

We take care of the environment on your behalf...

Communication On Progress (CoP) Report

December 2013



STATEMENT OF CONTINUED SUPPORT OF POLYECO SA

Message from the President

I am proud to announce Polyeco's continued support of the United Nations Global Compact initiative and the Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption.

This global initiative is a unique opportunity to establish an open dialogue with our stakeholders and sharing best practices for sustainability.

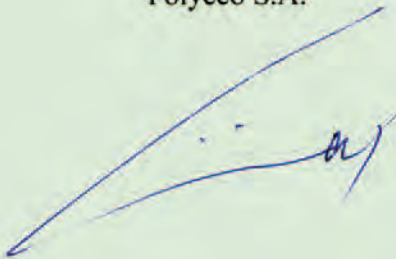
As we are cautiously optimistic about the Greek and global economic recovery we have used the past year 2012 mainly to consolidate our position as an efficient enterprise and enhance our business globally.

Leveraging the dynamics and structured synergies between the sister companies of our group our purpose remain to persevere in the promotion and implementation of a management approach coherent with the UN Global Compact principles.

We have attached herewith our Communication on Progress (COP) which describes practical actions taken during the FY 2012 to implement the GC principles.

We intend to share this information with our stakeholders using our primary channels of communication and we look forward to another year of opportunities to uphold the principles of UNGC.

Ioannis Polychronopoulos
President
Polyeco S.A.



STATEMENT OF CONTINUED SUPPORT OF POLYECO SA

Message from our Vice President and Managing Director

Responsible business development is a philosophy that extends throughout Polyeco's entire group of companies. Signing the GC affirms our long-standing commitment to the Ten Principles and our intent to advance those principles within our sphere of influence.

Looking back proudly on how our company has grown and all we have accomplished over the past years since our establishment in 2001 and earlier since the establishment of our mother company Environmental Protection Engineering SA in 1977, we realize that our achievements are attributable to our commitment for responsible growth and the significant contribution of our exceptional people.

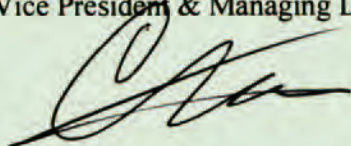
In early 2012 we have laid out an ambitious vision aimed at strengthening the long-term competitiveness of our business through sustainability and innovation.

In our ambitious journey towards sustainability, we strive to transcend the incremental approach by radically transforming our company, at the same time as reducing costs and improving efficiency, and, in the process, to lead the way in our industry.

Our new approach is driving changes in the way we source inputs, structure our supply chain, make capital investments, develop our products and engage with our stakeholders. Our strong belief is that in the long run, this approach is less risky than a business-as-usual approach.

Our Communication on Progress (COP), is made available to all stakeholders through the Global Compact website (www.unglobalcompact.org) and our corporate website (www.polyeco.gr).

Athanassios Polychronopoulos
Vice President & Managing Director



[Table of Contents]

Statements of continued support

From our President Page 02

From our Vice-President & Managing Director..... Page 03

Human Rights Page 06

Labour Page 10

Environment Page 17

Against Corruption Page 21

Welcome to our World

Polyeco is the first and sole integrated and fully licensed waste management and valorization industry in Greece. Polyeco is a major player amongst the most prominent waste management companies in SE Europe and beyond with presence in Albania, Serbia, Kosovo, Montenegro, Macedonia, Cyprus, Lebanon, Mauritius, Mongolia, Jordan, Kazakhstan and Ethiopia. We are implementing efficiently some of the most technically challenging and time critical waste management projects of any size across the globe. Regardless of the scale of the challenge we work closely with you to tailor solutions to perfectly meet your business requirement and organization's goals in compliance with health, safety and environmental regulations.

Polyeco constantly strives on improving environmental management performance and competitiveness for its clients. Through continuous training and research & development in the fields of recovery, decontamination, reclamation and rehabilitation, we provide integrated waste management solutions for the industrial sector.

Polyeco's diverse field of expertise encompasses treatment, management, recovery, decontamination, licensing, transport and disposal of all types of hazardous and non-hazardous industrial waste.

Sustainability is at the heart of our business



Human Rights

[Principle 1]

Businesses should support and respect the protection of internationally proclaimed human rights.

[Principle 2]

Make sure that they are not complicit in human rights abuses.

Assessment, Policy and Goals

Description of the relevance of human rights for the company (i.e. human rights risk-assessment).

Description of policies, public commitments and company goals on Human Rights.

Polyeco Human Rights Policy

To respect the human rights of our employees, our contractors and community as established by the UN A/RES/3/217 Universal Declaration on Human Rights and in the ILO's Declaration on Fundamental Principles and Rights at Work, including non-discrimination, prohibition of child and enforced labor, and freedom of association and the right to engage in collective bargaining.

No discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement.

No use or support for forced or compulsory labor; no required 'deposits' – financial or otherwise; no withholding salary, benefits, property or documents to force personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.

No interference with exercise of personnel tenets or practices; prohibition of threatening, abusive, exploitative, coercive behavior at workplace or company facilities; no pregnancy or virginity tests under any circumstances.

Treat all personnel with dignity and respect; zero tolerance of corporal punishment, mental or physical abuse of personnel; no harsh or inhumane treatment.

We respect privacy and properly manage and use the Personally Identifiable Information (PII) that our fellow in Polyeco, as well as our prospective or former employees, entrust to us.

PII is defined as any information that directly identifies an individual – such as name, physical address, email address, employee ID, government ID, photograph, or any combination of information that might identify an individual.

We do not share this information with anyone, either inside or outside our Company, who does not have a legitimate business need to know. In addition, we should take steps to properly secure such data at all times from unauthorized access by third parties.

Goals and Commitments

Further Commitments and Actions to be taken

1. In the short-term we plan to promote specific measures to favour the protection of our staff facing complex family situation, particularly in the cases of serious sickness among the members of their families.

We believe this is an important initiative, particularly in a moment of economic recession and crises of the Greek State Social Welfare where families are more vulnerable and exposed to the lack of protection by the state.

2. Obtain a SA8000:2008 accreditation. Although efforts to establish measurements, standards and certifications related to social responsibility are ongoing, we have set a goal to go beyond simple compliance by voluntarily obtaining the the Social Accountability International Standard (SAI8000) certification based on international human rights and labor conventions up to the end of 2018, to credibly demonstrate to all of our stakeholders and interested parties that existing company policies, procedures, and practices conform to the requirements of this standard.

To integrate the SAI8000 standard into our management systems and practices through an evidenced-based process means that direct-hires, suppliers, subcontractors, sub-suppliers and home workers will all be covered under this standard.

This will result in more stringent clauses in the contracts with contractors and the supply chain, requiring the acceptance of specific obligation to be compliant with SA8000 standard.

Polyeco has zero tolerance for human rights abuses, including forced labor, child labor and human trafficking, anywhere.

Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

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

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

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

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

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

Polyeco has no track record with incidents of human rights violations

Measurements of Outcome

Description of how the company monitors and evaluates performance.

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

Success here is generally measured by the lack of reports of violations of policy or law regarding the human rights, and, to date, there have been no reported violations in Polyeco, nor within the group of our parent and sister companies nor our contractors.

Should a violation be reported, we intend to undertake a thorough investigation.

[Principle 3]

Businesses should uphold the freedom of association and the effort of collective bargaining.

[Principle 4]

The elimination of all forms of forced and compulsory labor.

[Principle 5]

The effective abolition of child labor.

[Principle 6]

The elimination of discrimination in respect of employment and occupation.

Assessment, Policy and Goals

Description of labor rights, related risks and opportunities, written policies, commitments and company goals on labor rights

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

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

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

We value the relationship we have with our employees.

The success of our business depends on every employee in our global enterprise. We are committed to fostering open and inclusive workplaces that respect human and workplace rights, where all employees are valued and inspired to be the best they can be.

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

Together, they describe our high standards and expectations, addressing such subjects as child labor, forced labor, freedom of association, discrimination, health and safety, hours of work and Human Rights. Our Code of Ethics and Business Conduct and our Workplace Policy Handbook, apply to all entities in which Polyeco S.A. owns a majority of interests.

Implementing the United Nations Guiding Principles on Business, labor and human rights in our corporate context we use three primary components:

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

The selection, recruitment and remuneration of our personnel are based on their qualifications, skills, work experience, and on personal interview without gender, age, family status or other discriminations. Wages offered by the company are equal or greater than the minimum rates applicable for each job position.

It is our policy, in accordance with all applicable laws, to recruit, hire, train and promote person in all job titles without regard to race, sex, religion age, disability, nation origin, or any other characteristic protected by applicable law.

Occupational Health and Safety Management

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

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

To achieve its Occupational Health and Safety goals, Polyeco S.A. is committed to the following:

- Its compliance with each legislation requirements and the relevant standards.
- The development, settlement and application of a complete Safety Management System according to the OHSAS 18001 standard.
- The appropriate and sufficient training / update on its personnel safety through special seminars and appropriate working instructions/procedures.
- Constant monitoring, documenting and evaluating safety and also the review of the present Safety Policy in order the constant improvement of the safety level.
- Ensure that our employees and contractors maintain a professional attitude towards alcohol consumption and do not use, possess or sell illicit drugs that are not prescribed.
- The disposal of necessary resources for the above goals accomplishment.

Implementation

Description of concrete actions taken by your company to implement labour policies, reduce labour risks and respond to labour violations.

To prevent any potential human and labor rights violation we have made available complain boxes in our headquarters and depending on the violation corrective action, the company may take the reassignment of duties and in severe cases separation from the company the person committed such violation. Failure to respect the letter or the spirit of Polyeco's Code of Ethics and Business Conduct or the law of the country, may lead to disciplinary measures commensurate with the violation, including termination of employment and other criminal penalties such as fines and jail sentences.

Day to day responsibility is delegated to all senior management of the regions, categories, functions, and operating companies of the Group. They are responsible for implementing these principles, if necessary through more detailed guidance tailored to local needs, and are supported in this by the Board of Directors. Compliance with the Code is subject to review by the Board supported by the Corporate Responsibility and for financial and accounting issues by external Audits.

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

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

Remuneration: In Greece we live times of deep social and economic crises. Our primary responsibility is always to our people, the protection of all our employees, their corresponding salaries and fringe benefits in a time that most of our competitors are laying-off staff and decreasing salaries.

We ensure that our employees are paid well, at least legal minimum wage; sufficient to meet basic needs, have access to affordable benefits, and work in a safe environment.

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

Employee wellbeing

The wellbeing of our employees is a key component of our corporate values and sustainability. We have strengthened and expanded support initiatives for employees offering them benefits beyond the statutory minimum, to help them cope with balancing work and family commitments.

We also actively protect motherhood and parenthood in our company through flexible labor regime, without any loss of benefits, for up to 12 months, as well as to our employees caring for elderly family members or family members with serious sickness.

We have also established a leave/short working hour system for employees caring for family members with special needs rated over 80%.

Occupational Health and Safety Management Implementation

Polyeco has as a priority to respect human life by giving due consideration to safety and health concerns.

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

- We focus our attention on the Health and Safety of our employees.
- We Implement safety leadership programmes including regularly undertaking audits and workplace site inspections of our operations; and empowering all employees and contractor to cease work when there is a threat of safety;
- Prior to employment, a prospective employee may submit to a D&A test. During employment, each employee may be randomly tested for alcohol and/or drug abuse. Contractors are also obliged to conform the D&A Policies of Polyeco prior to undertaking work on behalf of Polyeco. In the event of an incident, each key person may be automatically tested for D&A.

This duty extends to matters including the maintenance of plant; assessing the potential risks to employees' health and safety; hazard identification; systems of work; the arrangements for the use, handling, work equipment and workplace environment, storage and transport of articles and substances; information and training.

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

All employees and contractors are required to:

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

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

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

Medical Follow Up of Employees

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

Preventive checks and vaccines

Moreover, we provide employees with assistance for flu vaccinations, and try to prevent transmission by offering all employees the opportunity to get vaccinated at work.

For our employees working overseas, in addition to services in health consultation by an occupational nurse, we provide all necessary support and physical examinations by partner medical institutions versed in health management for persons from other countries and preventive vaccinations for the particular host country or region.

Training and inspection

We offer a wide range of relevant vocational, technical and waste management training programmes to our staff. From ADR certificates as standard for all our drivers, systematic training forms an essential part of Polyeco technical approach to allow them to perform their roles competently and safely.

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

Measurements of Outcome

Description of how the company monitors and evaluates performance

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

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

On the internal front, the Human Resources process provides information on our compliance with the requirements of the ISO 9001 standard, which are fully on-line with the human rights principles, manpower planning, selection process and recruitment. On the external front, the procedure on the selection of suppliers and contractors makes sure that our partners also comply with the same principles we follow.

Greek Labor authorities are monitoring and audit Polyeco with regular procedures according to the Greek legislation.

Polyeco has no track record with incidents of violations of labor principles or legal cases, rulings fines or other relevant violations of labor principles.

No human and workplace rights complaints regarding harassment, discrimination, child or forced labor were received by Polyeco's senior management during 2012 and we found no issue where freedom of association had been denied.

During 2012/13 we have also succeeded to meet our ultimate aim to operate a zero accident business.

Environment

[Principle 7]

Businesses should support a precautionary approach to environmental challenges.

[Principle 8]

Undertake initiatives to promote greater environmental responsibility; and

[Principle 9]

Encourage the development and diffusion of environmentally friendly technologies.

Assessment, Policy and Goals

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.

Polyeco S.A. is a modern and dynamic enterprise providing integrated sound waste management, with products and services that relate to the environment's protection addressed to various business sectors and industries.

The overall activity of the company is to identifying and understanding the hazards inherent to the activities we undertake and effectively assessing, controlling and managing those risks.

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

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

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

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

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

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

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

All matters relating to the protection of the environment are encountered by the Environmental and Quality Control Officer, who holds responsibility and independence.

Implementation

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

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

Our customers also benefit from Polyeco and our group, taking a step in the right ecological direction they reap the benefits from our solutions that include hazardous and non-hazardous waste management.

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

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

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

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

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

We intend to stabilize carbon emissions and environmental footprint from our operations, to the lowest possible level through renewable energy investments.

Measurements of Outcome

Description of how the company monitors and evaluates performance

Polyeco monitors its environmental performance with environmental measurements, and sets environmental goals, according to Environmental Management Procedures EMP.AE-40 and EMP.AE-20 EMAS. Finally it systematically conducts environmental internal and external inspections.

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

No environmental incidents from our operations were reported at any Polyeco's worksites during 2012.

Making More from Waste: Recovery/Recycling/Reuse

At our main hazardous waste treatment facility we treat hazardous waste preventing their release into the environment and provide environmentally friendly methods of managing hazardous materials.

During 2012, in our headquarters facilities,

- a. 14.789,600 tons of Alternative Fuels were produced from waste**
- b. 13.120,179 tons of Waste Raw Materials were treated**

Carbon Emissions

The footprint and impact of our company is relatively modest. Still, we are committed to make it even more sustainable and do plan to implement in the next year some specific measures:

- We have significantly reduced the paper consumption in our offices and marketing activities and we intend where and when we cannot avoid any paper consumption, to prefer the use only recycled papers.
- Carbon Emissions: we have set targets to keep as low as possible our direct greenhouse gas emissions and we made a significant investment to create a solar power station which will be ready to commence commercial operation in the first quarter of 2013.

Renewable Green Energy – Photovoltaic Station

Green energy, such as solar, is an excellent source of long-term growth for our company and our relative investments are an increasingly important part of Polyeco's business.

To achieve our commitment to UN GC Principles and stabilize carbon emissions and environmental footprint to the lowest possible level, Polyeco funded a significant investment to create a solar power station consisting of 1000 photovoltaic panels that have been installed, on the roof of our main industrial facilities in Aspropirgos, Greece. This Green Energy Solar Station has a total surface of 3300m², and a generating capacity of 250 kW.

The conversion of direct current to alternating current generator is carried through 12 inverters DELTA (Germany), while for the connection of the unit to the Medium Voltage Power Network a privately owned Low – Medium Voltage Substation of 250kVA was built.

The commercial operation of this power station started after successful completion of the connection of the unit to the medium voltage network of the Hellenic Electricity Distribution Network Operator S.A. (HEDNO) in February 2013. The station is expected to produce annually about 320.000kWh « green » electricity, enough to supply about 80 households midsize and reduce greenhouse gas emissions by about 270 tons of CO₂ and a total of nearly 6 tons of SO₂, CO, NO_x and PM₁₀ emissions.

EBEA 2006 Eco Awards

The award was granted to Polyeco, for its sensitivity and best practices to the protection of the Environment.

Accreditations

- 1221/2009 EC (EMAS) Environmental Management Standard, which documents that the product and services provided contribute to the protection of the environment.
- The OHSAS 18001:2007 Occupational Health and Safety Specification, which serves as the foundation of our management approach to employee health and safety.
- The ISO 9001:2008 or ISO/TS16949 quality management system standards, which provide a framework to improve system and process quality to increase efficiencies, reduce risks and avoid errors.
- EL0T 17025:2005 Accreditation of the Quality Control of our Laboratory
- ISO 28000:2007 Specification for the Security Management Systems for establishing, implementing, operating, monitoring, reviewing, maintaining and improving a documented Supply Chain Security Management System (SCSMS), using continual improvement approach.

Against Corruption

[Principle 10]

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

Assessment, Policy and Goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment).

Description of policies, public commitments and company goals on anti-corruption

We support the UN Convention Against Corruption and we strongly believe that corruption and bribery practices not only compromise the social merit of development but also undermine the efforts of the company itself for sustainable development.

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

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

Implementation

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

In our Code of Ethics & Business Conduct we have set the very highest standards for the quality of service we provide and the way we run our business wherever we operate around the world. Our code serves to guide the actions of our employees and sets out our commitment on how to do business in a fair way: treating everyone – customers, colleagues, investors, suppliers and sub-contractors, as well as the wider community with honesty, integrity and respect.

The Board is directly responsible for the anti-corruption policy of the company. Polyeco requires that any suspicion of involvement in corruption or fraudulent activities to be reported to the Board in accordance with the procedures specified by the Chief Legal Officer.

Measurement of Outcomes

Description of how the company monitors and evaluates anti-corruption performance.

Success here is generally measured by the lack of reports of violations of policy or law and, to date, there have been no reported violations in Polyeco and our parent and sister companies of the Group. Should a violation be reported, we intend to undertake a thorough investigation.

Sustainability is at the heart of our business

Polyeco SA – Headquarters

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