

**Non-Financial Statement**

**2018**

**INTERAMERICAN**

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**1. INTRODUCTION**

This report, which includes the non-financial information for all INTERAMERICAN and its subsidiaries (100%) activities in Greece, in the following aspects, as these are set in section 7 “Non-financial statement” of circular 62784/2017 in accordance with the law 4403/2016 requirements:

* Anti-corruption and bribery.
* Respect for human rights.
* Responsible supply chain.
* Social and labor issues.
* Environmental issues.

Within this framework and always in relation to INTERAMERICAN’s operation, the main risks relevant to the aforementioned issues are described below), the management policies, as well as relevant key performance indicators, with the purpose to better depict and understand the issues.

Each description/reference in this report refers to the year 01.01.2018 to 31.12.2018, unless otherwise stated. The GRI standards were used to select the relevant non-financial indicators. Always in compliance with the aforementioned legislation, an indicative description of the Company's business model is presented below.

INTERAMERICAN considers that reporting non-financial information is as important as that of financial information. Transparency while providing the relevant information is a key element of good business practice advocated by the Company, to have both a performance comparison with other similar companies and a trustworthy relationship with Company’s stakeholders.

**2. BUSINESS MODEL**

INTERAMERICAN Hellenic Life Insurance Company S.A.(“Interamerican Life” or “The Company”) is a member of the Achmea Group. Achmea B.V. holds 99.89% of the issued share capital of “Interamerican Life”, therefore the minority right equals to 0.11%. The registered office of the Company is located in Maroussi, Attica, no 57, Konstantinou street, zip code 15124. Hellenic Business Registry (GEMH) is: 914001000. On 31/12/2018 Interamerican Life employed a total of 299 employees. The following legal entities are 100% subsidiaries of Interamerican Life:

1. Interamerican Hellenic Casualty Insurance Company S.A.
2. Athinaiki General Clinic S.A.
3. Medifirst S.A.
4. Interassistance Road Assistance

More information on Achmea Group organisational structure and INTERAMERICAN’s, is available in the Solvency and Financial Reporting (http://www.interamerican.gr/default.asp?pid=868&la=1). The Bank of Greece is responsible for overseeing Interamerican Life. The Achmea Group supervision is carried out by the Bank of the Netherlands (De Nederlandsche Bank).

The concept of private insurance in Greece has been historically associated with the name of INTERAMERICAN. Since the first years of its operation, the Company has been distinguished for its dedication to the satisfaction of citizens' insurance needs and the development of innovative products and services. INTERAMERICAN operates throughout the Greek territory.

**3. ANTI-CORRUPTION AND BRIBERY**

**Principal risks and their management**

INTERAMERICAN, recognizes that the fight against corruption is one of the most important Sustainable Development issues for the Company and its stakeholders. INTERAMERICAN recognizes and estimates annually the risks of corruption at national, insurance market and supplier /customer levels. Furthermore, it plans to reduce these risks in terms of its operation.

The potential occurrence of such risks can have a negative impact on the Group, in financial level (e.g. fines), operational level (e.g. termination of operations), as well as reputation and credibility loss while disrupting its relationship with its various stakeholders’ groups that interacts with. All employees must fully comply with applicable laws and internal regulations.

The Company's objective is to strengthen and improve the procedures to prevent and combat potential corruption risks, to comply with relevant legislation, and to ιintensify the relevant controls.

**Due diligence and other policies**

**Regulatory compliance**

INTERAMERICAN has established a regulatory compliance function in line with the international compliance framework which is implemented to ACHMEA's subsidiaries and includes a relevant annual program. The compliance function is performed in INTERAMERICAN by the Regulatory Compliance Division and includes the operations of:

* monitoring,
* consulting support,
* “assigned person” (with regards to non-compliance incidents).

The mission of the Regulatory Compliance Division within the Company is the responsible management of its compliance risks. The term compliance risk means "the risk of legal or administrative sanctions, substantial financial loss or reputation loss " that an insurance company may suffer because of its failure to comply with laws, regulations, relevant self-regulatory organizational standards and codes of conduct which apply to its activities.

**Prevention and Fight against Corruption**

INTERAMERICAN makes every effort to anti-corruption, through developed policies and processes, key elements of which are:

* a Governance System with clear responsibilities, implementation of the four eyes principle while making important decisions, proper functioning of the four core Internal Audit System operations (Risk Management, Actuarial Valuation, Regulatory Compliance, Internal Audit),
* the Code of Ethics mandatory implementation,
* the Purchasing and Procurement Regulation mandatory implementation,
* the Integrity and Anti-Fraud Policy mandatory implementation,
* the provision of information to Company’s employees about corruption offenses, the importance of reporting such incidents, as well as the relevant internal policies and procedures,
* the establishment and execution of a control system from Risk Management and Regulatory Compliance.

Through its Risk Management Division, INTERAMERICAN controls all its subsidiaries, Sales Offices, Internal Divisions and Departments for corruption-related risks. The Company is bound that, in case any of its employees or insurance consultants are denounced for corruption, and in case the allegation is justified via specific procedures, they will take the appropriate disciplinary measures against them, both based on Company’s Code of Ethics and on the relevant contract signed by both parties.

**Anti-corruption training**

With regards to the training on anti-corruption it is noted:

* the participation of INTERAMERICAN executives at the “Business Integrity Forum”, which was organized by “Transparency International- Greece (May 2018),
* the signing of a Memorandum of Understanding with the organization "International Transparency - Greece", which ensures - among other things - the access of Company executives to educational, research materials and tools, as well as the participation of executives in training sessions of the organization,
* training programs for employees and mediators for anti-money laundering.

**Prevention and Fight against Fraud**

In INTERAMERICAN we have developed and incorporated into our business planning, an integrated “Integrity and Fraud Policy”. The policy’s main objectives are (a) to inform all employees potential about the meaning and importance of business integrity and (b) the yearly implementation of the Integrity Risk Analysis Strategy and the subsequent reassessment of the audits framework.

The risks covered by the Policy are:

* Money Laundering and Terrorist Financing
* International Sanctions
* Corruption
* Conflict of interests
* External and internal fraud
* Cybercrime
* Code of Ethics
* Incidents Management

**Preventing and Suppressing Money Laundering and Terrorist Financing**

The INTERAMERICAN operation is fully in line with the criteria and requirements of the International, European and National regulatory framework for the prevention and suppression of transactions relating to the laundering of crime proceeds/illicit activities and/or the terrorism financing. For such transactions to be prevented, the Board of Directors, since 2008, has approved and submitted to the competent supervisory authority, a copy of the "Internal Control and Communication Regulation" in relation to the above (Anti-Money Laundering Policy).

**Fraud Incidents Reporting Policy**

By the end of 2015, INTERAMERICAN introduced its Fraud Incidents Reporting Policy within business operation. This policy, which has been implemented uniformly to all ACHMEA Group subsidiaries, since the beginning of 2016, establishes a specific procedure for reporting and recording incidents-occurrences that take place within the Company. All INTERAMERICAN employees are required to identify and report any incidents to the Regulatory Compliance Division, which is responsible for recording, coordinating, and monitoring their investigation. Every employee can disclose the information he/she has at his disposal in two ways:

* either by informing the Regulatory Compliance Division,
* or by sending an email to the address created specifically for this purpose ([incident@interamerican.gr](mailto:incident@interamerican.gr)).

The data submitted by the employees are treated with absolute confidentiality and only the Regulatory Compliance and Internal Audit Departments authorised employees, have data access.



Each incident, after being recorded, is checked in relation to the accuracy and correctness of the reported issues. For incident investigation, depending on which sector it relates to, executives are involved from the Regulatory Compliance, Internal Audit, Human Resources and Legal Departments, as well as any other Division, if this is required.

The Regulatory Compliance Division reports on a quarterly basis all registered incidents to the Audit Committee, the Board of Directors, and the Regulatory Compliance and Risk Management Division of the ACHMΕΑ International Activities Division, in accordance with the Incidents Reporting Policy.

**Business Continuity System ISO Certification**

The Company (all INTERAMERICAN -Life, General and Assistance) was audited and certified according to the International Standard ISO 22301: 2012 for the Business Continuity Management System. The System is holistic and features a framework to enhance organisation resilience, to have a general incidents interruption preparation methodology and a guide for building and maintaining plans for operations adaptation in case of emergencies. The System implementation connects business activities, IT and communications technology to facilities and is part of the Company's Risk Management, based on its reciprocity and efficiency optimisation for the Company.

**Outcomes of the above policies and non-financial key performance indicators**

* Conduct of an internal audit at subsidiary companies, internal Company divisions and departments and relevant audit reports preparation, which are sent to Company’s Management, the Audit Committee and the Board of Directors.
* Participation in a variety of events organised by various institutional or not organisations, which are stepping up their efforts towards this direction.
* Training on ML/TF.

In 2017, a Memorandum of Understanding was signed with the Non-Profit Organisation, Transparency International Greece, to combat corruption incidents, recognizing that transparency and integrity consist necessary requirements for the economic and social prosperity, as well as the healthy competition.

During 2018, there were no legal actions related to corruption incidents (fraud/ conflict of interest) against INTERAMERICAN, its employees nor any Company insurance consultant. For the reporting period, the Company, as a matter of principle, did not participate in any lobbying activities and did not provide any funding or any sort of contribution in sort or in any other form to political parties or similar bodies.

**4. RESPECT FOR HUMAN RIGHTS**

**Principal risks and their management**

INTERAMERICAN's concern is to ensure an ethical and fair work environment, based on meritocracy and equal opportunities for all. In this context, the Company is systematically acting to protect the rights of its people and other stakeholders, as well as to further improve corporate functions.

Overall, human resources management is consistent with INTERAMERICAN’s principles and respective values. The Company respects its people rights and dignity and is committed to create a working environment of mutual trust and respect, in which diversity is respected and is a true value. The employees work collectively and are free to express their opinion and harness their talent. In this way, multiple benefits are created for both employees and the Company. At the same time, the employee satisfaction index is improved as well as their efficiency, while they become aware of their shared responsibility for the impacts on Company's reputation.

INTERAMERICAN recognizes the risk of the occurrence of a human rights violation incident both within the Company, and its business partners and suppliers which can be linked to its operations.

The responsible Company behaviour and operation in relation to human rights at work, furthermore ensures its course towards Sustainable Development.

It has also recognized the risk of employees’ privacy violation and other stakeholders and it has therefore developed the policies outlined in the "Due diligence policies and other policies" section.

**Due diligence and other policies**

**Code of Ethics**

The Code of Ethics that is being established and implemented by the Company, sets out the conduct rules that all employees must abide by.

This Code is based on five Corporate Values: Integrity, Innovation, Respect, Teamwork and Responsibility. Based on these five values, we have co-molded with our employees the principles and behaviors that must govern the everyday working life of all of us. The Code contains guidelines for the following chapters:

* Cooperation (unwanted behavior, employee privacy).
* Handling of commercial information and resources (computer facilities, clean desk and screen policy, responsible use of social media).
* Addressing conflicts of interest (dealing with "Focus on customer interest", accepting and offering gifts, additional employment, unjustified favoritism, compliance with competition).
* Incident management (aggression and threats, Emergency procedures).

The responsibility for the Code implementation lies within the Board of Directors. Any potential breach and attempt to conceal it, must be reported to the Risk Management Division, and are subject to thorough investigation. If the accusations/reports are proved justified, sanctions can potentially be imposed: ranging from a simple recommendation to an employment contract termination.

**Fair treatment**

Respect is one of the most important INTERAMERICAN values. Within this framework, the Company behaves with respect towards its customers, employees, partners and suppliers and treats them all equally. For the Company, fair treatment and respect in practice means treating everyone morally and objectively, without misusing information, misinterpreting or even concealing data deliberate. At the same time, it means guaranteeing equal opportunities for employees based on strict professional criteria, as well as creating a working environment free of discrimination or harassment of any kind.

The Company respects and supports the internationally proclaimed human rights and strictly enforces national and european legislation while endorsing the Declaration on Diversity to further diffuse the need to defend human rights. In this context, the Company opposes any form of child or forced labor and takes the necessary measures to combat it.

**Equal Opportunities**

The efficiency at work is the most basic criterion for rewarding employees. INTERAMERICAN provides equal pay for similar jobs, regardless of gender.

In INTERAMERICAN the reward is provided according to the value of each role within the Company. This practically means that people holding roles of equal value are rewarded the same, regardless of their personal characteristics, such as gender, nationality, age.

The Company offers equal opportunities to all its employees by providing opportunities for all, vocational training and career prospects, having the resources required to serve these goals seamlessly.

**Privacy Policy**

For INTERAMERICAN, respect for privacy and personal data protection are key priorities. For this reason, the Company takes all the necessary measures to prevent theft, loss and leakage of customers/insured people, employees and suppliers’ personal data. In accordance with the requirements of the Data Protection Authority, the Company has obtained from the Authority the necessary licenses for the collection, preservation and processing of files with customers, suppliers and employees personal and sensitive data. Customers’ data, for which specific employees have access based on location-activity, is classified and confidential and is not disclosed to third parties.

**Outcomes of the above policies and non-financial key performance indicators**

**Human Rights**

During 2018, the Company was not informed on:

* human rights violations incidents regarding its activity,
* discrimination or harassment incidents of any kind.

In the context of the Company's commitment to non-discrimination and the provision of equal opportunities for professional development, in 2018, the percentage of women's representation in the Board of Directors and the overall constitution committees was 23.6%.

**Distribution of positions in the BoD and Committees (by gender, age and nationality)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **2017**  **Gender/Age** | **Male** | **Female** | **Total** |  | **2018**  **Gender/Age** | **Male** | **Female** | **Total** |
| **40-50** | 14 | 2 | 16 | **40-50** | **20** | **9** | **29** |
| **51+** | 34 | 0 | 34 | **51+** | **22** | **4** | **26** |
| **Total** | 48 | 2 | 50 | **Total** | 42 | 13 | 55 |
|  |  |  |  |  |  |  |  |
| **Gender/ Nationality** | **Native** | **Foreigner** | **Total** | **Gender/ Nationality** | **Native** | **Foreigner** | **Total** |
| **Male** | 29 | 29 | 48 | **Male** | 33 | 9 | 42 |
| **Female** | 0 | 2 | 2 | **Female** | 12 | 1 | 13 |
| **Total** | 29 | 21 | 50 | **Total** | 45 | 10 | 55 |

**Data Protection**

Since 2016, INTERAMERICAN has created and staffed a project management team, which has thoroughly analyzed the articles and concepts of the regulation. Analysis is considered as one of the first key steps for compliance. The new order set by the General Data Protection Regulation (GDPR) was first understood and consolidated by the Management, which supported the education through a recurrent awareness program to familiarize all Company’s human resources and to smoothly adapt to the regulatory framework.

The implementation of the DPIA (Data Privacy Impact Assessment) by INTERAMERICAN has highlighted, from the beginning of 2017, the deficiencies and vulnerabilities that existed in the Company and based on them, the implementation plan was designed.

Furthermore, INTERAMERICAN established a Data Protection Officer (DPO) with assigned tasks, as well as the creation of a cross-functional DPO Hub, which is made up of diverse skills executives, chaired by the DPO. The purpose of the Group's recommendation is to cover the full range of requirements of the Regulation as well as ongoing cooperation to address relevant issues that may arise.

Key, compliance-oriented actions were carried out, such as:

* procedures and actions implementation,
* Private Data Protection policy draft,
* gratification of rights (access, correction, deletion, imitation of processing, portability and opposition) of the data subject (customer)
* consent creation (electronic and written) which must be clearly distinct, understandable, easily accessible, clear and simple.

At the same time, a framework was formulated to meet the "by default and by design" specifications in the systems and procedures, a data classification and categorization according to the new regulation, a mapping, a recording and control of the data processing flow, a Clean Desk Assessment and Archiving and Retention Policy.

1. **SUPPLY CHAIN ISSUES**

**Principal risks and their management**

The Company recognizes the risks that are present throughout its supply chain. To this end, INTERAMERICAN strives to ensure its perfect and sustainable operation in every service and / or product it offers, as well as any collaboration it joins.

In particular, the Company recognizes the risk of potential collaboration with suppliers who do not respect international sustainable development standards and do not share common policies and values ​​with INTERAMERICAN. The occurrence of such risks may have negative impacts both at financial (e.g. through the imposition of fines) and operational level (e.g. cessation of collaboration with suppliers) as well as at non-financial level (e.g. impact on reputation and the credibility of the Organization).

Consequently, the responsible supply chain management is both a prerequisite for INTERAMERICAN’s sustainable development, as well as a competitive advantage over other companies. In recent years, the Company has taken the necessary steps for its supply chain strategy redesign by developing a more streamlined, comprehensive management model.

**Due diligence and other policies**

Based on the above-mentioned strategy, we have established a central Purchasing and Procurement Department, aiming to further optimise our internal operations in relation to supply chain structures effectiveness. This department is subject to and reports directly to Company’s Chief Financial Officer and has undertaken the gradual collection and processing of all relevant Company procedures.

The Purchasing and Procurement Department, together with the Procurement Committee and the Executive Committee, have the overall responsibility for supply chain processes management, with objectives as summarised below:

* Optimisation of Company’s internal customers’ service level, in combination with relevant budget effective management.
* Ensure compliance with all department or Company transparency, integrity, regulatory compliance and business continuity terms.
* Ensure compliance with INTERAMERICAN’s Suppliers Code of Conduct, as described on the corporate website (www.interamerican.gr/providers-code-of-ethics).
* Equal treatment of the suppliers involved in Company's procedures, aims at the creation of long-term strategic partnerships, where deemed necessary. Equal access and suppliers’ management, which is ensured in purchasing and procurement processes, is a major parameter for the development of a healthy business environment between Companies and approved suppliers. These partnerships can either take the form of long-term cooperation in cases of specific reasons, for example, business continuity, or occasional partnerships for example, INTERAMERICAN Companies' Goods-Services purchases.

**Purchasing and Procurement Committee Responsibilities**

INTERAMERICAN’s Purchasing and Procurement Committee constitutes an executive independent Company body. In the Committee participate one (1) member of the Executive Committee, four (4) regular members elected by the Executive Committee, as well as by a lawyer appointed by the Executive Committee without the right to vote.

Under the relevant internal regulation, the Committee is empowered to take all necessary information to consider the purchase of material and services of the Organization's companies with cost of over 15,000 euro and either to issue opinions on them or to promote its detailed proposals to INTERAMERICAN’s senior executive bodies (e.g. Executive Committee, Board of Directors).

**Purchasing and Procurement Regulation**

In Purchasing and Procurement Regulation, which was approved and entered into force during 2014, the rules regulating each material or service procurement, to meet the needs of all INTERAMERICAN subsidiaries, are recorded and codified. The regulation is posted on the internal corporate website, with the aim that every employee has access to at any time. The objective is to continually make corrective additions, in the light of the ever-increasing needs and developments.

In order for model implementation, for the appropriate supply chain management processes and final supplier selection, the relevant bodies are the Purchasing and Procurement Department and the Procurement Committee. In INTERAMERICAN, bids are conducted in the following three ways:

1. Bids without Tender: The process takes place in purchases of items or services for which the estimated cost is less than 15,000 euro. In these cases, the process requires a reasonable number of bids (at least three) to be evaluated accordingly.

2. Bids with Closed Tender: The process takes place in purchases of items or services with an estimated cost of more than 15,000 euro and less than 500,000 euro.

3. Bids with Open Tender:   
The process takes place in purchases of items or services with an estimated cost of more than 500,000 euro.

During 2015, the "Supplier Code of Ethics" was incorporated into the Purchasing and Procurement Regulation, which is an integral part of any contractual cooperation between INTERAMERICAN and its suppliers. By signing a contract with INTERAMERICAN, each products and services supplier must respect and align with:

* the Corporate Responsibility principles adopted by INTERAMERICAN,
* the Social and Environmental commitments undertaken by the Company, such as the United Nations Environment Program Finance Initiative – «Principles for Sustainable Insurance».
* the UN Global Compact ten corporate responsibility principles.

INTERAMERICAN systematically monitors the suppliers’ compliance with these contractual obligations. Failure to comply with them results in the termination of their cooperation with the Company. The supplier contractual obligations are described mainly by Service Level Agreements (SLAs) formulated in the contract in an analytical way and monitored by the business owner of the project daily and in cooperation with the Purchasing Department of the Company, when required (e.g. escalation, major issue, etc.).

**Developing responsible relations within the supply chain**

INTERAMERICAN is governed by the Code of Ethics, as well as the Integrity and Fraud Policy, aiming at becoming the most trusted insurance company and always in the best interest of the client. The corporate culture of transparency and integrity applies without exceptions to all Company employees and business partners. For this reason, INTERAMERICAN promotes partnerships exclusively with business partners committed to the same principles and values ​​with regards to combating all forms of fraud and corruption such as conflict of interest, payments facilitation, bribery, money laundering and terrorist financing, tax evasion, internal and external fraud. The parties commit that they will not accept any kind of corruption and are further bound by the rules of professional conduct as described in the Bank of Greece Governor's Act 86 / 5.4.2016 and included in the new draft law on the adoption of the Insurance Distribution Directive (IDD).

**Green Procurement**

INTERAMERICAN, in addition to the economic and technical criteria, it also applies criteria based on the principles of green procurement in its supplier selection and evaluation process. These criteria concern, on behalf of the suppliers:

* environmental Management System certification (ISO 14001 ή EMAS),
* implementation of an environmental policy,
* compliance with the environmental regulation,
* implementation of initiatives and commitments related to the environmental protection.

**Human Rights in the Supply Chain**

As mentioned above, Company’s partners are selected based on strict criteria. Nevertheless, in the agreements and contracts that the Company signs with them, it does not contain any specific terms regarding human rights. Respect for human rights is protected by Greek and international law and, by definition, the agreements that the Company signs are subject to the current legislative framework.

**Outcomes of the above policies and non-financial key performance indicators**

The relevant actions carried out with the aim of increasing the optimization of INTERAMERICAN's supply chain processes, indicatively concern:

* the continuous evaluation of all the Company's suppliers, for each partnership, both at the level of the services provided and at the level of the economic performance, with the aim of creating a database of suppliers by category of requested service or product,
* the implementation of Lean / Agile practices in the day-to-day processes and in line with the Company's general guidelines,
* the expansion of the product procurement processes automation using an online platform that is fully linked to the Company's accounting system (SAP),
* the intensive monitoring of significant efficiency and cost evaluation, procurement cycle duration, automation of daily processes, compliance with the Company's regulatory guidelines.

In 2018, INTERAMERICAN collaborated with more than 3,340 suppliers in service or product purchase categories. The most important categories are:

* infrastructure for the facilities operation and services provided,
* medical services, materials and machinery,
* consulting services,
* marketing and advertising services,
* travelling and events.

The Company's expenditure on the purchase of products and services in the year 2018 exceeded the 72 million euro.

For the Organization, cooperation with local suppliers is a priority in the context of strengthening INTERAMERICAN's contribution to the national economy and the development of local communities. In this context, in the year 2018 the percentage of cooperating suppliers, based and operating in Greece, was over 85% (out of the total).

In 2018, there were no substantiated complaints about the unlawful use of Company’s clients / insured, employees and suppliers’ personal data.

**6. SOCIAL AND LABOR ISSUES**

**LABOR ISSUES**

**Principal risks and their management**

Securing an ethical and fair working environment is a main concern for INTERAMERICAN, which is distinguished for meritocracy and for providing equal opportunities to all. By the means of this philosophy, we protect our people’s and our stakeholders’ rights and in a more general sense, we improve the Company’s operation.

The Company recognizes the potential risk of non-compliance on labor issues caused either through its operations or through its stakeholders’ operations with who it interacts Potential occurrence of non-compliance incidents with respect to labor rights would cause negative impacts both to a financial level (i.e. paying compensations, imposing sanctions) and operational level (i.e. loss of talent and human resources). At the same time, the potential occurrence of this type of incidents would damage the Company’s reputation and its reliability as a responsible and fair employer in the insurance sector. Multiple benefits are generated in a working environment where employees are free to express their views and see their talent utilised. This is because a more pleasant and rewarding working environment is created, where employees are jointly responsible for the Company results and fame and therefore, the Company benefits as well.

For the aforementioned reasons the aim is to create an attractive working environment and to improve the Company’s reputation as a preferable employer, aiming at the employee satisfaction, the maintenance of competent executives and the attraction of young individuals.

**Due diligence and other policies**

**Existing Policies and Procedures**

The Company, within the framework of ensuring an ethical and fair working environment, has established the following policies and procedures:

**Policies**

• Integrity and Anti-Fraud Policy

• Gift Acceptance and Offering Policy

• Incident Reporting and Management Policy

• Case Management Policy

• Education Policy

• Recruitment Policy

• Visitor Security Policy

• Non-Smoking Policy

• Loan Policy

• Internal Audit Regulation - Money Laundering

• Travel Policy

• Corporate Vehicle Policy

• Corporate Mobile Phone Policy

• Corporate Credit Card Policy

• Purchasing Regulation

• Resource Usage Policy

• Basic Safety Principles

• Privacy Policy

• Information Security Policy

• Business Continuity Management Policy

• About cybercrime

**Procedures**

• Complaint Management Procedure

• Internal Movement Procedure

• Contract Renewal Procedure

• Job Evaluation Procedure

• Purchase of Old Equipment Procedure

**Attracting and selecting employees**

**Locality**

INTERAMERICAN’s employees - in areas outside Attica as a rule - come from local communities, consequently resulting in a substantial contribution of the Company to local employment growth.

**Employment opportunities**

Fundamental principal of INTERAMERICAN is to attract and retain talented employees with high levels of training and motivation. The Company collaborates with Greek Universities, Greek and foreign colleges, and technical schools, providing the possibility to students to complete an internship program within the Organization, which in most instances is paid. During 2018, 9 students completed their internship program at INTERAMERICAN.

**Value investment**

Digital Trainee Program

To attract young graduates the Company initiated in 2015 and based on the ACHMEA standard the “Digital Trainee Program”. The program’s goal is to promote the most talented young graduates and to hire them in the Company. The “Digital Trainee Program” constitutes an investment in human capital for the future of INTERAMERICAN and ACHMEA, in view of the company’s strategic priority to emerge as ultimate “Digital Insurer” in Greece until 2020.

The “Digital Trainee Program” innovation is constituted in the fact that it provides to its participants, the trainees, the opportunity to work in three different departments during the two first years upon their recruitment by the Company (8 months per year). The mobility in different functions and working environments helps them acquire a spherical experience in corporate organization matters and follow different practices (work, insurance etc.). The education they acquire is constant and intensive, both in practical level (on the job training) and theoretical, with programs focusing on their personal development. The young trainees are expected to play a key role on INTERAMERICAN's next day in terms of cutting-edge know-how and innovative activities.

**Employees awareness**

INTERAMERICAN ensures so as for each employee to:

* Know exactly what the Company expects from him and his work.
* Have an honest and constructive communication with his or her supervisor about his performance.
* Be supported in developing his or her capabilities in an environment that promotes innovative thinking and development.
* Have his or her performance recognised based on merit, and to be competitively rewarded as per the remuneration standards of the insurance market.
* Have his or her opinion heard and to participate in improving his team’s performance.
* Feel that the Company treats him or her fairly and with no discrimination.
* Know that he or she can request support for managing his or her personal needs and priorities.

At the same time, with the aim to operate responsibly, the Company:

* The Company has a Code of Ethics and related policies, which are compulsory for all employees.
* It supports and cooperates regularly with the employees’ union, protecting the right to freedom of association.
* It ensures human rights and the applicable legislation are met through the employment contracts Διασφαλίζει ότι μέσω των συμβάσεων εργασίας τηρούνται τα ανθρώπινα δικαιώματα και η ισχύουσα νομοθεσία σχετικά με την εργασία και τις εργασιακές σχέσεις.
* It advocates the elimination of discrimination during hiring and employment and takes care so that new recruits and all employees are appropriately informed.

**Working conditions**

The proper management of human resources in the light of the working conditions provided to them is a material issue for INTERAMERICAN as it can affect both its relationships with its employees and its broader corporate operation, as it directly affects its human capital productivity and it indirectly ensures the Company's progress towards Sustainable Development.

**Company- Human Resources relationship**

Based on recognition of its employees’ value, INTERAMERICAN commits itself to providing them valuable work experience, excellent working conditions and additional social benefits, such as free medical care and insurance for themselves and their families.

**Collective agreements - Syndicalism**

INTERAMERICAN recognises and promotes the employees’ right to participate to collective bargaining and trade unions. In this context, Management’s engagement and communication with employees and their representatives are of particular importance for the mutual benefit of both the employees and INTERAMERICAN. For this reason, a specific internal communication process is implemented by the Company and Management regularly cooperates and communicates with INTERAMERICAN’s employees’ union, which has been founded with the aim of safeguarding and promoting the labor, economic and insurance rights of employees.

**Education and performance evaluation**

INTERAMERICAN has developed and implements an integrated Performance Management System that is linked to Company’s vision and strategic goals. The Performance Management System has at its core the dialogue and aims at fair and objective evaluation of each employee contribution and, consequently, its reward is based on the same criteria, a philosophy that enhances the sense of employees’ participation and recognition of their contribution to the Company’s operation and results.

Our Company, wishing to make communication and feedback more relevant to employee performance and development and to better support each employee personal development, has introduced a new feedback system called the Impraise (360o Review Tool).

As far as Education is concerned, the Human Resources Division has a framework of education that links the educational function with the Company's strategic planning process.

For the year 2018, a series of training programs were implemented, which are part of the following strategic guidelines:

* Interamerican Basics
* Leadership Development
* IAG Way of Working
* Innovation

**Outcomes of the above policies and non-financial key performance indicators**

No incidents of discrimination or harassment of any kind have been disclosed to the Company during 2018. Moreover, the Company provided training and development opportunities to its employees irrespective of gender, age etc.

In INTERAMERICAN, all (100%) employees are subject to collective labor agreements (sectoral or business). Employee wages meet legal requirements, while the 90% of the employees receive wages above the minimum wage collective bargaining agreements.

|  |  |
| --- | --- |
| **Wages based on collective labor agreements** | |
| **2017** | **Employees percentage** |
| As the agreement | 12.52% |
| Above the agreement | 87.48% |
| **2018** | |
| As the agreement | 14.4% |
| Above the agreement | 85.6% |

Moreover, in response to the call of the Hellenic Network for CSR (CSR Hellas), the Company has subscribed the Declaration on Diversity and participates in the European Pact for Youth, which is a partnership of the national CSR networks of Europe to boost employment.

**Employees’ breakdown by contract and type of work**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Total employee number per contract type** | **2018** | | | **2017** | | |
| **Male** | **Female** | **Total** | **Male** | **Female** | **Total** |
| Indefinite | 643 | 512 | 1,155 | 627 | 494 | 1,121 |
| Fixed term | 0 | 4 | 4 | 38 | 14 | 52 |
| **Total** | **643** | **516** | **1,159** | 665 | 508 | 1,173 |
| **Total employee number per type of work** | **2018** | | | **2017** | | |
| **Male** | **Female** | **Total** | **Male** | **Female** | **Total** |
| Full time | 624 | 509 | 1,133 | 635 | 501 | 1,136 |
| Part time | 19 | 7 | 26 | 30 | 7 | 37 |
| **Total** | **643** | **516** | **1,159** | **665** | **508** | **1,173** |

**Additional benefits to employees**

The Company offers to its employees Group life and health insurance (Standard and Extended Program) which includes: life insurance, permanent total disability insurance, healthcare, doctor’s visits, diagnostics, maternity benefits, hospital care. Additionally, it offers:

* Direct medical assistance program
* Family legal protection insurance
* Reduced car insurance premiums
* Voluntary savings program
* Possibility for insurance at the Professional Insurance Fund of INTERAMERICAN employees
* Nursery allowance (only for the insurance employees)
* Personal loans with reduced interest rate and payoff duration up to 30 months
* Discounts in corporate products and services
* Flexible working hours
* Possibility to work from a distance
* Doctor’s office, restaurant and gym (in two buildings) within the Company
* Entertainment events and gifts for the employees’ children

It is noted that there is no discrimination based on employment contract or type with respect to the above additional benefits, which apply to all Company employees (apart from where explicitly mentioned), and apart from the below described which applies to a specific number of employees.

**INTERAMERICAN Professional Insurance Fund**

All INTERAMERICAN, permanent, full-time employees (of the Life, Casualties, Assistance, Interassistance and Mentor) can be eligible to be covered by the Professional Insurance Fund by applying for their participation and paying their personal contributions of 1% to 10% of their nominal wage. The Company’s contribution amounts to 4.25% of beneficiary’s nominal wage and it is offered to employees having completed 12 months in the Company.

The Fund – created in 2010- constitutes a model retirement complement and is one of the 13 same kind Professional Optional Insurance Funds (another 4 compulsory insurance funds exist). At the end of 2018, the members were 1,238 and the reserves for the industry of one-off basis pensions amounted to 18.02 million euro.

The members’ savings investments are applied through the flexible Mutual Fund “Professional Insurance Fund INTERAMERICAN Global Balanced Fund of Funds”. The average return on the capital saved for the members was 5.52% for the year 2018. The Professional Insurance Fund from its beginning of operation and up to 31/12/2018, has paid 139 one-off basis of 2,683,916 euro.

Respectively, during 2018 performance evaluation, 947 employees participated and completed it (541 men and 406 women), representing the 87% of the total number of employees who met the evaluation requirements (1,090 employees). The requirements are with respect to the expertise type (specific expertise types are excluded, e.g. drivers, doctors), the service time in the Company or the last job position (excluding those who work less, either the six months in the Company or the six months in the last job).

**Preventive Medicine and Employee Information Actions**

The Company regularly organizes actions aimed at informing and sensitizing its employees on health care and prevention in various fields. During 2018, wellness activities involving 265 employees with a total of 581 participations in pilates, anti-smoking sessions, running, play therapy sessions, basketball team and a holistic nutrition program were implemented as part of the "Well Being project it's4U" project.

Furthermore:

* 134 employees participated in the 10th Race of the Pan-Hellenic Association of Women with Breast Cancer "Alma Zois".
* 46 employees participated in the "Static Cycling Marathon" event, organized in September 2018 at Syntagma Square by the "Target - Prevention" organization for the prevention of breast cancer.
* 76 employees participated in venous insufficiency testing in collaboration with the "Butterfly" Skeletal Function Association.

**Occupational accidents**

|  |  |
| --- | --- |
| **2018** | **2017** |
| 2 at INTERAMERICAN Life (28 days absence in total)  5 at INTERAMERICAN Assistance (124 days absence in total)  1 at Athinaiki MEDICLINIC – 7 days absence in total) | 1 at Athinaiki MEDICLINIC (15 days absence in total) |

**New recruits/Turnover**

|  |  |  |
| --- | --- | --- |
|  | **2018** | **2017** |
| New recruits | 86 | 102 |
| Turnover | 89 | 52 |

**SOCIAL ISSUES**

**Principal risks and their management**

INTERAMERICAN recognizes as one of the most material risks, the Insurance risk. The Insurance risk includes various social risks (e.g. aging population) which the Company examines and takes into consideration when developing its products and services.

Moreover, with the participation of the Company’s internal and external stakeholders, INTERAMERICAN continues to invest in the social investment pillar, understanding the risk that exists because of the impacts of the financial crisis to the wider society. Moreover, INTERAMERICAN identifies the risks which relate to non-responsible provisioning of products and services and to non-responsible communication and engagement with the wider society.

Consequently, during the planning of the annual program, the below are taken into consideration as key issues:

* The social, economic and environmental conditions of the time and specifically the consequences of the long economic crisis and recession to the Society and the Environment.
* The mandates of the international and national organizations, of which the Company is a member or partners with.
* The relevance of the responsibility practices with the Company’s operation, to leverage the technical know-how.

**Due diligence and other policies**

**Security of products/services**

INTERAMERICAN implements a framework of responsible investment policies, which determines the vision and our approach to responsible investing with key consideration the integration of social factors in the Company’s investing processes. These factors are an integral part of the Company’s investment decisions, as the Company assumes that they can impact risks and rate of return.

Solvency II is the most recent regulatory framework which regulates capital requirements, operation and supervision of insurance companies operating in the European Union. Solvency II offers to European insurance companies a common basis for operating regarding the qualitative and quantitative assessment of their solvency, while at the same time offers to them the possibility of identifying their own internal insurance `and financial risk management models and of organising of the methods for the dissemination and reduction of these risks through other methods (reinsurance, investments).

INTERAMERICAN is the first Company in the Greek insurance market to receive in 2015 the related approval, which has been activated with the issuance of law Ν. 4364/2016 by the means of which Solvency II is integrated into the Greek legislation.

**Solvency and Actuarial Operation**

The main goals of the Solvency II regulatory framework are:

* To introduce new corporate governance and transparency techniques, which will ensure the proper operation of the Market and the suitable level of protection of European citizens – holders of insurance contracts.
* To avoid complexity in calculating solvency margin and adjustment of margin according to the increasing needs and evolution of the insurance market.
* To establish the calculation of the solvency margin according to a method adjusted to the real risks that insurance companies are facing.

**Partial Internal Model**

Of great importance to INTERAMERICAN’s readiness for implementing SOLVENCY II - with a view to the implementation of the EU Solvency II Directive from the beginning of 2016- is the approval that the parent Company ACHMEA received -during 2015- from the Central Bank of the Netherlands and the Bank of Greece for using the Partial Internal Model for calculating the capital requirements for Solvency. The possibility for receiving approval for developing and using the internal model is an innovation of Solvency II. The development of the internal model since the beginning of the entry into force of the Solvency II (2016) allows INTERAMERICAN to improve its understanding, assessment and management of risks it assumes operating in the casualties’ sector and to differentiate from the average European and Greek insurance Company which use the standard formula. The use of the Internal Model results in better depiction of the different Company risk profiles, in increasing the focus in risk management issues and most importantly, the optimum management of business decisions such as pricing and the reinsurance structure.

**Social Investment**

In ​​Social Investment, the Company, in parallel with its insurance activity, has been implementing a multi-dimensional Corporate Responsibility Program under the title "Acts of Life" since 2004, which is an integral part of its business strategy. This program focuses on two pillars, society and the environment, with specific results on an annual basis and an assessment of its effectiveness to adapt to and respond to the needs of the society in which the Company operates.

**Operational Axes**

The main axes of social contribution, “Acts of Life”, are four:

**For the Society:**

1. Leverage of the Company’s infrastructure and insurance.
2. Actions focusing on Health, Risk Management, Supporting Vulnerable Social Groups as well as Supporting Culture and Education.
3. Volunteerism.

**For the Environment:**

1. Protecting the environment and reducing the environmental footprint.

**Outcomes of the above policies and non-financial key performance indicators**

The budget for implementing the above policies derives from:

* The relevant financial budget of the Company which concerns sponsorships and donations and other support related to the actions which the Company undertakes,
* The Company’s human resources, on a voluntary basis, having at its core the “Life Volunteers” team members,
* The private health units (clinics and multi- clinics), the Immediate Medical and Road Assistance fleet (Vehicles and Personnel) and the provisioning of insurance cover.

In 2018, the Company spent 299,091 euro which correspond to 0.36% of recurring profits before taxes during the same year.

Indicatively, INTERAMERICAN:

* At the end of 2018, had insured 125 vehicles of social institutions and organizations as a sponsor for civil liability.
* In 2018, covered 10 social events by sending an ambulance and specialised staff, provided 82 workhours of its direct medical assistance personnel, carried with ambulance 37 citizens in need and provided consulting services for health issues to other 190, for a total value (approximately) of 20,000 euro.

In 2018:

* there has been no incident of non-compliance, fine or non-monetary sanction to the Company regarding the relevant product and service information, marketing, promotion and advertising practices.
* no major fines and non-pecuniary sanctions were imposed for non-compliance with laws and / or regulations in the social and economic field.

**7. ENVIRONMENTAL PROTECTION**

**Principal risks and their management**

Climate change risks, as well as other environmental risks are should be effectively recognised, evaluated and addressed by insurance companies. The insurance industry, is already at the heart of this challenge, placing emphasis on the implementation of preventive measures, safeguarding the assets of its insured clients and compensating huge amounts of caused damages worldwide

For INTERAMERICAN, the climate change effects can affect the amount of compensation paid, but the Company has not completed the quantification of the effect of the phenomenon on its activities, which is expected to take place over the next years. It should be noted, however, that, apart from approaches to the quantification of impacts on climate change, there is so far no acceptable, globally approach - only estimates. INTERAMERICAN recognizes, however, in this direction, the substantive nature of this matter, both for itself and its stakeholders, as well as for ensuring the Company's progress towards Sustainable Development.

Due to the nature of its activities, INTERAMERICAN is not subject to significant regulatory risks (e.g. due to its emissions) that may harm/affect its responsible operation. Nevertheless, the Company, through its services (environmental liability insurance and investment in electricity from renewable energy sources such as photovoltaic and wind power plants, biomass power plants), helps customers to reduce their regulatory risks, but also enhances/encourages customers’ ability to make responsible investments, which contribute to climate change effects mitigation.

In addition, INTERAMERICAN has an Internal Risk Management Model in which only the earthquake is identified as a risk, but the impacts of other risks based on current experience (e.g. floods) are also evaluated to be included in modeling, whenever feasible based on accepted world-wide technical approaches.

**Due diligence and other policies**

**Environmental risk assessment**

Given the specialized know-how in environmental insurance, INTERAMERICAN operates an environmental insurance unit that offers insurance services in accordance with the Royal Institute of Chartered Surveyors (RICS) procedures.

**Reinsurance**

INTERAMERICAN performs reinsurance activity in all its main branches of business, which has resulted in significant strategic benefits in stabilizing its results and in acquiring know-how to develop new products. With regards to natural disasters, which are mainly due to climate change and which are the main object of reinsurance, the Company, through the implementation of the Internal Risk Management Model, is able to understand the destructive models and develop structures for the implementation of the most up-to-date decision-making processes, both in terms of optimal reinsurance coverage and risk taking. INTERAMERICAN's reinsurance business is the Reinsurance Committee, it is under the umbrella of the Executive Committee of the Company.

**Partnerships**

* For the 9th year, INTERAMERICAN is in line with the declaration and the requirement of institutional investors from major countries, to continue supporting the Paris Agreement implementation (December 2015).
* Co-signed the 2018 GLOBAL INVESTOR STATEMENT TO GOVERNMENTS ON CLIMATE CHANGE.
* Co-signed the Sustainable Insurance Initiative of the UN Environment Directorate, in partnership with the UNESCO Global Nature Fund and World Heritage Center, in which they proclaim the commitment of the global insurance industry to the protection of World Heritage Sites.
* Continued the provision of green products/services to enable customers to participate in environmental protection as well.
* Maintained in 2018 the cooperation agreement for the proper recycling of batteries with Sunlight Recycling. During 2018, 2,735 kg of Pb-acid waste (code EKA 160601) were led to primary storage for recycling.
* Carry out sterilisation and incineration of hazardous waste, deriving from ATHINAIKI MEDICLINIC.

**Climate Change Declaration**

The Company has signed the Climate Change Declaration and is the only insurance organisation in Greece, which is committed, since 2006, to specific principles under the United Nations Environmental Programme Finance Initiative/UNEPFI, for the Bank-assurance Institutions. At the same time, INTERAMERICAN is actively involved in both the Global Insurance Commission and the Central and Eastern Europe Working Group to promote sustainability goals. INTERAMERICAN, founding member since 2012 of the UN Global Initiative to implement the Sustainable Insurance Principles (UNEPFI/PSI), within the framework of active participation and support for the process of implementing the decisions of the UN World Conference on Climate in Paris (COP21, Dec. 2015), cooperates with the UN Secretariat Executive Committee on Climate Change (UNFCCC), aiming for the successfully creation of a global informational database.

**Green products/services**

Since 2008, INTERAMERICAN has been offering the energy insurance product "Energy Line" for insurance protection of electricity generation investments from renewable resources in Greece (photovoltaic and wind power plants, biomass power plants). This product offers a flexible insurance framework that covers each insured unit needs, irrespectively of the installed capacity, tailored to each lending bank requirements and customer choices.

In addition, given the EU and national legislation requirement to remedy potential environmental damage by those responsible, the businesses insurance coverage against the risk of environmental damage restoring by the competent auditing authorities, is a necessary cover up for any rational business unit. INTERAMERICAN provides for this purpose the specialised product line "Green Line".

**Internal operation**

INTERAMERICAN, as a service provider, is classified in those activities whose operation does not have a significant environmental effect. Nevertheless, the Company, assuming its responsibility, implements a continuous process of recording, monitoring and attempting to improve its environmental footprint. The following actions and initiatives for the reduction of its energy footprint are applied to all the Company's buildings:

* Minimizing the lighting of secondary importance spaces (warehouses, parking etc.).
* Constant control of the electrical and mechanical installations, with the aim to achieve the maximum operational performance. In particular, in the main building, we have developed interventions by installing a smart IoT platform that has led to energy savings of 12% annually.
* Boilers' maintenance and their settings optimization.

Also, on all equipment or materials purchases, their energy efficiency (rating) is evaluated.

**Outcomes of the above policies and non-financial key performance indicators**

**Insurance Coverage** **of Power Generation Units from RES**

|  |  |  |  |
| --- | --- | --- | --- |
| **INSURANCE COVERAGE (2018)** | **CONTRACTS NUMBER** | **POWER (MWp)** | **INSURED VALUES (€)** |
| At all risk of assembly, third party civil liability, employers' liability | 0 | 0 | 0 |
| Fire and additional risks and loss of earnings during operation | 485 | 46.08 | 73,823,476 |
| Any risk of mechanical damage and loss of profits during operation | 2,257 | 375.08 | 748,296,418 |
| TOTAL | 2,742 | 421.16 | 822,119,894 |

|  |  |  |  |
| --- | --- | --- | --- |
| **INSURANCE COVERAGE (2017)** | **CONTRACTS NUMBER** | **POWER (MWp)** | **INSURED VALUES (€)** |
| At all risk of assembly, third party civil liability, employers' liability | 0 | 0 | 0 |
| Fire and additional risks and loss of earnings during operation | 517 | 84.60 | 90,962,215.92 |
| Any risk of mechanical damage and loss of profits during operation | 1,792 | 359.37 | 569,131,622.08 |
| TOTAL | 2,309 | 443.97 | 660,093,838 |

**Energy consumption monitoring and management**

The spaces monitored and controlled by the Company in relation to the use of natural resources are of total area of 31.448 m2.

|  |  |  |  |
| --- | --- | --- | --- |
| **Electricity consumption (KWh)** | **2016** | **2017** | **2018** |
| Building Doiranis street 240 | 1,243,356 | 1,177,578 | 1,121,820 |
| Building Syggrou Avenue 124-126 | 1,460,630 | 1,429,749 | 1,407,556 |
| Building Argyroupoli (Polemiston & Geroulanou) | 447,123 | 453,357 | 402,576 |
| Thessaloniki – Thermi Building 1 (Ι/ΑΝ LIFE) | 37,503 | 69,323 | 36,880 |
| Thessaloniki – Thermi Building 2 (Ι/ΑΝ DAMAGES) | 30,155 | 64,935 | 29,904 |
| ATHINAIKI Mediclinic | 1,092,800 | 1,073,600 | 1,098,032 |
| **Total** | **4,311,567** | **4,268,542** | **4,096,768** |

|  |  |  |  |
| --- | --- | --- | --- |
| **Petroleum (lt)** | **2016** | **2017** | **2018** |
| Building Syggrou Avenue 124-126 | 16,000 | 21,000 | 16,200 |

|  |  |
| --- | --- |
| **Water management** (m3) | **2018** |
| Building Doiranis street 240 | 1,916 |
| Building Syggrou Avenue 124-126 | 7,102 |
| Athinaiki Mediclinic | 3,815 |

|  |  |  |
| --- | --- | --- |
|  | |  |
| **Ozone layer**  *TOTALS OF FIRE EXTINGUISHERS PER CATEGORY* | | Items |
| FIRE EXTINGUISHER PORTABLE POWDER6kg | | 615 |
| FIRE EXTINGUISHER PORTABLE CARBON 2kg | | 54 |
| FIRE EXTINGUISHER PORTABLECARBON 5kg | | 77 |
| FIRE EXTINGUISHER POWDER12kg | | 39 |
| FIRE EXTINGUISHER TROLLEY CARBON 3 (30kg) | | 3 |
| FIRE EXTINGUISHER TROLLEY POWDER 50kg | | 2 |
| FIRE EXTINGUISHER PORTABLE POWDER 12kg | | 15 |
| FIRE EXTINGUISHER PORTABLE POWDER3kg | | 1 |
| FIRE EXTINGUISHER PORTABLE POWDER2kg | | 1 |
| FIRE EXTINGUISHER TROLLEY POWDER 25kg | | 6 |
| FIRE EXTINGUISHER FOAM 6 lt | | 2 |
|  |  | **815** |

|  |  |  |
| --- | --- | --- |
| **Solid waste management (kg)** | **2018** | **2017** |
| Paper recycling | 9,440 | 9,535 |
| Electrical and electronic equipment waste recycling | 64 | 181 |
| Battery recycling | 35 | 58 |
| Toner recycling | 1,065 | 743 |
| Paper consumption | 3,593 | 3,612 |

**Car Battery Recycling**

In 2018, 40 kg of Pb-acid waste (code EKA 160601) were placed at primary storage for recycling. It should be noted that both ATHINAIKI MEDICLINIC and CarPoint, i.e. building facilities and facilities that are not administrative centers or sales outlets, produce waste that require special management. The following paragraphs, the waste management data of these facilities are presented.

**ATHINAIKI MEDICLINIC**

The quantities that were led to incineration and sterilization in 2018 amounted to:

|  |  |  |
| --- | --- | --- |
|  | **2018** | **2017** |
| Sterilization | 16,231 kg | 16,386 kg |
| Incineration | 10,022 kg | 10,965 kg |

**“CarPoint”**

In CarPoint, from the first day of operation up to the end of 2018, the following have been managed:

* 324 kg of waste paint or varnish containing organic solvents or other hazardous substances (European Waste Catalog - EKA 08 01 17).
* 396 kg of packaging containing or contaminated by residues of hazardous substances (code EKA 15 02 02).
* 351 kg absorbent materials, filter materials, wiping cloths and protective clothing polluted by dangerous substances (code EKA 15 02 02).

These wastes were collected by a licensed hazardous waste collection and transport company and were taken to final management at the AVG facility in Germany, licensed by the German authorities and approved by the German Ministry of Environment and Energy.

In 2018, INTERAMERICAN did not receive any fines and/or penalties for violating environmental legislation and regulations.