



2019 Non-Financial Statement

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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 labour issues.
- Environmental issues.

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

INTERAMERICAN is implementing a materiality analysis, in accordance with the international reporting standards Global Reporting Initiative (GRI), with the participation of the Company's internal and external stakeholders, and with the aim to define its material sustainable development topics. Material are the topics that cause the main economic, environmental, and social impacts of INTERAMERICAN or significantly influence the stakeholders' assessments and decisions with regards to the Company. You can find more information on INTERAMERICAN's Sustainable Development Report which is available in the Company's website.

In addition, INTERAMERICAN undertakes to comply with the Ten Principles of the United Nations Global Compact (UNGC), implements international standards for sustainable development and has renewed its commitment as a member of the Sustainable Greece 2020 Initiative. Specifically, in relation to the UN Sustainable Development Goals (SDGs), which we have recognized as a substantial and guiding approach to key priorities worldwide, to promote social welfare, eradicate poverty and fair and unrestricted development - we join forces with our Stakeholders in order to implement them.

Each description/reference in this Report refers to the year 01.01.2019 to 31.12.2019, unless otherwise stated. The GRI standards were used to select the relevant non-financial indicators.

In compliance with the aforementioned legislation, a concise 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. (hereafter “INTERAMERICAN” 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 Athens, Attica, no 124-126, Syggrou avenue, zip code 11782. Hellenic Business Registry (GEMH) is: 914001000. On 31/12/2019 Interamerican Life employed a total of 290 employees. The following legal entities are 100% subsidiaries of Interamerican Life:

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

More information on Achmea Group and INTERAMERICAN’s organisational structure 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 on an annual basis 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 INTERAMERICAN, 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 it 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 intensify 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 from 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 combat 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.

INTERAMERICAN controls -via its Internal Audit plan- 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 the 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" during June and November 2019,
- the signing of a Memorandum of Understanding with the organization "International Transparency - Greece", since 2017, 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,
- educational programs by the Regulatory Compliance Division and the Sales Training Division to employees and intermediaries to combat money laundering,
- training program of the Regulatory Compliance Division on General Insurance (Mobile & Convenience) personnel in matters of Business Ethics and Corporate Governance.

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 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 its 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).

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 ACHMEA 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's implementation connects business activities, IT and communications technology to facilities and it is part of the Company's Risk Management, with a view to the reciprocity and efficiency optimisation for the Company. During 2019 an Internal Audit (from the Internal Audit department) took place with 19/6/2019 as the date of the Internal Audit Report submission. The re-certification process, by an independent certification body, is set for 2020.

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 (including the participation of the Regulatory Compliance Officer as a speaker at the annual ACFE conference in November 2019).
- Training on anti-money laundering and countering the financing of terrorism.

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 2019, there were no legal actions related to corruption incidents (fraud/conflict of interest) against INTERAMERICAN, its employees nor any Company insurance consultant. For the same 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 kind 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's 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 the employees and the Company. At the same time, the employee satisfaction index is improved as well as their efficiency, while the awareness of the shared responsibility for the impacts on the Company's reputation becomes evident.

INTERAMERICAN recognizes the risk of the occurrence of a human rights violation incident both within and outside the Company, 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 is 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 deliberately. 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 any kind 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 is opposed to any form of child or forced/compulsory labour and takes the necessary measures to combat them.

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, INTERAMERICAN 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, are classified and confidential and are not disclosed to third parties.

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

Human Rights

During 2019, the Company was not informed on:

- human rights violations incidents regarding its operation,
- any kind of discrimination or harassment incidents.

In the context of the Company's commitment to non-discrimination and the provision of equal opportunities for professional development, in 2019, the percentage of women's representation in the Board of Directors and the overall constitution committees was 29.4% (2018: 23.6%).

Positions in the BoD and Committees (by gender, age and nationality)

2018 Gender/Age	Male	Female	Total	2019 Gender/Age	Male	Female	Total
40-50	20	9	29	40-50	14	10	24
51+	22	4	26	51+	22	5	27
TOTAL	42	13	55	TOTAL	36	15	51

2018 Gender/ Nationality	Native	Foreigner	Total	2019 Gender/ Nationality	Native	Foreigner	Total
Male	33	9	42	Male	26	10	36
Female	12	1	13	Female	13	2	15
TOTAL	45	10	55	TOTAL	39	12	51

Data Protection

Since 2016, INTERAMERICAN has created and staffed a project management team, which has thoroughly analyzed the articles and concepts of the regulation (EE)2016/679 for the Protection of Personal Data. 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 with the regulatory framework in force. NTERAMERICAN established a Data Protection Officer (DPO). Within the compliance framework, specific actions took place, 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,
- the continuous reform of all INTERAMERICAN leaflets for the compliance with the Regulation, the Greek legislation and the Directives and Decisions of Data Protection Authority,
- the control on a regular basis and the constant updating of the Information for the processing of personal data to the public that is permanently posted on the corporate website of all INTERAMERICAN websites in Greece and Cyprus,
- the continuous update of all forms for the information on personal data and the statements of consent of the Athens Clinic and the Medifirst Diagnostic Centers,
- the update of the information to the public for the processing of personal data carried out by the Athens Clinic and the Medifirst diagnostic centers that are permanently posted on its corporate website.

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 regulation, a mapping, a recording and control of the data processing flow, a Clean Desk Assessment and Archiving and Retention Policy. INTERAMERICAN fully complies with the Regulation for the DPIA implementation, where it is required during the design of new insurance products and services.

5.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 in financial (e.g. through the imposition of fines) and operational level (e.g. cessation of collaboration with suppliers) as well as in 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 it 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, with the aim to create 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.

For the model implementation, the appropriate supply chain management processes implementation, and the final supplier selection, the responsible 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.

Already since 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 involve:

- 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 2019, INTERAMERICAN collaborated with more than 3,500 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 2019 exceeded the 80 million euro.

For INTERAMERICAN, 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 2019 the percentage of cooperating suppliers, based and operating in Greece, was over 83% (out of the total).

In 2019, there were no substantiated complaints about the unlawful use of Company's clients/insured, employees, and suppliers' personal data.

6. SOCIAL AND LABOUR ISSUES

LABOUR 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 labour issues caused either through its operations or through the operations of its stakeholders, with whom it interacts. Potential occurrence of non-compliance incidents with respect to labour rights would cause negative impacts both at 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 reputation, 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-Supply 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 2019, 11 students completed their internship program at INTERAMERICAN.

Value investment

New way of working

Within the Sustainable Development framework, the Company is implementing a Transformational plan. The plan envisions a gradual organizational restructuring: a change in structure, the introduction of a new way of working, and methodologies for developing innovation, which have begun to be implemented as part of its Transformational plan. In this context, already since 2017 we have initiated the introduction of the "agile" methodology for the management and development of projects based on the principles of self-organization, team work, and responsibility with a direct impact on the Company which gains the required flexibility in an environment that constantly changes and capitalizes on any emerging opportunity. At the same time, we have deployed the "accelerator" methodology to INTERAMERICAN's innovation program "Imagine" for the creation, testing, and development of new ideas coming from our employees directly. So far, the program "Imagine" has delivered 278 ideas from which 24 have been managed and tested by 110 employees that have taken part to the program having received the relevant training and certification. Finally, from 2019 a strategic partnership has been initiated with the Athens University of Economics and Business, in order to further deploy the ideas of the program and create collaborations with start-up companies.

Employees awareness

INTERAMERICAN ensures so as for each employee to:

- Know exactly what the Company expects from him/her and his/her work.
- Have an honest and constructive communication with his/her supervisor about his/her performance.

- Be supported in developing his/her capabilities in an environment that promotes innovative thinking and development.
- Have his/her performance recognised based on merit, and to be competitively rewarded as per the remuneration standards of the insurance market.
- Have his/her opinion heard and to participate in improving his/her team's performance.
- Feel that the Company treats him/her fairly and with no discrimination.
- Know that he/she can request support for managing his/her personal needs and priorities.

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

- has a Code of Ethics and related policies, which are compulsory for all employees,
- supports and cooperates regularly with the employees' union, protecting the right to freedom of association,
- ensures the related to labour human rights and the applicable legislation are met through the employment contracts.
- advocates the elimination of discrimination during recruitment 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 topic 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, the 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 the 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 the 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 transparent and relevant to the employee performance and development, and to better support each employee personal development, has introduced a new feedback system called Impraise (360° 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 2019, a series of training programs were implemented (to all Group companies), which are part of the following strategic guidelines:

- Interamerican Basics
- Leadership Development
- IAG Way of Working & Innovation
- Digital & Analytical skills

The total training hours for the year 2019 were 18,875 hours and the average hours of training per employee were 16.5 hours, while the employees trained were 652.

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

No incidents of any kind of discrimination or harassment have been disclosed to the Company during 2019. 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 labour agreements (sectoral or business). Employee wages meet legal requirements, while approximately 90% of the employees receive wages above the minimum wage as per collective bargaining agreements.

Wages based on collective labour agreements	
2018	Employees percentage
As the agreement	14.4%
Above the agreement	85.6%
2019	
As the agreement	13%
Above the agreement	87%

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 (Group)

Total employee number per employment contract	2018			2019		
	Male	Female	Total	Male	Female	Total
Permanent	643	512	1,155	619	514	1,133
Temporary	0	4	4	5	9	14
Total	643	516	1,159	624	523	1,147

Total employee number per employment type	2018			2019		
	Male	Female	Total	Male	Female	Total
Full-time	624	509	1,133	605	516	1,121
Part-time	19	7	26	19	7	26
Total	643	516	1,159	624	523	1,147

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, and 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.
- Vouchers / ticket restaurants 1-2 times per year.
- Two additional leave days for all employees (1 on Christmas and 1 on Easter).

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 5.25% of the 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 19 same kind Professional Optional Insurance Funds (another 4 compulsory Insurance Funds exist). At the end of 2019, the members were 1,264 and the reserves for the industry of one-off basis pensions amounted to 20.51 million euro (€20,516,727).

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 8.95% for the year 2019. The Professional Insurance Fund from its beginning of operation and up to 31/12/2019, has paid 154 one-off basis of 3,017,985 euro.

Respectively, during 2019 performance evaluation, 912 employees participated and completed it (511 men and 401 women), representing the 87.4% of the total number of employees who met the evaluation requirements (1,043 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 2019, at Group level and as part of the "Well Being project it's4U" project, wellness activities where 2 in 10 employees participated took place. Specifically, there were 93 unique participations in pilates, 46 unique participations in running team and 73 in running events, 18 participations in anti-smoking sessions from which 5 managed to quit smoking, 24 unique participations in play therapy sessions, 25 unique participations in meditation sessions, 17 unique participations in yoga sessions, 54 unique participations in traditional dances groups, 20 unique participations in the Parents Academy, 115 unique participations in chair massage sessions, and 135 unique participations in holistic diet program with 9 hours seminars, and 6 personal sessions. Moreover, in 2019 a Lending Library for the employees was created with donations of 267 books so far.

Furthermore:

- 172 employees participated in the 11th Race of the Pan-Hellenic Association of Women with Breast Cancer "Alma Zois".
- 104 blood units were collected by voluntary blood donations.

Occupational accidents (Group)

2018	2019
2 at INTERAMERICAN Life (28 days absence in total)	2 at IAG LIFE (71 days absence in total) 2 at IAG ASSISTANCE 2 (61 days of absence in total)

5 at INTERAMERICAN Assistance (124 days absence in total) 1 at Athinaiki MEDICLINIC – 7 days absence in total	7 at INTERASSISTANCE ROAD ASSISTANCE (385 days of absence in total) 4 at ATHINAIKI MEDICLINIC (109 days of absence in total)
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Recruitments/Turnover (Group)

	2018	2019
Recruitments	86	76
Turnover	89	88

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

At INTERAMERICAN we implement 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 N. 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, in view of the implementation of the EU Solvency II Directive from the beginning of 2016, was 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 systematically since 2004 a multi-dimensional Corporate Responsibility Program under the title "Acts of Life", 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:

4. 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 2019, the Company spent 269,969 euro which correspond to 1.47% of recurring profits before taxes during the same year.

In addition, the economic value generated and distributed by INTERAMERICAN's activities, directly or indirectly, is its measurable Social Product. The positive contribution to the Greek economy is the element that further ensures the Company's license to operate, as well as its Sustainable Development in the future.

In the year 2019, INTERAMERICAN distributed the financial value presented in the following table.



Indicatively, INTERAMERICAN:

- At the end of 2019, had insured 147 vehicles of social institutions and organizations as a sponsor for civil liability.
- In 2019, covered 13 social events by providing 90 employee working hours. 33 underprivileged people were hospitalized and another 168 were provided with medical advice. The estimated total cost was approximately 20,000 euro.

During 2019:

- 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 ISSUES

Principal risks and their management

Climate change risks, as well as other risks that concern the natural environment degradation and the quality of life 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 significant amounts of caused damages worldwide.

For INTERAMERICAN, the recording and quantification of the multidimensional effects of the climate change (especially those deriving from natural disasters), which can directly impact the amount of compensation paid, is expected to take place over the next years in collaboration with the parent Group, Achmea Holdings BV. It should be noted, however, that, apart from approaches to the quantification of impacts on climate change, there is so far no globally acceptable approach - only estimates. INTERAMERICAN recognizes, however, in this direction, the topic's materiality, both for the Company 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, by dispersing their exposure to financial risk through the insurance, which undoubtedly 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, storms, landslides, extreme rainfall) are also evaluated to be included in modeling, whenever feasible, based on accepted world-wide technical approaches and the guidelines coming from the parent Group, Achmea Holdings BV.

Within our broader plan to manage exposure to environmental risks and with absolute consistency in fulfilling our commitments and obligations, we proceeded in 2019, with the Certification (for Life, Casualty and Assistance) by an independent, approved auditor for the implementation of the ISO50001 Energy Management System. The Certification concerns infrastructure, facilities and vehicles, which cover approximately 90% of the Company's total energy consumption for operational needs. With this Certification, we simultaneously exceed the requirements of Law 4342/2015, where we were obliged to take energy audits by independent energy auditors.

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 run by the Reinsurance Committee, it is under the umbrella of the Executive Committee of the Company.

Partnerships

- For the 10th 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 in 2018 the 2018 GLOBAL INVESTOR STATEMENT TO GOVERNMENTS ON CLIMATE CHANGE.
- Co-signed in 2018 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.
- Participated in "A new deal for Europe" the largest initiative for the support of a sustainable future, which has been assumed at European level by the private sector with the aim of a Sustainable Europe till 2030.
- Maintained during 2019 the cooperation agreement for the proper recycling of batteries with Sunlight Recycling. During 2019, 1,322 kg of Pb-acid waste (code EKA 160601) were led to primary storage for recycling.
- Carried out sterilisation and incineration of hazardous waste, deriving from ATHINAIKI MEDICLINIC.

Climate Change Declaration

The Company has co-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 the Sustainable Development 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", which offers a series of dedicated insurance products against environmental risk, based on the client's business activity (e.g. holistic insurance of production facilities, hazardous waste management insurance, collection-transportation of hazardous and non-hazardous, raw materials, and finished products insurance).

Internal operation

INTERAMERICAN, as an assurance 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 during 2018 a smart IoT platform that has led to energy savings of 22.61% for the year 2019 compared to year 2018.
- 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 (2019)	CONTRACTS NUMBER	POWER (MWp)	INSURED VALUES (€)
At all risk of assembly, third party civil liability, employers' liability	1	0.5	304,500.00
Fire and additional risks and loss of earnings during operation	507	47.72	86,111,920.52
Any risk of mechanical damage and loss of profits during operation	2,417	402.32	780,692,429.71

TOTAL	2,925	450.54	867,108,850.23
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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 25,000 m².

Electricity consumption (KWh)	2018	2019
Building Doiranis street 240	1,121,820	1,027,649
Building Syggrou Avenue 124-126	1,407,556	1,190,658
Building Argyroupoli (Polemiston & Geroulanou)	402,576	402,279
Thessaloniki – Thermi Building 1 (I/AN LIFE)	36,880	Contract termination 31.7.2018
Thessaloniki – Thermi Building 2 (I/AN DAMAGES)	29,904	29,638
ATHINAIKI Mediclinic	1,098,032	1,022,023
Total	4,096,768	3,672,247

Petroleum (lt)	2018	2019
Building Syggrou Avenue 124-126	16,200	15,800

Water management (m³)	2018	2019
Building Doiranis street 240	1,916	1,986
Building Syggrou Avenue 124-126	7,102	4,315
Athinaiki Mediclinic	3,815	2,960

Emissions¹

Indirect emissions in tons (t) deriving from electricity consumption and direct emissions from heating oil consumption are reflected in the following tables.

Indirect emissions (t)		2017	2018	2019
Electricity (indirect energy consumption)	CO ₂	4,221.59	4,051.70	3,631.85
	NO _x	4.0082	3.8469	3.4482
	SO _x	12.0800	11.5939	10.3925
	Particles PM10	0.9519	0.9136	0.8189
Conversion factors based on the Building Energy Efficiency Regulation (Y.A. DEPEA/178581/2017 (Government Gazette 2367 / B` 12.7.2017):				
0.989 Kg CO ₂ /KWh electricity				
0.000939 Kg NO _x /KWh electricity				
0.00283 Kg SO _x /KWh electricity				
0.000223 Kg PM10/KWh electricity				

Direct emissions (t)		2017	2018	2019
Heating oil (direct energy consumption)	CO ₂	54.72	42.21	41.17
	NO _x	0.0622	0.0480	0.0468.
	SO _x	0.0099	0.0077	0.0075
	Particles PM10	0.0027	0.0021	0.0020
Conversion factors based on the Study of Emissions Indicators per type of fuel, of the National Technical University of Athens (2013):				
0,264 Kg CO ₂ /KWh heating oil consumption				
0,0003 Kg NO _x /KWh heating oil consumption				
0,000048 Kg SO _x /KWh heating oil consumption				
0,0000131 Kg PM10/KWh heating oil consumption				

¹ The calculation of the emissions was implemented in collaboration with the company Terra Nova Environmental Technical Consulting Ltd.

Transports

Through INTERAMERICAN's vehicles usage, GHG emissions occur, which are released into the atmosphere and enhance the greenhouse effect. It is noted that the continuous development and implementation of online insurance with the proportional reduction of personal meetings leads to energy savings resulting from the operation of the Company, due to the reduction of travel required to promote relevant insurance products.

Direct energy consumption (fuels consumption) for the company's vehicles (lt)	2019
Unleaded	21,101.16
Diesel	34,923.79

corresponding to 1,959.64 GJ energy consumption (2,053.2 GJ reduction in relation to 2018)

The direct emissions for 2019, due to the Company's vehicles, amounted to 141.40 equivalent t CO₂, with a decrease of 3.75 equivalent t CO₂ compared to 2018.

Also, for the year 2019, INTERAMERICAN's CO₂ emissions from the use of equipment that operates with fluorinated greenhouse gases (e.g. R410A) were over 2,450.98 tons of CO₂e. This figure is going to be monitored by INTERAMERICAN for comparability purposes and performance improvement.

Solid waste management (kg)	2018	2019
Paper recycling*	9,440	564
Electrical and electronic equipment waste recycling	64	488
Battery recycling	35	75
Toner recycling	1,065	552
Paper consumption**	3,593	2,710
Film (09 01 07 – R4)	N/A	78
Plastics (20 01 39 – R12)	N/A	448
Metals (20 01 40 – R4)	N/A	844

**In 2019, the partnership with the external partner for paper recycling in our central offices was terminated. The paper intended for recycling is collected in dedicated bins at the office premises and is being disposed in the special blue bins for recycling, without being able to monitor quantities. Within 2020, there will be a redesign of the paper recycling process, with the aim to maximize improvement and to properly track the quantities sent for recycling.*

***It concerns number of boxes and not kg.*

ATHINAIKI MEDICLINIC

The quantities that were led to incineration and sterilization in 2019 amounted to:

	2018	2019
Sterilization	16,231 kg	20,369 kg
Incineration	10,022 kg	11,836 kg

“CarPoint”

In CarPoint, from the first day of operation up to the end of 2019, the following have been managed:

- 1,704 kg of waste paint or varnish containing organic solvents or other hazardous substances (European Waste Catalog - EKA 08 01 17).
- 395 kg of packaging containing or contaminated by residues of hazardous substances (code EKA 15 02 02).
- 371 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 2019, INTERAMERICAN did not receive any fines and/or penalties for violating environmental legislation and relevant regulations.