Business Administration (MBA)
- Executive MBA.



4.5 Employee Health and Safety

HALCOR focuses in creating and maintaining a modern and safe working environment, which improves on a continuous basis, confirming the high safety standards that the Company is committed to provide to its employees. For this reason, HALCOR implements an Occupational Health and Safety Management System (the relevant certification for Halcor’s manufacturing sites in the area of Inofita was initiated at the end of 2009 and was completed in March 2010), in accordance with the standards OHSAS 18001:2007 / ELOT 1801:2008.



HALCOR, with reference to occupational health and safety, has set a target of zero occupational accidents. The Company is committed to make every possible effort to provide a safe working environment that will ensure and promote the health and well-being of its employees.



4.5.1 HALCOR’s Health and Safety Principles

- All accidents 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 check 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 sub contractors should be involved in the effort to improve safety.

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.
- Supports the provision of 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 continuously improve.
- Commits to comply with the 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 towards accidents prevention and controlling of hazardous situations prior to their occurrence.
- Recognizes their key role of human behavior in health and safety and ensures a constant update and upskilling of its employees in this area.
- Supports the active participation of its entire workforce, regardless of hierarchy, in improving health and safety.
- Aims to promote a culture of safety in all of its activities, including other companies, contractors, suppliers, etc.

HALCOR's preparation for certification according to OHSAS 18001/ELOT 1801 standards

HALCOR, after a considerable effort to promote occupational health and safety and having concluded that significant progress has been achieved so far, has set the objective of being certified according to the OHSAS 18001/ELOT 1801 standards, by early 2010.

The rationale behind this decision is to retain the achieved health and safety standards and also to continuously improve as this is a requirement of OHSAS ; this is achieved through meeting all legislative related requirements, setting targets, scheduled training, planned audits (of the System and the workplace) with the active participation of the entire workforce.

To achieve this goal, the following were accomplished during 2009:

- Updating and approval by senior Management of the Health and Safety Policy.
- Development of a Health and Safety Management System (Procedures, Instructions and all related documentation), which is in compliance with the existing processes and meets the OHSAS requirements.
- Uploading of the Health and Safety revised Policy and Management System to the Intranet, accessible by all concerned.
- Distribution and accessibility to the Health and Safety Policy and Management System to all concerned.
- Provision of training and awareness, according to each employee's position.
- Health and Safety Management system implementation and in-house audits for a reasonable time, prior to applying for the OHSAS certification.

4.6 Occupational Health

HALCOR, with reference to Health and Safety, has carried out the following for its employees:

- Installation of the required amenities and equipment on the shopfloor (changing rooms, toilets, individual cabinets), maintained and cleaned regularly.
- Implementation of personal hygiene rules (washing and/or shower after work).
- Operation of a well-equipped infirmary in each plant and scheduled visits by the Occupational Doctor.
- Medical records for all employees.
- Sufficient medical kits per Department and medicine replenishment responsibility of departmental managers.
- Employee medical examination by the Occupational Doctor after any reported accident.
- Medical checkups for all employees to ensure they are in good health
- Flu vaccinations in company's infirmaries.
- 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 2009, in cooperation with the "Laiko" General Hospital of Athens, two donation events took place in the company's infirmary and a total of 67 blood-bags were collected.
- Conducting appropriate measurements in the workplace to validate that working conditions meet all required criteria.

4.6.1 Swine flu – Virus A(H1N1) – Management / Prevention Plan

HALCOR ensured that it was properly informed by the appropriate authorities when, the swine influenza virus A(H1N1) pandemic occurred. The objective was to carry out all necessary measures to deal with potential or confirmed cases that could arise, as a large number of people work in the company.

The Occupational Doctor, Human Resources Department and HALCOR's Health and Safety Department coordinated their activities to gather all required information and implement an effective action plan. For reference the relevant authority website (www.keelpno.gr) was often used and informatory seminars to all Halcor's management were carried out.

The preventive measures and implemented actions were the following:

- A large number of surgical masks were provided, to be used in the workplace, but also for public transport to and from work
- A special leaflet was made and distributed to all employees with an overview of the flu, preventive measures for its containment and the appropriate washing procedures.

- These procedures were posted on top of all water sinks in the workplace, with explanatory photographs.
- Alcoholic disinfectant dispensers were placed in selected areas (e.g. hallways, restrooms, etc).

4.7 Occupational Safety

HALCOR, with reference to Safety, has carried out the following 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.
- Distribute and explain to employees a Health and Safety Manual and a 5S Manual (presented later in this chapter). These manuals refer to the Company's Health and Safety Principles and relevant rules and one of their purposes is to help change behavior towards safer practice
- Training programme implementation, involving also external specialists to continuously train and update employees on Safety.
- Recalculates, in regular intervals, risk in 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, purchasing and usage of the latest most advanced Personal Protective Equipment (PPEs)
- Emergency drills to ensure equipment integrity and employee readiness.

The results of these actions have improved Safety at Work as presented in the table below :

Health and Safety Index			
Indicators	2007	2008	2009
Total employees	769	742	668
Annual working hours	2,004,118	1,905,664	1,520,632
Annual total number of incidents that resulted in absence from work 26	19	11	
Percentage of accidents/incidents for all employees	3.4	2.6	1.6
Absences / lost days due to occupational accidents or incidents 813	567	397	
Absences / lost working hours due to occupational injuries or accidents	6,504	4,536	3,176
Percentage of total days lost due to injury or occupational accident per total working days (lost working hours / total working days %)	0.3	0.2	0.2
Total fatal accidents	0	0	0
Frequency Index (*1)	13	10	7
Severity Index (*2)	405	300	260

(*) Frequency and severity indices are calculated for 1.000.000 man-hours.

No occupational diseases have ever occurred in the Company.



(*1) Frequency Index =	$\frac{\text{Total accidents (LTI)} \times 106}{\text{Total working hours}}$
(*2) Severity Index =	$\frac{\text{Total absentee days due to accident} \times 106}{\text{Total working hours}}$

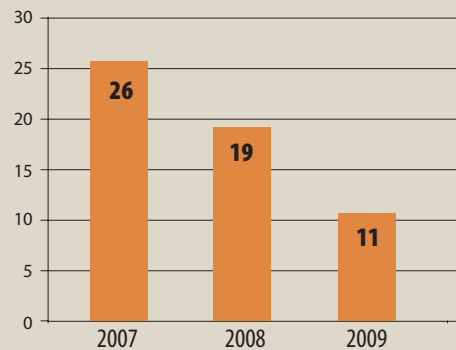
In the following graph the total number of incidents/accidents of the past 3 years are presented. During 2009, only 11 incidents/accidents have occurred, achieving therefore a 42% reduction when comparing to 2008.

4.8 Health and Safety Training

Halcor continued in 2009 its successful training and audit programmes on Health and Safety. The Company has, as a primary target, the elimination of all injuries as well as incidents that relate to employees safety. For this purpose the Company implements the following actions:

- Continuous training of staff in 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
- Weekly audits in all departments, to ensure all safety rules are complied with and PPEs are used appropriately by all.
- Risk Analysis and assessment, using established tools and techniques to calculate risk with the active participation of employees.

Injuries or accidents occurred during work



5S Program

HALCOR, acknowledging its responsibilities towards employees, to reinforce workplace safety, to manage resources and equipment effectively, applies the 5S system and its philosophy (Short, Straighten, Sanitize, Standardize, Sustain).

The 5S vision is to “create a workplace that is always safe, clean and tidy”, which is part of HALCOR’s philosophy and commitment to pioneer in this area.. Maintaining a clean, tidy and safe working environment is a guarantee for products of high quality to customers.

The targets of the 5S system implementation, aim at improving the working environment and can be summarized in the following:

- Improvements in Occupational Health and Safety
- Reduce number of accidents/incidents
- Improve working conditions and ergonomics
- Improves shopfloor morale
- Clean and Tidy workplace at all times
- Improve productivity
- Recycling, respect towards the environment
- Energy consumption reduction
- Participation of all staff, gradual culture change
- Improve corporate image.



2010 Targets

HALCOR's targets for 2010 are the following:

- Redesign the Company's Intranet to strengthen internal communication and include all human resources related issues.
- Increase internal training in Health and Safety as well as in other issues regarding the Company's operation for all employees.
- Continue the 5S program implementation, to continue improving the working environment and prevention of accidents/incidents.
- Organise and implement “Health and Safety Month”, in which relevant training will be carried out, to improve on awareness and knowledge on health and safety issues. During this month there will be a campaign on informing employees about correct implementation of safety measures to reduce risk and accidents.
- Continuous reduction of occupational incidents/accidents, aiming at their elimination.

5. ENVIRONMENT



Bearing in mind today's environmental challenges, HALCOR seeks to actively contribute to the international effort of environmental protection, by operating responsibly and by reducing its environmental footprint.

HALCOR's Environmental Policy

HALCOR is committed to a business development model that is environmentally sound, without damaging 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 legislation requirements, by the provision of all necessary resources.

This commitment is proved by the transparent operation of the Company, full compliance with environmental regulations and law as well as the commitment to invest in technologies and equipment that minimize environmental footprint. In addition this commitment is evident by its relevant policy, systems and know how development for sustainability.

5.1 Environmental Principles

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

1. Compliance with the existing national and European environmental legislation and regulations, its manufacturing sites always operating within the emission limits on their environmental licences.
2. Responsible operation with full knowledge of the 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 environmental related issues and minimization of the environmental footprint of its operations.
5. Transparency, open communication with all stakeholders such as governmental and non governmental organizations, academic institutions, local communities and the society at large.
6. Training, updating and awareness of employees on environmental issues so that they actively participate in matters of environment.
7. Implementation of an Environmental Management System to ensure continuous improvement, compliance with the law and regulations and to minimize environmental footprint.

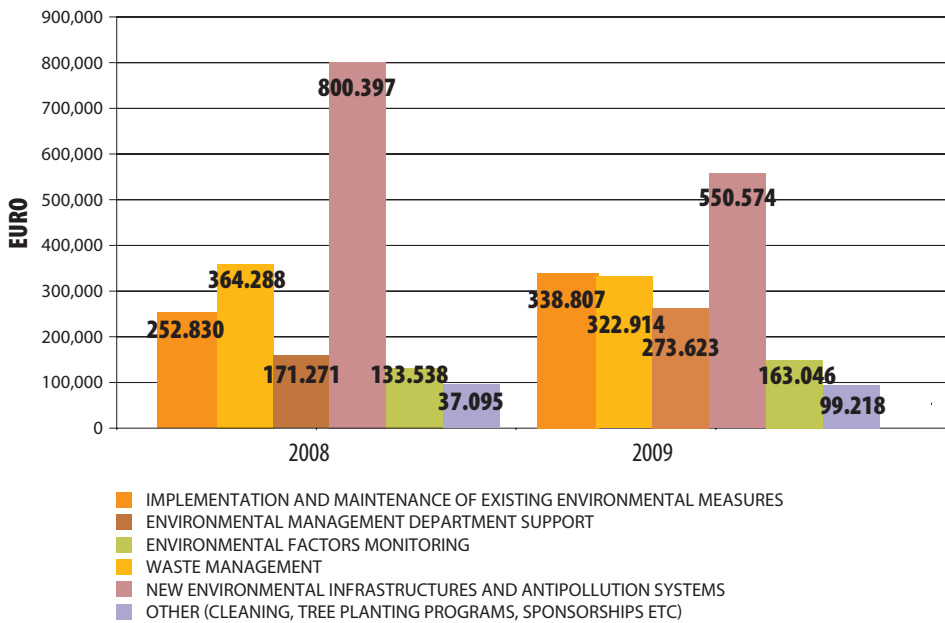
5.2 Environmental management investments

HALCOR, committed towards the protection of the environment continued also in 2009 significant investments, in order to minimize the environmental impact of its facilities. Despite the global economic recession and the subsequent reduction of production volumes by 33%, environmental expenditure in 2009, reached Euro 1.75 million approximately the same as in 2008, which was Euro 1.67 million.

The 2009 environmental expenditure included the following :

- Operating and maintenance cost for environmental protection equipment reached Euro 338,807.
- Investments in new environmental infrastructure and antipollution systems reached Euro 550,574, these included primarily antipollution measures at the recycling and melting plants as well as natural resources preservation projects at the copper tubes plant.
- Waste management cost, by licensed companies, reached Euro 322,914.
- Monitoring environmental parameters cost (water chemical analysis, air pollutants, etc), reached Euro 163,046.
- Environmental Management Department, external subcontractors and REACH regulation compliance cost, reached Euro 273,623.
- Planting trees at company premises and general environmental clean up cost, reached Euro 99,218.

Environmental Protection Investments



5.3 Environmental Management System

HALCOR applies the principles of its Environmental Policy and achieves its environmental targets, by the implementation of an Environmental Management System. This System aims at continuously improving on environmental issues, a target that is achieved by the process illustrated in the following diagram:



Already in three out of the five manufacturing facilities (recycling-melting plant, copper tube plant and rolled titanium zinc plant) such Environmental Management Systems are implemented, certified, according to the ISO 14001:2004 standard by third party, independent auditors. In addition, in the other manufacturing sites (brass bars and tubes plant) such a system is also implemented certified this time to the EMAS Regulation standard (EMAS registration number EL-00030) again by a third party auditor.

In 2010, HALCOR intends to certify the Environmental Management System of the brass bars and tubes plant, to the ISO 14001 standards and to have all its plants certified during the period 2011-2014.

HALCOR's ISO 14001 Certification

Plant	2009	2010	2011-2014
1 Copper Bars	√	√	√
2 Brass Bars and Tubes	-	√	√
3 Recycling and melting	√	√	√
4 Rolled Titanium Zinc Products	√ (*)	√	√
5 Compounds(**)	-	-	√

(*) The plant is registered to the EMAS standard.

(**) HALCOR, has a production line in the plastic and elastic compounds plant of its subsidiary company HELLENIC CABLES S.A. sited at Inofyta, which produces compounds exclusively for copper tubes sheathing. For this reason, its environmental footprint is also monitored.



5.3.1 Governance structure and environmental training

HALCOR is of the firm belief that an effective environmental protection is only possible with the active involvement and support of all employees. For this reason, the Company has assigned specific environmental responsibilities across the entire management hierarchy.



In addition, with continuous updating and awareness of environmental issues in mind, HALCOR has established an environmental training program for its employees.

During 2009, HALCOR implemented such a training program for its management team. In more detail, this training included ISO 14001 and EMAS audits, REACH and GHG regulations, legislation regarding water disposal to the Asopos river and Corporate Social Responsibility in general.

HALCOR, is implementing a 5S system to improve the working environment including its equipment. One of the 5S objectives is to raise employee awareness on environmental issues and how their daily work can impact upon them. More information about the 5S program can be found at the Human Resources chapter of this Report.

Within the context of continuous environmental updates, a large number of HALCOR's senior managers participated in a number of conferences and meetings regarding Environmental Issues and especially in these which referred to the wider Asopos river area. For 2010, there is an approved, scheduled programme for further employee updating and training on environmental issues. In more detail, this training is delivered also by electronic and printed materials based on weekly training plans.

HALCOR aims to continue planting trees at its facilities with the active participation of its employees.



5.4 HALCOR's Environmental Issues

HALCOR has identified and assessed all the environmental issues that are related to its operations. Of these, the most important are the following:

- Use of natural resources (water, fuels, energy, raw materials, etc)
- Use of chemical substances
- Solid waste, wastewater and air emissions management
- Preparation and response to emergency situations.

The acknowledgement of the parameters that have an environmental impact has the objective of being able to monitor these and provide the means to prevent environmental problems. In order to manage effectively its environmental issues, HALCOR has implemented a system by which it is able to monitor and record all parameters that have an environmental impact.

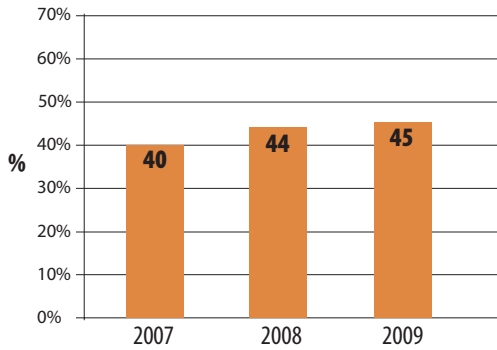
In HALCOR's plants, monitoring and recording systems for treated wastewater, air emissions and noise are installed. For the measurement and analysis of these environmental parameters, established and proven methods are employed. The data of these systems is recorded and stored, readily available on request by the appropriate authorities.

5.4.1 Raw materials

HALCOR purchases significant amounts of raw materials, that are used in its production processes, some of which, have a significant environmental footprint, such as copper which is Halcor's main raw material.. Consequently, focus is given to the efficient use of raw materials not only due to the financial impact that this usage has but also due to the substantial environmental footprint that these materials have.

HALCOR's main raw materials used are primary and recycled metals as well as insulation materials used in coated copper tubes.

Recyclable Metals Percentage*



(* In the diagram are included also the recyclable metals quantities that come from internal returns



European REACH Regulation

Due to the fact that industry uses chemicals, HALCOR is in compliance with regulations of the legislation on chemical substances and their industrial products, as required by the European Regulation REACH (Registration, Evaluation, Authorization and Restriction of Chemicals). This Regulation aims to improve the protection of human health and the environment, from the dangers that result from the use of chemicals, also to promote alternative methods of control and to improve the safe handling and use of substances in all sectors of the industry.

On December 21, 2009, HALCOR was audited by the State General Chemical Laboratory (Thisvi Branch), to check compliance with the legislation regarding the chemical substances and the European REACH Regulation. No cases of non-compliance were found by this audit.

HALCOR, being a large metals processing company as all other companies in the metals industry, uses small amounts of chemicals in the production processes, as necessary.

A series of measures are taken in order to manage chemicals effectively, according to the standards and specifications of their Material Safety Data Sheets (MSDS), such as:

- Storage in dry, guarded areas
- Operator's training on avoiding spills
- Conducting response drills in case of emergency.

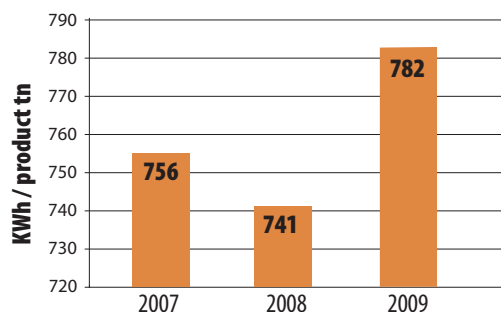
5.4.2 Energy Use

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

Thermal energy:

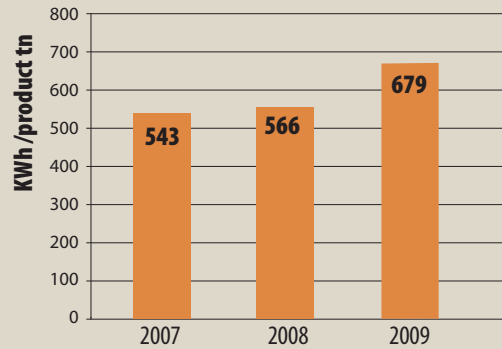
During 2009, thermal energy consumption decreased by 30%, due to the decrease in production levels. The total thermal energy consumption during 2009 was 71,546 MWh in comparison to the consumption of 2008, which was 101,754 MWh. Thermal energy mainly stems from natural gas consumption. Regarding specific thermal energy consumption, as seen in the diagram below, HALCOR consumed 782 KWh/ton of product, showing a small increase in comparison with the previous years. This increase is mainly due to the increased energy consumption in the recycling and melting plant.

Specific Thermal Energy Consumption





Specific Electrical Energy Consumption



Electrical energy:

The specific energy consumption in the production operations during 2009 was 679 KWh/ton of product. In comparison to previous years, HALCOR displayed a 20% increase of the

specific electric energy consumption during 2009, due to the product mixture.

The specific electric energy consumption increase is due to the manufacture of specific copper and zinc alloy products, which demand thermal processing at a higher temperature, in order to achieve certain technical specifications. This thermal processing is carried out at special furnaces where electricity, natural gas and LPG are consumed.

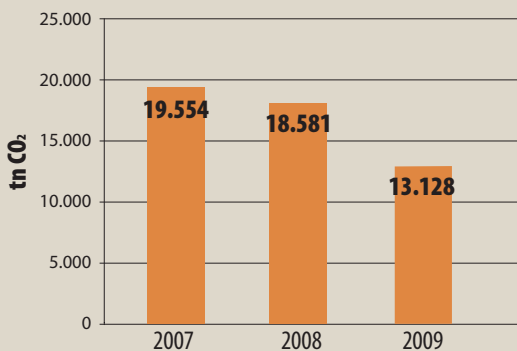
5.4.3 Climate Change

HALCOR places great emphasis on the issues of actions as regards climate change. For this reason, the following measures are taken :

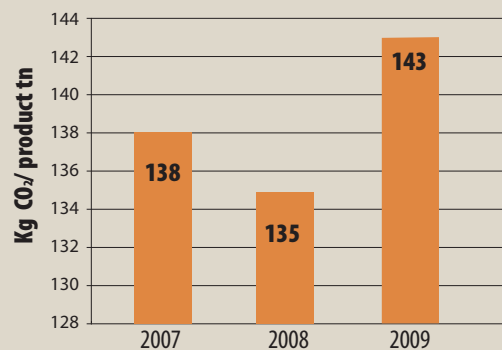
- Use of environmental-friendly fuels, like natural gas, which means less air emissions per energy unit consumed.
- Regular maintenance and fine tuning of relevant equipment, in order to maximise efficiency and therefore reduce to the maximum possible, air emissions.

At the following diagrams, total and specific direct CO₂ emissions deriving from fossil fuels combustion are presented. The small increase in specific direct CO₂ emissions, was due to products with specific requirements of higher temperature processing.

Total Direct CO₂ Emissions



Specific Direct CO₂ Emissions





It should be noted that none of HALCOR’s manufacturing sites participate in the European Emissions Trading Scheme, as their type of operations are excluded by the relevant regulations.

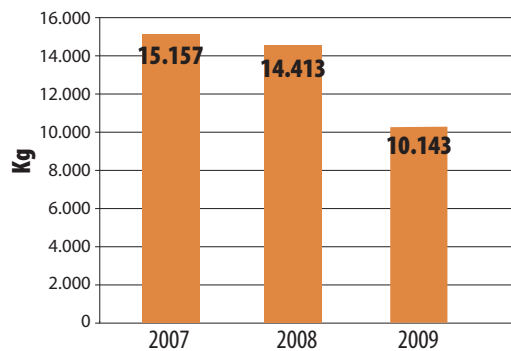
5.4.4 Atmosphere

HALCOR, within the context of environmental parameters, monitors its air emissions continuously. This is implemented through:

- The operation of instruments for continuous monitoring and recording of solid particles
- A program of frequent measurements of various environmental parameters at air emission points at the recycling- melting plant.

NOx emissions are a result of fossil fuels combustion processes, natural gas being the main type of fuel used for thermal energy requirements. Total NOx emissions during 2009 were 10,141 kg, while in 2008 were 14,413 kg.

NOx Emissions



In 2009, for airborne solid particles a monitoring system was installed at the air emissions points of the recycling-melting plant furnaces, aiming at the continuous monitoring of emission levels.

Tree Planting

In 2009, planting trees in HALCOR’s premises continued, a policy that started in 2007. In more detail, in the surrounding areas of the recycling-melting plant, 227 Layland trees were planted as well as 1,053 of smaller size, such as green bushes, etc. It is planned to continue this policy at the copper tubes plant in 2010, with an estimated total budget of Euro 80,000.





5.4.5 Photovoltaic panels

HALCOR, foreseeing the growth of the Renewable Energy Sources sector proceeded in investing in the production of photovoltaic panels in Bulgaria, long before the relevant legislation was instituted in Greece.

Energy Solutions S.A., a subsidiary of HALCOR S.A. (38.6%), is the first company that produced crystalline silicon photovoltaic panels in the Balkans. Its production commenced in January 2005, with advanced technology and know-how with certified products of high quality.

With several years of sales in Germany's demanding market as well as other European countries, Energy Solutions S.A. has already equipped operations of more than 2 MWp, as its photovoltaic panels combine advantages, such as trustworthy and durable raw materials, certified quality and sound manufacturing, offering best quality for best price.

Energy Solutions S.A. aims at the wider usage of photovoltaic technology, offering high quality products, complete solutions for special installations and competitive pricing. Greece has an unlimited potential for renewable energy sources, especially solar energy, and can play a leading role in Europe in solar energy generation as well as exporting technology and know-how on harnessing this power source.

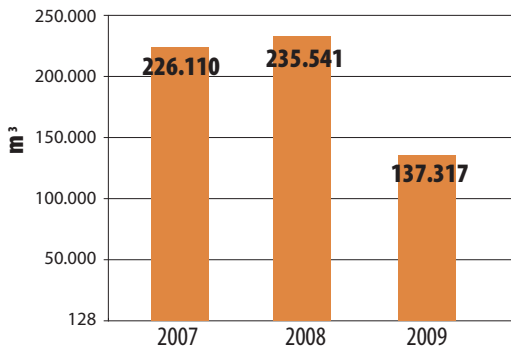


5.4.6 Water use

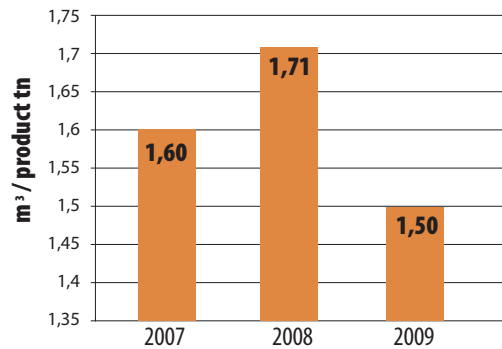
During 2009, the total water used in HALCOR's five production facilities amounted to 137,317 m³. As shown in the diagram below, the water usage was reduced by 42%, in comparison to 2008. A continuous effort for preserving water is taking place by recycling and recirculation of water.

Waste water that is generated by the production process is transferred via an appropriate piping network towards an Industrial Wastewater Processing System, which operates inside HALCOR's facilities. The System has different sub-units, according to the qualitative characteristics of the wastewater to

Total Water use



Specific Water Consumption



be treated. HALCOR, has four wastewater treatment units, one of which consists of a physicochemical treatment system, and the other three consist of primary treatment systems (sedimentation and oil removal). With these systems and an appropriate operation and maintenance, it is ensured that the parameters of disposed wastewater are in full compliance with the relevant regulations.

In addition, according to the existing wastewater disposal licenses, HALCOR monitors, on a monthly basis, the environmental parameters of the treated wastewater (such as pH, BOD, COD, total dissolved solids, fats and oils – hydrocarbons, heavy metals, temperature, etc).

Through the implementation of the Company’s Environmental Management System and the continuous environmental performance improvements, HALCOR’s goal is not only to comply with the relevant regulations, but also to go beyond these, in order to protect the environment.

Integrated Wastewater Management System (Zero Liquid Discharge)

HALCOR, aiming at decreasing its environmental footprint through natural resources savings, intends to install an integrated wastewater management system (Zero Liquid Discharge) at the recycling-melting plant as well as at the brass bars and tubes plant, during 2011. The wastewater produced by the copper tubes plant will be forwarded to a similar system that ELVAL uses, situated next door, which it is installing in 2010. By using such systems, not only wastewater disposal into aquatic bodies comes to a complete stop, but it is also possible to recycle and reuse treated wastewater in the production process.

HALCOR has placed special collection units in all points that a spillage of liquids may occur, ensuring therefore that no such materials find their way to the environment.

Regular Wastewater Parameters Monitoring System

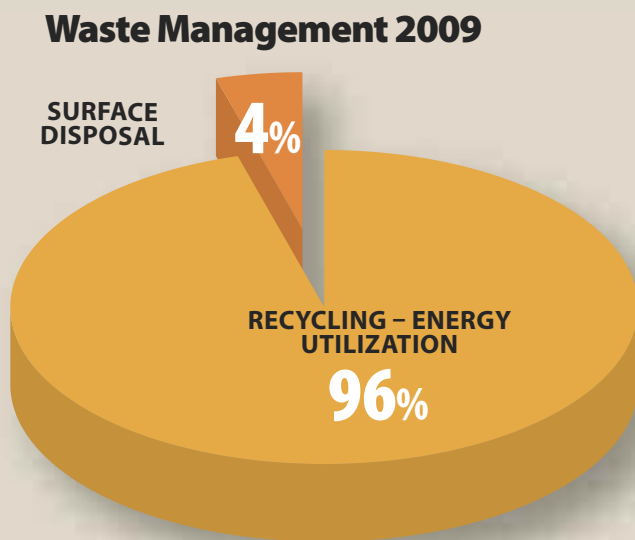
During 2009, equipment for the regular monitoring of the wastewaters’ qualitative parameters in the recycling – melting plant was installed.

Through the installation of this system, it became possible to monitor and control several parameters, such as pH, conductivity and temperature of the treated wastewater, which is to be discharged to the environment.

The instruments used, continuously monitor and are connected to a continuous electronic recording system. During 2010, similar systems will be installed in the copper tubes and brass bars & tubes production plants.

5.4.7 Waste

A result of the production processes, is waste which is generated in liquid or solid form. The total amount of this waste is separated at source, using appropriate storage means. These types of segregated waste are then collected by licensed companies and transferred towards further processing. HALCOR's waste management methods are presented in the following diagram.



HALCOR generated the following waste:

Waste	Management Method	Quantity (kg)		
		2007	2008	2009
Mixed recyclable materials (scrap metals, metal recycling)		29,068,070	29,266,337	19,192,885
Packaging, paper, wood, plastic)				
Sewage sludge	Recycling	152,360	72,850	73,590
Vehicles tires	Recycling	---	---	8,420
Waste from electric and electronic equipment	recycling	---	---	3,990
Metals	Recycling	467,010	1,270,460	1,867,740
Mixed materials – Waste	Surface Disposal	1,213,900	754,440	856,410
Used oils	Recycling	355,190	472,040	370,644
Batteries	Recycling	2,600	533	1,180
Filter dust	Recycling	296,545	318,614	297,483
Emulsions	Energy utilization	897,970	909,270	1,019,950
Polluted absorbing materials	Energy utilization	---	1,550	17,520
Fluorescent lamps	Recycling	---	---	80
Total waste		32,453,645	33,066,094	23,709,892



Copper recycling benefits

The use of recycled copper contributes significantly to the reduction in energy consumption, as almost 85% of the energy used is saved (3 times less energy and 2.5 times less thermal energy that is needed for primary copper production). This results in a reduction of global greenhouse gases (75% less CO₂) benefiting therefore the environment and our society in general.

The only production facility of the Company that can use recycled materials is the recycling-melting plant. During 2009, recycled materials (copper scrap, zinc and related alloys) constituted 25% of the total feed materials used, which was an increase when compared to 23% of 2008. Recycled materials used included internal scrap returns, which also increased from 44% in 2008 to 45% 2009.

5.4.8 Nature conservation – Biodiversity

HALCOR has all of its operations sited outside of protected areas or areas of high biodiversity value, and none of its facilities is adjacent to any protected areas. Therefore, there is no direct impact to protected areas' biodiversity or other areas of high biodiversity value, from its operations.

However, all necessary measures are taken, to minimize the impact on the natural environment by its operations.

Targets

HALCOR has set the following targets:

- Certification according to ISO 14001 - Environmental Management for all plants.
- Zero discharge of processed wastewater and recycling of the water used for cooling, through installation of Zero Liquid Discharge system until 2011.
- Increase environmental issues training for all employees in 2010.
- Continue tree planting in facilities in 2010.

6. SOCIETY



HALCOR, in the context of Corporate Social responsibility, develops and implements actions that are geared towards the support of local communities. In terms of this nature of contribution, actions can also be found in areas such as health and research & development with reference to copper applications.

6.1 The benefits of using Copper

The widespread use of copper in a variety of applications today, has made copper as one of the most important metals of our time. The great resilience of copper over time, absolute water tightness, immunity to any foreign element and unique antibacterial properties, help maintain the cleanliness and hygiene of water, which is necessary in water distribution networks and air networks in central air conditioning and ventilation systems. Because of these properties, copper is now the primary material selected in the field of hospital equipment.

Rolled copper products are mainly used in architectural, electrical, decorative and industrial application. There are also important applications in the health sector as well as in a wide range of devices that people come in contact with, as copper has antibacterial properties. Extruded copper products are used in architectural, decorative, construction, electrical, mechanical applications, in electrical panels, valves, batteries and supports for water pipes.

6.1.1 Copper and the Environment

Copper has a number of features and properties due to which it is characterized as an environmentally friendly metal. These properties can be summarized as follows:

- 100% natural product found in soil and in water
- resistant and long-lasting properties
- 100% recyclable and can be recycled many times over without losing any of its properties
- A good conductor for electricity increasing the efficiency of electrical applications.

Significant applications of copper are found today in the construction industry and particularly in buildings. The construction sector accounts for 40% of energy consumption in Europe, with significant energy losses due to inadequate heating systems, lighting, etc. According to published research, energy

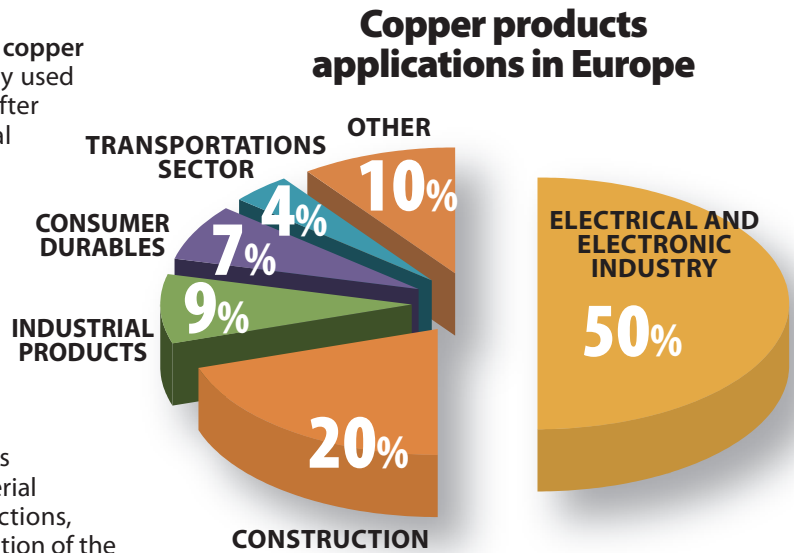


saved through the use of copper electrical applications (transformers, motors, etc) could reach up to 70% of the energy consumed.

In addition, 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.

6.1.2 The antibacterial properties of copper

For centuries, copper has been widely used for its antibacterial properties. After detailed research, the anti-microbial properties of copper were scientifically proven, making copper and copper alloy products suitable for use in fields of health, heating, water management, ventilation and air conditioning as well as in food processing. The replacement of other materials used on surfaces that come in frequent contact with people (e.g. door handles) with copper or brass materials, because of their antibacterial properties, can help against infections, contributing also to the further reduction of the bacterial load of such surfaces, always in combination with modern methods of sterilization.



- skin conditions caused by fungus or staphylococcus, since a simple contact of these microbes with a copper surface is enough to eliminate them within two hours.

Copper can act against:

- gastric infections, since its use in water pipes minimizes the risk of water contamination from a variety of bacteria (listeria and coliforms)
- “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 virus of the common flu as well as the H5N1 avian influenza, which becomes rapidly inactive upon contact with copper

It is worth mentioning that the U.S. Environmental Protection Agency (EPA), has officially registered 282 copper alloys as solid materials with antibacterial properties, suitable for applications related to public health.

6.2 Enhancing Research and Education

6.2.1 Hellenic Copper Development Institute (ELKEME)

In the context of its Corporate Responsibility, HALCOR supports the activities of the ELKEME in educational matters and the promotion of using copper in sensitive areas, such as health and the environment. Specifically and in relation to education and training, HALCOR participated in organising programs of the ELKEME, by providing related materials and facilities for courses, or through funding for the implementation of specific programs, throughout Greece.



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

6.2.2 Hellenic Metals Research Center (ELKEME)

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. ELKEME having developed partnerships with most Universities and other education institutes in Greece and abroad, which conduct research on metals and materials, contributes to students training, providing materials, equipment and training staff to carry out exercises and experiments. In addition, ELKEME coordinates the promotion of students in the industrial sector,, so they can conduct research for their thesis or work as interns.

HALCOR, as part of the ongoing cooperation with the ELKEME, in 2009 provided work for three students from University and Technological Education Institutes as part of their practical training, in various departments of the Company (Electrical Engineering, Quality Control Department).

6.3 Supporting the local communities

HALCOR recognizes the importance of social contribution, particularly towards the local communities in which it operates. HALCOR has a long tradition of supporting the local community. In this context, HALCOR seeks to employ personnel from the local community. In addition, in support of local communities, the Company prioritises working with local contractors and suppliers, enhancing therefore the local economy.



Educating the workers and technicians of Viotia

In 2009 (2-20/11/2009) HALCOR, in cooperation with ELVAL S.A, co-sponsored an educational program of seminars in Inofita on "Education of Workers and Technicians". During the program, which lasted 90 hours, the participants were trained in the following topics:

- Safety at work
- Environment
- Total Quality
- Metallurgy
- Pneumatic and hydraulic automation
- Lubrication and preventive maintenance.

The purpose of the training course was for the participants to acquire basic knowledge and skills relevant to industrial workers and technicians, which are essential should they wish to pursue such careers in an industrial environments. In addition, the program offered the participants priority in possible future recruitment opportunities, from HALCOR S.A. and ELVAL S.A.

During 2009, within the framework of Corporate Responsibility, HALCOR designed and implemented a number of actions, the most important of which were the following:

- **Financial support to the Scholarship program of the University of Piraeus:**
HALCOR provided financial support to the scholarship program of the Department of Banking and Financial Management of the University of Piraeus.





- **Sponsorship support to the Solar Energy Industries Association (SEIA):**
HALCOR continued in 2009 the sponsorship of SEIA, which aims to study, promote and monitor the technological and scientific developments of issues related to solar energy, solar energy applications and the cooperation with its members as well as their representation at a national and international level.
- **3rd Conference of the Hellenic Society of Solid Waste Management (HSSWM):**
HALCOR sponsored the 3rd HSSWM Conference on “Solid Waste Management: Aiming at a zero waste society”, which was held on 30-31 October 2009 at the Eugenidio Foundation. The conference’s objective was to provide a forum for discussion and consultation between the scientific community, businesses and institutions of central and local government to promote integrated and sustainable solutions to waste management.
- **Sponsoring support to the International Environmental Conference:**
HALCOR financially supported the organization of the International Environmental Conference “CEMEPE & SECOTOX: 2nd Conference on Environmental Management, Engineering, Planning and Economics”, held on 21-26 June 2009, on the island of Mykonos.
- **Supporting sponsor of the 10th World Congress for Sterilization:**
At the 10th World Congress of Sterilization and at the 20th PanHellenic Surgical Perioperative Nursing Conference conducted concurrently at the Creta & Terra Maris Conference Center in Heraklion, Crete, on the 7-10 October 2009, HALCOR sponsored the participation of ELKEME, which presented, in the context of the conference, the antibacterial properties of copper. The conference had as its main objective the wider communication and exchange of information between all the experts in the field, in regard to the results of new research and development in the area of sterilization and perioperative nursing, stressing the need to reduce hospital infections.
- **Support of the Municipal Musical Conservatory of Inofita**
The Company, in support of the local community through the Viotia Industries Association, provided financial support to the Municipal Musical Conservatory of Inofita.

- **Inofita Customs Authority**
The Company financed the construction of a special shelter for the Inofita Customs Authority, to improve working conditions.
- **Agios Thomas Elementary School**
HALCOR sponsored the elementary school in the village of Agios Thomas in Inofita, supplying all the necessary laboratory equipment for their Chemistry Laboratory.
- **Supporting Institutions – Providing copper**
HALCOR, supported the activities of ELKEME, HMRC and that of primary education, in areas related to copper usage and its benefits in the field of Health and the Environment. It continued to support various training programs either by donating materials (metals) and/or by providing the facilities needed to carry out such programs.
- **Student Internships**
HALCOR collaborates with the School of Mining and Metallurgical Engineering of the National Technical University of Athens and provides an internship each year. In addition, students of the Technological Education Institutes conduct every year their six-month traineeship at the Company, that has lead in many cases to their permanent employment.

Support of the association “BREATH – Friend of Intensive Child Care”



During 2009, HALCOR instead of sending out corporate Christmas gifts, chose to allocate a sum for the needs of the NGO “BREATH – Friend of Intensive Child Care”, supporting its work.

BREATH is a non-profit organization, created to support the intensive care of children and infants (ICU). BREATH continuously help children in intensive care units and support their needs after hospitalization.

It also has an ongoing and permanent care for “its children” of which some are still hospitalized in the ICU, while others are under medical supervision.

Targets for 2010

The Company, in the context of its Corporate Responsibility and with respect to its actions for Society, has set for 2010 the following objectives, aiming at contributing to the local development:

- Increase communication and contact with the local authorities, to be updated on the important issues and needs of the local community.
- Strengthen the local economy by selecting local employees and suppliers.

7. KEY PERFORMANCE INDICATORS



HALCOR S.A.

Key performance indicators of HALCOR are presented below, regarding the economic, environmental and social performance of the Company during 2009.

Economic Development	2007	2008	2009
Net Sales (in thousand euros)	755.974	635.252	343.547
Total Revenues (in thousand euros)	766.983	646.768	349.844
Operating cost (in thousand euros)	(708.057)	(619.760)	(327.930)
Payments to providers of capital (in thousand euros)	(13.752)	(16.625)	(6.979)
Total Investments (in thousand euros)	12.046	19.767	10.003
Net profit / (loss) (in thousand euros)– after taxes	9.786	(15.184)	(11.188)
Payments to government (in thousand euros) (taxes) (7.141)	(539)	-	-
Net profit per share (in thousand euros)	0,1977	(0,1499)	(0,1105)
Total capitalization (in thousand euros)	326.120	75.960	137.740
Marketplace	2007	2008	2009
Payments to suppliers (excluding materials and intercompany transactions) (in thousand euros)	47.350	41.650	45.248
Local suppliers	5,6%	6,2%	7%
Number of customers' complaints	200	202	169
Human resources	2007	2008	2009
Number of employees	769	742	668
Percentage of women / total employees	8,6%	8,0%	7,9%
Number of manpower training hours (participations by hours)	3.588	5.657	3.088
Employee salaries and benefits (in thousands euros)	(32.077)	(33.756)	(28.186)
Total annual injuries (leading to absence)	26	19	11
Number of deaths	0	0	0
Percentage of injuries / accidents of all staff	3,4	2,6	1,6
Employees Health and Safety expenses	110.000	350.000	520.000
Environment	2007	2008	2009
Total water use (m ³)	226.110	235.541	137.317
Specific water consumption (m ³ /tn product)	1,6	1,71	1,5
Specific thermal energy consumption (KWh/tn product)	756	741	782
Specific electrical energy consumption (KWh/tn product)	543	566	679
Total direct CO ₂ emissions (tn)	19.554	18.581	13.128
NO _x emissions (kg)	15.157	14.413	10.143
Total waste (kg)	32.453.645	33.066.094	23.709.892
Total environmental expenses (in euros)	928.079	1.759.419	1.748.182
Society	2007	2008	2009
Annual Contribution to Social Development	95.172	82.041	73.434
Personnel rate (from the local community)	31,2%	36,3%	34,2%
Blood donation – Total blood-bags collected	31	46	67

8. 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, exactly as is the case of the financial reports. The GRI framework includes Organisations' 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 raw material into production processes and come from the

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

Abbreviations

CO ₂	Carbon Dioxide
EPA	Environmental Protection Agency
GHS	Globally Harmonised System of Classification and Labeling of Chemicals
GRI – G3	Global Reporting Initiative, Edition G3
ILO	International Labor Organization
ISO	International Organization for Standardization
LPG	Liquefied Petroleum Gas
MSDS	Material Safety Data Sheet
MWh	Mega Watt per Hour
NO _x	Nitrogen Oxides
OHSAS	Occupational Health and Safety Assessment Series
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
TUV	Technischer Überwachungsverein
VOCs	Volatile Organic Compounds
KE.P.E.K	Regional Centre for Occupational Risk Prevention
PPE	Personal Protection Equipment
SBB	Viotia Industries Association
SEV	Hellenic Federation of Enterprises
Land Fill	Area for burying waste hygienically.

9. GRI INDICATORS

GRI Ref.	Description	Section – Notes
1.	Strategy and Analysis	
1.1	Chairman's statement	Page 3
1.2	Description of key impacts, risks and opportunities	Page 3/2.4/2.5
2.	Organizational Profile	
2.1	Name of the Company	1.2
2.2	Primary brands, products, and/or services	1/3/3.1/3.1.1/3.1.2/ 3.1.3/3.1.4/ 3.2.1/3.2.2
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	1/2.3.3
2.4	Location of organization's headquarters	1.2
2.5	Countries where HALCOR operates	1/3
2.6	Nature of ownership and legal form	1.2/2.2
2.7	Markets served	1/3
2.8	Scale of HALCOR	2/2.1/7
2.9	Significant changes during the reporting period	2.2.1
2.10	Awards received in the reporting period	1.4
3.	Report parameters	
REPORT PROFILE		
3.1	Reporting period	Page 1
3.2	Date of most recent previous report	Page 1
3.3	Reporting cycle	Page 1
3.4	Contact point	Page 1
REPORT SCOPE AND BOUNDARY		
3.5	Process for defining report content	Page 1
3.6	Boundary of the report	Page 1
3.7	State any specific limitations on the scope or boundary of the report	Page 1
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities	Page 1
3.9	Data measurement techniques and the bases of calculations	Page 1
3.10	Explanation of the effect of any re-statements of information provided in earlier reports	Page 1
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Page 1
GRI CONTENT INDEX		
3.12	Policy and current practice with regard to seeking external assurance for the report	Page 1/9
ASSURANCE		
3.13	Policy and current practice with regard to seeking external assurance for the report	Page.1/10
4.	Governance, Commitments, and Engagement	
GOVERNANCE		
4.1	Governance structure of the organization	2.3.1/2.3.2/2.3.3
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
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives	2.3.1
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	2.3.4
4.7	Process for determining the qualifications and expertise of the members of the highest governance body	2.3.1

GRI Ref.	Description	Section – Notes
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance	Page. 3/1.5/3.5/4/ 4.1/4.5/4.5.1/ 4.8/5/5.1
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental and social performance	2.3.1 / 2.3.3
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance	2.3.1 / 2.3.3
COMMITMENTS TO EXTERNAL INITIATIVES		
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization	2.4 / 4.5.1 / 4.7 / 5
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses	1.3 / 1.5.1 / 9
4.13	Memberships in associations and/or national/international advocacy organizations	1.3
STAKEHOLDER ENGAGEMENT		
4.14	List of stakeholder groups engaged by the HALCOR	1.6
4.15	Basis for identification and selection of stakeholders with whom to engage	1.6
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	1.6
4.17	Key topics and concerns that have been raised through stakeholder engagement	1.6
5. Economic Performance Indicators		
EC1	Direct economic value generated and distributed	2 / 2.1 / 7
EC4	Significant financial assistance received from government	During 2009 no financial assistance was received by the government
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation	1.6 / 3.5 / 3.5.1 / 3 – 2010 Targets / 6.3
EC7	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation	1.6 / 4.2 / 6.3 / 6 – 2010 Targets
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind, or pro bono engagement	2 / 2.1 / 6.2.1 / 6.2.2 / 6.3
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts	2 / 6.1 / 6.2.1 / 6.3
6. Environmental Performance Indicators		
MATERIALS		
EN1	Materials used by weight or volume	5.4.1
EN2	Percentage of materials used that are recycled input materials	5.4.1
ENERGY		
EN3	Direct energy consumption by primary energy source	5.4.2
EN4	Indirect energy consumption by primary source	5.4.2
EN6	Initiatives to provide energy-efficient or renewable energy-based products and services, and reductions in energy requirements as a result of these initiatives	5.4.5/6.1.1
WATER		
EN8	Total water withdrawal by source	5.4.6
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	5.4.8
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	5.4.8
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk,	Since the Company does not operate in such areas, there is no negative impact to IUCN Red List species and national conservation list species



GRI INDICATORS

HALCOR S.A.

EMISSIONS EFFLUENTS AND WASTE

EN16	Total direct and indirect greenhouse gas emissions by weight	5.4.3
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	5.4.3
EN20	NOx, SOx, and other significant air emissions by type and weight	5.4.4
EN21	Total water discharge by quality and destination	5.4.6 / 5.4.7
EN22	Total weight of waste by type and disposal method	5.4.7
EN23	Total number and volume of significant spills	There where 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 is no significant impact since the Company does not operate in protected areas

PRODUCTS AND SERVICES

EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	5.3 / 5.4.6
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COMPLIANCE

EN28	Monetary value of significant fines and total number of non-monetary sanctions for non compliance with environmental laws and regulations	There where no fines or non monetary sanctions
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OVERALL

EN30	Total environmental protection expenditures and investments by type	5.2
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7 Labor practices and descent work performance indicators

EMPLOYMENT

LA1	Total workforce by employment type, employment contract, and region	4.2/4.2.1
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	4.2.2

LABOR/MANAGEMENT RELATIONS

LA4	Percentage of employees covered by collective bargaining agreements	4.2.1
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OCCUPATIONAL HEALTH AND SAFETY

LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees	4.7
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region	4.7
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases	4.2.2/4.6.1

TRAINING AND EDUCATION

LA10	Average hours of training per year per employee by employee category	4.4
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	4.3/4.4
LA12	Percentage of employees receiving regular performance and career development reviews	4.3

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	4.2/4.2.4
LA14	Ratio of basic salary of men to women by employee category	4.2.4

Human rights performance indicators

NON-DISCRIMINATION

HR4	Total number of incidents of discrimination and actions taken	4.2.4
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CHILD LABOR

HR6	Child labor	4.2
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FORCED AND COMPULSORY LABOR

HR7	Forced and compulsory labor	4.2
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INDIGENOUS RIGHTS

HR9	Total number of incidents of violations involving rights of indigenous people	No incidents
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9 Society performance indicators**CORRUPTION**

S02	Percentage and total number of business units analyzed for risks related to corruption – No incident of corruption has been occurred. Internal Audit checks continually all Company's departments and facilities.	
S03	Percentage of employees trained in organization's anti-corruption policies and procedures.	4.4
S04	Actions taken in response to incidents of corruption.	4.4

PUBLIC POLICY

S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country. The Company do not support or sponsor political parties, whether directly or indirectly.	
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ANTI-COMPETITIVE BEHAVIOUR

S07	Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes.	There were no such legal actions. 2.4.1
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COMPLIANCE

S08	Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations	There were no such incidents of non compliance. 2.4.1
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10. Product responsibility performance indicators**CUSTOMER HEALTH AND SAFETY**

PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures	3.3
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	There were no such 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
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	There were no such incidents of non compliance
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	3.4.1

MARKETING COMMUNICATIONS

PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes	There were no such incidents of non compliance
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CUSTOMER PRIVACY

PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	There were no such complaints
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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 such fines
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The photos shown in the Report are shot by the photographer Spyros Charactinos, as also as Kyriaki Athanaselli and Erietta Papadogianni.

The paper of the Report has been produced by sustainable managed forests FSC and involves 60% recycled pulp.



		G3	C	C+	B	B+	A	A+
		In Accordance						
Mandatory	Self Declared							
				Report Externally Assured		Report Externally Assured		Report Externally Assured
Optional	Third Party Checked							
	GRI Checked							

10. STATEMENT OF APPLICATION LEVEL CHECK

Introduction

Det Norske Veritas AS ('DNV') has been commissioned by the management of HALCOR S.A to carry out an Application Level Check against the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines Version 3.0 on HALCOR S.A's CR Report 2008 Version 15 ('the Report').

The Application Level Check does not represent DNV's view on the value or quality of the Report and its content. It is a statement about the extent to which the GRI Reporting Framework is applied. Therefore, DNV has not professionally assured the quality and content of the report.

Independence

DNV did not provide any services to HALCOR S.A that could conflict with the independence of our work. DNV was not involved in the preparation of any statements or data included in the Report except for this Application Level Check.

Conclusion

DNV has checked this Report against the criteria for the GRI Application Level 'B'. We confirm that the criteria for Application Level 'B' have been met.

For
Det Norske Veritas AS

Nicola Charissis
Market Manager for Greece & Cyprus
DNV Business Assurance

Dr Helena Barton
Service Area Manager: CR Report
Verification
Det Norske Veritas AS

Athens, 2010-06-09



11. CORPORATE RESPONSIBILITY AND SUSTAINABILITY REPORT 2009 FEEDBACK FORM

Your opinion helps us improve

We invite you to provide your opinion in order to help HALCOR's Corporate Social Responsibility and Sustainability 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
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 S.A., Attn: George Mavraganis, 57km Athens Lamia National Highway, GR 32011, Inofita, Viotia, Greece, email: csr@halcor.vionet.gr or by fax: +30 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

