

Communication On Progress

Annual And Corporate Responsibility Report 2017

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2. INTRODUCTION

2.1. About This Report

The present report is created as a continuity of our previous COP, covering the time period from December 2016 to December 2017, confirming Polyeco's constant commitment and respect to the principles of the United Nations Global Compact.

This report was approved by the Board of Directors of Polyeco SA on 25 May 2018.



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2.2 Letter from the Vice President

“For five years now, Polyeco S.A. continues its long standing commitment and support to the Ten Principles of the United Nations Global Compact on Human Rights, Labour Standards, Environment and Anti-corruption, by implementing and integrating those principles in the decision making procedure”



Athanasios Polychronopoulos
Vice President of Global Development

2017, was a year of economic challenges in an unstable business environment, as the deep recession of Greek economy continued. However, our company not only succeeded to maintain its high performance meeting the needs and expectations of our stakeholders, but also achieved to stimulate the development and extroversion of its activities in the field of environmental management.

Polyeco S.A., as the first and sole integrated and fully licensed waste management industry in Greece, and a major player amongst the most prominent waste management companies in Europe, demonstrates that responsible entrepreneurship requires the most advance practices and methods.

In 2017, Polyeco S.A. proudly organized a Sustainable Development Program, taking into account not only the needs of the Greek society, but also the local communities of the countries across the globe where the company implements waste management projects. Polyeco contributed to the strengthening of local communities with the recruitment and remuneration of local personnel, without discrimination based on race, nationality, social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions or age.

In an effort to further raise the public’s awareness about the importance of the protection of the

environment and sustainable development, we introduced numerous activities through Polyeco Contemporary Art Initiative (PCAI), with emphasis on education.

Believing that environmental consciousness should be cultivated at an early age, PCAI designed an innovative educational program for schools in Greece and abroad. PCAI Junior, created in the summer of 2017, constitutes an educational platform that enables students to understand critical, ecological issues that affect their place of residence.

POLYECO S.A. does not just perform waste management projects. We build relationships based on trust, which in turn contribute to environmental protection by linking Contemporary Art to the Environment and Sustainable Development, drawing high moral satisfaction as it is not limited to business development but reinforces the local communities achieving the recovery of man's relationship with nature.

For yet another year, we have managed to fully incorporate the UN Sustainable Development Goals to our internal and external operations. The **Communication On Progress Report 2017**, includes all the information about the company's performance on the axis of society - employees, health-safety and environment.

A handwritten signature in blue ink, appearing to be 'Athanasios Polychronopoulos', written over a white background.

3. CORPORATE IDENTITY

“Sustainability is at the heart of our business”

3.1. Company Overview

Polyeco S.A. is the first and sole integrated and fully licensed waste management and recovery industry in Greece founded in 2001.

The investment and implementation of such a venture in Greece was based on the successful outcome of a research undertaken by the General Secretariat of Research and Technology, with the participation of the University of Patras, University of Crete, Demokritos National Center for Scientific Research, Titan S.A. Cement Industry, as well as the mother company, Environmental Protection Engineering S.A.

A leader amongst the most prominent waste management companies in SE Europe, Polyeco has strong presence in the Balkans, Middle East, Africa, Central Asia, Latin America and countries of the Indian Ocean, implementing some of the most challenging and time critical waste management projects across the Globe. Experienced personnel always work closely with clients to tailor solutions that meet their business requirements and organization’s goals always in compliance with health, safety and environmental regulations.

In the context of International Development, POLYECO has established an extensive network of companies

undertaking major environmental projects making it one of the largest International Hazardous Waste Management companies worldwide.

Since its establishment, Polyeco S.A. constantly strives on improving environmental management performance and competitiveness for its clients. Through continuous training, research & development in the fields of recovery, decontamination, reclamation and rehabilitation, it provides integrated sustainable waste management solutions for the industrial sector. Polyeco’s vast field of expertise encompasses licensing, decontamination, transport treatment, recovery and disposal of all types of hazardous and non-hazardous industrial waste.

In 2015 Polyeco expanded its network of companies with the establishment of Polyeco B.V. based in The Netherlands, Polyeco Gulf Ltd. in Sultanate of Oman and Ecorecovery S.A. and Nordeco S.A. in Greece. In 2016 Polyeco Group International DMCC and Polyeco Group Mexico S. de R.L. de C.V. were established.

Polyeco’s sustainable development plan is stimulated by its aim to provide complete solutions to its clients and increase the promotion of recovered industrial waste into new production cycles.

- 2008:** POLYECO BALKANS D.O.OEL. was founded in Skopje.
- 2009:** POLYECO ALBANIA SH.P.K. & POLYECO D.O.O. were founded in Tirana and Beograd
- 2015:** POLYECO GULF L.L.C. & POLYECO B.V. were founded in Muscat and in the Netherlands
- 2016:** POLYECO INTERNATIONAL DMCC was founded in Dubai.
- 2017:** POLYECO S.A. was founded in Mauritius.

3.2. Main Services

POLYECO focuses on the provision of sustainable, complete waste management services, by undertaking the design, treatment and safe final disposal of all kinds of industrial waste streams, covering reliable, cost-effective and environmental friendly solutions to industries.

POLYECO has treated over 400.000 tons of industrial waste, and has produced secondary liquid and solid fuels, secondary raw materials and additives for pollution prevention. Industrial wastes that cannot be recovered or disposed of in Greece are exported to licensed facilities within the European Union for final disposal.

“Sustainable Waste Management”

- ✓ Environmental Services
- ✓ Industrial Waste Management
- ✓ Production of Alternative Fuels
- ✓ Production of Raw Materials
- ✓ Production of Industrial Additives

POLYECO has completed several hazardous waste management projects

Indicatively:

Kazakhstan: Two projects for the management of PCB oils and the management of PCB capacitors (United Nations Development Program Kazakhstan).

Kosovo: Energy Sector Clean-up and Land Remediation Project. Waste removal and on-site treatment of waste of the former KEK gasification plant (World Bank funded project).

Mauritius: Two projects, for the sustainable management of POPs waste (PCBs and DDT) and of DDT contaminated soil (United Nations Development Program Mauritius).

Ethiopia: Disposal and safeguarding of obsolete pesticides and other associated hazardous chemicals (Ministry of Agriculture, World Bank funded project).

Greece: Rehabilitation and decontamination of CHYMA SA chemical storage facilities after an explosion accident.

INDUSTRIAL SERVICES

- Rehabilitation and Decontamination
- Asbestos Management
- Fuel Tank Cleaning
- Car Repair Hazardous Waste Management
- Dry Cleaning Hazardous Waste Management
- Chemical Lab Hazardous Waste Management

WASTE MANAGEMENT

- Hazardous Waste Management
- Spent Fluorescent Lamps Management
- Batteries Waste Management
- Asbestos Management
- Radioactive Materials Management
- Marine Waste Management
- Spill Response

3.3. Facilities



The company's premises are located in Athens in the industrial area of Aspropyrgos refineries and in Salonika in a proprietary land within the industrial area of Sindos. The design of the facilities and the selection of equipment are in compliance with the IPPC Directive.

The operation of a modern laboratory, able to analyze any type of collected raw material and product, depicts the high level requirements and specifications applied by the unit.

POLYECO facilities in Aspropyrgos and Thessaloniki are designed to operate according to the strictest European Environmental Regulations.

- ✓ Quality Management System certified as per EN ISO 9001
- ✓ Environmental Management System verified according to EMAS III (EU Regulation 1221)
- ✓ Occupational Health & Safety Management System certified as per OHSAS 18001
- ✓ Quality Control Laboratory accredited under the terms of ELOT EN ISO/IEC 17025
- ✓ Security Management System for the supply chain certified as per EN ISO 28000



LABORATORY

Polyeco's quality control, ISO 17025 certified laboratory is one of the most vital parts of the industry. The laboratory determines various environmental parameters to industrial waste, ensures quality at the production process and contributes to the selection of the most effective treatment and/or recovery methods. Analysis for third parties is also conducted.

The laboratory is equipped with modern analytical systems, including ICP – AES, Mercury Analyzer based on Cold Vapor Atomic Absorption technique, Total Organic Carbon Analyzer, Ion chromatography for anions and cations, GC – ECD, GC – FID, GC – MS, automated Kjeldahl apparatus, automated Soxhlet apparatus, automated Calorimeter, FTIR, spectrofluorometer, spectrophotometer, EOX – AOX analyzer, Flash point (open cup), Flash point (closed cup), microwave oven and various other equipment necessary for sample pretreatment. Most of the instrumentation is fully automated (accompanied by autosamplers), resulting in the capability to handle up to 20 samples per day for time consuming analyses, e.g. metals, and even more samples for less time consuming analyses.

In the course of years of operation, different methods were developed based on ISO, ASTM, APHA or EPA standards, covering the determination of a wide range of parameters. Other analyses such as BOD, COD, flash point determination, AOX determination in water samples, identification of unknown compounds by GC – MS, photometric methods etc. are also conducted periodically. Laboratory performance and quality is assured via ISO 17025 Quality System, ISO 9001 and EMAS 14000. In accordance with ISO 17025, specific guidelines are established for the frequent maintenance and upgrade of instrumentation, as well as the accuracy of analyses results.



DISTINCTIVE LIQUID WASTE UNIT

The unit is capable of performing programmed or manual treatment steps of liquid waste including acidification, reduction, chemical oxidation, coagulation/flocculation & filtration. It is, at last, the industrial realization of the laboratory theory consisting of having a current pass through waste-water to make the suspended solids and most dissolved salts react as normal flocculated sludge.

Tank Farm

Six holding tanks are used for the temporary storage of the received liquid waste. Each tank or group of tanks is dedicated for the storage of specific liquid streams.

Following laboratory analysis of the stored liquid waste one of the following treatment lines is selected for the treatment of the waste:

- Electro-coagulation and Electro-flotation
- Physicochemical Treatment
- Evaporator

HAZARDOUS WASTE TRANSFER STATION

Within its facilities Polyeco operates a separate Hazardous Waste Transfer Station (HWTS).

The HWTS was designed and built in conformance with the highest safety standards. Automatic fire detection and fighting system is installed throughout the store area and suitable HDPE (High Density Polyethylene) liner is placed on the ground to prevent potential leakages. The purpose of the HWTS is to offer temporary storage capabilities for various types of hazardous waste (flammable, toxic, corrosive etc.), which cannot be treated within the facility, so that they can be immediately removed from the producer's site minimizing risk to health or the environment. The waste is then transferred according to the EU law to certified European disposal facilities.

3.4. Mission Vision and Values



OUR MISSION

Dedication to our customers, establishment and maintenance of long-term relationships give us the ability to provide the most innovative, reliable and cost-effective solutions in the field of our activities.

OUR VISION

Our vision is the improvement of the society's quality of life, by offering solutions for the sustainable and viable environmental protection and waste management.



OUR GOAL

Our goal is to develop innovative waste treatment and valorization methods, by constantly combining the high-level training and expertise of the personnel with advanced technological processes.

OUR PRINCIPLES

“Our Guiding Principles drive everything we do, the way we think, our decision making process. These four words sum up the key attributes leading us to success and help us fulfill our mission.”



INNOVATION

We always think about how we can make improvements, identify new opportunities and meet requirements to provide better solutions to our clients existing needs or anticipating their future needs. Innovation is a necessity for us. Our future success depends on the creativity of our individuals and teams and a willingness to keep thinking and acting on the possibilities for innovation in all that we do.



CREATIVITY

Creativity is the necessary element in every stage of the innovation process. It is the ability to make connections that result in ideas. Creativity help us scale a barrier to implementation, improve margins, speed up a process, find solutions in every aspect of our daily work.



INTERGRITY

We succeed by doing things the right way, with respect to ethics, laws, standards of quality, and each other. We keep our promises and build trust and loyalty with our clients, our partners, our suppliers, our people.



AGILITY

We are flexible, adaptable and responsive. Our ability in using a combination of balance, coordination, speed, reflexes, strength, and endurance helps us take advantage of change. Whether in business or in technology, we move with speed and dexterity to adapt and adjust to emerging client and project requirement.

4. SUSTAINABLE DEVELOPMENT & CSR

“The United Nations Sustainable Development goals as a driver for our common future”

Sustainable Development (SD) is at the heart of our POLYECO S.A. business and an essential component of POLYECO S.A. long term strategy to support the development, while promoting social responsibility, environmental management, corporate governance and business ethics.

POLYECO S.A. focus the efforts on managing the effects of its activities, in order to identify the areas with the greatest impact, according to the essential issues of CSR and determine of these issues following international standards and Best Available Techniques.

The other high priority's objective of our policy is *“Making More from Waste: Recovery/Recycling/Reuse”*. At our main hazardous waste treatment facility we treat hazardous waste preventing their release into the environment and provide environmentally friendly methods of managing hazardous materials in accordance with the Circular Economy principles.

The foundation of our approach lies in two key documents: Our Code of Ethics and Business Conduct our Workplace Policy Handbook. Both are influenced by the United Nations (UN) and International Labour Organization (ILO) declarations. Together, they describe our high standards and expectations, addressing such subjects as child labour, forced labour, freedom of association, discrimination, health and safety, hours of work and Human Rights.

Our Code of Ethics and Business Conduct and our Workplace Policy Handbook, apply to all entities in which POLYECO S.A. owns a majority of interests.

The umbrella principles set forth in our Code of Ethics and Business Conduct and in our Workplace Policy Handbook. Both are influenced by the United Nations (UN) and International Labour Organization (ILO) declarations. Together, they describe our high standards and expectations, addressing such subjects as child labour, forced labour, freedom of association, discrimination, health and safety, hours of work and Human Rights, and they are supported by policies applying to both the general conduct of POLYECO S.A. and the individual conduct of each employee.

4.1. Sustainable Development Strategy

POLYECO S.A. has established a set of key performance indicators (KPIs) in alignment with Global Compact. These data help monitor and measure Sustainable Development performance and implementation. In addition, the POLYECO S.A. employees have an active involvement in the area of Sustainable Development.

POLYECO S.A. Sustainable Development strategy is guided by a continuous performance improvement plan. The plan defines yearly priorities and objectives whose progress is regularly monitored and evaluated. This plan plays a key role in determining and validating POLYECO S.A. commitments with regard to social responsibility, environmental management, governance, human rights, labour and ethics.

Being by definition POLYECO S.A. a company having sustainability at the heart of our business and servicing blue chip clients, NGO's, UNIDO, UNEP, UNPD and the World Bank our main focus is in leveraging the dynamics and structured synergies between the sister companies of our group to persevere the promotion and implementation of a management approach coherent with all the UN Global Compact principles.

Together, they describe our high standards and expectations, addressing such subjects as child labour, forced labour, freedom of association, discrimination, health and safety, hours of work and Human Rights.

POLYECO S.A. is a modern and dynamic enterprise providing integrated sound waste management, with products and services that relate to the environment's protection addressed to various business sectors and industries. The overall activity of the company is to identify and understand the hazards inherent to the activities we undertake and effectively assess control and manage those risks. We also provide on-site hazardous and non-hazardous integrated waste management solutions, decontamination, site remediation and building capacity, to its client's facilities and by conducting client's personnel training and assessments.



POLYECO S.A. keeps its processes and services as “clean” as possible, by applying BEST AVAILABLE TECHNIQUES according to our permissions, this means that all our facilities are already certified under the EMAS environmental management standard. The continuous improvement of our services is translated into direct benefits for the environment.

POLYECO S.A. is a modern and dynamic enterprise providing integrated sound waste management, with products and services that relate to the environment’s protection addressed to various business sectors and industries. The overall activity of the company is to identify and understand the hazards inherent to the activities we undertake and effectively assess control and manage those risks. We also provide on-site hazardous and non-hazardous integrated waste management solutions, decontamination, site remediation and building capacity, to its client’s facilities and by conducting client’s personnel training and assessments.

Through its operations POLYECO S.A. helps environmental protection, conserves natural resources, fauna and flora, public health and public interests. We take reasonable steps to preserve the environment through responsible practices to minimize the environmental impact of our operations by complying with all applicable laws, guidelines and waste management industry standards.

Furthermore, Polyeco is implementing measures and actions in order to reduce greenhouse gas emissions, the main cause of climate change. Except for the use of energy efficient products, POLYECO S.A. has established a solar power station at its facilities in Aspropyrgos. We are also conducting efforts in order to reduce water usage by establishing monitoring and targeting system.

To respect the human rights of our employees, our contractors and community as established by the UN

A/RES/3/217 Universal Declaration on Human Rights and in the ILO’s Declaration on Fundamental Principles and Rights at Work, including non-discrimination, prohibition of child and enforced labour, and freedom of association and the right to engage in collective bargaining.

Since its foundation in 2001 POLYECO SA implements programs, initiatives and practices that reflect its values and define its Corporate Social Responsibility (CSR), incorporating voluntarily social and environmental friendly targets in its everyday business activities. For POLYECO SA, CSR is not just resolved to simple compliance with legal and business obligations but extends to substantial contribution to the society and the environment with respect to the principles of sustainability and prosperity. In this way POLYECO S.A. aims to eliminate as far as is reasonably practicable, each potential hazard or/and hazardous situation that might damage the human health.

POLYECO SA is fully committed to the concept and practice of equal opportunity in all aspects of employment. We hire the best and encourage them to achieve their best in a manner consistent with our core values and ideology. When developing its strategy, policies and practices on sustainability, POLYECO S.A. is actively involved in established trade associations and maintains dialogues with public authorities, rating agencies, socially responsible investors, non-governmental organizations (NGOs), customers and suppliers. It acts in accordance with legislation to promote transparency and integrity during its interactions with concerned parties in relevant sectors.

In addition, PCAI is destined to mirror POLYECO’s growth in relation to the ART and SOCIETY, Linking Contemporary Art to Environment & Sustainable Development. The objective has been to create a framework that will allow POLYECO SA to implement its unique environmental awareness raising program.



POLYECO SA is among the 21 most sustainable companies in Greece for 2017 were presented during an even organized in the premises of the old Athens Stock Exchange by Sustainable Performance Directory.

The 21 companies, part of the leading group of the business community in the country, can operate as examples of good business practice and can play a significant role in drafting a new growth model directly related with competitiveness and attracting of investments.

Athanasios Polychronopoulos

Member of the Board of the Hellenic Federation of Enterprises (SEV) Council for Sustainable Development

Mr. Athanasios Polychronopoulos, Vice President of Global Development of Polyeco S.A., resumed his duties as a Member of the Board of Sustainable Development, having absolute sense of the responsibility and obligations of his position. He is committed to communicating the Council's message that the country's economic development is inextricably linked to sustainable development.

The Hellenic Federation of Enterprises (SEV) Council for Sustainable Development is an entity which operates as a non-profit organization. The Council was created to be a powerful and dynamic factor for businesses, which are willing and able to play a leading role among the members of SEV in promoting Sustainable Development in the Greek business reality and in creating the necessary framework for discussion and weighing of critical issues of Sustainable Development among businesses, the State and society in general.

In this context, the Council promotes communication, information and education of its members and society in general, actions involving cooperation and promotion of the concept of Sustainable Development. In 2017 Polyeco S.A. contributed substantially to the design of the study concerning the Circular Economy that was commissioned by the Council for Sustainable Development of SEV. In that case, this Study includes individual subjects of the Circular Economy on a Sectoral level, the promotion of the required regulatory interventions, as well as the Search for Common Acceptable Solutions in the Waste Management.

Our Company embraces SEV's initiatives on sustainable development and presents its proposals regarding the content and the structure of the National Plan. More precisely, Polyeco S.A. suggests that the National Plan should be adjusted to the international standard ISO 26000:2010-Guidance on Social Responsibility, as well as aligned with the British standard SA 8000:2014- Guidance on Social Accountability. Also, the National Plan should refer to Organizations, in order to include both public and private sector.

Furthermore, Polyeco supports that the National Plan on Sustainable Development and on Corporate Social Responsibility (CSR) should be combined with art in the context of a



socially and environmentally responsible development. Concerning the definition of CSR, in order to avoid bureaucracy, this should be defined as it is stated in the respective international standard ISO 26000:2010 as well as the British standard SA 8000:2014.

Another important point is that under the international legal framework in force, the establishment of the issuance of Corporate Responsibility Reports is crucial for the proliferation of CSR. In an effort to increase the efficiency of social responsibility, it would be beneficial for the organizations of the public sector to incorporate the principles of CSR in their actions and programs aiming at responsible operation.

Additionally, it would be very useful if the public services developed artistic and cultural initiatives aiming at raising the awareness of their third parties (subcontractors, suppliers, local community). Concerning the implementation of a national strategy for CSR, it is substantial to establish an evaluation process for the quality of the reports at a national level, applying the appropriate procedures and methodology.

In conclusion, Polyeco S.A. defends that in the context of contemporary entrepreneurship, social responsibility should constitute the basis of the actions and the strategy of both private and public companies, creating a positive environment for the society.

4.2. Corporate Social Responsibility



Corporate Social Responsibility constitutes of systematic voluntary integration of activities in a social, environmental and cultural dimension in our every-day practices which, though cannot be categorized as sheer charity or public relations, significantly contribute to sustainable development firmly founded on the principles of ecological, financial and social sustainability.

Since its foundation in 2001 and with continuous efforts, POLYECO implements projects and practices which depict its values and define Corporate Social Responsibility.

POLYECO is a member of the United Nations Global Compact, the greatest global initiative on Corporate Responsibility. As a member of the Global Compact our company has committed to align its principles with ten globally approved principles in the field of human rights, labor, environment and fighting corruption.

Furthermore, POLYECO is a founding member of the Hellenic Foundation of Enterprises Board for Sustainable Development and has committed to implement the «Code of Sustainable Development Principles» and to integrate those principles in the decision making procedure.

We believe that Corporate Social Responsibility relies on the interaction between societies and enterprises.

Effective Contribution to Sustainable Development and Progress of the Values of Professionalism, Research and Innovation, as well as Social Responsibility, fully integrated within a healthy and sensitive society.

Our company is ready to confront the great challenges of the future, aiming at Environmental Protection.

4.3. Polyeco Contemporary Art Initiative (PCAI)

“A statement about Polyeco’s ethos and identity reflecting the company’s energy and sense of commitment



Since its foundation in 2001 Polyeco implements programs, initiatives and practices that reflect its values and define its Corporate Social Responsibility (CSR), incorporating voluntarily social and environmental friendly targets in its everyday business activities. For Polyeco, CSR is not just resolved to simple compliance with legal and business obligations but extends to substantial contribution to the society and the environment with respect to the principles of sustainability and prosperity.

In our 2014 Report we had the pleasure to announce the launching of Polyeco’s ambitious Contemporary Art Initiative, PCAI which primarily aims at raising environmental awareness through a unique art program inspired by the crucial issue of waste management, which is not only technical, but also environmental and social.

Since then, Mr. Athanasios Polychronopoulos, Executive Chairman of Polyeco Group, Director of PCAI and driving force behind the company's art initiative, decided to implement a sprinting strategy towards the implementation of PCAI's objectives. His genuine belief that art is the best tool to stimulate dialogue about waste management was complimented by his wish to share this assumption with the company's employees, clients and the general public. The objective has been to create a framework that will allow Polyeco to implement its unique environmental awareness-raising program. Within three years PCAI has accomplished to finalize its structure and to begin the implementation of its vision.

STRUCTURE

PCAI implements its objectives through three areas of activity, The Collection, The Projects, The Support. PCAI has become part of an international trend in the corporate collecting sphere that goes beyond purchasing art works.



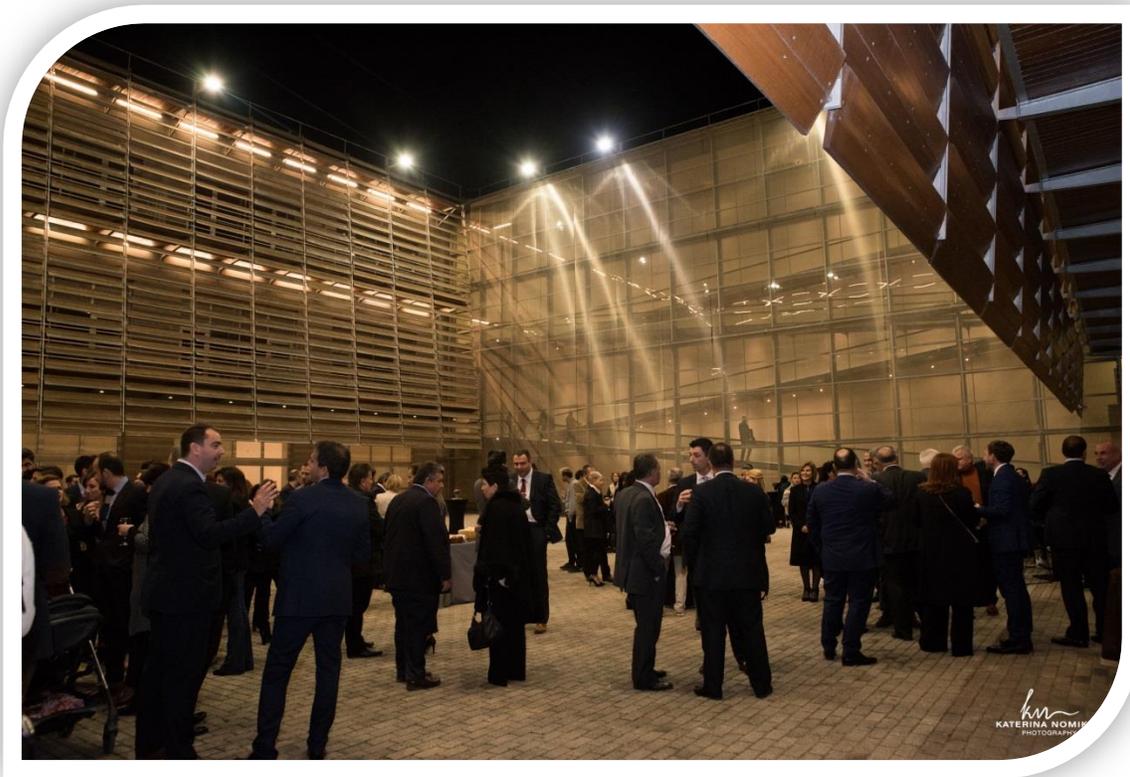
THE COLLECTION The Collection is based on special commissions mainly of moving image art. PCAI provides mid-career and emerging artists with the means and resources to create an artwork inspired by urgent environmental issues in their broader relation to current sociocultural, economic, philosophical concerns. The Collection invites artists to reflect on the concept of waste and related processes in a free and innovative way; to create art that challenges the limits of previous views and representations; to imagine new forms and use radical tactics while addressing our changing world.

The first of the capsules comprising the collection of PCAI was created between 2014 and 2017 under the curatorial work of Nadja Argyropoulou and was presented with the Paratoxic Paradoxes exhibition, organised with the cooperation of the Benaki Museum in Athens (April-May 2017). So far the PCAI Collection includes 16 works of art,

11 of which are part of the first PCAI Capsule. More specifically the Capsule includes works by Loukia Alavanou, Sophia Al-Maria, Korakrit Arunanondchai, Vasilios Patmios Karouk, Anja Kirschner, Eva Kotatkova, Eva Papamargariti, Agnieszka Polska, Mika Rottenberg, Wu Tsang and Saskia Olde Wolbers whereas the Collection is completed with the works of Angelo Plessas, George Drivas, Natasa Efstathiadi, Efi Spyrou and Navine G. Khan Dossos.

THE PROJECTS are all the activities and events (special commissions, exhibitions, publications, educational programs and workshops) organized by PCAI within the organization's foundational aim. Such activities and events develop beyond the Collection, yet are often in dialogue with issues raised by its material. In 2017 PCAI launched PCAI JUNIOR, an innovative educational program focusing on environmental awareness through film and art.

1. PARATOXIC PARADOXES EXHIBITION AT THE BENAKI MUSEUM, ATHENS



In 2015 Nadja Argyropoulou was invited to curate the first PCAI capsule of commissioned works. The resulting capsule included new works of moving image (film, video, animation, digital imaging, etc.) of Loukia Alavanou, Sophia Al-Maria, Korakrit Arunanondchai, Vasilios Patmios Karouk, Anja Kirschner, Eva Kotatkova, Eva Papamargariti, Agnieszka Polska, Mika Rottenberg, Wu Tsang, Saskia Olde Wolbers that were presented at the Benaki Museum, Athens in spring 2017 parallel to Documenta 14. The exhibition Paratoxic Paradoxes attracted thousands of visitors and received raving reviews from the local and the international press.

Focusing on whether man's relationship to the environment the most controversial, complex and unfinished project of humanity it explored this critical question through the contemporary viewpoint of political ecology and eco-criticism, as it is shaped in the crux of art, politics, socioeconomic demands, pedagogy and activism, beyond naive classifications, univocal readings and outdated strategies. The exhibition was designed by architect and artist Malvina Panagiotidi and it was accompanied by a virtual dumpsite, designed by Eva Papamargariti and Vassiliki Maria Plavou as an online parasitic body living in the PCAI site. (www.pcai.gr).

2. PCAI JUNIOR'S FIRST PROGRAM AT GEITONAS SCHOOL ATHENS AND RESULTING FILM LAS PTINAS

Believing that environmental consciousness should be cultivated at an early age, Polyeco Contemporary Art Initiative has designed an innovative educational program for schools in Greece and abroad. PCAI Junior, created in the summer of 2017, constitutes an educational platform that enables students to understand critical, ecological

issues that affect their place of residence.



The platform is based on experiential learning games that take place indoors and outdoors of the school, allowing children to learn through play. The activities, taking place within the framework of the platform, are location based enabling students to recognize the threats of their area of residence and develop environmental awareness. More specifically, the children are initially asked to study and comprehend an environmental threat, then to propose a solution and, finally, to capture their ideas in a short film.

Moving image is the primary medium to capture this process as it constitutes one of PCAI Collection's basic media. The final outcome of this process, i.e. the short film, becomes part of PCAI's moving image archive, forming a global ecological, short film collection made by children for children. In 2017, the first PCAI Junior program took place at Geitonas School in Voula; an area which is part of the Kesariani Forest and it is considered protected due to its natural wealth. The forest contains an ecosystem of 250 animal species and hosts 98 different types of migratory birds that use the place to rest before traveling to Africa.

This fact has actually been the source of inspiration for the original animated video *Las Ptinas* (8'45'') created by the 5th Elementary Class pupils and the experienced PCAI educational team.

3. ANGELO PLESSAS' EVERYTHING HAPPENS AS IT SHOULD AT THE INTERNATIONAL AIRPORT ATHENS



Incorporating social responsibility and environmental awareness, Athens International Airport and PCAI Initiative joined forces, to take passengers and visitors of Athens airport on a journey through art.

The digital installation by artist Angelo Plessas, entitled EverythingHappensAsItShould.com, presents an interpretation of two disparate realms like nature and media, while raising awareness about environmental degradation, which constitutes one of the biggest challenges of the 21st century. The work of art invites us to reflect on the energy that each of us consume while chatting on social media about nature itself.

Created by artist Angelo Plessas, EverythingHappensAsItShould.com is an installation specifically conceived for the passengers that everyday use the Athens International Airport. The installation is based on a website, everythinghappensasitshould.com, which consists of a virtual environment in which a birdlike figure gives life to many creatures that appear and disappear according to the presence of visitors around them.

When activated by the presence and movement of passers-by, these creatures tweet out clouds with messages that contain the word "nature". By doing so, the installation puts in evidence the interconnectedness between the physical world we move in and the digital one that permeates all the realms of our lives, in which all our steps and actions have an effect on the amount of data and information that is constantly being generated and circulating online.

4. A TRIBUTE TO THE PCAI COLLECTION AT THE 58TH THESSALONIKI INTERNATIONAL FILM FESTIVAL



PCAI presented ten of its moving image artworks at the Thessaloniki International Film Festival in the section Film Forward.

The screenings were accompanied by talks and discussions related to the films and PCA's vision.

This tribute to the PCAI Collection included works by *Eva Kotatkova*, *Loukia Alavanou*, *Agnieszka Polska*, *Eva Papamargariti*, *Saskia Olde Wolbers*, *George Drivas*, *Korakrit Arunanondchal*, *Natasa Efstathiadi* and *Sophia Al-Maria*.

THE SUPPORT refers to our engagement in other initiatives and individuals that share the same vision and concerns.

5. GEORGE DRIVAS' LABORATORY OF DILEMMAS 57TH VENICE BIENNALE (GREEK PAVILION)



PCAI supported artist George Drivas who represented Greece at the 57th Venice Biennale with his video installation *Laboratory of Dilemmas*, curated by Orestis Andreadakis. It constitutes a narrative video installation based on Aeschylus' *Iketides* (*Suppliant Women*), a play that poses a dilemma between saving the Foreigner and maintaining the Native's safety.

Addressing current global sociopolitical issues, the work deals with issues like the anguish and puzzlement of individuals and social groups when addressing similar problematics.

The Laboratory of Dilemmas focuses on the play's dilemma through found footage of an unfinished scientific documentary. The depicted experiment was never completed for unknown reasons and it is presented in the form of a Labyrinth of multiple video and sound sources that develop into a unique audiovisual experience. A number of acclaimed international actors and actresses, like Charlotte Rampling, Yorgos Kotanidis and Kora Karvouni, are participating in the videos.

George Drivas' work has received raving reviews and it has been included in the Venice Biennale's highlights by Aesthetica, Elle Décor and Architectural Digest magazine amongst others. George Drivas has also produced Kepler, the first video art commissioned by Polyeco Contemporary Art Initiative. Kepler was created on the occasion of the award of contract to Polyeco by the Global Environment Facility (GEF) for management of pesticides in Tbilisi Georgia 2014. It has been presented in more than 10 international art and film festivals.

6. DANAЕ STRATOU'S UPON THE EARTH UNDER THE CLOUDS AT THE AISXYLIA FESTIVAL 2017



PCAI supported Danae Stratou's installation titled Upon the Earth Under the Clouds that was presented from June to October 2017 at the Old Oil Mill of Eleusis, within the context of Aisxylia Festival 2017.

Upon the Earth Under the Clouds is a large-scale site-specific installation conceived for the Old Mill and the city of Eleusis. Using water and soil as its core materials and ceramic pots as its

dominant morphological feature, the work enters into a dialogue with the rich history of Eleusis, from antiquity to the long industrial history of the city and its present-day structure. Woven into its narrative are the myth of Demeter and Persephone, mortality, the notion of voyaging, the existential quest for a destination, and migration, not only as a defining feature of the city's history, but also as a repeated historical occurrence. Through this project, the artist aimed to connect past and present, using water as the conduit. Reflecting the sky above, the water's surface joins earth and sky, the out-of-reach with the tangible and, by extension, the imaginary and the real, mortality and the transcendent, the familiar and the unknown.

7. SUPPORT OF IMAGINED HOMES, THE 6TH THESSALONIKI BIENNALE OF CONTEMPORARY ART

PCAI supported the 6th Thessaloniki Biennale. The Thessaloniki Biennale of Contemporary Art, first inaugurated in 2007, was organised by the Greek State Museum of Contemporary Art and assumed the responsibility of bringing together Thessaloniki's various artistic sectors while simultaneously providing a further international voice to Greece's artistic scene.

Although tested by the current social conditions and the downsizing of available financial resources, the 6th Thessaloniki Biennale was to be executed using the Museum's own resources – its manpower and collaborative relationships– to take full advantage of the region's existing cultural capital, as well as the wealth of Thessaloniki's architectural heritage. The core aspiration of the 6th Biennale was to cultivate a model of co-curation, to diffuse contemporary art throughout the city, and to utilise synergies in Greece and abroad.

8. SUPPORT OF THE GARDEN SEES EXHIBITION AT THE ATHENS CONCERT HALL (MEGARON)



Polyeco Contemporary Art Initiative supported The Garden Sees exhibition that was presented in the Garden of the Athens Concert Hall (Megaron), from July 6th to September 17th, 2017.

The exhibition, curated by Anna Kafetsi, included installations, sculptures, text-sculptures, video projections, luminous and sound works in approximately 85 different spots of the Megaron Garden. The Artists: Zbyněk

Baladrán, Matthew Barney, Natalie Yiayi, Jorge Galindo & Santiago Sierra, Douglas Gordon, Katerina Zacharopoulou, Amar Kanwar, William Kentridge, Phanos Kyriacou, Andreas Lolis, Jenny Marketou, Kostas Bassanos, Shirin Neshat, Tim Noble and Sue Webster, Eleni Panouklia, Nikos Papadopoulos, Rena Papaspyrou, Rania Bellou, Pipilotti Rist, Danae Stratou, Maria Tsagkari, Maria Tzanakou, Nari Ward, Maaria Wirkkala.

The exhibition without the theological or metaphysical connotations that could be read in the borrowed title, seeks the connection -the conversation- of the Garden with the social space and the City, the transcendence of the boundaries of its physical reality and its opening to imagination.

9. ANGELO PLESSAS' WORK AT THE CLIMATE CHANGE CONFERENCE

PCAI participated at the 2017 Climate Change Conference that took place in Athens on July 4, with Angelo Plessas' digital installation "EverythingHappensAsItShould.com", after receiving an invitation by Boussias Communications, an independent business publishing and information company. The conference was organized by weekly digital Newsletter Plant.

Distinguished foreign and Greek speakers, experts and practitioners from a wide range of businesses, as well as representatives of ministries, energy management bodies, financial institutions and consultancy firms in Greece and abroad, presented specific opportunities and threats. The conference acted as an information and dialogue platform on the impact of climate change policies on businesses in all sectors.

PARTICIPATION OF EMPLOYEES

Polyeco's employees play a crucial part in the implementation and the dissemination of the initiative, actively helping the artists in both research and the creation of their projects, using all the means in their disposal. They also act as ambassadors of PCAI in their areas of activity. Polyeco Project Managers are in a continuous dialogue with PCAI's Director exchanging information and narratives about past, current and future projects.

The benefits from employee involvement have been recorded to be so substantial that through this growing new collaboration PCAI wishes to communicate to Polyeco employees that their participation in the Initiative through a number of different actions will eventually expose them to numerous different and creative ways of thinking.

SHARING

Apart from our own curated projects of the PCAI collection we accept loan requests from institutions and other professionals. So far we have accepted loan requests from many international institutions and festivals such as Cairo Video Festival, Alternative Film/Video Festival, Academic Film Center, Belgrade, Serbia, Kuala Lumpur Eco

Film Festival, Malaysia, Festival du nouveau cinema, Montreal, Canada, “Kino der Kunst”, Festival and Group Show, Munich, Germany, “ECU”, European Independent Film Festival, Paris, France, Glasgow Short Film Festival, Glasgow, UK, Athens International Film Festival, Athens, Greece, Panorama of Ecological Films, Society for the Environmental and Cultural Heritage, Athens, Greece, The House of Cyprus: Cultural and Educational Office of the Embassy of the Republic of Cyprus in Greece, Mu.ZEE Museum Ostend, TILT Platform, Greece.

TARGET AUDIENCE

Having as an ultimate goal the creation of environmental consciousness and culture, PCAI does not address a specific audience. On the contrary, it wishes to connect audiences through art. Adopting the principle that environmental protection is a common responsibility and can only be achieved with collective effort, our initiative addresses each and every one, trying to communicate through art the challenges that threaten nature and the consequences that are caused by the over exploitation of natural resources and human intervention, when there is no respect for the environment. However, special emphasis is given to the creation of environmental awareness among young people, which on the one hand will suffer more from the consequences of environmental degradation and on the other hand will be called to disseminate their culture to future generations.

WORK IN PROGRESS

PCAI is destined to mirror Polyeco’s growth. Its activities are on par with the success of the company.

For the next year we wish to:

1. Develop an increasing activity around our growing Art Collection. In 2018 we are planning to collaborate with the Contemporary Art Center in Thessaloniki and the State Museum of Contemporary Art in Thessaloniki and co-produce a video art exhibition focusing on urban, environmental and social resilience and sustainability under the title Resilient Future.
2. Expand our educational program to other schools in Greece and abroad and develop affiliations with other organisations and institutions
3. Expand our animated film library and promote our first educational film to film and kids festivals.
4. Present our Collection abroad and collaborate with Museums, Institutions, Festivals and Organisations that share our vision and goals
5. Further our support to artists and art institutions and expand our affiliation program and synergies.
6. Design and Implement an artist-in-residence program that would invite contemporary artists to stay in Athens and create new works inspired by PCAI’s vision and goals.
7. Involve more of our employers; enhance our engagement program promoting the role of art in the workplace stimulating productivity, innovation and open-mindedness
8. Commission and engage local artists in countries where Polyeco operates and further address our stakeholders and the local communities we offer our services to, especially those in parts of the world who are experiencing a form of cultural isolation. PCAI wishes to engage them in a creative dialogue and in some cases promote their artistic voices
9. Enhance our social impact and interaction with local communities and pose issues that concern environmental policy in local, regional and national level

10. Attract support from other initiatives and institutions. Currently PCAI operates exclusively through Polyeco's means and resources. Our aim is to be able to generate more financial support in order to expand our program and activities
11. Be recognized for our effort to make a lasting contribution to all the countries that trust its services

CHALLENGES

PCAI was inaugurated at a time of national financial turmoil and has managed to progress and establish strong foundations that ensure that it will stand in time in order to continue to benefit, support and inspire a number of different audiences. PCAI has undertaken commitment programs that require time and effort from a great number of people.

2017 HIGHLIGHTS

During 2017 we had the opportunity to communicate our activities and mission to very diverse and interesting audiences. Our highlights include:

1. Paratoxic Paradoxes Exhibition at the Benaki Museum, Athens
2. PCAI JUNIOR's First Program at Geitonas School resulting in Las Ptinas Film
3. Presentation of Angelo Plessas' work Everything Happens As It Should at the International Airport Athens
4. A tribute to the PCAI Collection at the 58th Thessaloniki International Film Festival
5. Support of George Drivas' Laboratory Of Dilemmas at 57th Venice Biennale (Greek Pavilion)
6. Support of Danae Stratou's Upon The Earth Under The Clouds at the Aisxylia Festival 2017
7. Support of the 6th Thessaloniki Biennale of Contemporary Art titled Imagined Homes
8. Support of the Garden Sees Exhibition in the Athens Concert Hall (Megaron)
9. PCAI Participation in the Climate Change Conference with Angelo Plessas' work Everything Happens As It Should
10. Loans and collaborations with institutions and festivals in Greece and abroad, such as the Mu.ZEE Museum Ostend and TILT Platform, Greece

5. HUMAN RIGHTS

Principle 1

“Businesses should support and respect the protection of internationally proclaimed Human Rights”

Principle 2

“Make sure that they are not complicit in human rights abuses”

5.1. Assessment, Policy and Goals

It is a company's public expression of its commitment to meet its responsibility to respect internationally recognized human rights standards. At a minimum, this means the rights set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.



Respecting human rights is a fundamental part of Polyeco's responsibility as a company and is vital to operate our sustainable business. We are committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We seek to avoid complicity in human rights abuses and to use our influence to promote the fulfilment of human rights.

Our commitment to operating with respect for human rights is reflected in all aspects of Polyeco's business operations and is integrated in our company policies and relevant procedures. We aim to identify, assess, and manage the human rights impacts of our business activities based on the operational context, our leverage and business relationships.

Polyeco looks to those human rights defined in the Universal Declaration of Human Rights and its two corresponding covenants, The International Covenant on Civil and Political Rights and The International Covenant on Economic, Social and Cultural Rights. Additionally, we also look to children's and women's rights as outlined in the United Nations Convention on the Rights of the Child and the United Nations Convention on the Elimination of Discrimination against Women.

Polyeco's approach to its business operations is in compliance with the ILO International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, The Children's Rights and Business Principles, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact, to which we are signatories. In this context, Polyeco has developed and implements a human rights policy, according to which the company commits to align its operations and strategies with the universally accepted principles in the areas of human rights. Polyeco's Human Right Policy is integrated within the company's standards literature of Code of Ethics and Business Conduct.

Polyeco Human Rights Policy

- ❖ We respect the human rights of our employees, our contractors and community as established by the UN A/RES/3/217 Universal Declaration on Human Rights and in the ILO's Declaration on Fundamental Principles and Rights at Work, including non-discrimination, prohibition of child and enforced labour, and freedom of association and the right to engage in collective bargaining.
- ❖ There is no discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement.
- ❖ No use or support for forced or compulsory labour; no required 'deposits' - financial or otherwise; no withholding salary, benefits, property or documents to force personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.
- ❖ No interference with exercise of personnel tenets or practices; prohibition of threatening, abusive, exploitative, coercive behavior at workplace or company facilities; no pregnancy or virginity tests under any circumstances.
- ❖ We treat all personnel with dignity and respect; zero tolerance of corporal punishment, mental or physical abuse of personnel; no harsh or inhumane treatment.
- ❖ We respect privacy and properly manage and use the Personally Identifiable Information (PII) that our partners and employees in Polyeco, as well as our prospective or former employees, entrust to us.
- ❖ PII is defined as any information that directly identifies an individual - such as name, physical address, email address, employee ID, government ID, photograph, or any combination of information that might identify an individual.
- ❖ We do not share this information with anyone, either inside or outside our Company, who does not have a legitimate business need to know. In addition, we take steps to properly secure such data at all times from unauthorized access by third parties.

Goals:

- To trigger in-house human rights learning, management capacity and leadership the very process of developing a human rights policy can have positive managerial spinoffs.
- To raise awareness and understanding of the company's human rights impact across departments.
- To build leadership commitment around human rights so that there was political support inside the company for resources to be assigned to policy implementation.
- To generate in-house managerial capacity, insights for future priorities and enthusiasm around the topic.

Commitments:

To promote specific measures to support our staff facing complex family situations, particularly in the cases of serious illness among the members of their families. We believe this is an important initiative, particularly in a moment of economic recession and crisis of the Greek State Social Welfare where families are more vulnerable and exposed to the lack of protection by the state.

To continue to integrating the SA8000 standard into our management systems and practices through an evidence-based process, focusing on the comparison of the quality of life between our people and the community and to obtain a SA8000:2014 accreditation.

Our goal is to go beyond simple compliance by voluntarily obtaining the Social Accountability International Standard (SA8000) certification based on international human rights and labour conventions by 2018, to credibly demonstrate to all of our stakeholders and interested parties that existing company policies, procedures, and practices conform to the requirements of this standard.

5.2. Implementation

Our Code of Ethics and Business Conduct is the main tool to which a greater visibility and knowledge is given in order to make our position towards human rights clear to each of our stakeholders, both internal and external. A copy of our Code of Ethics and Business Conduct is made available to all our employees, contractors, supply chain, and other stakeholders in our headquarters and on our corporate website.

Our harassment policy, which is part of our Code of Ethics and Business Conduct, contains multiple reporting means by which a person can report harassment or any other abuse of our Code of Ethics and Business Conduct or human rights protection policy and protect the anonymity of the senders of reports. We track all such reports and investigate as the case warrants.

Our company operates in full compliance with the Greek Law regarding human rights and the Labour legislation on all of its activities, as well as the local laws and legislations of all other countries in which we operate.

These, among other regulations, forbid all forms of forced and compulsory labour, provide employees the freedom and the right to resign from their work voluntarily and reward extra hours of work with additional payment. We are against any form of child labour in all of our operation in Greece and abroad and we require the same from our contractors and supply chain.

Polyeco is fully committed to the concept and practice of equal opportunity in all aspects of employment. We hire the best and encourage them to achieve their best in a manner consistent with our core values and ideology.

This Code of Ethics and Business Conduct applies with no exceptions to all members of the Board of Directors and all Polyeco's employees. Contractors, suppliers, free lancers, business partners and other third parties are also expected to adhere to this Code when dealing with or acting on behalf of Polyeco.

With this Code Polyeco makes its expectations to employees and management clear and explicit.

5.3. Measurements of Outcome

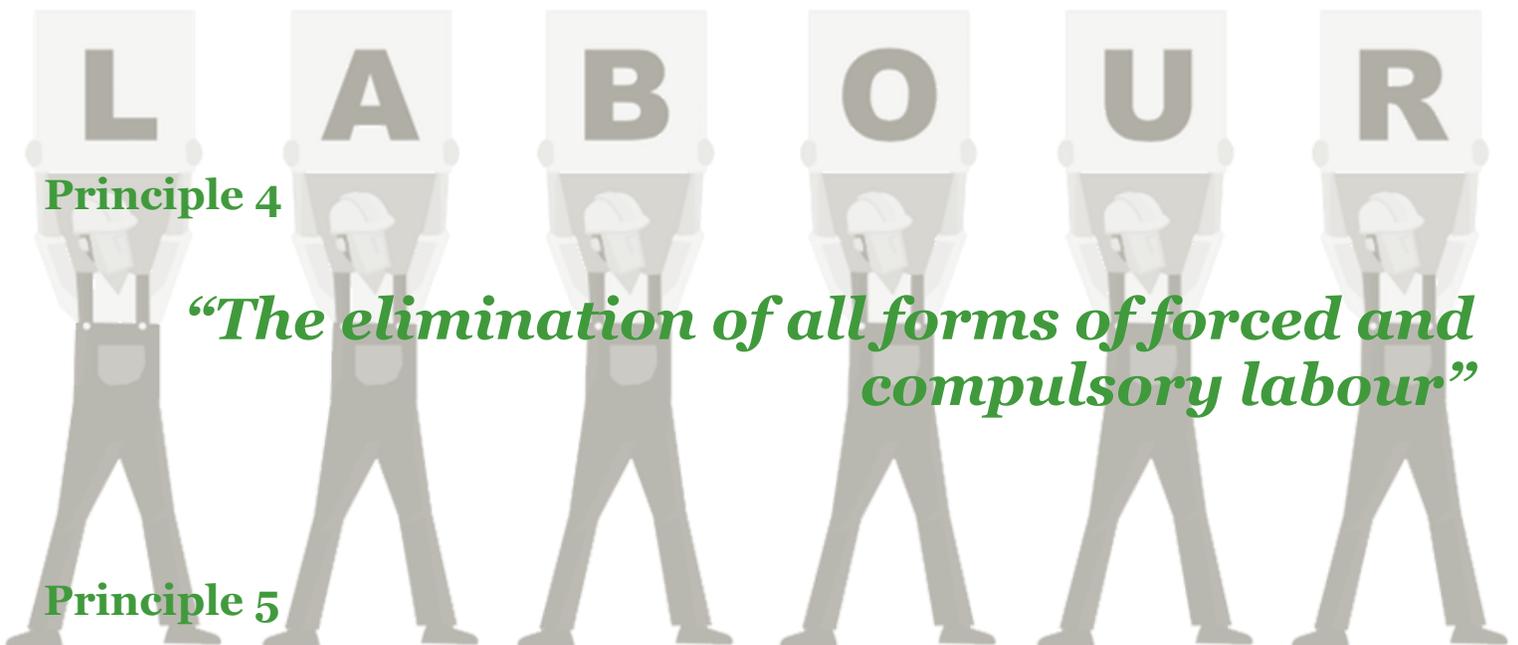
Polyeco's Group of Companies has no track record with incidents of human rights violations. Success in this field is generally measured by the lack of reports of violations of policy or law regarding the human rights and, to date, there have been no reported violations in Polyeco, nor within the group of our parent and sister companies nor from our contractors. Should a violation be reported, we will undertake a thorough investigation.

Polyeco implements specific procedures for reporting and investigating near miss incidents, which include Human Rights violations. Near miss incidents reports are reported and investigated on a weekly basis. To date, there have been no near miss incidents involving Human Rights violations have been reported within Polyeco's activities nor within the group of our parent and sister companies nor from our contractors.

6. LABOUR

Principle 3

“Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining”



Principle 4

“The elimination of all forms of forced and compulsory labour”

Principle 5

“The effective abolition of child labour”

Principle 6

“The elimination of discrimination in respect of employment and occupation”

6.1. Assessment, Policy and Goals

Being by definition a company having sustainability at the heart of our business and servicing blue chip clients, NGO's, UNIDO, UNEP, UNPD and the World Bank our main focus is in leveraging the dynamics and structured synergies between the sister companies of our group to persevere the promotion and implementation of a management approach coherent with all the UN Global Compact principles.

Our company complies with the Greek Labour Legislation on all of its activities, as well as the local laws and legislations of all the countries in which we operate.

Among other regulations, these forbid all forms of forced and compulsory labour, give to employees the freedom and the right to resign from their work voluntarily and reward extra hours of work with additional payment. We are against any form of child labour in all of our operation in Greece and abroad, and the same we require from our contractors and supply chain.

The foundation of our approach lies in two key documents: our Code of Ethics and Business Conduct and our Workplace Policy Handbook. Both are influenced by the United Nations (UN) and International Labour Organization (ILO) declarations.

Together, they describe our high standards and expectations, addressing such subjects as child labour, forced labour, freedom of association, discrimination, health and safety, hours of work and Human Rights.

Our Code of Ethics and Business Conduct and our Workplace Policy Handbook, apply to all entities in which Polyeco S.A. owns a majority of interests. Implementing the United Nations Guiding Principles on Business, labour and human rights in our corporate context we use three primary components:

- a. **Our Code of Ethics and Business Conduct**, a key document used as a framework for respecting human rights in our business context influenced by UN A/RES/3/217 Universal Declaration
- b. **Our Workplace Policy Handbook**, influenced by the Greek Labour legislation, the UN A/RES/3/217 Universal Declaration of Human Rights and International Labour Organization (ILO) declarations
- c. A due diligence process to identify, prevent, mitigate and be accountable for labour and human rights abuses

Occupational Health and Safety Management

We are measured by our ability to safeguard the health, safety and welfare of our people. Polyeco S.A. is committed to achieving excellence in providing a healthy and safe working environment and to supporting environmentally sound practices in the conduct of its activities.

Recognizing the social and economic dimension of the occupational accidents Polyeco S.A. has developed and applied a comprehensive and effective Safety & Health Management System according to OHSAS 18001 standard and The Health and Safety at Work etc Act 1974 requirements.

IN THE WORKPLACE

The workplace is a strategic entry point for freeing society from discrimination.

Combating discrimination at the workplace can help reduce disadvantages, such as in education, resulting from inequity that people may have suffered at earlier stages in life. When the workplace brings together workers of different races, sexes and ages, for example, and treats them equally, it helps build a sense of common purpose. By doing so, it defuses stereotypes and prejudices that are at the heart of discrimination.

Polyeco introduces measures to promote equality, being aware of the diversities of language, culture and family circumstances that may exist in the workforce. Managers and supervisory staff seek to develop an understanding of the different types of discrimination and how it can affect the workforce.

Polyeco treats all employees fairly, ethically, respectfully and with dignity. Polyeco offers equal employment opportunities without any distinction based on age, gender, sexual orientation, disability, race, religion,



citizenship, marital status, family situation, country of origin or other factors, in accordance with the laws and regulations of each country where it operates.

The selection, recruitment and remuneration of our personnel are based on their qualifications, skills, work experience, and on personal interview without gender, age, family status or other discriminations. Wages offered by the company are equal or greater than the minimum rates applicable for each job position. It is our policy, in accordance with all applicable laws, to recruit, hire, train and promote person in all job titles without regard to race, sex, religion age, disability, nation origin, or any other characteristic protected by applicable law.

Within company operations and cooperation with other businesses, we ensure that employment contracts are provided to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or termination of work.

Polyeco respects the freedom of association and the right of all employers and workers to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests.

Child labour is an essential concern for Polyeco. In this context, we use adequate and verifiable mechanisms for age verification. We ensure the adherence of minimum age provisions of national labour laws and regulations, especially in countries with Low Human Development Index, where Polyeco executes many of its projects.

6.2. Implementation

To prevent any potential human and labour rights violation we have made available complain boxes in our headquarters and depending on the violation corrective action, the company may take the reassignment of duties and in severe cases separation from the company of the person that committed such violation.

Failure to respect the letter or the spirit of Polyeco's Code of Ethics and Business Conduct or the law of the country, may lead to disciplinary measures commensurate with the violation, including termination of employment and other criminal penalties such as fines and jail sentences.

Day to day responsibility is delegated to all senior management of the regions, categories, functions, and operating companies of the Group. The responsibilities of Polyeco managers include and go beyond those of other employees. In every unit, senior management is responsible for instilling these values and ensuring that the corresponding principles are applied. They are responsible for implementing these principles, if necessary through more detailed guidance tailored to local needs and are supported in this by the Board of Directors.

Compliance with the Code is subject to review by the Board supported by the Corporate Responsibility and for financial and accounting issues by external Audits.

Through our Code of Ethics and Business Conduct it has been made clear to our employees and contractors and any other people involved in our supply chain that any breach of the code must be reported in good faith to our senior management and/or the Chief Legal Officer, by regular post, complaint box or email, having the right to remain anonymous, although we do not recommend it, and that all inquiries will be handled promptly and discreetly.

Working Hours

Compliance with laws & industry standards; normal 5 day work week, not including overtime, and maximum work week not exceeding 48 hours; and at least 1 day off following every 6 consecutive work days, with some exceptions; overtime is voluntary, not regular, not more than 12 hours per week required overtime.

Remuneration

Our primary responsibility is the protection of all our employees, their corresponding salaries and fringe benefits in a time that most of our competitors are laying-off staff and decreasing salaries. We ensure that our employees are paid well, at the least legal minimum wage; sufficient to meet basic needs, have access to affordable benefits, and work in a safe environment.

Wages and benefits are clearly communicated to workers; paid in convenient manner -cash or bank deposit; overtime paid at premium rate; all employees receive a wage receipt with an analysis of their payment that include, any overtime payment, tax and social security deductions. We do not make use of false apprenticeship schemes to avoid legal obligations to personnel.

Employee wellbeing

The wellbeing of our employees is a key component of our corporate values and sustainability. We have strengthened and expanded support initiatives for employees offering them benefits beyond the statutory minimum, to help them cope with balancing work and family commitments. We also actively protect motherhood and parenthood in our company through flexible labour regime, without any loss of benefits, for up to 12 months, as well as to our employees caring for elderly family members or family members with serious sickness. We have also established a leave/short working hour system for employees caring for family members with special needs rated over 80%.

Occupational Health and Safety Management Implementation

Polyeco commits to comply with all the applicable legislation for Health and Safety (H&S) and welfare of their employees, or any other person in or near the site of the works and of members of public throughout the duration of the works. In addition to the applicable legislation, the European best practice is applied in case the legislation is not considered enough. In order to achieve effective health and safety protection, the co-operation of all Polyeco employees, as well as subcontractors, involved in the project is required.

Each member of staff must regard health and safety as an integral part of all the works undertaken. The views of interested and affected stakeholders, both internal and external, e.g. the Ministry of Environment, will be evaluated during the constant revision of Quality, H&S and Environmental policy.

POLYECO staff is encouraged to demonstrate a continuous commitment to health and safety performance, as well as compliance with all statutory requirements for H&S. The H&S system shall cover all the activities of POLYECO.

IMS Sytem

An integrated IMS manual has been developed to ensure product and service quality continue to meet the highest standards demanded by POLYECO and expected by its customers; ensure products, processes and services are carried out in an environmentally responsible and protective manner; provide a safe and healthy work environment for its workforce and other interested parties; ensure conformity with legal and other requirements applicable to POLYECO's Operations and ensure the performance of internal audits in order to ensure the effectiveness of the System.

The H&S provisions are integrated in the IMS manual, describe the H&S Management System of POLYECO and provide linkage to all management system documents. The integrated manual covers the following documentation and H&S procedures:

- Objectives of the H&S system, field of coverage, general requirements
- H&S Policy
- Planning for Risk Assessment, Legal requirements
- Requirements by clients
- Organization chart, structure and responsibilities allocation
- Appointment of Quality, H&S and Environmental Officer
- Appointment of Dangerous Goods Safety Advisor
- Appointment of Technical Safety Officer
- Competence, Training & Awareness
- Documents & Records Control, Subcontractor management
- Special Health & Safety guidance on : maintenance activities, fire protection, manual movement of loads, machinery operation, chemical substances, safety signs, PPE
- Control, monitoring, corrective actions
- First aid, medical inspection of personnel

POLYECO implement and maintain a process for periodically evaluating compliance with legal requirements and other requirements each country where operational activities are taking place. These requirements relate to the environmental, health, safety and quality aspects of its processes, products and services and are applicable to all persons working for or on behalf of the organization. Results of evaluation are recorded and reported to management for review and direction of actions when required.

Polyeco's first priority is personnel's safety. To ensure the Safety of our employees we act preventively, conducting training sessions before commencement of the works and daily toolbox talks to all involved personnel.

To prevent accidents and disasters such as explosions, fires, and leaks/spills of hazardous substances, we adhere strictly to disaster prevention management standards, and we are committed to preventative action/ recurrence prevention including earthquake countermeasures.

- We focus our attention on the Health and Safety of our employees
- We Implement safety leadership programs including regularly undertaking audits and workplace site inspections of our operations; and empowering all employees and contractor to cease work when there is a threat of safety;
- Prior to employment, a prospective employee may submit to a D&A test. During employment, each employee may be randomly tested for alcohol and/or drug abuse. Contractors are also obliged to conform the D&A Policies of Polyeco prior to undertaking work on behalf of Polyeco. In the event of an incident, each key person may be automatically tested for D&A, if required This duty extends to matters including the maintenance of plant; assessing the potential risks to employees' health and safety; hazard identification; systems of work; the arrangements for the use, handling, work equipment and workplace environment, storage and transport of articles and substances; information and training.

The Chief Technical Officer oversees all our operations, engineering, research and development, and Environment, Health and Safety functions. The global EHS team develops standards, provides expertise and facilitates best-practice sharing across Polyeco, while on-site Technical Officers and EHS staff is accountable for their EHS performance throughout our worksites globally.

All employees and contractors are required to:

- Carry out their work in accordance with Polyeco's safety policies, processes and procedures;
- Not use, possess, distribute or sell, alcoholic beverages, illicit or controlled drugs not prescribed by their doctor, drug paraphernalia in the workplace and whilst performing duties for, or on behalf of, Polyeco S.A.;
- Stop work where there is a threat to their or others' safety;
- Be accountable for their own safety, and that of others; "SLAM" - Stop, Look, Assess and Manage the hazards and risks inherent to the activities they undertake;
- Report any hazards or identified risks and all incidents that cause actual or potential injury or damage;

Polyeco S.A. assumes that every employee will make every reasonable effort to fulfill his responsibilities and obligations, responding to the company's commitment contributing to the implementation of this Policy.

With the satisfaction of the above conditions Polyeco S.A. aims to eliminate as far as is reasonably practicable, each potential hazard or/and hazardous situation that might damage the human health or the environment.

Polyeco is certified according to OHSAS18001 international standards, ensuring the continuous improvement of our EHS system.

KPIs

KPI's are developed and incorporated in the IMS in order to identify and grade our main waste management activities on the site and to follow-up and communicate our Health and Safety improvements. These KPIs are the accepted criteria for measuring our company as a service provider. Polyeco has established KPIs regarding incidents, accidents, near misses per working hour in our facilities and in all sites we operate. Accordingly, we inform the client of the possible safety precautions that need to be implemented in order to avoid risk for safety at work.

Standard Operating Procedures

Similar work activities produce a basic 'model' risk assessment reflecting the core hazards and risk associated with these activities. Such 'model' risk assessments form the Standard Operating Procedures (SOPs) and are applied in every workplace, when they are appropriate to the specific type of work. The SOPs are adapted to the actual work situations of the current project. These SOPs form part of the Health and Safety Plan and will be communicated to all personnel on site.

Apart from the Standard Operating Procedures (SOPs) also Safety Procedures (SPs) are established in order to secure the safety of activities such as: Task Risk and Environmental Impact Assessment, New Employees, Contractors & Visitors Induction, Health & Safety Awareness, Communication, Participation & Consultation, HAZCOM, COSHH, Contractors Evaluation & Responsibilities, etc.

Emergency Response Plan

The Risk Assessment forms the basis of the Health and Safety Management System and provides a systematic approach in order to identify potential health and safety hazards and appropriate control measures to ensure a safe place of work. All information arising from the Risk Assessment of the project will be placed on file and communicated to all members of staff included in the project and will apply to all stages of the project, from the commencement stage to the project delivery.

The following is fully considered to undertake and complete the risk assessment:

- Identify hazards;
- Identify those people who might be affected whether employees or 3rd parties;
- Evaluate the risks and identify precautions and control measures;
- Brief project staff;
- Inform project staff of any revisions.

POLYECO maintains an emergency response and preparedness procedure to identify the potential for and to respond to accidents and emergency situations. This procedure is also meant to prevent and/or mitigate associated environmental, safety and health impacts.

The procedure is tested (as appropriate) with the participation of all employees.

Medical Follow Up of Employees

In our headquarter facilities at Aspropyrgos, we have an occupational physician and first aid facilities to provide medical support participating in our Health Safety & Health Management System, and periodically distributing health-related information.

Preventive checks and vaccines

Moreover, we provide employees with assistance for flu vaccinations, and try to prevent transmission by offering all employees the opportunity to get vaccinated at work. For our employees working overseas, in addition to services in health consultation by an occupational nurse, we provide all necessary support and physical examinations by partner medical institutions versed in health management for persons from other countries and preventive vaccinations for the particular host country or region.

Training and inspection

We offer a wide range of relevant vocational, technical and waste management training programs to our staff. From ADR Drivers Training Certificates to DGSA Dangerous Goods Safety Advisers certificates as standard, systematic training forms an essential part of Polyeco technical approach to allow our personnel to perform their roles competently and safely. The Chief Technical Officer oversees all our operations, engineering, research and development, and Environment, Health and Safety functions. The global EHS team develops standards, provides expertise and facilitates best-practice sharing across Polyeco, while on-site Technical Officers and EHS personnel in our global worksites are accountable for their EHS performance.

During 2017, our employees participated in targeted and specialized training programs, based on the risk assessments, on Health & Safety, Environment and Quality. In addition, they also participated in seminars and conferences in order to remain updated and enhance their knowledge.

Operational Safety

The qualification focuses on international standards and management systems, enabling students to effectively discharge workplace safety responsibilities both onshore and offshore. It covers health, safety and environmental management in context, hydrocarbon process safety, fire protection and emergency response, logistics and transport operations.

6.3. Measurements of Outcome

Polyeco's Group of Companies has no track record with incidents of labour rights violations.

Our certified with ISO 9001:2008 quality management system incorporates two processes (one internal and one external) that provide all information required to measure the outcomes.

On the internal front, the Human Resources process provides information on our compliance with the requirements of the ISO 9001 standard, which are fully on-line with the human and labour rights principles, manpower planning, selection process and recruitment.

On the external front, the procedure of the selection of suppliers and contractors makes sure that our partners also comply with the same principles we follow.

Greek Labour authorities are monitoring and audit Polyeco with regular procedures according to the Greek legislation. Polyeco has no track record with incidents of violations of labour principles or legal cases, rulings fines or other relevant violations of labour principles. Also, Polyeco S.A. is implementing all required measures for the prevention of work accidents.

No human and workplace rights complaints regarding harassment, discrimination, child or forced labour were received by Polyeco's senior management during 2016 and we found no issue where freedom of association had been denied.

Work in Progress

In October 2017 we formed a special committee designated to prepare Polyeco's compliance with the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), which will be valid up to 25 May 2018. A specific time table is established in order to train and inform all our employees about their Human rights use.

7. ENVIRONMENT

Principle 7

“Businesses should support a precautionary approach to environmental challenges”

Principle 8

“Undertake initiatives to promote greater environmental responsibility”

Principle 9

“Encourage the development and diffusion of environmentally friendly technologies”

7.1. Assessment, Policy and Goals

Polyeco S.A. is a modern and dynamic enterprise providing integrated sound waste management, with products and services that relate to the environment's protection addressed to various business sectors and industries. The overall activity of the company is to identify and understand the hazards inherent to the activities we undertake and effectively assess control and manage those risks.

Polyeco also provides on-site hazardous and non-hazardous integrated waste management solutions, decontamination, site remediation and building capacity, to its client's facilities and by conducting client's personnel training and assessments.

Through its operations Polyeco helps environmental protection, conserves natural resources,, public health and public interests. We take reasonable steps to preserve the environment through responsible practices to minimize the environmental impact of our operations by complying with all applicable laws, guidelines and waste management industry standards.

We keep our processes and services as "clean" as possible, this means that all our facilities are already certified under the EMAS environmental management standard. The continuous improvement of our services is translated into direct benefits for the environment.

We have developed an Environmental Management System in full compliance with the requirements of the international standard 1221/2009/EC (EMAS) through which it is documented that products and services provided by Polyeco contribute to the protection of the environment. The scope of the system is the sound management of hazardous and non hazardous waste.

Our certified with ISO 17025:2005 Laboratory is responsible for waste sample analysis and classification. Our Quality Control department produces treatment recommendations control forms and other legislative documentation. Additionally, the department can advise our customers on all hazardous waste regulatory issues, providing specialized industry knowledge and guidance.



Policy

Polyeco recognizes its responsibility towards the Environment, the Health, Safety and well-being of its personnel and people affected by its activities.

Also aware of its responsibilities and duties towards its shareholders and stakeholders, Polyeco is committed to internationally recognized health, safety and environmental standards. Polyeco will act in an ethical and socially responsible manner with ambition to avoid negative impacts, enhance positive effects and contribute to sustainable development. This HSE policy applies to all activities of Polyeco from conceptual design to operations; its principles apply to all personnel working on behalf of Polyeco whether as employees, contractors or suppliers.

Polyeco is committed to:

- Integrating HSE in business performance and demonstrating HSE importance through hands-on leadership and behavior
An ongoing focus on improving HSE performance
- Ensuring safe operations that protect our people, the environment, communities and assets.

Our Environmental policy is achieved through the implementation of our Environmental Management System, which consists of:

- Commitment to collaborate wherever possible with companies that have developed an environmental management system;
- Savings on non-renewable natural resources and energy in all its business;
- Continuous education of employees;
- Continuous updating of clients and partners;
- Continuous monitoring of legal and other regulations and requirements related to environmental issues

All matters relating to the protection of the environment are under the responsibility of the Environmental and Quality Control Officer.

Technical Environmental Standards

Facilities are designed, constructed and operated to minimize energy consumption, emissions to air, discharges of liquid effluents and waste generation.

Polyeco works systematically to reduce the environmental footprint of each project. Facilities are located and operated in such a way in order to minimize physical and ecological impacts.

Environmental Key Performance Indicators (KPIs)

The company has evaluated the environmental aspects in which the company's activity has possible environmental consequences and has established a set of measurement targets.

Those are:

- Electricity consumption
- Suspended Particulate Matter
- Noise
- Liquid waste from rainwater in circulation and storage areas
- Hazardous and non hazardous waste leakage risk
- Risk of explosion or fire
- Water Consumption
- Paper consumption
- Hazardous materials storage
- Emissions of air pollutants (Volatile Organic Compounds – VOCs)

The above mentioned are monitored internally and by external audits (Certification Bodies).

Polyeco conducts Particulate Matter and Volatile Organic Compounds Measurements at emission points, as well as Liquid Waste Measurements, which are carried out by Polyeco's accredited laboratory. Polyeco also monitors the levels of Environmental Noise within its facilities.

In addition to the above evaluation procedure, Polyeco S.A. has developed environmental programs, setting specific goals, invests in environmental projects and implements the best available environmental techniques and practices for achieving continuous improvement.

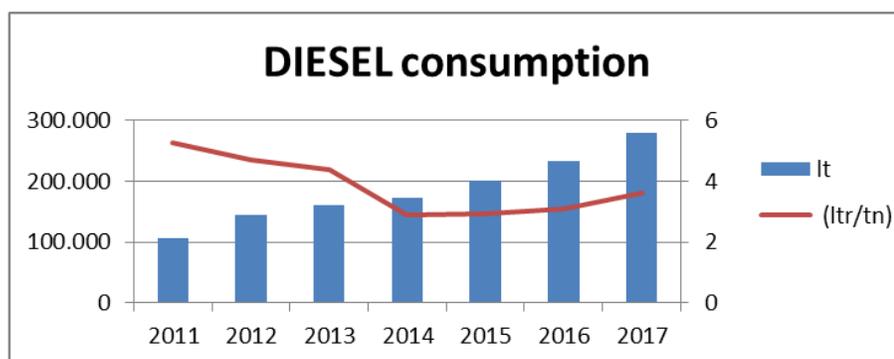
Indicatively, Polyeco monitors the Consumption of Resources within its facilities and takes appropriate measures in an effort to reduce the effects that arise from the use of electrical and electronic equipment, toners/inks, lamps, batteries, lubricants and packaging materials.

Adopting efficient strategy in this field, Polyeco contributes to the conservation of natural resources, reducing operating expenses and raising employee environmental awareness. "Reduce, Reuse and Recycle" is one of Polyeco's fundamental principles, implementing longstanding and active waste reduction and recycling programs. More precisely, our top priority is to reduce waste generation in the first place and the second priority is the reuse and recycling of materials, whenever this is possible.

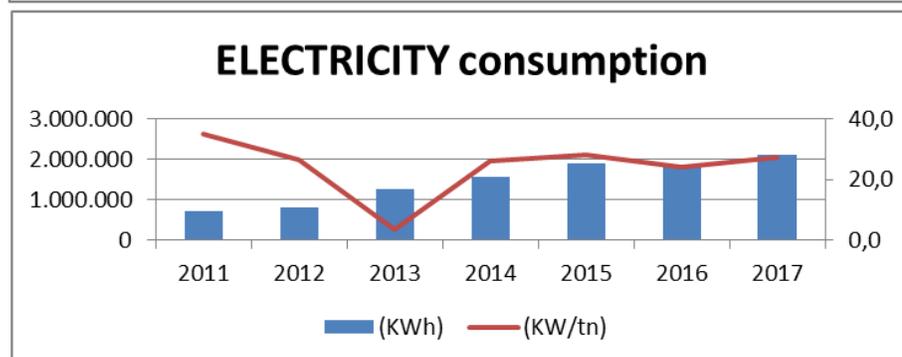
7.2. Implementation

We implement our Environmental Management System aimed at achieving long-term goals and protecting the environment from hazardous materials.

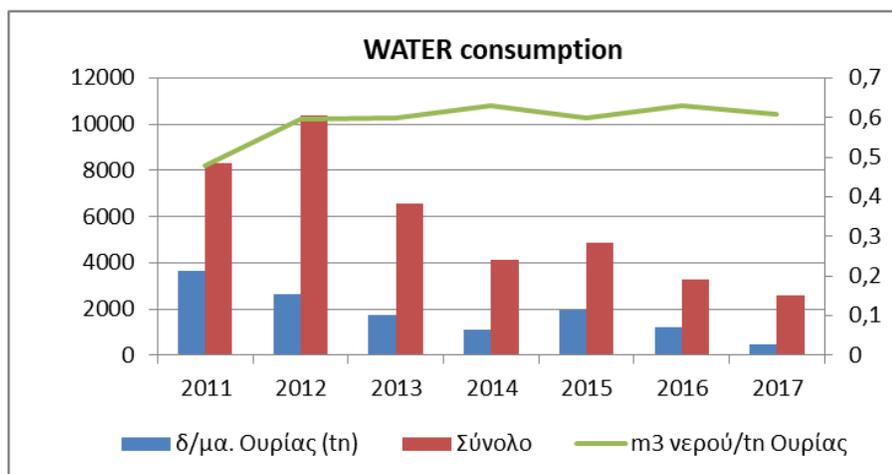
Within its activities, Polyeco S.A. bounds and guarantees the implementation of the agreed actions with its customers, applying the National and International Legislation, with view the environment's protection from any form of its burden.



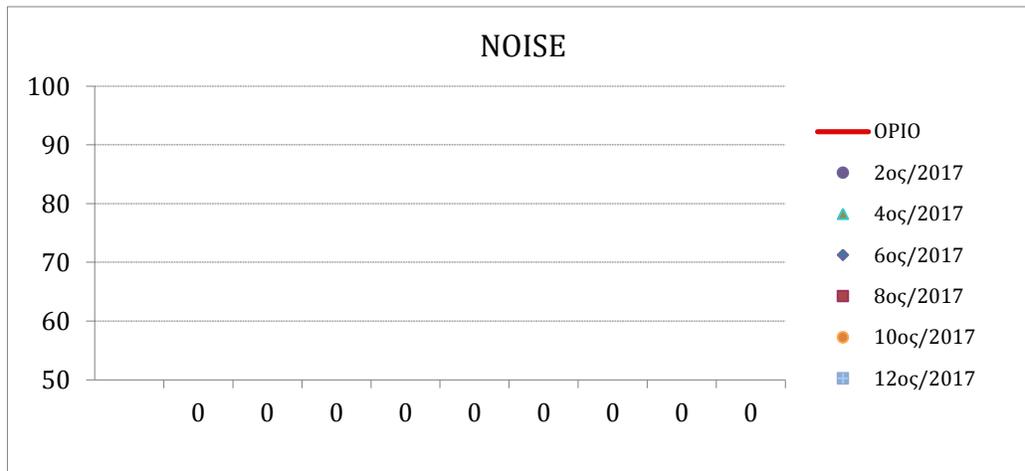
One of our prime duties is to control and mitigate risk at all of our operating sites. Our safety performance is a key part of the relationship with our customers, who rely on us to maintain the high level of operational integrity at all times.



Each site is subject to routine inspections by Polyeco's safety professionals and we work closely with our contractors to ensure that they always meet our own high standards.



In full compliance with EMAS Regulation, Polyeco S.A. constantly monitors the basic environmental indicators measuring: water consumption, electricity consumption, greenhouse gas emissions and total annual emissions of air pollutants (NO_x, SO₂, and particulate matter) that arise from the company's activity.



2017 NOISE Monthly Measurement points						
	dB(A)					
	February	April	June	August	October	December
Σ1	55	54	61	65	59	52
Σ2	65	63	60	52	58	58
Σ3	60	63	61	59	60	65
Σ4	58	64	63	58	55	64
Σ5	61	63	57	59	63	55
Σ6	58	63	52	57	63	64
Σ7	56	61	63	55	53	56
Σ8	62	53	62	57	63	52
Σ9	60	56	62	60	55	58
AVG	59,44	60,00	60,11	58,00	58,78	58,22
Typical declination	2,91	4,14	3,35	3,37	3,61	4,78

ENVIRONMENTAL PROJECTS AND TARGETS – SUMMARY

PROJECTS 2017

Scope	Target	Programme	TARGET completion In %	DATE START/END
1. Training /sensibilisation of all personnel	Training in Environmental Management issues 14 different environmental issues	<ul style="list-style-type: none"> -Training program -Contents 1.Environmental Policy 2.Recycling , reduce the consumption of energy , water etc 3.Analysis of the opportunities of improvements coming from the personnel 4. Employee participation in proposals on the improvement of the Environmental Management System 5. Employees are informed of the updates of the Environmental Management System 	100	01.01.2017-01.01.2018
2. Measurement of particles in air SPM (Aspropyrgos)	Check the particles in the air to be <15 mg/Nm ³	<ul style="list-style-type: none"> In order to minimise the environmental impacts from the site activities we installed and operate : -Special dust collection machinery in order to release max 15 mg/Nm³ -Appropriate dust collection system in the Iron Sulphate Department . -Special machinery to reduce dust release from the packaging mat.in solid fuel department. -Released particles measurement in the production of the Alternative solid Fuel 	100	continued
3.Liquid waste Analysis (Aspropyrgos)	Quality control of rejected liquid wastes	To be under the Legal limit .Measures to be more frequent than Legal requirements	100	continued
4.Noise measurement (Aspropyrgos)	<ul style="list-style-type: none"> -Noise from the site activities -Noise in the site limits to be <65db 	Measurements with an accredited company instrument.	100	continued
5. Reduce of used consumables (Aspropyrgos)	<ul style="list-style-type: none"> Paper- 5%,water- 5% and ink - 5% per employee Energy reduction -5% per product ton 	<ul style="list-style-type: none"> • For paper we measure A4 consumption, energy , water via measurements • Personnel sensibilisation via Seminars and written Management commitment 	100	01.01.2017 01.01.2022 For inks 2012-2018
6. Internal use of Natural resources	Internal use of the 65% of A4 and 90% of the ink	Target is to ameliorate the use of the natural resources.to recycle the used A4 and ink in the ASF	100	01.01.2017-01.01.2022
7. Recycling	<ul style="list-style-type: none"> <u>Paper recycling:</u> 100% of used paper <u>Battery recycling:</u> 2 full boxes /year in Aspropyrgos 2 full boxes /2years in / Thessaloniki <u>Lamp recycling:</u> 100% <u>Ink refilling :</u> 100% Packaging material recycling 100% damaged Electronic equipment recycling: 100% 	Target is to sensitize the personnel in Environmental respect via recycling	100	01.01.2017-01.01.2022
8. Measure of released pollution in building no5 during repacking .	Measure of the released pollution <20 mgTOC/Nm ³	Scope is the measure of the released TOC in the activate carbon release filter in building 5. We develop new best practices and we inform/train the employees .	100	continued
9 .Measure of released pollution in buildings (3) (10) ASF production	Measure of the released pollution <20 mgTOC/Nm ³	The Scope is to measure the TOC in the outlet of the buiding no 3 This concerns Aspropyrgos site and is conducted by a independent CB	100	continued
10.Elimination of Environmental Unsafe conditions in the warehouse	Explosive gases and related accident prevention. 0 Dangerous conditions	<ul style="list-style-type: none"> Preventive measures to be taken in building 4 - Installation of a reliable gas monitoring system -24h parameters monitoring 	100	continued

TARGETS 2018

Scope	Target	Programme	TARGET completion	DATE
			In %	START/END
Training /sensibilisation of all personnel	Training in Environmental Management issues 14 different environmental issues	-Training program	100	01.01.2017-01.01.2018
		-Contents		
		1.Environmental Policy		
		2.Recycling , reduce the consumption of energy , water etc		
2. Measurement of particles in air SPM (Aspropyrgos)	Check the particles in the air to be <15 mg/Nm ³	In order to minimise the environmental impacts from the site activities we installed and operate :	100	continued
		-Special dust collection machinery in order to release max 15 mg/Nm ³		
		-Appropriate dust collection system in the Iron Sulphate Department .		
		-Special machinery to reduce dust release from the packaging mat.in solid fuel department.		
3.Liquid waste Analysis (Aspropyrgos)	Quality control of rejected liquid wastes	-Released particles measurement in the production of the Alternative solid Fuel	100	continued
		To be under the Legal limit .Measures to be more frequent than Legal requirements		
4.Noise measurement (Aspropyrgos)	-Noise from the site activities	Measurements with an accredited company instrument.	100	continued
	-Noise in the site limits to be <65db			
5. Reduce of used consumables (Aspropyrgos)	Paper- 5%,water- 5% and ink - 5% per employee	• For paper we measure A4 consumption, energy , water via measurements	100	01.01.2017
	Energy reduction -5% per product ton	• Personnel sensibilisation via Seminars and written Management commitment		01.01.2022
6. Internal use of Natural resources	Internal use of the 65% of A4 and 90% of the ink	Target is to ameliorate the use of the natural resources.to recycle the used A4 and ink in the ASF	100	01.01.2017-01.01.2022
7. Recycling	Paper recycling: 100% of used paper	Target is to sensitize the personnel in Environmental respect via recycling	100	01.01.2017-01.01.2022
	Battery recycling: 2 full boxes /year in Aspropyrgos 2 full boxes /2years in / Thessaloniki			
	Lamp recycling: 100%			
	Ink refilling: 100%			
	Packaging material recycling: 100%			
	damaged Electronic equipment recycling: 100%			
8. Measure of released pollution in building no5 during repacking .	Measure of the released pollution	Scope is the measure of the released TOC in the activate carbon release filter in building 5. We develop new best practices and we inform/train the employees .	100	continued
	<20 mgTOC/Nm ³			
9 .Measure of released pollution in buildings (3) (10) ASF production	Measure of the released pollution	The Scope is to measure the TOC in the outlet of the buiding no 3 This concerns Aspropyrgos site and is conducted by a independent CB	100	continued
	<20 mgTOC/Nm ³			
10.Elimination of Environmental Unsafe conditions in the warehouse	Explosive gases and related accident prevention.	Preventive measures to be taken in building 4 (Κτήριο 4).	100	Continued
	0 Dangerous conditions	- Installation of a reliable gas monitoring system		
		-24h parameters monitoring		
11. Energy savings related projects	Checking /regulate Transformers performance	- Scheduled maintenance by 3 rd parties specialists	90%	Q4
12. Reduction of released dust in building no 2	Update Dust filters capabilities from 35.000 m3 to 80.000m3 /h	Complete the expansion of the dust filters.	90%	Q2

The choice of the most appropriate method of waste management is carried out in such a way as to ensure that the human health will not be endangered, directly or indirectly and without using processes or methods that could harm the environment. For that reason measures are taken and proposed in order to: prevent or reduce production risk and waste, in accordance with the EU overarching principles. We help our clients primarily to prevent the generation of waste and to reduce its harmfulness. Where this is not possible, we aim in the reuse, recycling or recovery of the waste materials or their use as a source of energy.

The main objective of our policy is to prevent accidents or the creation of environmental problems, to the extent possible, by reducing any potential risk that could lead to environment pollution, through our Environmental Management System, continuous improvements, and the active participation of all our employees.

7.3. Measurements of Outcome

Polyeco monitors its environmental performance with environmental measurements, and sets environmental goals, according to Environmental Management Procedures EMP.AE-40 and EMP.AE-20 EMAS.

Finally, the company conducts systematically internal and external environmental inspections.

The primary responsibility lies to the General Manager of Polyeco and the Environmental and Quality Control Officer for the implementation of EMAS environmental management system. External audits take place regularly by the (a) Greek state public authorities, (b) TUV Hellas and (c) by external inspectors from private companies on behalf of our customers.

External audits (Lloyds):		
OHSAS 18001	14-03-2017	EUROCERT
ISO 9001-EMAS	17-03-2017	TUV HELLAS
ISO 28000	3/7/17	LLOYDS

Internal audits

POLYECO A.E.
INTERNAL AUDITS PROGRAM

From: 1/1/2017 To: 31/12/2017



Department	when	Audit Team	Concerning procedures
Environmental Management	08/2017	N.Mitropoulos S.Pitsakis OK 04 08 2017	ΔΠΕ.10,20,30,40,50,70)
Quality Management	10/2017	N.Mitropoulos E.Kyrtzi OK 17 10 2017	The General Quality procedures and the related departments
Commercial Department	10/2017	N.Mitropoulos E.Kyrtzi OK 17 10 2017	Δ.09.01,Δ.09.02,Δ.01.03
Production exports maintenance projects	11/2017	N.Mitropoulos OK 10 11 2017	Δ.07.01,Δ.04.01,Δ.04.10
Thessaloniki site (ISO 9001 EMAS OHSAS 18001)	09/2017	N.Mitropoulos OK 21 09 2017	Δ.02.06, Δ.09.01, Δ.04.10, Δ.01.03, Δ.04.12, ΔΠΕ 70, ΔΠΕ 30, ΔΠΕ 40, ΔΠΕ 50, ΔΠΕ 60 (ΔAY 01,ΔAY 02 ΔAY 03,ΔAY 04,ΔAY 05,ΔAY 06,ΔAY 07,ΔAY 08,ΔAY 09,ΔAY 10,ΔAY 11,ΔAY 12,ΔAY 13,ΔAY 14,ΔAY 15,ΔAY 16,ΔAY 17,ΔAY 18
OHSAS 18001 (all departments)	08/2017	N.Mitropoulos S.Pitsakis OK 08 08 2017	(ΔAY 01,ΔAY 02 ΔAY 03,ΔAY 04,ΔAY 05,ΔAY 06,ΔAY 07,ΔAY 08,ΔAY 09,ΔAY 10,ΔAY 11,ΔAY 12,ΔAY 13,ΔAY 14,ΔAY 15,ΔAY 16,ΔAY 17,ΔAY 18
ISO 28000:2007	09/2017	N.Mitropoulos S.Pitsakis OK 26 09 2017	All the H&S system procedures
Projects department	AIA 04/2017	N.Mitropoulos S.Pitsakis OK 05 04 2017	Δ.02.04,Δ.03.02, Δ.04.10,Δ.11.01, Δ.11.02, ΔΠΕ.10, ΔΠΕ.70,ΔΠΕ.ΑΕ.30, ΔΠΕ.ΑΕ.20, ΔAY 05,ΔAY 08,ΔAY 11, ΔAY 11, ΔAY 12, ΔAY 13,ΔAY 14, ΔAY 15, ΔAY 16, ΔAY 19
	AIA 07/2017	N.Mitropoulos S.Pitsakis OK 19 07 2017	Δ.02.04,Δ.03.02, Δ.04.10,Δ.11.01, Δ.11.02, ΔΠΕ.10, ΔΠΕ.70,ΔΠΕ.ΑΕ.30, ΔΠΕ.ΑΕ.20, ΔAY 05,ΔAY 08,ΔAY 11, ΔAY 11, ΔAY 12, ΔAY 13,ΔAY 14, ΔAY 15, ΔAY 16, ΔAY 19
	AMIANTOI	N.Mitropoulos OK 29 09 2017	ΔAY 04 20 08 11 16, Δ.05.01, OAY 36 37 38 39 40 17, Δ.05.01,ΔΠΕ.10

E 11.02.01

Έκδοση: 02

1/8/2007

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Incidents

No environmental (or Safety) incidents from our operations were reported at any Polyeco's worksites during 2017. However a complete scheme of procedures and SOPs (Safety Operation Procedure) are activated in order to prevent incidents in the sites and during projects all over the world.

- Every morning the Site Manager rains the staff on the risks of the daily operations (ToolBox Talk)
- We report all Unsafe Actions (UA), Unsafe Conditions (UC) , Near Misses (NM). The Site Manager reports them in his daily report .
- We treat every UA,UC or NM as a potential incident : we investigate it , we take all the necessary measures to avoid a similar case in the future, we communicate it to our teams on each site, as it provides a learning opportunity.

Every Month the KPIs (Environmental / Safety / Quality) are communicated to our Senior Management and discussed Our Legal Department, which is responsible for the Environmental Permits, provides updates on Environmental Legislation and feedback on the Legislation in the countries which we operate (whether we have facilities or temporary sites).

7.4. Extraversion

In an effort to further promote sustainable development and environmental protection, Polyeco moves beyond traditional approaches based largely on compliance and narrow risk assessments. In 2017 Polyeco made major efforts to raise environmental awareness:

In January 2017, Polyeco made an important donation to International Solid Waste Association's Scholarship Programme "Directing Children Out of Dumpsites Through Counselling and Education" in Nicaragua. The donation will help to bring 15 children **from the dumpsite to the school desk** for one year providing books, uniforms, transportation, family allowances (as in some cases, the child is the person working to provide for the family and they are not able to go to school), administration and psychological counselling. The ISWA Scholarship Programme currently targets 40 children who are sorting garbage in the dumpsites Nueva Vida and La Chureca in Nicaragua.



In March 2017, Polyeco organized the exhibition "Paratoxic Paradoxes", which was the first public presentation of a capsule of eleven original art works created through commissions to international artists by the cultural, nonprofit platform Polyeco Contemporary Art Initiative (PCAI). PCAI invites mid-career international and Greek artists to create an artwork of moving image, which is inspired by the notion of waste and waste management, as a way to raise environmental awareness. PCAI therefore provides the artists with an opportunity to explore and further research the field of waste, by giving them also access to resources, facilities and workforce where Polyeco is present in order to become more familiar with issues and challenges deriving from the waste management process.

In April 2017, Polyeco participated in the Technology Fair held within the 2017 COPs in Geneva. The fair was an opportunity for open discussions and exchange of knowledge and experience with COPs stakeholders on sustainable management of Hazardous Waste. Our company has efficiently managed in compliance to Basel and Rotterdam Convention POPs pesticides and PCBs from Europe, Asia, Latin America, Africa and the Middle East and the contingencies and solutions provided were explicitly presented to COPs participants. The important message for a detoxified future through the sound management of chemicals and waste was highlighted through the relative presentation by company representatives. Furthermore, PCAI was also represented in the Technology Fair and country delegates showed significant interest in the initiative and the mechanism that art can be used as a tool that will increase environmental awareness internationally.

In July 2017, believing that environmental consciousness should be cultivated at an early age, Polyeco Contemporary Art Initiative designed an innovative educational program for schools in Greece and abroad. PCAI Junior, constitutes an educational platform that enables students to understand critical, ecological issues that affect their place of residence. In 2017, the first PCAI Junior program took place at Geitonas School in Voula; an area which is part of the Kesariani Forest and is considered protected due to its natural wealth. The forest contains an ecosystem of 250 animal species and hosts 98 different types of migratory birds that use it as a place to rest before traveling to Africa. This fact has actually been the source of inspiration for the original animated video *Las Ptinias (8'45")* created by the 5th Elementary Class pupils and the experienced PCAI educational team.

In December 2017, Polyeco sponsored the 5th International Conference of the Hellenic Solid Waste Management Association for "Solid Waste Management and its Contribution to Circular Economy".

Awards



Polyeco managed to win three awards for **top waste management practices** at the [Waste & Recycling Awards 2017](#). In the category **Hazardous Recycling Business**, Polyeco was awarded the first prize for hazardous waste management in Djibouti, resulting in a significant reduction in the amount of waste that would otherwise be disposed in landfill.

Polyeco was also awarded in **the Innovative Waste Management Treatment category**, for the successful management and operation of the hazardous waste storage facility in Mauritius, which has rendered the waste treatment and recycling operations in the country particularly effective and efficient.

Finally, Polyeco's work was also recognized in the Corporate Social Responsibility & Waste Management category, where the company was honored for its Corporate Social Responsibility, through Polyeco Contemporary Art Initiative (PCAI), which

encourages artists to create artworks that cultivate environmental awareness at an individual and collective level.

Accreditations:



1221/2009 EC (EMAS) Environmental Management Standard, which documents that the product and services provided contribute to the protection of the environment.



The OHSAS 18001:2007 Occupational Health and Safety Specification, which serves as the foundation of our management approach to employee health and safety.



The ISO 9001:2008 or ISO/TS16949 quality management system standards, which provide a framework to improve system and process quality to increase efficiencies, reduce risks and avoid errors.



ELOT EN ISO/IEC 17025:2005 Accreditation of the Quality Control of our Laboratory.



ISO 28000:2007 Specification for the Security Management Systems for establishing, implementing, operating, monitoring, reviewing, maintaining and improving a documented Supply Chain Security Management System (SCSMS), using continual improvement approach.

8. AGAINST CORRUPTION

Principle 10

“Businesses should work against corruption in all its forms, including extortion and bribery”



8.1. Anti-Corruption & Antitrust Principles

We support the UN Convention Against Corruption and we strongly believe that corruption and bribery practices not only compromise the social merit of development but also undermine the efforts of the company itself for sustainable development. Our company follows the principals of ISO 37001:2016 for Anti-bribery Management System.

Moreover, in an effort to increase our awareness on anti-corruption, to promote compliance, effective internal controls and ethics, we participate in anti-corruption workshops organized by OECD.

On the other hand, being a company with a certified quality management system we are committed and make sure that all employees, partners, business associates and contractors haven't been involved in any corruption activities.

Any suspicion of involvement in corruption or fraudulent activities must be reported to the Board of Directors.

Polyeco is committed to supporting free market competition and preserving the free enterprise system. Employees and directors are not allowed to engage in price fixing or bid rigging, allocation of markets, geographically or by customers, or in the fixing of production or quotas for production. Also they are not allowed to exchange information with competitors regarding prices, market share, cost data, or any other data the exchange of which would be considered in violation of anti-trust laws and practices.

➤ **Anti-Corruption Laws**

Each employee and director of Polyeco , as well as all agents and representatives, must comply with all applicable anti-corruption laws. The laws of many other countries we operate in prohibit payments or offers to make payments of any kind, including the giving or offering of anything of value to foreign government officials, including officials of public international organizations, office seekers, political parties, or party officials to influence business in any way or obtain an improper advantage. Laws in many other countries where we may conduct business are even broader and cover corrupt payments made to any person, regardless of whether the person is a foreign official.

Polyeco performs an Evaluation of Legal Compliance for all activities placed in Foreign Countries.

➤ **Cooperation with Governmental Parties**

Polyeco 's Personnel and Representatives are forbidden from paying, offering to pay, or giving anything of value to any Foreign Public or Government Official to influence an official act or decision that will assist the Company in securing an improper advantage in obtaining or retaining business or avoiding a penalty following law violation.

➤ **Accounting and Records**

Polyeco maintains a system of internal accounting controls and records keeping, which accurately reflects all transactions. It also adopts sufficient control measures to protect these records from destruction or loss. False or misleading entries in Polyeco 's records are strictly forbidden for any reason.

Reporting – Violations – Disciplines

Polyeco will not tolerate actions that could affect the reputation or goodwill of its activities, nor will accept any effort to cover such action.

Violations of the anti-trust laws and regulation could result in multi-million dollar fines for the Company and long prison sentences for individuals; while may result in disciplinary measures by the Company, including termination of employment or cooperation.

Any employee or director who, in good faith, reports what believes to be a violation of this Policy will not be subject to any disciplinary action or other form of retaliation as a result of making such report.

Audits

Our HSSEQ Manager is our BIO (Business Integrity Officer) as of 2017, in order to ensure compliance and/or the Anti-bribery Company Policy. The 2018 Audit is scheduled for Q4 2018.

Communications

- Anti-corruption commitment is constantly repeated in every company General meetings (1~2/year)
- The President of the Company every year communicates a reminder on gift accepting / offering policy. All the receiving gifts from customers are collected and given to the personnel during Christmas/ New Year (via lottery).
- Polyeco buying procedures demand Purchase Department endorsement for all purchases .