

GLOBAL COMPACT

COMMUNICATION
ON
PROGRESS

2009





Company name : Halyvourgiki Inc.
Country : Greece
Industry : Production of steel
Contact name : Mr. Athanasios Lappas
Operations Director
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Statement of support

Our company recycles Metal Scrap and is a producer of completely recyclable products.

Our registration with the Global Compact (UNGCI) is a conscious act. We adopt its principles and as a company we are an active and responsible member of society.

Our commitment to the principles of the Global Compact is communicated to the whole structure of the company.

Our employees form the most important asset in our company and our primary concern is to provide continuous training. Our employees are the corner-stone for the company's continuous improvement, for Health and Safety at work, for the Environment and for the implementation of the ten principles of the Global Compact to all our daily operations.

Our aims, our efforts, our achievements are transmitted with utter transparency to our shareholders, our employees, our customers and suppliers, the broader society and during 2009 this commitment was fulfilled.



George Skindilias
Vice President and Managing Director

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

COMMITMENT:

We respect and support the protection of proclaimed human rights. We strive to be informed on third parties in violation with this principle so as to exclude any potential contact and business.

SYSTEMS:

All administrative and operational procedures of our company are designed in such a manner in order to fulfill and document our commitment to the above principle on a daily basis. The developed and implemented Human Resources, Environmental Management and Health and Safety Systems by our company, assure the protection of human rights. Health and Safety at work is a strategic priority according to our company policy and actions have been developed to completely eliminate accidents.

ACTIVITIES-OUTCOMES:

In 2009, we completed and implemented procedures concerning contracts and cooperation. Through these procedures the commitment of all contractors to abide by specific terms concerning health and safety and the protection of the environment is assured.

During 2009, 200 safety walks and 10 safety internal audits were performed.

Our Company has received a "Good Practice Certificate" by the European Agency for Safety and Health at work for its participation to the EU campaign to promote Risk Assessment as the start of systematic Safety and Health management.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses

COMMITMENT:

Our company implements the appropriate control mechanisms, to ensure that its activity as a whole, both in the internal and external market, is not involved in any kind of business that may result in the abuse of human rights. Our company is dedicated to the exact implementation of and adherence to national, European and United Nations' Law. This ethical behaviour is the most substantial element of our company's culture.

SYSTEMS:

The management and operational procedures of our company are not contrary to the above principle and are clearly defined to avoid misinterpretation. All our operations assure through the systems in place that our company is not involved in violation of human rights. The above principle is secured by the suppliers' evaluation procedure and is supported by the information ERP-SAP system operated by our company.

ACTIVITIES-OUTCOMES:

During 2009, we exchanged information with our business partners on the abuse of human rights.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

COMMITMENT:

Our company respects all legal rights of employees deriving from national, European and international labour law, as well as from our company culture. The Halyvourgiki Employees Union, the Employee Health and Safety Committee, the Occupational Physician, the first aid station, the systematic additional private health insurance scheme for our employees reflect the above stated. Our company respects the employees' right to participate in strikes.

SYSTEMS:

The elected Board of Halyvourgiki Employees Union is housed in a separate building on the plant's premises. On a regular basis or whenever required, the Union discusses, consults and negotiates employment issues with the company's management; on a daily basis the Union is in contact with all employees. The output of these meetings is documented and communicated to all employees.

The Employee Health and Safety Committee consists of elected employees and its role is to locate problems and suggest solutions to management.

The Occupational Physician cares for the employees' health, the hygiene of the working areas, schedules health checks and suggests measures to management.

The first aid station is manned on a shift basis, in order to provide prompt first aid to employees and maintains an ambulance on a state of preparedness.

ACTIVITIES-OUTCOMES:

In 2009, all scheduled meetings took place and all described systems operated effectively. Health checks, blood donation, advice and vaccination were organised. All strikes and work stoppages our employees participated in during 2009, were related to national issues and not linked to internal business. The medical files of all employees were completed and updated.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour

COMMITMENT:

Our company complies with all legal obligations of labour law. Our company performs no business with third parties in the event there is an implication or indication of violation of the above principle. In this case any kind of cooperation is immediately terminated.

SYSTEMS:

Any external subcontractor that may undertake any project or provide any kind of service is obliged to fully comply with national labour legislation. A dedicated document determines the exact health and safety conditions and all specific measures for the protection of the environment that must be taken into consideration by all subcontractors. No third parties are allowed to work without this commitment.

Lucid procedures are established and implemented to assure the elimination of any form of forced and compulsory labour.

ACTIVITIES-OUTCOMES:

Every employee undertakes specific duties and obligations relating to the position held, and is trained on a continuous basis. No overtime work occurs without the prior consent of the employee and no employee performs a task without adequate training.

Principle 5: Businesses should uphold the effective abolition of child labour

COMMITMENT:

Our company's operations, both in the internal and external market, assure no business with third parties not respecting this principle. In addition, our company acts continuously towards the fundamental abolition of child labour, especially in countries where this unacceptable situation prevails. Our company is committed to recruit personnel only above the legal working age.

SYSTEMS:

A procedure is implemented to abolish the possibility of recruiting candidates below the legal working age limit. The provided remuneration to personnel is such that it does not indirectly force the employees' families to send their children to work, but enables children to have access to education, health care and recreation provided by the community.

ACTIVITIES-OUTCOMES:

Security entrance checks performed to every incoming person assure no under age enter to work. Employees turn directly to management for any family problem they may be encountering, for support.

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation

COMMITMENT:

Our company does not discriminate during employment and recruitment. Individuals with a legal right to work in our country, irrespective of sex, skin colour, origin, nationality and religion are employed and recruited. Personality, experience and qualifications of individuals are a criterion on which the selection process is based. Our company expects from all partners to uphold the above principle. As an equal opportunities employer we organise the appropriate training corresponding to the demands of each position held, so that employees obtain qualifications and skills, gain technological and managerial knowledge and become professionally competitive to current market requirements.

SYSTEMS:

The Human Resources Department implements procedures documenting the above.

ACTIVITIES-OUTCOMES:

During 2009, the scheduled internal and external training plan was completed.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges

COMMITMENT:

We strive to preventively take all the necessary measures for the protection of the environment when purchasing raw materials, operating and during the environmental use of our products.

SYSTEMS:

According to the ELOT EN ISO 14001:2004 certified Environmental Management System (EMS), all environmental impacts from our plant's operation have been recorded, and on an annual basis environmental programmes for the improvement of the environmental performance are planned. For the improvement of the EMS there is a clear procedure for preventive actions.

ACTIVITIES-OUTCOMES:

Our concern for a precautionary approach to environmental challenges is expressed through our participation as a founding member of SEVIAN (Association of Hellenic Recycling and Energy Recovering Industries), where together with a number of large Greek industries we attempt to find waste management solutions especially for the prevention and avoidance of waste production. Our company continuously researches methods to manage the electric arc furnace dust.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility

COMMITMENT:

Our company is committed to its environmental policy to continuously reduce the consumption of energy, fuel and water, to continuously comply with the relevant legislation in force; we strive to improve our environmental responsibility.

SYSTEMS:

We have taken considerable initiative to enforce our environmental responsibility. We keep a thorough register of our waste according to the law and we act for the legitimate off-site disposal. We monitor our emissions systematically and continuously. Our measurements are kept in records which can be accessed by competent authorities.

ACTIVITIES-OUTCOMES:

We study the flora and fauna of the plant's marine zone with the aid of the H.C.M.R. (Hellenic Centre for Marine Research). A working group has been created for the full compliance of the REACH Regulation. Every year an increasing quantity of waste is disposed of and recycled by authorised waste management companies (slags, used oils, electrical appliances, used tires, paper). Environmental training occurs on a continuous basis.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies

COMMITMENT:

Our company is committed to continuously monitor and apply environmentally friendly technologies.

SYSTEMS:

Procedures are implemented to constantly reduce our environmental impacts by using environmentally friendly technologies.

ACTIVITIES-OUTCOMES:

Our company has completely upgraded its mechanical equipment and building structures. A considerable part of the investment concerned the protection of the environment: cooling water treatment plants, fume treatment plants for the electric arc furnace emissions, dedicated temporary waste storage sites according to specifications, equipment for the continuous measurement of emissions, special anti-pollution vehicles. All selected technologies are Best Available Techniques (BAT).

We seek to cooperate with suppliers and customers sharing with us the same environmental philosophy and sensitivity.

ANTI - CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

COMMITMENT:

Our company's activities, contacts and business are based on the high ethos of shareholders and employees. This ethos is the company's "trademark" in the internal and external market. We believe our ethical behaviour makes us a historic exemplar.

Our principle is: no business and no contact where there is an implication of corruption. We expect every third party to uphold this principle.

These principles are communicated and are explicable to our employees from the moment they join our company.

SYSTEMS:

The conditions of every transaction are controlled via specific purchasing procedures for the selection of partners in order to combat corruption. Our ultimate aspiration for ethical working behaviour and integrity is taught upon recruitment.

ACTIVITIES-OUTCOMES:

In 2009, we implemented all the necessary internal procedures to ensure the above principle, especially in the Purchasing Department. These procedures are entirely controlled and have been embodied to our company's information ERP-SAP system.

During 2009, we upheld our commitment to these ten principles. This commitment was expanded with training at all levels of our company, by setting the example and through our behaviour. We are confident our dedication to the 10 principles of the Global Compact is spread to third parties through every contact made.

